

Your reference: CSC1082

16th June 2025

Ms Joanne Davidson
East Area Development Manager
Newport City Council
Planning Services,
Planning and Economic Regeneration,
Newport City Council,
Newport,
NP20 4UR

Dear Ms Davidson,

PLANNING PORTAL REFERENCE: PP-14085133
APPLICATION UNDER SECTION 73 OF THE TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
MINOR MATERIAL AMENDMENT TO PLANNING PERMISSION REFERENCE: 23/0835
AT USKMOUTH POWER STATION, WEST NASH ROAD, NASH, NEWPORT, NP18 2BZ

Introduction

In respect of the above planning permission (ref: 23/0835), *'S73 Application to Vary Condition 1 (Approved Plans) And Condition 02 (Site Investigation And Risk Assessment) Of 22/0823 Installation Of A Battery Energy Storage System (Bess). Amendments Include Increasing The Amount Of Battery Infrastructure, Changes To The Site Layout, Changes To The Red Line Boundary And Soft And Hard Landscaping'* at Uskmouth Power Station, we submit the enclosed Minor Material Amendment (MMA) application under Section 73 of the Town and Country Planning Act 1990 (as amended), on behalf of the Applicant, Private Energy Partners Limited.

This application seeks to regularise minor amendments to the approved site layout and accordingly seeks to update the list of approved plans under Condition 1 of the consent.

Accordingly, please find enclosed with this submission:

- Completed Application Form and Certificates;
- The following plans:
 - Site Location Plan (50468-BUR-XX-XX-DR-C-0002 -S3-P2.0-1.0)
 - Proposed Scheme Overview General Arrangement (50679-BUR-GEN-XX-DR-C-0100 S3 P2.0)
 - Primary HV Ducting General Arrangement Sheet 1 (50679-BUR-SER-XX-DR-C-2702 S3 P5.0)
 - Primary HV Ducting General Arrangement Sheet 2 (50679-BUR-SER-XX-DR-C-2703 S3 P5.0)
 - Ducting Details Sheet 2 (50679-BUR-SER-XX-DR-C-2751 P3.0)
 - Ducting Details Sheet 3 (50679-BUR-SER-XX-DR-C-2752 P1.0)
 - Ducting Details Sheet 4 (50679-BUR-SER-XX-DR-C-2753 P1.0)
 - General Arrangement – Comparison to Original Design (50679-BUR-XX-XX-DR-Z-0001 P1.0)



- External Combined Underground Fire Sprinkler/Hydrant Ring Main Design (PG2505193-0001-P02)
- Fire Tank Plan and Sprinkler System Plan (PG2505193-0002-P03)
- Sprinkler System Water Supplies Pipe and Tank Layout Sheet 1 (PG2505193-0003—P01)
- Sprinkler System Water Supplies Pipe and Tank Layout Sheet 2 (PG2505193-0004—P01)

Description of Proposed Amendments

As the approved BESS facility is now under construction, minor design amendments to the layout and supporting infrastructure are necessary to accommodate the development and maximise efficiencies.

The amendments consist of:

- Amending the red line boundary to include additional land for access to the banking compound to the north and the new cabling route design.
- Installation of 2no. fire water tanks.
- Amending the layout of the banking compound including relocating fencing to accommodate spacing requirements.
- Raising the levels of banking compound.
- Slight repositioning of the attenuation pond away from electrical pylon exclusion zone (whilst maintaining attenuation volumes).
- Adjusting the BESS plateau earthworks to avoid an existing coal hopper chute and avoid the need for geotextile reinforcement.
- Amending the substation building positions to avoid interfering with other proposed infrastructure.

The enclosed 'General Arrangement – Comparison to Original Design' plan (ref: 50679-BUR-XX-XX-DR-Z-0001 P1.0) presents the proposed amendments, compared to the approved design.

Red line boundary

Minor amendments to the red line boundary are sought to include additional adjoining land within the Uskmouth site. These amendments will allow for the new cabling route between the banking compound and BESS compound; and additional land at the banking compound to allow for access.

Fire tanks

Owing to the nature of battery energy storage facilities, an on-site water suppression system is necessary for fire safety reasons. Originally, it was intended to deliver this requirement by utilising an existing tank house on site, however this building has been found to need significant repair works and its location would require extensive lengths of pipe to reach the water main.

As a result, it is proposed to install 2no. bespoke fire water tanks in the western part of the battery compound itself. The fire tanks extend to 2.77m height and 13.95m diameter will each have a net capacity of 338m³, integrated into a below ground sprinkler system network, to ensure the fire safety of the site. They will be positioned on a concrete base and a pump house enclosure will be installed between the two tanks (see Figure 1 overleaf).



