



By email: [REDACTED]

27/10/2025

Attention: Jennie Townsend

Dear Jennie,

Response to Planning Committee Comments and Additional Community Representation – Radcliffe BESS located on Land to the east of Shore Top Farm Planning Ref. 71888

The following information is presented to respond to comments made during the deliberations of the Bury Metropolitan Borough Council (BMBC) Planning Committee Meeting on the 2 September 2025 and a community representation made to BMBC subsequent to that meeting, relating to project site selection. It is understood that the community representation raises concerns relating to; the approach taken to investigating alternate brownfield sites; the coverage of the site selection search area; and fire risk.

An amended Site Selection Report dated 27 October 2025 has been prepared to respond to the concerns raised and accompanies this letter. A summary of the key points in the amended report is provided below.

Alternate Brownfield Sites

Due consideration has been given to identifying brownfield sites throughout the site selection process that commenced in 2021. This has been recounted in greater detail in the updated version of the Site Selection Assessment.

Despite a preference being given to brownfield or semi-industrial sites due to their increased planning suitability, viable sites are difficult to identify. Many sites are not suitable as they are simply not large enough to accommodate battery developments and where larger sites exist, they are often earmarked for other redevelopment plans. Redevelopment for logistics, data centres, industrial uses or housing typically outbids energy storage on land value, meaning site acquisition is generally cost prohibitive and lease options not attractive to landowners, who can develop or lease the land for more financially attractive uses. Many sites are owned by utilities, Councils, or industrial operators, and the land is tied up in other plans for utility expansion, redevelopment, industrial reuse, or are simply being held idle.

Moreover, BESS facilities typically cannot be located within built-up or heavy industrial areas due to them having to compete for import capacity with power hungry industrial facilities which already draw significant power from the grid. This means that PoC's near industrial uses often do not have spare import capacity.



The last constraining factor is that existing substations and other grid related infrastructure inevitably are located in countryside or green belt areas in order to service the nearby communities. This means that wherever grid infrastructure exists in the countryside or greenbelt, there will often be a demand for nearby grid balancing infrastructure like BESS facilities.

A representation has been made to Council indicating that suitable brownfield sites exist on Sion Street to the north of the River Irwell and an assertion made that the cost of running the cable to these sites under the River would be circa £180,000. It is unclear where the circa £180k has been derived from, but without appointing a quantity surveyor, the cost cannot be verified. From our experience, we would expect the activity to cost much more. Moreover, the estimate does not seem to account for the costs associated with obtaining easements over third party land and does not recognise the impracticalities associated with ongoing maintenance of a cable under a riverbed.

The impracticalities and unviable cost of crossing the River Irwell is attributed to a number of factors. Installing a cable under the River Irwell would require the use of a horizontal directional drilling (HDD) method, for a minimum distance of 500m to 800m at significant depth. The distance and depth of such a drill would push the technical limitations of the HDD drilling method, including cable tension limits, adding significant and unsustainable cost to the project. Similarly, the cost of maintenance is unlikely to be acceptable to the DNO, who would take ownership of the asset following construction. This is because once installed, accessing the cable for repair or inspection would not be possible and therefore in the event of a failure an entirely new drilled cable would be required under the river again at significant cost to the DNO.

Alternatives, such as sub-marine cables laid directly on the riverbed and above ground routes across the River Irwell are also considered to be impractical and financially unviable.

Submarine cables would cause a greater ecological impact, requiring access to the heavily vegetated riparian zone and suffer similar maintenance draw backs to the HDD method. An above ground alternative would involve attaching a cable tray to an existing bridge which would significantly extend the cable route length compared to the proposal site and cross additional third-party land. A comprehensive appraisal of each bridge crossing route and the associated constraints is detailed in Section 4 and Appendix 5 of the amended Site Selection Report.

Additionally, the land on Sion Street is already fully built out and occupied by existing industrial and commercial land uses, including a retail park with an Asda, Mc Donald's, and petrol station; the fully tenanted Dale Industrial Estate; and other miscellaneous industrial and commercial businesses along the length of Sion Street. There are no vacant parcels of land on Sion Street and so demolition and redevelopment of an existing premises would be required, however, as described previously, the use of land for the existing commercial and industrial purposes would outbid it's use as a BESS and therefore site acquisition would be cost



prohibitive and lease options not attractive to landowners who can use the land for more financially attractive uses. Even if redevelopment was viable, it would displace existing local businesses causing social and economic impacts.

Site Selection Search Area

The representation suggests that the 1km search area applied in the Site Selection Report should extend further, up to 5km.

