



Planning Statement



Client Name: National Grid Electricity Distribution Ltd

Site Address: Land at Alexandra Docks, Newport

Date: 5th May 2026



Document Control

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CONTENTS

1.0	INTRODUCTION	1
1.1	Background	1
1.2	Purpose	1
1.3	Statement Structure.....	2
2.0	THE SITE AND ITS SURROUNDINGS	4
2.1	Site Location	4
2.2	Site Description	4
3.0	THE PROPOSED WORKS	7
3.1	Need for NGED's Proposed 33/11kV Substation.....	7
3.2	The Proposed 33/11kV Substation.....	8
3.3	Drainage	10
3.4	Construction	10
3.5	Site Environmental Management	10
3.6	Operation and Maintenance	10
4.0	PRE-APPLICATION ENGAGEMENT	12
4.1	Pre-application Engagement with Newport City Council.....	12
5.0	PLANNING POLICY CONTEXT.....	14
5.1	Introduction	14
5.2	Future Wales: The National Plan 2040 (February 2021)	14
5.3	Newport Local Development Plan 2011-2026.....	16
5.4	Planning Policy Wales Edition 12 (February 2024).....	18
5.5	Technical Advice Notes	22
5.6	The Cardiff Capital Region Energy Strategy (2021).....	22
5.7	Newport City Council's Local Area Energy Plan (2022).....	22
5.8	Replacement Local Development Plan 2021-2036	23
6.0	PLANNING ASSESSMENT	25
6.1	Introduction	25
6.2	Principle of Development	25
6.3	Visual Impact	28
6.4	Green Infrastructure and Ecology	29
6.5	Flooding.....	31
6.6	Arboriculture	32
6.7	Archaeology.....	32
6.8	Traffic and Transport	33
7.0	CONCLUSION.....	36



SECTION 1 INTRODUCTION



1.0 INTRODUCTION

1.1 Background

- 1.1.1 This Planning Statement has been prepared by CarneySweeney on behalf of the applicant, National Grid Electricity Distribution Ltd (hereafter referred to as NGED), for the demolition of existing buildings and structures and the construction of a 33/11kV electricity substation compound. The proposal includes a switch room building, associated electrical equipment, access arrangements, drainage infrastructure, storage yard and other engineering works on land at Alexandra Docks, Newport.
- 1.1.2 The electricity distribution network is undergoing a fundamental transformation as patterns of demand and generation evolve. NGED is experiencing a rapid increase in connection requests associated with small-scale renewable energy (wind and solar), alongside the electrification of heat (heat pumps) and transport (electric vehicles). National electricity demand is expected to double by 2050, placing increased importance on a resilient and future-proof distribution network. The proposed substation will help meet existing and future electricity demand in the network serving Newport and the surrounding area.

1.2 Purpose

- 1.2.1 This Planning Statement has been prepared to support the application and focuses on the general planning policy issues associated with the application proposals. It is intended to assist the Local Planning Authority in its determination of the application and has been prepared in accordance with the requirements set out in Future Wales: The National Plan 2040 and Planning Policy Wales (Edition 12).
- 1.2.2 This Planning Statement is not a standalone document and should be read in conjunction with all other elements of the application which include:
- Application Drawings
 - Green Infrastructure Statement
 - Flood Consequences Assessment
 - Preliminary Ecological Appraisal
 - Preliminary Roost Assessment
 - Ground Investigation Report
 - Shadow Habitat Regulations Assessment
 - Topographical Survey
 - Arboricultural Report
 - Archaeological Desk Based Assessment
 - Drainage Statement
 - Construction Environmental Management Plan
 - Construction Traffic Management Plan



1.3 Statement Structure

1.3.1 The remainder of the report is structured as follows:

- Section 2 provides a description of the site and the surroundings.
- Section 3 sets out the need for the proposals and the application proposals.
- Section 4 provides a summary of the pre-application response.
- Section 5 sets out the relevant development plan policies.
- Section 6 provides an assessment of the proposed development.
- Section 7 presents our overall conclusions.





SECTION 2 THE SITE AND ITS SURROUNDINGS



2.0 THE SITE AND ITS SURROUNDINGS

2.1 Site Location

- 2.1.1 The application site is located within the Port of Newport, which is owed and operated by Associated British Ports (ABP). The site lies at the junction of East Way Road and Alexandra Docks Road approximately 2km south of Newport City Centre and is centred on grid reference E:331624, N:185825. See Figure 2.1.



Figure 2.1: Application Site

2.2 Site Description

- 2.2.1 The application site is accessed directly from Alexandra Docks Road which runs parallel to the site's western border and wraps around the site at its southern extent. East Way Road provides access directly from and onto the A48, Usk Way (Southern Distributor Road).
- 2.2.2 The application site extends to approximately 0.3 hectares and is occupied by three stand-alone container units, a corrugated shed, a demountable office, a single permanent building and an existing substation with transformers inside. The site is surrounded by a mesh fence approximately 1.8m in height. See Figure 2.2.



