

25/1071 Imperial Park Cable Route – Response to Ecology Comments

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1 Background

1.1 This note serves as a response to ecology comments made by Matthew Harris, Ecology Officer at Newport City Council in relation to planning application 25/1071. The response has been prepared by Tetra Tech RPS on behalf of SSE.

1.2 Matthew Harris' comments made to Grant Hawkins (dated 2nd February 2026) are set out in bold, with a response to the comments provided below.

2 Ecology Comments

Scrub Clearance Rationale

2.1 The proposal entails clearance of scrub and construction of a trench along the western edge of the current highway. Firstly, I would ask what options have been explored for the cable route in this location? In accordance with the stepwise approach to ecosystem resilience, section 6.4.15 states that 'The first priority for planning authorities is to avoid damage to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning. Where there may be harmful environmental effects, planning authorities will need to be satisfied that any reasonable alternative sites (including alternative siting and design options) that would result in less harm, no harm or benefit have been fully considered.' Do we have a rationale for why the cable route is set to the west of the highway and not further east where it would have less impact upon the scrub along the western edge?

The Imperial Park Cable Route scheme has been the subject of site optioneering and selection since early 2025 as set out in Section 5 of the Preliminary Ecological Appraisal (PEA)¹. The scheme's current design has sought avoidance and minimisation as per the stepwise approach (avoid, minimise, mitigate, restore, compensate). A 'direct route' between the 400kv National Grid substation and Microsoft's proposed datacentre was initially proposed in early 2025. This direct route extended north west from the existing substation to the proposed Microsoft datacentre. It was advised from an early stage to explore an alternative route to avoid the need to reopen and create new trenches through semi-natural vegetation (scrub, waterbodies / ditches, neutral and regenerating grassland) that would lead to the disturbance, fragmentation and isolation of habitats. As part of the optioneering process, an alternative route was proposed whereby the cable was to be sited within the unused highway south of the proposed Microsoft data centre. It was advised that the alternative route should be sought given that it would be sited within largely disturbed and artificial features, including habitats in unfavourable condition. Following the decision to progress the alternative option, HDD was recommended to avoid impact on the Gwent Levels SSSI features and associated land take of semi-natural habitat (i.e. grassland, reedbed, ditches and reens).

¹ Tetra Tech RPS (2025) Imperial Park Cable Route. Preliminary Ecological Appraisal.

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- Further, adequate buffers were embedded into the layout to ensure indirect impacts on the ditch features of the Gwent Levels could be avoided.
- 2.2 Whilst initial optioneering of the alternative route included a more central position within the existing highway, the current alignment has been sited along the edge of the highway at the request of the Welsh Government. The land within the existing highway has been earmarked for future development, and so the Imperial Park cable route design has been adjusted to minimise the risk of future utility clashes and impacts on future operations.
- 2.3 Alongside the site selection, avoidance and minimisation measures that have been designed into the scheme as far as is reasonably practicable, proposed mitigation, restoration and compensation have been designed to satisfy the stepwise approach fully and avoid residual adverse effects. The proposed mitigation, restoration, compensation and enhancement have been outlined with the aim of delivering a more resilient ecosystem, and ultimately a net benefit for biodiversity.

