

Our Ref: /ST/Newburn BESS

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By email David Grimshaw david.grimshaw@newcastle.gov.uk

10 January 2025

Dear David,

Planning Application 2024/0447/01/DET- submission of updated information

1. I am writing to submit additional information in relation the above-mentioned planning application. The enclosed details have been supplied to address specific comments that have been raised in relation to the application to date during its determination period. Specifically, the submitted details address the following matters

- Updated Drainage Report – responding to comments made by the Lead Local Flood authority (LLFA)
- Ecological Impact Assessment (EclA) and updated Biodiversity Net Gain (BNG) Assessment – responding to comments made by the Councils Ecology officers.
- Response to Coal Authority comments in relation to potential mineshaft on site

- Updated landscaping plans – responding to comments from the council’s landscape officer
 - Assessment against Policy DM2 of the Council’s Development Allocations Plan (DAP)
2. In addition to the above reports, the proposed site drawings have been updated to reflect a revised layout of the substation area into the southern part of the site.
 3. Since the submission of the application, national planning policy in relation to renewable energy projects, of which this is one, has been updated through the revised National Planning Policy Framework (NPPF) which was issued last month.
 4. Paragraph 168 of the new NPPF replaces the previous paragraph 158, and now clearly states that when determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure (which includes battery energy storage systems such as the proposed development), **significant weight** should be given to the associated renewable energy benefits and contribution to a net zero future. This significant change in national policy further strengthens the planning case for the proposed Newburn BESS project.

Updated designs

5. The layout of the proposed scheme has been updated to take account of comments received particularly those from the Coal Authority. Alongside these amendments, the design of electrical substation element of the southern part of the site has been revised following changes in the proposed technology. The updated layout is shown on drawing 2991-FIG-DR-0006 (Rev P04), with key changes being the following:
 - The layout of the battery units has been amended to ensure that no electrical infrastructure is placed above the anticipated locations of the mine shafts;
 - The position of the required retaining walls on the eastern boundaries of the battery and substation parcels of the site are clearly shown;
 - The layout of the substation infrastructure in the southern part of the site has also been updated to reflect change in the technology to be used.;

Drainage details

6. An updated surface water drainage report has been undertaken by Hydrock and is attached to this submission. The updated strategy states that there are effectively two surface water catchment areas within the site: the battery storage area to the north and the substation area to the south.
7. It is proposed that the surface water collected around the battery units in the north will be discharged via underground pipe into the existing culvert that runs beneath the site. The layout of this is shown on drawing 29911-HYD-00-ZZ-DR-C-7 REV P01. The connection to the culvert will be undertaken within the redline site boundary.
8. Surface water collected in the southern portion of the site around the electrical infrastructure will be discharged into the existing sewer connection that collects all of the current surface water flows in this part of the site. This detail is also shown on drawing 29911-HYD-00-ZZ-DR-C-7 REV P01 which is appended to the updated drainage report.

Ecology Information

9. Following the comments submitted on the application by the Council's Ecology Officers, the following new and updated documents have been provided:
 - EclA;
 - BNG Calculations Report;
 - Statutory Biodiversity Metric; and
 - Statutory Biodiversity Metric Condition Assessment.
10. The metric confirms that 0.92 habitat units would be required to offset the proposed development and deliver a 10% net gain for ecology. At this stage it is anticipated that this shortfall will be offset through the purchase of offsite credits.

Response to Coal Authority Comments

11. A note has been produced by Roberts Environmental which addresses the comments made by the Coal Authority in relation to the application dated 19 June 2024. The note states that the risk presented in the previously submitted Hydrock report is not as severe as previously stated. This coupled with the relatively low sensitivity of the proposed end use, it is not necessary for further intrusive site investigations to be undertaken at this stage. The note concludes that during and following the completion of the proposed development a Watching Brief should be maintained on site for any signs of subsidence, with provisions for any necessary required maintenance.
12. In addition to the attached note, the site layout has been revised to avoid any electrical battery infrastructure being located within the area of influence of the potential mine shafts. The location of the mine shafts is shown on the revised layout drawing 2991-FIG-DR-0006 which is appended to this submission.

Updated Landscaping Plans

13. The attached drawing N1427-ONE-ZZ-ZZ-DR-L-0201 Rev P03 shows the proposed landscaping around the southern part of the site on the boundary with High Street and Walbottle Road. The design balances the need to provide a secure perimeter for the electrical equipment which occupies a constrained part of the site, alongside providing as much landscape screening as can be possibly provided. The need to maintain safe separation distances for the electrical infrastructure and reduce the need for impractical maintenance to be carried out means that taller screening measures (i.e. trees) would be impractical.
14. The proposed measures comprise the use of ivy screens to provide all year-round green screening and lower planting in front where possible on Walbottle Road. The ivy screens would be set in front of a wire mesh perimeter security fence, the majority of which would be covered by the landscaping screens. It is acknowledged that the ivy screens will not screen the entirety of the proposed substation electrical infrastructure, however they will have a significant effect upon close views for pedestrians and road users at ground level.
15. The remaining visible electrical equipment in views from the east on in particular will be set against the back drop of the retained North East Concrete batching facility and maintenance building. The site will remain in a predominantly industrial context with large scale buildings to the immediate south alongside existing lampposts, and telecommunication poles and wires. These existing and retained features reduce the sensitivity of the immediate urban landscape to the introduction of the visible substation infrastructure.

16.The proposed landscaping measures have sought to maximise the potential landscape solution given the highly constrained nature of the site. These details coupled with the character of the existing site's context mean, should present a reasonable and pragmatic solution.

Policy DM2 Assessment

17.Through discussions with yourself during the determination of the application, you have requested further information in relation the proposed scheme's impacts upon the loss of the potential employment uses, which are covered by Policy DM2 of the Development and Allocations Plan (DAP) on part of the application site. A separate report has been produced to address this matter which is appended to this letter.

18.I trust that the information outlined is clear, if you need anything further or have any questions please do not hesitate to get in touch.

Yours sincerely,



Managing Director at IC Planning



Enc.

Updated site layout plan – Drawing number 2991-FIG-DR-0006 Rev P04

Updated site elevations – Drawing number 29911-FIG-DR-0007.2 Rev P02

Landscaping Plan – Drawing number N1427-ONE-ZZ-ZZ-DR-L-0201

Roberts Environmental note – dated 2/9/24

Updated Hydrock Drainage Report - Dated November 2024

Policy DM2 Assessment

Updated Ecology reports