

Ein cyf/Our ref: CAS-293863-Q0G4
Eich cyf/Your ref: 25/0991

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 10 December 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: PROPOSED NEW BATTERY ENERGY STORAGE SYSTEM (BESS), TRENCHING FOR UNDERGROUND CABLING ASSOCIATED WITH THE SOLAR DEVELOPMENT APPROVED UNDER 23/0989 TOGETHER WITH ASSOCIATED WORKS

LLEOLIAD/LOCATION: LAND SOUTH OF DOCKS WAY DISPOSAL SITE, DOCKS WAY, NEWPORT

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 24 November 2025.

We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding land affected by contamination. If this information is not provided, we would object to this planning application. Further details are provided below.

Land Affected by Contamination

The majority of the proposed development is located within the Docksway Landfill Newport Phase 1 historic landfill site and the whole site lies within the Newport City Council Docks Way Landfill site.

However, no information has been submitted regarding:

- The proposed trenching and cabling design, including the depth and method of excavation.
- A Phase 1 Risk Assessment focusing on relevant contaminated land and characterisation of ground materials in relation to the proposed trenching.
- The potential to encounter unsuspected contamination.
- The potential to encounter contaminated groundwater which could be tidally influenced. The significance of this risk would be informed by the depth of cable trenching required. Any contaminated groundwater may need to be managed if the

excavation needs to be kept dry in order to install the cabling. A discharge permit may be required to manage contaminated groundwater.

- The management of the excavated materials from the trenching. The environmental quality of materials would need to be determined through appropriate testing if excavated materials will not be re-used, to determine if the excavated materials are hazardous, non-hazardous or inert. If the intention is to reuse the excavated materials or some portion of the materials, this would need to be undertaken via the Definition of Waste Code of Practice ([DoW:CoP](#)).
- Potential landfill gas risk would need to be assessed as any trenching and cabling could facilitate the movement of existing gas generation. Cabling is often bedded into high permeability materials such as sands or pea-gravel. Such materials can preferentially move gases.
- A Feasibility Study of situating the proposed BESS on legacy landfill including whether the existing hardstanding will be sufficiently load-bearing, the need for piling (including a piling risk assessment if piling is proposed), possible excavation of ground material for foundations and landfill gas risks including the potential to exacerbate the effects of a BESS fire. Operational and de-commissioning risks should also be considered. Tidal influence on shallow groundwater may also affect the generation and migration of landfill gas and this should be considered in relation to the operating BESS.

We therefore advise that you seek the additional information outlined above from the applicant in order to ensure that potential impacts from contaminated land and groundwater are addressed.

Battery Energy Storage Systems – Fire Risk

The proposed scheme involves the storage of large battery systems containing lithium ion electrolytes and hydrocarbons which have the potential to cause pollution in the event of fire at the site as a result of battery failure.

We are not the expert body to advise as to whether measures proposed by the applicant to minimise the risk of fire, or to suppress a fire at the site are adequate. We recommend that you seek advice from a Battery Energy and Electrical process safety expert and the relevant Fire and Rescue Service in determining whether the proposed measures to minimise the risk of fire, and to suppress a fire at the site are adequate.

You may also wish to consult the below guidance in relation to such matters:

- The National Fire Chiefs Council (NFCC) provide [Grid Scale Battery Storage System Planning](#) guidance;
- HSE guidance [on managing health and safety in grid scale electrical energy storage systems](#) which includes an assessment of the principal hazards.
- CIRIA C736 - Design of containment systems for the prevention of water pollution from industrial incidents.

Before determining the planning application, you should be satisfied that in the event of a fire all contaminated firewater can be fully contained on site and cannot enter the wider environment. We advise that measures to avoid pollution from contaminated firewater should be clearly set out by the applicant and provide sufficient detail in support of the planning application. This should include demonstration, to your satisfaction, that:

- thermal runaway detection equipment, automated alert systems, automated fire suppression systems and planned responses to a fire are adequate in detecting and

prevent the spread of fire. The relevant Fire and Rescue Service may advise you on these matters.

- there is sufficient spacing between units to help to prevent further spread of fires;
- contaminated firewater and foam run-off is prevented from infiltrating the ground or any offsite drainage networks with the use of impermeable surfaces, secondary containment and sealed drainage systems;
- the scheme includes sufficient storage capacity to contain contaminated firewater in the event of a fire. The relevant Fire and Rescue Service may advise you on what they consider to be adequate storage capacity;
- Notwithstanding the wider TAN15 considerations, where the site is proposed within a flood risk area, the risk of fire from battery exposure to a flood event has been avoided, and the proposed method of containing contaminated firewater will operate effectively without the risk of pollution;
- the proposed method of transporting contaminated firewater off-site will be effective, including under the prevailing conditions of a fire at the site;
- adequate post event cleanup and environmental remediation has been considered and planned.

Other Matters

The advice in this letter relates to matters which are included on our [consultation topics list](#). We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Jessica Jones

Jessica Jones

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Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.