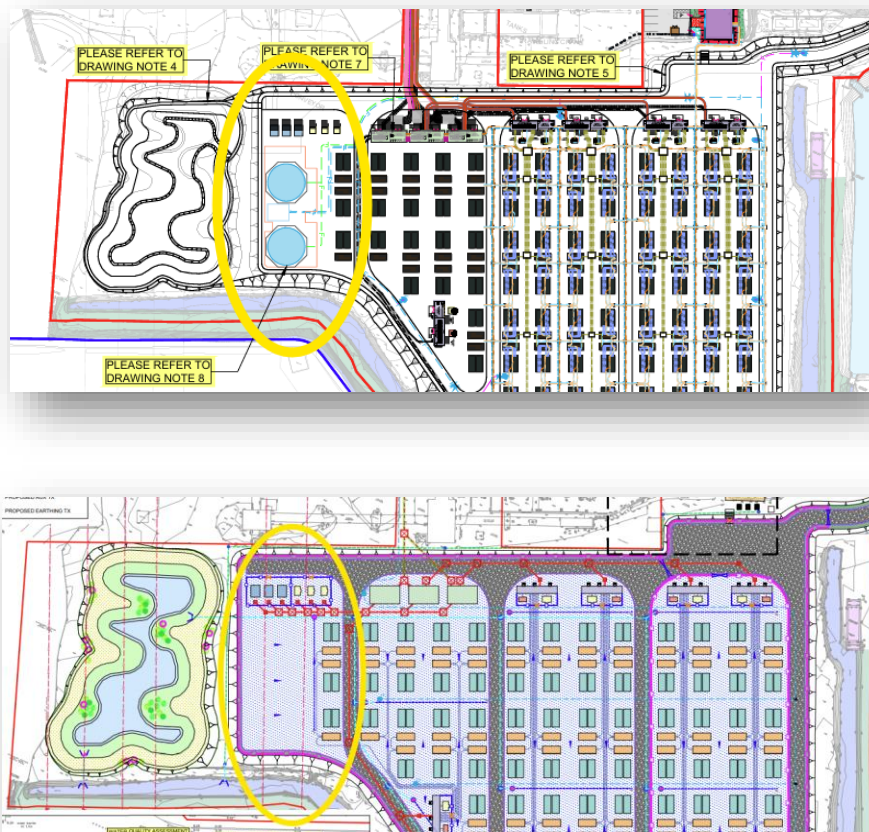


Figure 1: Extract of proposed layout with fire tanks included (top image); and current approved layout (ref: 23/0835) (bottom image)

The fire tanks are made of galvanised steel and will be painted green, to match the RAL colours of the battery units, which will help to visually integrate them into the site and surroundings. The fire pump house will be painted the same green colour. Ultimately, the form, scale and design of the fire tanks is in keeping with the industrial nature of the BESS site and wider Uskmouth site.

The tanks will be positioned within the approved perimeter fence for the BESS compound and will extend to a height of 2.77m. As a result, the fire tanks will be no more visually imposing than the approved battery units (which are 3m height) and will benefit from the visual screening of the boundary fence.

Cabling route

An alternative, direct, cabling route is proposed, travelling between the BESS compound and the electrical infrastructure at the banking compound. This involves ducting and routing of a 33kV power cable; multicore and control cable; 33kV trefoil ducted power cable; 170mm 33KV power cable duct; and 110mm multicore and control duct. Whilst it was previously proposed to utilise the existing tunnel network associated with the former power station, this is no longer feasible, and the amended route is therefore proposed to avoid existing infrastructure.

Detailed ducting section plans are provided with this submission to demonstrate the arrangement of the cabling infrastructure.

Banking compound



Proposed amendments to the banking compound comprise including access points from the internal circulatory road through the wider Uskmouth site, into the compound; and repositioning of the fencing boundary to accommodate space requirements for the infrastructure.

The electrical infrastructure at the banking compound is proposed to be raised to a ground level of 9.8m AOD, using the same method and materials as approved for the battery compound.

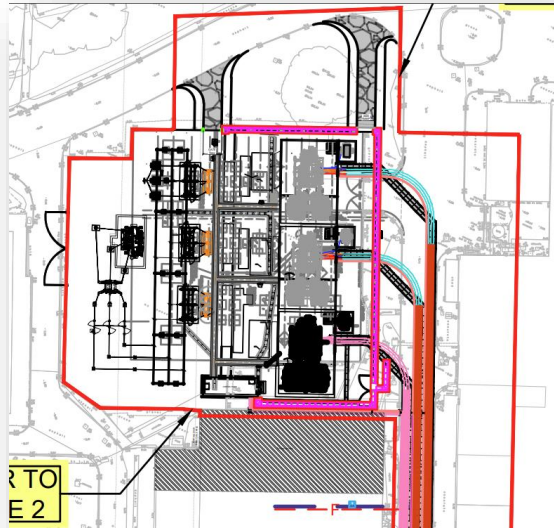


Figure 2: Extract of proposed site layout – banking compound

Attenuation Pond

The attenuation pond to the west of the BESS compound is required to be shifted slightly southwards to avoid a pylon exclusion zone to the north. Accordingly, the pond design has been slightly amended however its broad location and siting remains as approved and the required attenuation volumes are retained to ensure sufficient drainage in accordance with the approved position.