Tree Root Protection Areas

- it is unclear whether the existing cabling route would impact on the trees or the root protection areas of the trees along the western edge of the highway. If our Tree Team advise that impacts upon the trees planted as a shelterbelt along this route are likely, then the planned ecological mitigation in respect of dormice, bats and nesting birds may need to be amended to take account of additional tree loss.**
- 2.4 From an ecology perspective it is our understanding that the current easement associated with the cable route trenching would be restricted to the clearance of the bramble dominated scrub and low growing shrubs along the woodland edge (only), with the larger mature broadleaved trees that are set further into the woodland to be retained. It is our understanding that no mature trees would be lost or directly impacted as part of the cable route. It should be noted that the arboriculture report² was not based on topographical data and the stem line of the tree group was estimated based on aerial imagery. The drawing has therefore been prepared conservatively.
- 2.5 Whilst it is understood that trees would not be removed as part of construction, it is acknowledged that tree root protection areas (RPAs), specifically those towards the north western end of the tree group (specifically G11) could be encroached by trenching activities. Though, as the stratum below the scrub includes made ground, it is less likely that roots would be present along the entire edge. Nevertheless, as proposed within the arboriculture report, measures set out within an Arboricultural Method Statement (AMS) would reduce the potential impacts of RPA encroachment, if implemented during construction. The AMS would also ensure the necessary measures are implemented to safeguard mature trees, with recommended measures for avoiding activities that would otherwise lead to deterioration of tree health.
- 2.6 Whilst it is anticipated that loss of mature trees would be avoided, there is flexibility as part of the proposed dormouse compensation identified within the Dormouse Conservation Strategy³ for tree planting. Should the planted shelter belt trees referenced in Matthew Harris' response comprise low growing shrubs, the proposed replanted scrub edge could be managed accordingly so that selected shrubs planted within the scrub become mature broadleaved trees in the long-term.

Cables above Nant y Mor Reen

Section 4.1.3 of the PEA states that 'To avoid direct impacts, it is recommended that the cable trench above the culvert (of the Nant y Mor Reen) should be shallower, with cables laid laterally rather than stacked'. I do not see that this is the case on the Imperial Park Cable Layout and Section Plan - 0596-BPS-XX-XX-DR-CBL-2001-S2-P03, as the nearest

² Tetra Tech RPS (2025) Imperial Park Cable Route. Arboricultural Impact Assessment.

³ Tetra Tech RPS (2025) Imperial Park Cable Route. Dormouse Conservation Strategy.

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cross sections show the cables to be stacked. Therefore the recommendation in PEA section 4.1.3 should be reflected in the plans for the site.

- 2.7 From discussions with the SSE and SSE's engineering design team, it is understood that the design of the cable route would be amended to avoid impacts on the Nant y Mor Reen, with cable layout amended accordingly.

Hazel Planting

Section 5.2.2 refers to the planting of hazel scrub in compensation for loss of scrub habitat. I would prefer to see a mixture of woodland edge or understorey species included in a mixed planting scheme, rather than a monoculture of hazel. Either way, the Applicant should provide assurance that this planting is compatible with any long-term aspirations that our Highways Team have for this road. For example, if the highway is brought back into use for the Celtic Lakes development, then will it be acceptable to have hazel and other woody vegetation planted right up to the edge of the kerb? If not, the strategy for compensation and enhancement will need to be amended.

- 2.8 Given that hazel is far less abundant within the wider Imperial Park landscape, the proposal for a hazel dominated edge was to improve structural diversity along what is currently a relatively homogenous bramble monoculture (with non-native and invasive non-native species). Additionally, the aims of the hazel scrub proposal was to introduce additional foraging resource beyond bramble fruiting and benefit hazel dormouse foraging (given that bramble is likely to recolonise naturally). Nevertheless, if a mixture of native broadleaved species is preferred (as well as hazel), then this could be included within a planting palette as part of a detailed strategy, conditioned as part of successful planning consent.

Scrub Planting within HDD Areas

In their response of 20th January, NRW have advised in relation to the SSSI that

‘Some areas proposed for planting within the SSSI fall within marshy grassland and neutral grassland (as highlighted in figure 3 in the PEA). The shrill carder bee, a feature of the Gwent Levels SSSIs, has been recorded in these areas. We therefore advise that planting hazel within these habitats is avoided.’ I support the principle that compensatory planting for loss of scrub should not take place on existing grassland habitats. However, looking at the PEA and the figures submitted I cannot see any indication, including on Figures 3 and 4.3, that hazel planting is proposed for any grassland area. In my view, all compensatory planting is planned for areas where existing scrub habitats need to be cleared. Therefore I accept the mitigation measures that are proposed in relation to the Gwent Levels SSSI.

