



Archaeoleg Morgannwg-Gwent

Heneb

Glamorgan-Gwent Archaeology

Our ref: NEW1685/RD

ARCHAEOLOGICAL PLANNING

Head of Planning and Economic Regeneration
Newport City Council
Civic Centre
NEWPORT
NP20 4UR

15th July 2025

Dear Sir

Re: Removal of stored pulverised fuel ash (PFA) and the installation of a new battery energy storage system (BESS) with all associated drainage, infrastructure, engineering and associated utilities connections
Land At Uskmouth Power Station West Nash Road Nash Newport NP18 2BZ
Pl.App.No.: 25/0407

Thank you for consulting us about this application; consequently we have reviewed the detailed information contained on your website and can confirm that **the proposal requires archaeological mitigation.**

Information in the Historic Environment Record (HER) shows that the proposal is located in an area of high archaeological potential. It is within the Newport Archaeologically Sensitive Area (ASA) and on the Gwent Levels, although outside of the Registered Landscape. The Levels is an extensive area of alluvial wetlands and intertidal mudflats that is entirely the work of man, reclaimed from the Roman period onward. They contain a proven and possibly quite vast potential for extensive, well-preserved, buried, waterlogged, archaeological and paleoenvironmental deposits surviving from earlier landscapes. Previous archaeological evaluations carried out in the area of the Power Station, such as by Glamorgan Gwent Archaeological Trust in 1997 and Pre-Consult Archaeology in 1998, have found significant archaeological deposits. These include Roman field systems, drainage works and material finds such as ceramics.

The current proposal is for a containerised battery energy storage system. As such the system itself is unlikely to impact on below-ground remains. However, other facets of the proposal, such as the underground cabling, transformer stations, landscaping, water attenuation measures etc. may have an effect. Therefore, despite the modern industrial activity which is likely to have an adverse effect on any archaeological material, there is the possibility of encountering features and structures dating from the prehistoric period to the Second World War.

As such it is our recommendation that a condition requiring the applicant to submit a detailed written scheme of investigation for a programme of archaeological work to protect the archaeological resource should be attached to any consent granted by your Members. This is consistent with our response to the screening request.

PLANNING SERVICES
GWASANAETHAU CYLLINIO

Heneb is the trading name of

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Cadeirydd / Chair: Dr Carol Bell

PSG / CEO: Richard Nicholls

Cwmni Cyfyngedig (1198990) ynghyd ag Elusen Gofrestredig (504616) yw'r Ymddiriedolaeth

The Trust is both a Limited Company (1198990) and a Registered Charity (504616)

Cyfeiriad cofrestredig: Tŷ Cornel, 6 Stryd Caerfyrddin, Llandeilo, Sir Gaerfyrddin SA19 6AE

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We envisage that this programme of work would take the form of a watching brief during the groundworks required for the development, with detailed contingency arrangements including the provision of sufficient time and resources to ensure that any archaeological features or finds that are located are properly investigated and recorded; it should include provision for any sampling that may prove necessary, post-excavation recording and assessment and reporting and possible publication of the results. To ensure adherence to the recommendations we recommend that the condition should be worded in a manner similar to model condition 24 given in Welsh Government Circular 016/2014

No development shall take place until the applicant, or their agents or successors in title, has secured agreement for a written scheme of historic environment mitigation which has been submitted by the applicant and approved by the local planning authority. Thereafter, the programme of work will be fully carried out in accordance with the requirements and standards of the written scheme.

Reason: To identify and record any features of archaeological interest discovered during the works, in order to mitigate the impact of the works on the archaeological resource.

We also recommend that a note should be attached to the planning consent explaining that:

The archaeological work must be undertaken to the appropriate Standard and Guidance set by Chartered Institute for Archaeologists (CIfA), (www.archaeologists.net/codes/ifa) and it is recommended that it is carried out either by a CIfA Registered Organisation (www.archaeologists.net/ro) or an accredited Member.

If you have any questions or require further advice on this matter please do not hesitate to contact us.

Yours faithfully

R. Dunning

Rob Dunning BSc MCIfA
Archaeological Planning Officer

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