BESS Plateau

Slight amendments are proposed to the extent of the BESS plateau. In the north eastern corner, the extent is to be shifted eastwards to avoid interfering with an existing coal hopper chute (see figure below).



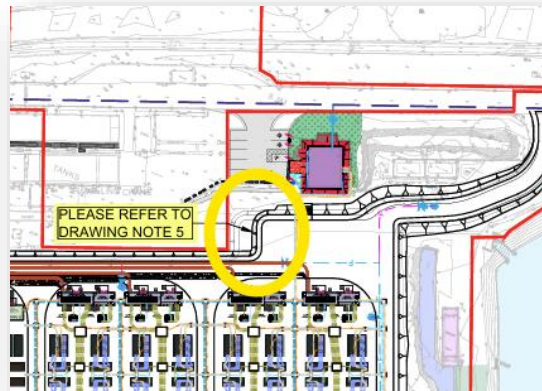


Figure 3: Proposed amendment to northeastern extent of BESS compound (shown left), to avoid existing structure (shown right)

In the southwestern part of the BESS compound, the plateau earthworks are slightly adjusted to avoid the requirement for geotextile reinforcement; and the earthwork slope slackened to reduce the amount of reinforcement required.

Substations

A slight amendment to the position of substations within the battery compound is proposed, simply to avoid interference with existing infrastructure.

Assessment of Proposed Amendments

As the detailed design and construction process has progressed on site, several minor amendments to the approved layout are required to address various changes, measures to improve construction and operational efficiencies, and to take account of existing structures on site.

Red line boundary

The proposed amendment to the red line boundary is considered minor material in scale and in respect of the impact of change to the site and development as approved.



Fire Tanks

The introduction of fire tanks is deemed appropriate to the site's industrial context and character and is essential to deliver the battery fire safety requirements on site.

Whilst the tanks are larger in scale when compared to the battery units, they are of a similar height (2.77m and 3m respectively) and are contained within the BESS compound which benefits from perimeter fencing serving as a visual screen. The fire tanks will be finished in the same green colour as the battery units, so that they will appear of comparable form and finish to the battery units and will be visually integrated within the overall development. It is considered that impact on nearby visual receptors is unlikely to discernibly or substantially alter as a result of this amendment.

It is noteworthy that when permission was originally granted for the BESS (under ref: 22/0823), this part of the site was to be occupied by electrical infrastructure. Following various amendments to the original full permission, this electrical infrastructure was relocated to the north of the site in the banking compound, leaving the westernmost part of the battery compound unused. The introduction of fire tanks to this part of the site therefore occupies an area originally deemed suitable for other ancillary electrical infrastructure and does not represent the introduction of development on a part of the site that was intended to be undeveloped.

As a result, the proposed fire tanks are deemed acceptable with regard to design, landscape and visual amenity.

Banking Compound

The electrical infrastructure at the banking compound is proposed to be raised to 9.8m AOD floor level, to accord with the ground raising for the battery compound, to address flood risk and condition 20 of ref: 23/0835 (which states "*All on site electrical infrastructure shall have a finished ground level no lower than 9.8m AOD*"). As with the battery compound, the same approved method and aggregates material will be utilised for these works.

Given the context of the immediate surroundings of the banking compound, this amendment is not considered to present any material impacts on the development as a whole and will safeguard the electrical infrastructure from flood risk.

Other layout amendments

The other amendments are primarily minor design tweaks to the layout and position of various approved elements on site (i.e. cabling, attenuation pond and substations), which do not result in any fundamental changes to the development in terms of the use, scale, height, massing, landscaping, energy capacity, nor number of battery units.

Summary and Conclusion

This proposal seeks minor amendments to the approved red line boundary and layout of the Uskmouth BESS site, to regularise and respond to changes on site that have been identified as the construction and design process has evolved.

The amendments are considered minor material in respect of the impact of change to the site and development as approved. The approved technical reports and mitigation measures relating to landscape and visual amenity, biodiversity, flood risk, ground conditions, highways and drainage, are all considered to remain applicable to the amended layout, and the approved and recommended mitigation measures can still be undertaken without prejudice, in accordance with the relevant conditions of the current S73 approval (ref: 23/0835).

The environmental merits of the BESS proposal advocated for within local and national planning policies remain relevant to consider, as the developer is committed to delivering an important sustainable energy storage facility to the network.



We trust that the above and enclosed is sufficient to enable a favourable determination of the application. However, should you have any questions, please do not hesitate to contact me.

Yours sincerely

Clodagh Macken

Clodagh Macken
Principal Planner
CarneySweeney

