
IMPERIAL PARK 132kV GIS SUBSTATION

LANDSCAPE AND VISUAL APPRAISAL RESPONSE TO LPA COMMENTS



Prepared for SSE Energy Solutions
November 2025

CONTENTS

1.0 Introduction3

2.0 Response to Officer Comments4

3.0 Appendix I8

I.0 INTRODUCTION

- I.1 RHLA Ltd were instructed by DWD, on behalf of SSE Energy Solutions, to review the proposals for a 132kV Gas Insulated Switchgear ('GIS') substation and associated infrastructure ('the Proposed Development') on land adjacent to the existing National Grid Imperial Park 400kV Substation ('the Site').
- I.2 This review was undertaken via a Landscape and Visual Appraisal (LVA), which was reviewed by Landscape Officers in October 2025. The purpose of this note is to respond to the three comments from the Landscape Officers' review of the LVA.

2.0 RESPONSE TO OFFICER COMMENTS

- 2.1 The Officer Comments are included in **Appendix I**. The following section sets out each of the three comments in bold text, followed by a response.

1. The negative impacts should be adequately acknowledged

- 2.2 The Applicant acknowledges that the Proposed Development would result in a range of adverse landscape and visual effects. This is demonstrated by the conclusions summarised in Tables 9-1 and 9-2 of the LVA.
- 2.3 Whilst adverse landscape effects are predicted, the Proposed Development is situated in an area of existing electrical infrastructure, including taller pylons, which already demarcate an electrical infrastructure character and perception of taller vertical features on the skyline. A minor adverse effect is predicted for the Wentlooge Levels Special Landscape Area due to the increase in built development and perception of the GIS building; however, this would reduce to negligible adverse in summer conditions, due to the reduced perception of the Proposed Development. All these tiers of landscape effects are of lesser importance, i.e. they are considered not to be significant.
- 2.4 Whilst adverse visual effects are predicted, the tiers of visual effects are low across the winter and summer phases of the Proposed Development. This is mainly due to the Proposed Development being seen in the context of notable electrical infrastructure via the Substation and pylons, such that the composition of views is already demarcated by vertical features. The main focus of adverse visual effects are for recreational users to the immediate south of the Site, on the Percoed Reen cycleway and Green Lane, from which the southern façade of the GIS building would be visible, including activity on the loading platform (when in use).
- 2.5 The conclusion in LVA paragraph 11.28 does not refer to beneficial landscape and visual effects. The conclusion is referring to the design mitigation, which is considered a positive response to Policy SP8: Special Landscape Areas, via the brick building enclosing the GIS equipment, given the operational constraints of infrastructure use. These design measures mitigate the potential landscape and visual effects, thereby demonstrating a positive response to policy. Whilst there is a difference of opinion between the likely visual effects of the Proposed Development between the review and the LVA, none of the effects are predicted to be of the highest tier 'major'.

2. The future management of existing tree groups as mitigation should be included where this falls within the blue line boundary.

- 2.6 With reference to the following extract of the Site Location Plan, the blue line covers land to the north-east of the Site, prior to the National Grid 400kV Substation. There is no vegetation within this blue line.
-

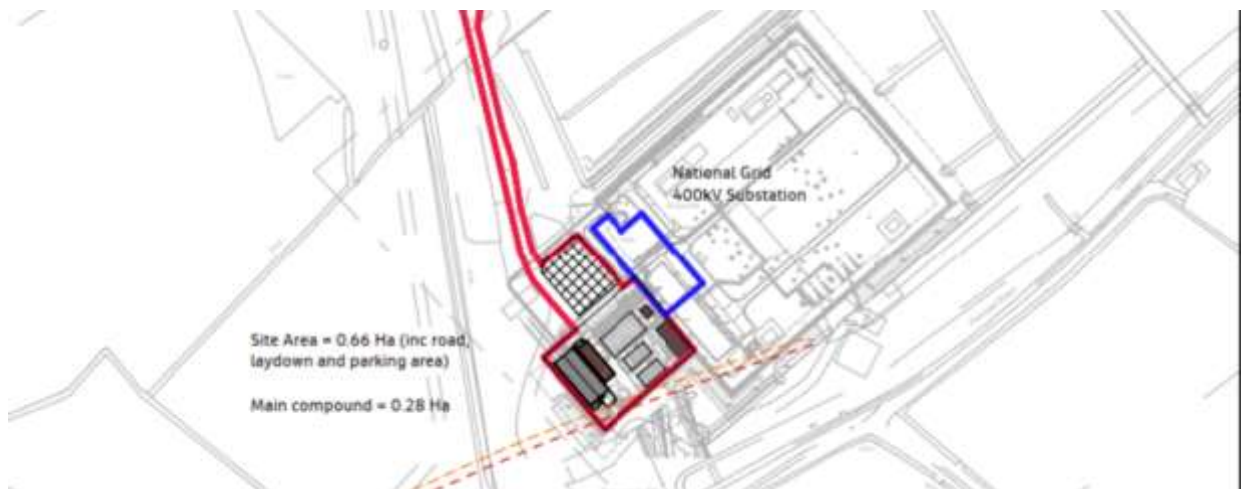


Image 2-1: Extract of the Site Context Plan.

