8th November 2026

Dear Development Management Team

Planning Application 119712 BESS Carrington Moss (2nd Response)

Thank you for the opportunity to provide further commentary on this planning application. Our previous objection remains valid and we continue to object. Please consider the following, in addition to our previous representation:

- The additional documentation does not demonstrate that this development can be built and operated without unacceptable effects on residents, heritage, ecology, drainage and the wider New Carrington Masterplan area (including cumulative effects).
- The evidence remains incomplete – all supporting documentation (including, for example, an updated Transport Assessment) should be available for public scrutiny prior to a decision being made (in relation to the Transport Assessment, for example, among other issues, the construction traffic figures do not reconcile, the traffic assessment does not adequately address peak and cumulative effects, and the access and road-safety assessment is incomplete. On this basis, it is astounding that National Highways can offer a 'no objection' response. We can see no representation from the Local Highways team).
- The application should be assessed against the current NPPF, rather than relying on the previous policy position – its transport policy, TR6 for example, calls for proportionate assessment of transport impacts, consideration of reasonable future scenarios and cumulative effects, and a travel plan where significant movement is likely.
- Given the size and scale of this proposal, the Council should carefully assess the effect of the development on the Grade II listed Church of St George on the church's setting and significance.
- Bearing in mind the combined effects of all other committed development in the area, the cumulative effects of all harms on local residents should be fully scrutinised, including, for example, in relation to noise.
- We highlighted fire safety in our previous response, given the size and scale of this, and other similar developments in Carrington, the Council should require a site-specific fire-risk and emergency-response assessment for a 1,400 MW facility located among other energy infrastructure. This should be prepared with the relevant fire and rescue service and address emergency access, isolation and shutdown, equipment spacing, water supply, firefighting operations and the risk of firewater contaminating land or nearby watercourses.
- The drainage strategy proposes discharge to a culverted ditch on the western boundary and records high groundwater levels. The Council should require clear evidence that the drainage system can operate safely in these conditions, that discharge will not increase flood risk or harm water quality, and that contaminated firewater can be contained. These details should be settled before permission, not left as unresolved design matters.
- Construction is expected to last **24 months**, so dust, noise, HGV routing and traffic controls should be secured by conditions.

Biodiversity Net Gain

Given the very poor planning application documentation, the Council should be satisfied that the submitted BNG baseline and metric are accurate, that the proposed habitat measures are feasible, and that long-term management and monitoring are secured before granting permission.

The application does not appear to comply with either PfE policies JP-G8 or JP Allocation 30. There appears to be a 58% on-site loss, with most of the required gain bought elsewhere. This does not deliver the on-site gain PfE policies require. The BNG report suggests that the habitat loss and the Trading Rule will be satisfied through the purchase of substantial habitat units from an off-site habitat bank. This means Carrington residents will have depleted natural capital assets, and a site elsewhere will benefit. The lack of the New Carrington Masterplan is exacerbating that inequity.

No habitat bank, site or agreement is identified, and the report says the approach "*would be confirmed post-consent*". This should not be acceptable to Trafford. We assume the planning officer will require delivery within the New Carrington area, and that the 30-year legal agreement and the habitat management plan will be secured before determination or by obligation.

Community Safety

From a community safety perspective, a 1400MW / 2800MWh BESS can transform from a grid asset into a major local industrial hazard, especially in an area like Carrington, which contains so many hazardous businesses and COMAH zones. If risks materialise, the impact spreads beyond the site and could directly impact homes, schools, and businesses. We highlighted some of the specific threats in our previous response, including, for example, toxic plume dispersion. There are also risks of explosion, which could ricochet between facilities and other hazardous businesses.

For a facility of this size and scale, a major fire can generate a toxic plume that travels several miles. Communities downwind in all directions face significant threats. We understand this application now means that there will be 5 large BESS facilities proposed in Carrington – what are the Council's plans for notifying communities of imminent threats or mandatory evacuation orders, and how will citizens and businesses be compensated for disruption (or worse) should the risks materialise.

We also have concerns about multiple BESS operations of this size and scale impacting services to residents given their connectivity to the substation at Carrington. What is the potential for so many, such large BESS and other businesses (like Data Centres) to:

- Disrupt services for residents, including, for example, black outs?
- Introduce severe digital and electrical vulnerabilities to the local grid network?
- Be subject to cyber-attacks (given their reliance on software and that they are high value targets for hackers)?
- Create a single point of failure, causing unintentional but cascading service failures should there be flooding, lightening, or physical attacks?

For the reasons set out in this and our previous objection, the application should be refused.

Kind regards

Marj Powner

Chair, Friends of Carrington Moss