- 2.9 To re-affirm Matthew Harris' comment, scrub planting will be restricted to areas of former scrub (in unfavourable condition) cleared as part of the HDD works. No neutral or marshy grassland would be lost as part of the cable route. If NRW feel that temporarily impacted land should be managed and restored to grassland rather than reinstated as scrub, then this would need to be confirmed by NRW and agreed to by Newport City Council.
- 2.10 Our latest proposals (as set out in the Dormouse Conservation Strategy) refer to the planting of hawthorn, blackthorn and willow as part of reinstatement proposals. Hazel no longer forms part of planting within HDD pits.

Clearance During the Breeding Period (hazel dormouse and breeding birds)

NRW have also acknowledged that a Dormouse Conservation Strategy has been prepared for this site. We should be assured that at least the principles of this strategy are

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acceptable to NRW before granting consent. One of the recommendations in this strategy is that vegetation is cleared between May and September, during the dormouse active season. However this also coincides with the main breeding season for dormice, so a nest with juveniles may well be encountered. Similarly, the clearance is scheduled to take place during the bird nesting season, and the PEA advises that site clearance should take place outside the late February to August nesting period. Whilst I accept that the exact clearance and construction timetable is not yet known, there is currently a conflict in the proposed timing of clearance to avoid harm to either dormice or nesting birds.

A better solution would be to clear above-ground vegetation in winter, when birds are not nesting and when dormice are hibernating at ground level, and then clear roots and stumps in spring when dormice have awoken from hibernation and made their way to retained vegetation nearby. This would reduce likelihood of encountering either nesting birds or breeding dormice which could lead to substantial delays in the construction schedule.

- 2.11 The PEA was prepared at a time when construction timescales were largely uncertain (as Matthew Harris acknowledges at the end of the first paragraph in the comment above). On that basis, the PEA provided recommendations and advisory to SSE on the best course of action, where feasible. The Dormouse Conservation Strategy was prepared following confirmation of timescales for construction from SSE and was prepared on that basis, with targeted measures within the breeding season. The targeted measures were aimed at reducing impacts on breeding hazel dormouse as far as reasonably practicable.
- 2.12 NRW have since commented on the planning application (correspondence dated 12th February) stating *'we advise that either two-stage clearance is undertaken (vegetation is cut down during hibernation season, then grubbed up in May); or single-stage clearance under strict ecological supervision is undertaken in May or September'*. A single stage approach before the end of May would therefore be implemented as part of approved licensed works following successful planning consent, which is broadly in line with methods set out in the Dormouse Conservation Strategy.
- 2.13 It is acknowledged that clearance activities within the breeding season for hazel dormouse could also lead to potential impacts on nesting birds. The necessary precautionary measures will be implemented where a nest site is recorded within clearance or associated works areas. Suitable buffers, exclusion zones and the necessary avoidance measures will be referenced in a Precautionary Method of Works document that would sit within or alongside a CEMP (the latter is anticipated to be secured as part of a planning condition). The precautionary measures will accord with the measures set out within a hazel dormouse licensed method statement. It is expected that all measures designed and included within the necessary conditioned document / plan would be discussed and agreed to by Matthew Harris.

Friends of Road to Nature

As NRW have highlighted, section 5.2.9 of the PEA states that final biodiversity enhancement measures must be agreed and discussed with the local planning authority's ecologist and set out in a detailed Biodiversity Strategy (or Landscape and Ecological Management Plan (LEMP)) and that long term implementation will be secured as a condition of successful planning consent. NRW agree with this approach and advise that this is secured via a condition. In commenting on a LEMP or Biodiversity Strategy, particularly where it relates to land owned by NCC outside the SSSI, I would take advice from the Friends of Road to Nature (FoRTN) group, who have actively been managing habitats in this area. Looking at the PAC Report submitted with this application, it does not appear that the Friends of Road To Nature were consulted on the PAC, nor that adjoining landowners/occupiers, members of the general public, Coedkernew Community Council, and the relevant Councillors for Tredegar Park and Marshfield, responded to the PAC during the consultation period. Therefore in the absence of a Local Nature Recovery Action Plan for Newport, I will take into account any advice or opinions of the local community, including FoRTN, on the LEMP.

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- 2.14 It is agreed that final habitat creation, restoration and enhancement measures (including management) at the appropriate locations should be agreed and discussed with members of the Friends of the Road to Nature.

Yours sincerely,



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