- 2.7 However, with reference to the following extract of the RPS Tree Survey, there is vegetation to the south of the Site, extending to the southern edge of the Green Lane.

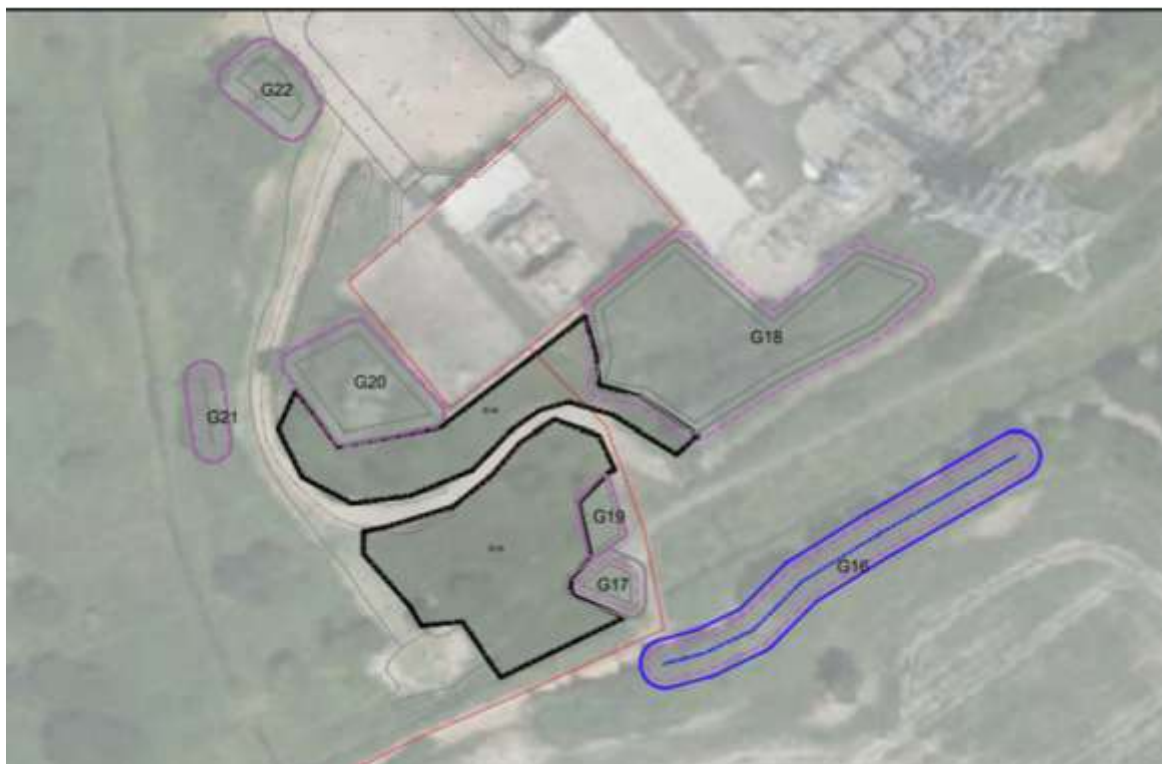


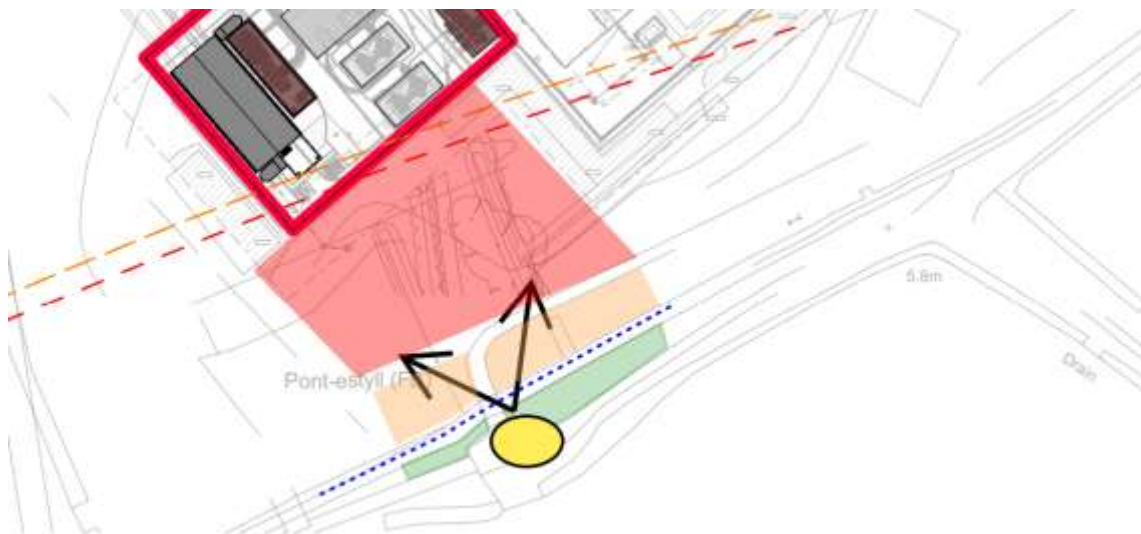
Image 2-2: Extract of the RPS Tree Survey illustrating existing tree groups.