For the Radcliffe substation, a 1km search area was chosen, taking into account that although the Substation was initially identified as having relative export capacity within the Electricity North West search area, the export capacity available was found to be low and accordingly, a proportionate and appropriate search area of 1km radius from the PoC was chosen in order to render a viable project, meaning that sites outside of this area are not regarded as viable alternatives. Beyond 1km, it was deemed that the costs associated with cables, installation, greater third-party landowner involvement and negotiations, environmental management and mitigation, would be prohibitive and render the project unviable.

This step is important because the further the PoC from the development site, the less feasible the project becomes, due to electrical losses, the additional costs of cables, installation, greater third-party landowner involvement and negotiations, environmental management and mitigation. Naturally, large projects are more capable of absorbing the costs of a longer connection route, whilst smaller projects are not. Grid reinforcement costs may also dictate that a shorter connection route is required to offset the costs. Further site specific factors will also affect viability, for example, a 1.1km soft open trench dig would be cheaper than a 900m hard dig. However, detailed geological surveys can only be undertaken once a site is selected.

By way of example, the issue of PoC distance was dealt with in appeal decision (APP/V4630/W/24/3347424), which overturned Walsall Metropolitan Borough Council's (WMBC) decision to refuse planning permission for a 49.35MW battery, for reasons including inappropriate development in the Green Belt.

As part of the Inspector's decision, an Alternative Sites Assessment (ASA) prepared by the Applicant was relied upon. At paragraph 31, the Inspector summarises the key locational requirements relating to BESS developments, stating that:

"The development of a BESS has one key locational requirement. That is the availability of and proximity to a grid connection. Access to the local grid is the biggest constraint facing the alternative energy supply and associated infrastructure industries. Sites need to be located close to a point of connection (POC) to the grid, so as to minimise the loss of energy during transmission and the grid must have capacity to absorb the electricity discharged at times of peak demand."



By applying the above-mentioned locational requirements, the Applicant's ASA deemed a 2km search area to be the maximum viable distance from the point of connection for the 49.35MW Battery, which the inspector deemed to be appropriate, concluding at paragraph 32:

" The ASA considered a search area of some 2km from the POC. In my experience, this is generally the maximum distance for a connection before its viability, both in terms of electricity transmission and cost, becomes questionable. Undertaking what I consider a robust assessment, the ASA concludes that there are no alternative sites suitable for this scheme."

The Appeal Decision was recently upheld in the High Court Decision of Walsall Metropolitan Borough Council -v- Secretary of State for Housing, Communities and Local Government and others [2025]¹ that rejected WMBC's attempt to overturn the planning permission. In this decision, Judge Jarman KC stated that *"it is tolerably clear why in that context the inspector found that the ASA was robust in concluding that there were no alternative sites, given the grid connection requirement"*.

The High Court decision confirms that the 1km search distance applied for the Radcliffe substation is appropriate, noting that the High Court was dealing with a circa 50MW BESS nearly 5 times larger than the Radcliffe project which only tolerated a 2km search area radius for viability.

Fire Safety

The representation made to Council also suggests that there are fire safety benefits relocating the BESS north of the River Irwell.

There would be no benefit in relocating the BESS facility from a fire risk perspective. The proposed BESS layout is consistent with the minimum separation distances prescribed under the NFCC Grid Scale Battery Energy Storage System Planning Guidance for FRS document, which requires BESS units to be at least 10m clear of combustible vegetation. Further fire safety related mitigation measures are detailed within the Fire Statement and Outline Battery Safety Management Plan already submitted with the application.

Conclusion

The information presented in the Site Selection Report demonstrates that, although the site is within the Green Belt, there are no other more preferential, suitable or available locations either within or outside of the Green Belt within the search area. Nor are there any available brownfield sites capable of accommodating the project.

We reiterate that the Site Selection Report has been submitted despite there being no statutory or national policy requirement mandating the preparation of a site selection report outlining

¹ Walsall Metropolitan Borough Council -v- Secretary of State for Housing, Communities and Local Government and others [2025] EWHC 2360 (Admin)



potentially developable land for a Battery Energy Storage System (BESS) development, nor is a sequential test required, as confirmed in the Bramley² High Court decision in 2023.

Should you require any further information, please do not hesitate to contact me on the below details.

Yours faithfully,

Dylan Mitchell
Planning Manager - Low Carbon Alliance

t. +44 [REDACTED]

e. [REDACTED]

4th Floor, Hamilton House, Mabledon Place, London WC1H 9BB
www.lowcarbonalliance.co.uk | [LinkedIn](#)

² Bramley Solar Farm Residents Group v Secretary of State for Levelling Up, Housing and Communities, Bramley Solar Limited and Basingstoke and Deane Borough Council [2023] EWHC 2842 (Admin)