Our Ref: 2658-03/JM

30 April 2026

Planning Department
Wrexham County Borough Council
Guildhall
Wrexham
LL11 1AY

Dear Sir / Madam

PROPOSED NON-MATERIAL AMENDMENT TO PLANNING PERMISSION P/2023/0175 FOR THE DEVELOPMENT OF A BATTERY STORAGE FACILITY ON LAND TO THE NORTH OF NATIONAL GRID'S LEGACY SUBSTATION, OFF BRONWYLFA ROAD, TALWRN, WREXHAM

I write, on behalf of HD639LEG Ltd (the Applicant), to apply for a Non-material Amendment (NMA) under Section 96a of the Town and Country Planning Act 1990 (as amended), to planning permission P/2023/0175 in respect of the above development (the Consented Development) on land to the north of National Grid's Legacy substation, Bronwylfa Road (the Site).

This submission has been made via the Wales Planning Portal (ref. PP-14891156) and comprises:

- This Covering Letter;
- Planning Application Forms;
- The following updated drawings:
  - 2658-03-03 General Arrangement Rev A;
  - 2658-03-07 Switchgear Container Rev A;
  - 2658-03-08 Control Room Rev A; and
  - 2658-03-11 Hard Landscaping Plan Rev A;
- [redacted]

Background

The Consented Development (ref. P/2023/0175) was granted planning permission by Wrexham County Borough Council (WCBC) on 24th July 2023. The Applicant has since been working closely with their chosen battery energy storage system (BESS) technology provider and site contractors to develop the facility. This detailed design work has resulted in a very limited number of small amendments to the consented site layout and the equipment on site.

The revised site layout is fundamentally the same to that approved under the Consented Development and the proposed amendments (discussed in detail below) would not materially change the appearance or function of the BESS facility. As such, they are considered non-material and capable of being determined under the Section 96a NMA process.

Axis is the trading name of Axis P.E.D LTD,
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Manchester Office: 1st Floor, Barfield House, Alderley Road, Wilmslow, SK9 1PL
North East Office: Maling Exchange, Studio 307, Hoults Yard, Walker Road, Newcastle Upon Tyne, NE6 2HL

The Proposed Amendments / Revised Scheme

The 'Revised Scheme' layout (as shown on amended drawing ref. 2658-03-03 General Arrangement Rev A) incorporates the following changes:

i. The perimeter security fence has been slightly moved in along the western boundary;
ii. An access gate has been added along the southern boundary fence;
iii. The BESS and MVS units (i.e. the main components on the Site) have been very slightly repositioned, however the total number and appearance is unchanged;
iv. The Switchgear Building has a different design and the elevations drawing has been updated to show this (see 2658-03-07 Switchgear Container Rev A);
v. The Control Room has a different design and the elevations drawing has been updated to show this (see 2658-03-08 Control Room Rev A);

To clarify, no changes are being sought to the planning boundary (redline) of the Consented Development. As such, the approved drawings setting out the planning redline are unchanged.

The hard landscaping for the Site is unchanged, however the associated approved planning drawing has been updated to reflect the revised layout (see drawing 2658-03-11 Hard Landscaping Plan Rev A).

The Revised Scheme would not materially change the findings of any of the original environmental reports for the Consented Development. As such, the conclusions of these approved environmental reports remain valid, and the reports have not been updated.

To assist WCBC in identifying the changes between the Consented Development and the Revised Scheme, a side-by-side Comparison Drawing has been provided at Enclosure A to this covering letter.

Table 2 below clarifies which drawings of the Consented Development are proposed to be amended or remain unchanged. Those drawings which are unchanged have not been resubmitted.

Table 2: List of Updated Drawings

Current Consented Drawing Name / Reference	Amended / Unchanged	Revised Drawing Name / Reference
2658-03-01 Statutory Plan	Unchanged	
2658-03-02 Location Plan	Unchanged	
2658-03-03 General Arrangement	Amended	2658-03-03 General Arrangement Rev A
2658-03-04 Existing Site Plan	Unchanged	
2658-03-05 Battery Storage Containers	Unchanged	
2658-03-06 Inverter-Transformer Stations	Unchanged	
2658-03-07 Switchgear Container	Amended	2658-03-07 Switchgear Container Rev A
2658-03-08 Control Room	Amended	2658-03-08 Control Room Rev A
2658-03-09 Auxiliary Transformer Compound	Unchanged	
2658-03-10 Fencing and Security	Unchanged	
2658-03-11 Hard Landscaping Plan	Amended	2658-03-11 Hard Landscaping Plan Rev A

Summary

Overall, the proposed amendments are not considered to materially change the appearance, scale or function of the Consented Development and sit within the consented planning redline boundary. The conclusions and mitigation measures of the existing environmental reports would remain unchanged.

Accordingly, the proposed amendments are considered to be non-material and thus capable of being accepted under the NMA planning route.

I trust the contents of this letter are clear. If you have any queries regarding this submission, please do not hesitate to contact the undersigned.

Yours faithfully,



Enclosure A - Site Layout Comparison



