



By email: [REDACTED]

06/08/2025

Attention: Jennie Townsend

Dear Jennie,

**Response to Objections – Radcliffe BESS located on Land to the east of Shore Top Farm
Planning Ref. 71888**

The following information is presented to respond to your email on Wednesday 30 July 2025, requesting a written response to the objections received in relation to the above-mentioned planning application.

A response to each of the key matters raised in the objections is summarised in Table 1 on the following page. Additionally, for balance, it should be noted that two public comments were made in support of the proposal, citing the following factors:

- Close proximity to existing substation.
- Energy storage is essential to support a move to renewable energy that produce energy intermittently.
- The low cost of renewable energy development, relative to other technologies.
- Renewable energy reduces the UK's dependence on imported energy.
- Job creation.
- Relative lack of pollution emissions.
- Carbon neutrality.
- Low ecological value on the site, noting its grassed nature.
- Lack of significant impact to the immediate area.

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

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Table 1: Response to Objections

No.	Issue Raised	Response
1	Fire risk	Grid scale Battery Energy Storage Systems (BESS) are no longer a new technology, and the fire safety of them is constantly improving, both by way of reduced combustion risk and improved emergency response planning from operators and fire and rescue services. As a result, safety related incidents involving BESS facilities are rare in the UK. BESS facilities are fitted with remote and automatic detection systems for fire detection, alarms, emergency shut off, and fire suppression. New BESS facilities are also designed to contain fires to individual units and prevent cascading thermal events to other containers. Pre-application consultation was sought from the Greater Manchester Fire and Rescue Service and formal written advice received in September 2024. The advice made no objection to the proposal, subject to compliance with advice relating to access road standards, provision of an on-site static water tank supply for firefighting purpose, separation between units and vegetation, and emergency/risk management. The advice received from the Fire and Rescue Service is consistent with NFCC Grid Scale Battery Energy Storage System Planning Guidance for FRS document, and Approved Document B Volume 2 for buildings other than dwellings under The Building Regulations 2010. The proposed BESS Facility has been designed consistent with the Greater Manchester Fire and Rescue Service advice, including the above-mentioned guidance documents. The BESS facility is also consistent with draft NFCC planning guidance, which was subject to public consultation in August 2024. The draft guidance is intended to replace the existing 2022 NNFCC guidance but has not yet been adopted. Accordingly, fire risk has been appropriately mitigated in accordance with relevant policy guidance and to the extent deemed acceptable by the Fire and Rescue Service.



		Some of the objections suggest there would be benefit in the producing an emergency response and risk management plan. The applicant routinely prepares such documents for all its BESS facilities and therefore would be accepting of this requirement as a pre-commencement condition. It is appropriate to prepare the emergency response and risk management plan at the pre-commencement stage, when the exact battery storage specification is chosen. The battery specification has not been selected at this stage as the technology is constantly improving and may change between now and the time of installation.
2	Construction traffic	Several objections raise concern regarding construction traffic impacts to residents, horses, stock and wildlife due to noise, dust and vibration. The applicant's consultation efforts included a letter drop to all residents on Wood Street and other surrounding areas to seek feedback on this specific issue. However, no responses were received. Notwithstanding, a comprehensive Construction Traffic Management Plan has been submitted with the application and includes a suite of best practice measures to mitigate impacts to nearby residents. Dust generated during the construction of the development will be limited to a short duration of approximately 6 months and will be mitigated using the following measures: • Implementation of heavy duty road-way matting along the vehicle access route and use of wheel-washing facilities to avoid trafficking of mud offsite. • Use of water suppression as needed in dry conditions. • Covering vehicle loads transporting any waste materials off-site. • Sweeping Wood Street, the adopted highway and the PRow when required or when reasonably requested by any officer of the Local Highway Authority or relevant persons. Pollution emitted from construction vehicles would not generate a perceptible difference to local vehicle emissions already occurring on Ringley Road West. Moreover, the Environment Section within Bury Council has reviewed the proposal and advised that 'due to the scale of the development, it is considered unlikely that the development would create an increase of more than 500 AADT (annual average daily