- 2.8 This vegetation is understood to be within land owned by Newport City Council (NCC). The Applicant is prepared to enter into a Section 106 agreement with NCC to facilitate the management of these tree groups identified in the Tree Survey between the Site and the Green Lane.
-

-
- 2.9 The management would be based upon ensuring continued vegetation and tree coverage within these areas for visual screening and functional value, along with enabling the future succession of young trees to grow taller in height.
- 2.10 Whilst this area is within the constraints of the pylon line and swing zones of the pylon wires, given there is existing vegetation present, it is considered that by ensuring its retention and increasing its overall height, in time, this would reduce views from the immediate south of the Site, along the Percoed Reen and Green Lane.
- 2.11 The mechanism for the management would be via a combination of yearly inspections and management guidance for contractors, controlled by a Vegetation Management Plan (VMP). The VMP could be conditioned as part of the planning approval.

3. Any opportunities for planting within a blue line boundary (outside the constraints) should be identified.

- 2.12 With reference to the following sketch, the intervening land between the Green Lane and the Percoed Reen cycleway has been reviewed in respect of potential additional planting in respect of views from the Green Lane (illustrated by the yellow dot),



- 2.13 As noted above, with the red hatch and yellow hatch areas under the pylons and within the swing safety zones, it is proposed to undertake the management of these areas via a Section 106 agreement, with NCC (as the landowner for the coloured areas), rather than implement new planting.
- 2.14 A new low height/scrub planting is proposed in the green hatch, adjacent to Green Lane. Whilst it would enclose the path once established, it would reduce the visibility of the proposed building from along the lane. The operational constraints of the swing-zone would require the vegetation to be managed at around 2m in height. The proposed species would mirror those in the surrounding landscape, e.g. *Rosa canina*, *Salix fragilis*, *Salix caprea*, *Crataegus monogyna* and *Alnus glutinosa*.
-

-
- 2.15 The landscape management of this new planting would be covered by the VMS and the planting plan could form part of the landscape conditions.
- 2.16 In summary, it is considered that with the proposed management and new planting in land to the south of the Site, the visual effects from the Green Lane (Viewpoint 13) can be mitigated. The new planting and management of the existing vegetation would be delivered by the Applicant entering into a Section 106 agreement with Newport City Council. The details of this and the proposed planting and management can be covered by conditions, if found to be acceptable by Landscape Officers.
-

3.0 APPENDIX I

APPLICATION NUMBER: RECON 25/0520

PROPOSAL: THE CONSTRUCTION AND OPERATION OF A 132KV GIS SUBSTATION, INCLUDING SUBSTATION BUILDING, ASSOCIATED INFRASTRUCTURE AND WORKS

SITE: Land Adjacent To Electric Substation Celtic Way Celtic Lakes

APPLICATION TYPE: Full

Note that my recommendation in July 2025 was for the proposals to be reviewed by a professional landscape architect rather than submission of a 'Landscape and Visual Appraisal'. The submitted LVA is useful in showing the impact that the proposed [27m in length x 19m high] red brick building would have on localized views, below is viewpoint 13 from Green Lane.



The focus of visual amenity impact will be on users of Green Lane (refer viewpoints 12 and 13) and Percoed Reen (refer viewpoints 5-9). In my view the impact has been underplayed:

- The impact is likely to be more than 'negligible adverse' (winter) and 'neutral' (summer) and more likely to be 'Moderate' in winter possibly reducing to 'Moderate-Minor' in summer.
- The following Conclusion para 11.28 suggests the proposal will have a beneficial rather than adverse impact 'The Proposed Development would contribute positively in respect of introducing new electrical infrastructure in a manner which mitigates the potential landscape and visual effects, thereby responding positively to the policy requirements.'

Para 10.1 of the LVA and the image provided in 10.1 outline constraints to new planting which is accepted. The very tightly drawn red line boundary precludes opportunities for mitigation and enhancement planting, however it is still not clear whether there are locations within a wider blue line boundary outside the constraints that might be suitable.

There is no commentary on the future management of tree groups shown in the Tree Survey extract below and how this would contribute to visual amenity mitigation.



Whilst the LVA is useful, I would advise the following aspects are reviewed:

1. The negative impacts should be adequately acknowledged.
2. The future management of existing tree groups as mitigation should be included where this falls within the blue line boundary.
3. Any opportunities for planting within a blue line boundary (outside the constraints) should be identified.

Gill Mackley CMLI Mackley Davies Associates Ltd for Streetscene and City Services October 2025