

Newport City Council
Civic Centre
Newport
NP20 4UR

Ein cyf/Our ref: CAS-275038-V0K9
Eich cyf/Your ref: 25/0110

Dyddiad/Date: 07 March 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: VARIATION OF CONDITION 1 (APPROVED PLANS) OF PLANNING PERMISSION 21/1067 TO REMOVE CONDITIONS 3 (REPTILE METHOD STATEMENT) AND 4 (APPOINTED ECOLOGIST) AND EXTEND THE TIME LIMIT TO COMMENCE DEVELOPMENT BY 5 YEARS IN RESPECT OF PLANNING PERMISSION 16/0855 FOR THE INSTALLATION OF COMMERCIAL BATTERY STORAGE AND ASSOCIATED INFRASTRUCTURE AND WORKS

LLEOLIAD/LOCATION: UK POWER RESERVE TRASTON ROAD NEWPORT SOUTH WALES NP19 4RQ.

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 18 February 2025.

We have no objection to the variation of condition 1 and provide the following advice.

The planning application proposes less vulnerable development. Our Flood Risk Map confirms the site to be within Zone C1 of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Flood Map for Planning identifies the application site to be at risk of flooding and falls into Flood Zone 2 and 3 Sea.

Section 6 of TAN15 requires the Local Planning Authority to determine whether the development at this location is justified. Therefore, we refer you to the tests set out in section 6.2 of TAN15. If you consider the proposal meets the tests set out in criteria (i) to (iii), then the final test (iv) is for the applicant to demonstrate through the submission of an Flood Consequences Assessment (FCA) that the potential consequences of flooding can be managed to an acceptable level.

We have reviewed the supporting FCA referenced 65206973-SWE-ZZ-ZZ-T-C-0001 dated 5 December 2024 to support a commercial scale battery storage and associated infrastructure facility. The FCA also covers the minor amendments sought by this variation application including but not limited to the following:

- Changes to the arrangement/layout of equipment platforms
- The construction of a new harmonic filter equipment (principally changing the size of the control room)
- The introduction of water tanks beneath the welfare building
- Minor extension of fencing

The topographical survey of the site states that the site falls from south to north with levels ranging from 7.5-6m AOD. Levels where the battery site is to be constructed vary between 6.44-7.5m AOD.

The application for a battery storage facility comes with the assumption the storage capacity of the batteries would be less than 25 years. However, the FCA and design life of 75 years has been used for the flood risk assessment and the following flood levels provided:

- 1 in 200 year plus climate change : 7.91m AOD
- 1 in 1000 year plus climate change : 8.1m AOD

In order to comply with the requirements of TAN 15, it is proposed to raise all structures to a level of 8.51m AOD with the use of silts. Whilst we do not encourage the use of silts and voids, this design would ensure the components of the development are located above the extreme flood events with a freeboard allowance.

The FCA confirms that the site is not usually manned and in the event of flooding of the site, it is not expected that there will be any people on the site to evacuate. However, an emergency route provided in the FCA suggest east and north of Traston Road to Nash Road, then north on Nash Road to the A5 would be the most suitable evacuation route. It is recommended that the owners of the site should sign up to the available early warning system by NRW to allow for evacuation and have the ability to remotely shut down all electrical equipment in order to protect the site. We would expect the emergency planners of the LPA to review any emergency plans for the site.

A number of storage tanks will be buried below the level of 8.51m AOD and the FCA calculated the loss of volume associated with these components. The displacement volumes given in the FCA are shown to be insignificant and will have a negligible impact on the level of flood water in the local area, and compensation is therefore not considered necessary. We are satisfied with this statement and require no further assessment in terms of tidal third party impacts or displacement.

Given the changes to the development are minor from a flood risk aspect, we would have no further comment.

As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, we recommend you consider consulting other professional advisors on matters such as emergency plans, procedures and measures to address structural damage that may result from flooding. Please note, we do not normally comment on or grant the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

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 on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Rhian Isaac

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

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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.