		traffic). Therefore, in line with the Planning Practice Guidance-Air Quality and EPUK Guidance, an air quality assessment will not be required.' Regarding vibration, heavy vehicle traffic of any busy road has the potential to cause some limited vibration to adjacent homes. Some minor vibrations may be perceptible to residential occupants but would not be significant enough to cause damage to homes. Moreover, heavy vehicle movements would be over a short, approximate 6 month duration, with a peak of 10 Heavy Goods Vehicle trips per day during weeks 4-8, tapering down to an average of 2 trips per day from weeks 12 to 20. All deliveries will be within construction hours of 07:00 - 19:00, Monday to Friday, and 08:00 - 13:00 on Saturdays. No deliveries will occur on Sundays or Bank Holidays. Drivers will be directed to turn off their vehicles when unloading deliveries.
3	Public Right of Ways	Objections have been received that raise concern regarding construction traffic impacts to public right of ways. The construction of the BESS facility will not require the closing of any Public Right of Ways (PRoW). The construction traffic route crosses both PRoW 7SS and PRoW 9SS. To ensure pedestrian priority is maintained at both PRoW crossings, gates will be put in place, and a banksman used to direct traffic across the PRoWs. Signage will be present for both pedestrians and HGV drivers alerting them to the presence of construction vehicles and pedestrians, examples of signage are shown in the CTMP. Visibility splays have been prepared for the PRoW crossing, confirming sufficient visibility for approaching goods vehicles and pedestrians. Further details are provided within the Construction Traffic Management Plan.
4	Damage to Wood Street	Some residents have raised concerns that the road surface of Wood Street will be damaged by construction vehicles. To address this, a walk-over condition survey on the PRoW, Wood Street and local highway network will be carried out and agreed with Highway Officers, prior to commencement of construction. This would be followed by a further condition survey with Highway Officers including a photographic record covering the same extents as the pre-construction condition survey at the end of construction activities. Any damage or defects attributable to the BESS will be rectified with remedial works.



5	Operational traffic related impacts	One objection raises concern regarding operational traffic related impacts. The Construction Traffic Management Plan submitted with the application outlines the proposed operational maintenance access, which includes an estimated 2 visits per month by a 4x4 vehicle or van. Due to the low frequency of vehicle movements and the type of vehicle, any resulting impacts by way of noise, dust and vibration would be low or negligible.
6	Parking on Wood Street	Some of the objections raise concern that parking will be restricted on Wood Street and highlight that users of Outwood Country Park currently use Wood Street for parking, impacting car parking supply. Parking for residents on Wood Street will be maintained for the duration of construction as outlined in the Construction Traffic Management Plan (CTMP) submitted with the application. No construction worker parking or delivery unloading will occur on Wood Street. All construction worker parking and unloading of deliveries will be managed on-site within the construction compound areas shown on the plan titled 'Proposed Site Layout with Construction Compound Area', drawing no. 121-10024, revision 014, submitted with the application. For this reason, no overspill of parking would occur on Wood Street or the public highway. Some residents are concerned that there is not sufficient road width on Wood Street to cater for parking and construction movements at the same time. To address this, the CTMP includes swept path diagrams, showing that the largest vehicle expected to enter the site can safely do so with parked cars on one side of Wood Street. To deal with scenarios where residents cars are parked outside of designated areas the CTMP proposes a communication/monitoring strategy so that residents can be informed in good time when deliveries will be undertaken as well as the details for a point of contact on the site. Additionally, on weekdays, deliveries will be avoided between 08:00 – 09:00 and 17:00 – 18:00.



