

Arboricultural Consultation Response

Application: 25/0520

Proposal: Construction and operation of a 132kV GIS substation, substation building, associated infrastructure and works.

Site: Land Adjacent to Electric Substation, Celtic Way, Celtic Lakes, Newport, South Wales.

Date: 3rd March 2026

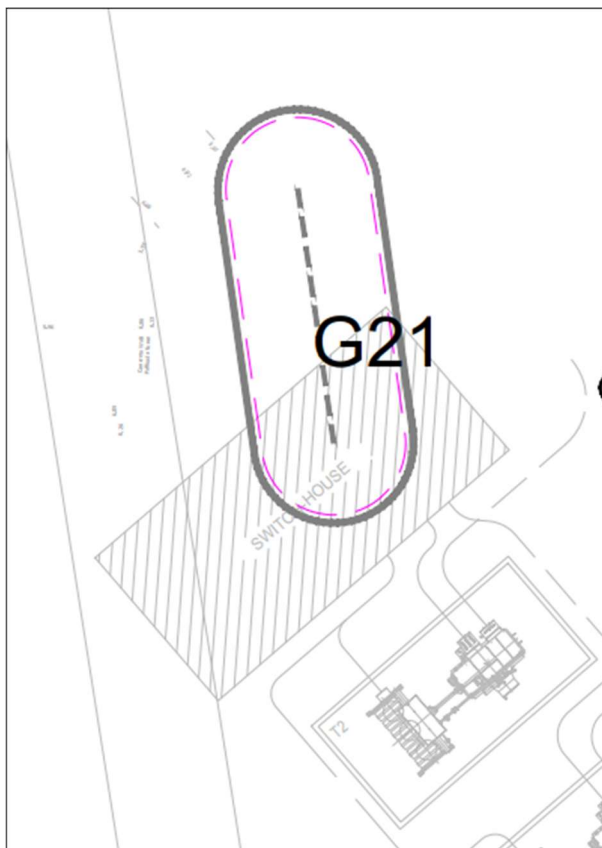
Arboricultural Comments

Having reviewed the *Arboricultural Implications Assessment (AIA) Rev. 2, September 2025*, together with the *Tree Protection Plan (TPP) June 2025 Revision P02*, the submitted documents are incomplete. For these reasons, **arboricultural objections must remain in place** until the issues outlined below are addressed.

1. Conflicting Information on Tree Removal

Section 5.11 – Tree Removals

Section 5.11 of the AIA states that *no trees are to be removed to facilitate the development*. However, the proposed 'switch house' shown on the 'June 2025 TPP' clearly shows significant encroachment into G21 (Category C), refer to plan excerpt below:-



These discrepancies must be resolved. Either:

- the AIA must be updated to reflect the removal of G21
or
- the design layout must be revised to align with the AIA and avoid G21 and be reflected within the TPP.

If group G21 is indeed to be removed, the following must be addressed:

1. **Justification** must be provided for why removal is unavoidable.
2. **Consideration of alternatives** is required, including repositioning of the proposed substation to avoid intrusion into Group G21.

If tree removals are accepted, a **minimum replacement planting ratio of 1:3** must be applied.

2. Works Within Root Protection Areas (RPAs)

Section 4.14 – Underground Services

Section 4.14 requires correction. Where installation of underground services within the RPA is unavoidable, the work must comply with **BS 5837:2012, Section 7.7**, which supersedes NJUG guidance for the purposes of planning. This correction must be made within the AIA.

Section 5.14 – RPA Impacts Not Identified

Section 5.14 fails to identify whether the proposed scheme requires works within RPAs. This omission is significant because:

- The scheme description refers to a **cable route running between trees adjacent to the road**, and further along a **Public Right of Way (PRoW)**.

These elements **must** be shown on an updated TPP, with all trees within **15m on either side** of the cable route plotted and assessed.

Currently, the AIA only includes a generic comment on underground services (4.14), which is insufficient.

A detailed assessment is required of all construction and installation activities that may affect RPAs.

3. Tree Protection Plan (TPP) June 2025 Rev P02

The premise of using the **new site boundary fencing** as Tree Protection Fencing is acceptable **in principle**, subject to the following:

- The fencing must be **erected prior to any work commencing**, including preparatory groundwork.
- The TPP must be updated to show the correct sequencing and ensure compliance with BS 5837.

- The current TPP Rev 02 does not show tree protection fencing or identify areas where works occur within or near root protection areas requiring arboricultural supervision. These omissions must be addressed in an updated revision.

A revised TPP must be submitted alongside the corrected **AIA Rev. 2**.

4. Arboricultural Method Statement (AMS)

Once the above issues are resolved, a full **Arboricultural Method Statement** will be required.

The AMS must:

- Assess all impacts arising from construction and service installation.
 - Include detailed methodologies for any work proposed within RPAs.
 - Set out measures to prevent, minimise or mitigate harm to retained trees.
 - Identify whether redesign is required to safeguard arboricultural constraints.
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Conclusion

Due to inconsistencies between the AIA and TPP, lack of clarity regarding proposed tree removals, absence of detailed assessment of the cable route, and insufficient information on works affecting RPAs, the arboricultural documentation is incomplete.

Arboricultural objections are therefore maintained until the applicant submits:

1. A corrected **Arboricultural Implications Assessment (Rev. 2)**.
2. An updated **Tree Protection Plan (Rev P03)**.
3. A subsequent **Arboricultural Method Statement**, once the above omissions have been addressed.

Vaughan Lewis – Director. Tec.Arbor.A. MArborA.
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