Figure 2.2: Application Site

- 2.2.3 The site's surroundings are predominantly industrial in character with industrial units adjoining the site immediately to the north and south. To the west is the 'North Dock' water body at Alexandra Docks. Further east is the River Usk.
- 2.2.4 The nearest residential properties are located approximately 400m north of the site, above the A48.
- 2.2.5 The topography of the site is relatively flat from 9.33 m AOD to 8.85 m AOD.
- 2.2.6 The site is shown to be within a Flood Zone 3 area in terms of rivers and sea, albeit there are no records of this having occurred to date.
- 2.2.7 The site is not subject to any statutory ecological, historical or landscape designations and no public rights of way cross the site.



SECTION 3 THE PROPOSED WORKS



3.0 THE PROPOSED WORKS

3.1 Need for NGED's Proposed 33/11kV Substation

- 3.1.1 NGED is the local distribution network operator for Midlands, South and West Wales. Operating as a separate legal entity within the National Grid Group, NGED receives electricity from the high-voltage transmission network operated by National Grid Electricity Transmission (NGET) and distributes it through the lower-voltage network to homes and businesses. NGED has a statutory obligation to connect both electricity demand and generation customers while maintaining a reliable and resilient power supply.
- 3.1.2 Substations play a critical role in the UK's transmission and distribution systems. They regulate power flows and voltages and provide the connection points for electricity generation and demand.
- 3.1.3 The distribution network is undergoing significant change as patterns of demand and generation evolve. NGED is experiencing a rapid growth in connection requests linked to small-scale renewable generation (such as wind and solar), the electrification of heat (heat pumps), and the transition to electric vehicles. National electricity demand is expected to double by 2050, increasing the need for a robust and adaptable distribution network.
- 3.1.4 To respond to these pressures, NGED are developing plans to build a new 33/11kV primary substation on land at Newport Docks. The proposed substation will help provide additional capacity on the network for generic load growth (i.e., it is not related to any individual customer).
- 3.1.5 The City of Newport is currently supplied by three 132/11kV Bulk Supply Point (BSP) substations at Newport South, Newport East and Newport West which together supply in the region of 47,500 customers.
- Newport West BSP has a firm capacity of 30MVA and is located off the Southern Distributor Road adjacent to Newport Recycling Centre (Grid Ref: 330457,185827).
 - Newport East BSP has a firm capacity of 40MVA and is located off Corporation Road adjacent to the Newport Bus Depot (Grid Ref: 331901,188036).
 - Newport South BSP has a firm capacity of 30MVA and is located at the junction of Corporation Road and Traston Road (Grid Ref: 332948,185709).
- 3.1.6 The location of these existing substations is shown in Figure 3.1 below.



Figure 3.1: Location of Existing NGED Substations

- 3.1.7 There is currently minimal demand headroom available at the existing BSP substations, with the majority of remaining capacity already allocated to contracted demand and committed developments. This limits the ability of the network to accommodate further growth.
- 3.1.8 Electrical demand across Newport is expected to increase in the coming years, driven largely by the UK Government's 2050 net zero target. This target will accelerate the uptake of low-carbon technologies such as electric vehicles, heat pumps, and hydrogen production. Newport City Council's Local Area Energy Plan (LAEP), published in March 2022 following the Council's declaration of an Ecological and Climate Emergency in November 2021, reinforces this outlook. As part of that declaration, the Council committed to developing a plan to transform how the city consumes and generates energy.
- 3.1.9 To accommodate this anticipated demand growth across Newport - and to prevent the distribution network from becoming a barrier to the connection of low-carbon technologies - it is necessary to establish a new 33/11kV Primary Substation.

3.2 The Proposed 33/11kV Substation

- 3.2.1 This application seeks full planning permission for the demolition of existing buildings and structures and the construction of a new 33/11kV electricity substation compound. The proposal includes a switch room building, associated electrical equipment, access arrangements, drainage infrastructure and other engineering works.



- 3.2.2 The substation compound comprises two main areas. The primary compound, located on the eastern part of the site, will measure approximately 47m by 28m and will contain a switch room building (measuring 21m by 6m and 5.4m in height) along with associated electrical equipment.
- 3.2.3 The western part of the site will provide an external storage area for general electrical plant and equipment. The entire compound will be enclosed by a 2.4m-high palisade fence, with two separate access points serving the main compound and the storage area from the internal port road network.