7	Biodiversity	A number of objections raise concern that the biodiversity impacts of the proposal are unacceptable. A Preliminary Ecological Appraisal (PEA) was submitted with the application which documents the various ecological constraints affecting the site, the ecological surveys undertaken and makes recommendations for avoidance/mitigation/compensation, and opportunities for enhancement. The PEA confirms that the only habitat lost will be modified grassland, which is of negligible ecological importance. The nearby woodland will be retained, with direct impacts avoided by use of an underground horizontal directional drilling method for the cable connection to the nearby substation. There are no statutory or non-statutory designated sites within a close enough proximity, to be impacted by the proposal. A number of enhancements are recommended within the PEA, including: • A Biodiversity Net Gain of 39.47% through the planting of hedgerows and meadows. • Provision of bat roost boxes; • Seeding the site with a wildflower seed mix, increasing biodiversity benefitting, insects bats, birds and the like. • Provision of invertebrate 'hotels' and Bumblebee boxes. • Eradication of invasive non-native species. The PEA confirms that subject to the recommended mitigation methods, the proposed development would accord with Local Policies JP-G2, JP-G3, JP-G7, JP-G8 and the NPPF. A similar conclusion is made by the Bury Council ecological consultee – GMEU who in their advice states 'there are no significant ecological issues with this development. Issues relating to bats, nesting birds and invasive species can be dealt with via condition. 10% Biodiversity net gain is achievable on-site'. A single objection raises concern that electromagnetic forces will threaten bat life. The applicant is not aware of any peer reviewed scientific literature that confirms the low-level electromagnetic radiation, like that emitted from a BESS facility would cause harm to bat populations. It should be noted that all electrical equipment, even household items emit electromagnetic radiation. The Preliminary Environmental Appraisal submitted with the application, included survey effort for bat species and concludes that no
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		significant impacts would occur to bats as a result of the proposal, subject to the use of a sensitive lighting strategy.
8	Spread of invasive species	The application is supported by an Invasive Non-native Species Survey Report (INNSS). The INNSS involved a survey of the site area, finding Japanese Knotweed, Ginat Hogweed and Himalayan Balsam to be present on the site. The INNSS recommends an eradication program and control methods to be implemented during construction to eradicate and prevent the spread of invasive species. The proposal would have a positive impact on local biodiversity by eradicating the invasive species and ensuring they are not inadvertently transported off-site to new locations.
9	Operational noise	Objections have been received relating to the noise impacts of the proposal and some have suggested that no noise assessment has been undertaken. The application is supported by a Noise Assessment that models and assesses the operational noise emissions that would be experienced at the nearest sensitive receptors, finding that the noise produced by the development would be within the Lowest Observed Adverse Effect Level (LOAEL) during both the daytime and night-time periods. This accords with the criteria outlined in BS 4142:2014, BS 8233:2014, WHO, and IEMA Guidelines for Environmental Noise Impact Assessment (2014) and as a result, the noise impacts of the proposal would be low. Furthermore, the noise assessment findings confirm that the proposal is consistent with the National Planning Policy Framework (NPPF) and Planning Practice Guidance relating to noise.
10	Location within the Green Belt	Objections have been received suggesting that the proposed development should not be allowed within the greenbelt. It is accepted that, in accordance with national and local policy, the proposed BESS facility would constitute inappropriate development within the Green Belt. Notwithstanding, paragraph 160 of the



		National Planning Policy Framework (NPPF) provides that <i>‘in such cases, developers will need to demonstrate very special circumstances if projects are to proceed’</i>. The Planning, Design and Access Statement (PDAS) submitted with the application sets out the very special circumstances (VSC) applying to the proposed development, including: • No significant harm to openness. • The small footprint, landscape mitigation and temporary nature limits harm to character and appearance of the area. • The role of BESS to support the renewable energy transition and meet net zero targets. • The national policy considerations outweigh harm to the greenbelt. • A Biodiversity Net Gain of 39.47% through the planting of hedgerows and meadows. There is a substantial body of recent case law presenting similar VSC as those listed above for the Radcliffe BESS. Six relevant appeal decisions where VSC have been demonstrated for BESS proposals are summarised within the PDAS for context. Additionally, separate to the VSC presented above, paragraph 155 prescribes circumstances that development in the greenbelt should not be regarded as inappropriate. One of the key requisites within paragraph 155 (among others) is that the development is located on grey belt land. The PDAS submitted with the application includes detailed consideration of the proposal against Paragraph 155 of the NPPF and concludes that <i>‘the Proposed Development would utilise grey belt land and would not amount to inappropriate development in the Green Belt. Subject to mitigation, the proposal would comply with the development plan when read as a whole and with the guidance set out in the NPPF.’</i> In conclusion, the PDAS states <i>‘there is unequivocal support for this type of facility in national policy documents, notably NPPF and NPS EN1. For the reasons outlined in the PDAS’</i> and it is considered that proposed BESS can be supported in the greenbelt, in accordance with Paragraph 153 of the NPPF due to the VSC presented, or alternatively, in accordance with NPPF paragraph 155 due to its location within grey belt land.
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		Some objections suggest there are suitable alternate sites outside the greenbelt, including brownfield sites that would be more suitable for the development. However, no specific sites have been suggested. A comprehensive Site Selection Report was submitted with the application which sets out the sequential process that has been used to appraise the suitability of potential alternative sites. The report concludes 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 required area of search. Some of the factors considered in coming to this conclusion include; distance from a viable point of connection to the grid, a relative lack of site constraints, distance from residential receptors, and a lack of proximal brownfield sites.
11	Visual impact	Objections have been received raising concern regarding the visual impacts of the proposal. Specifically, some objection suggests there will be impact to cycle route 6, the Irwell Sculpture Trail, the Irwell Valley Way, the Rotary Way and the Outwood Country Park. A Landscape Visual Appraisal (LVA) was submitted with the application that assesses the visual impact of the proposal from each of the mentioned locations. Outwood Trail, Irwell Valley Trail and National Cycle Route 6 are located to the east of the site. Views of the site from here are largely filtered by woodland but may be available in some sections. The Irwell Sculpture Trail passes through the northern extent of the site and follows its eastern boundary. From here, the development will be partially visible but will be experienced in the context of existing infrastructure and wooded landscape, with limited contrast against the existing setting. The Rotary Way walking route is located 181m to the southwest, where intervening hedgerows and trees provide some screening, with only glimpsed and filtered views of the development possible. The LVA concludes that subject to implementation of the landscape scheme, the proposed development can be successfully accommodated within the existing character of the site and surrounding area. The proposed development will remain consistent with the established landscape pattern, reinforcing existing



		green infrastructure while enhancing biodiversity and ecological connectivity. The site's location, alongside existing overhead lines infrastructure and industrial uses such as the substation, ensures that it can accommodate the proposed development. Furthermore, the effects will be localised, minor, and reversible following decommissioning. On this basis, the Planning, Design and Access Statement submitted with the application confirms that the proposal complies with Policies JP-G1, JP-G2, JP-G7, saved UDP policies EN8, EN9 and the NPPF.
12	The facility will be permanent	The BESS is proposed to be used for a 40 year period consistent with other BESS developments across the UK. The applicant is willing to accept a time limited grant of planning permission and a condition requiring the preparation of a decommissioning strategy at the end of the 40 year period. The time limited planning condition provides certainty that the development will cease and the land returned to its pre-developed state at the end of the 40 year period.
13	Air quality (other than traffic)	The nature of the facility is such that normal ongoing operation of the development will not cause air quality related impacts, nor generate dust. The proposal does not involve any large-scale earthworks during construction that would generate significant dust. Limited excavation is proposed to be undertaken, during which workers will employ sediment and erosion controls to ensure limited or no emission of dust occurs.
14	Cable Route	A single submission suggests cable routes have not been shown. An indicative cable route corridor is shown on the Proposed Site Layout Plan submitted with the application. The cable route corridor has been considered within each of the specialist reports submitted with the application. Of note, the Arboricultural Impact Assessment submitted with the application has assessed the potential impacts of the cable route installation on nearby trees. In order to avoid impacts to existing trees, a horizontal directional drill method is proposed to be used to install the cables underneath the trees without impact. The remainder of the cable route can be installed using conventional trenching methods. Further details regarding this methodology can be found within the AIA.



15	Community Consultation	A single objection has been received stating there has been a lack of community consultation. A second submission stated the consultation undertaken has been inadequate. The community consultation method and outcomes are detailed in the Statement of Community Involvement submitted with the application. The community consultation programme has been undertaken in a manner that is proportionate to the nature and scale of the proposed development, noting that only limited guidance exists within Bury Council's own Statement of Community Involvement. As part of this process, engagement has been undertaken with Bury Council, Manchester Fire and Rescue Services and local community since late 2023. A total of 22 letters were mailed to residents of Wood Street and nearby farms, explaining the nature of the proposal, it's benefits and the efforts to be undertaken by the applicant to minimise impacts to neighbours and the broader community during construction and ongoing operations. The letters provided contact details inviting community members to get in touch and share their views of the proposal. No contact was made from community members in response to the letters. Notwithstanding the lack of community responses, the pre-application engagement with Bury Council was extremely valuable and has enabled the Design and wider team to reappraise and refine the layout and enhance the landscaping which will provide further screening around the site. Consultation with Manchester Fire and Rescue Services has also informed the design layout in relation to access roads, locating nearby fire hydrants, sizing of the on-site static water tank supply, separation between units and vegetation, and emergency/risk management.
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