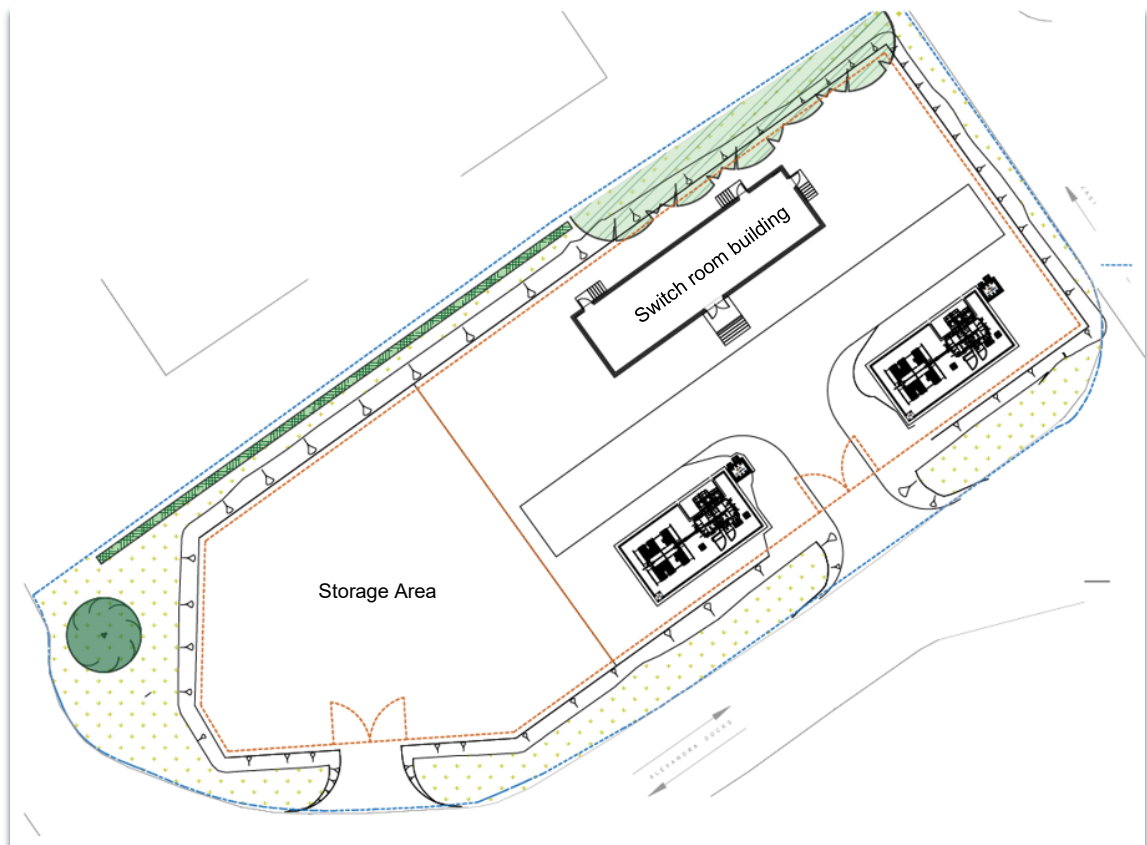


Figure 3.2: Proposed Site Layout

- 3.2.4 The ground levels on site are proposed to be raised and levelled to achieve a ground level of 9.4m AOD. This will ensure all site and electrical infrastructure is raised above the relevant flood level, as detailed further in the supporting Flood Consequence Assessment.
- 3.2.5 An existing tree and some boundary vegetation will be retained with the introduction of further planting providing habitat protection and enhancement. This will include the retention and enhancement of areas resulting from scrub removal at the western end of the compound to accommodate construction and visibility splays. 47m of native hedgerow planting is proposed along the northern boundary. All non-hardstanding areas will be seeded with a locally appropriate, species-rich mix.



3.3 Drainage

- 3.3.1 A Drainage Statement, prepared by Burroughs, is submitted as part of the planning application. It sets out that NGET's proposals include a combined sustainable drainage system (SuDS) that is designed to control runoff rates and provide water quality treatment.
- 3.3.2 The SuDS strategy utilises a Type 3 permeable stone build-up, which provides temporary storage within the granular sub-base and initial filtration of runoff. Surface water will be collected via carrier pipes and conveyed through a Class 1 full retention oil interceptor to remove hydrocarbons associated with substation infrastructure. Flows will then discharge to a below ground attenuation system (e.g. oversized pipes) before being released at a controlled rate via a flow control device to the local surface water drainage network.
- 3.3.3 Regarding foul drainage, any foul flows associated with occasional maintenance visits will be managed via a small welfare unit connected to a sealed foul holding tank. Accordingly, no foul discharge to the public sewer or local drainage network is proposed as part of the development.

3.4 Construction

- 3.4.1 The construction of the proposed substation is planned to be undertaken over a period of approximately 18 months commencing in Q1 2027.
- 3.4.2 A temporary construction compound would be established within the substation compound footprint within the red line boundary, to allow for the safe construction of the substation. The construction site will be securely fenced off during the construction period.

3.5 Site Environmental Management

- 3.5.1 During installation, the appointed Contractor will be required to operate under a detailed site-specific Construction Environmental Management Plan (CEMP). It will, as a minimum, implement the mitigation measures identified within the CEMP which accompanies this application. The CEMP sets out a variety of control measures for managing the potential environmental effects of construction works including control and management of noise, dust, surface water runoff, waste and pollution control and set out responsibilities for the preparation and implementation of the plan.

3.6 Operation and Maintenance

- 3.6.1 The substation would typically be unmanned during day-to-day operation although small welfare/office facilities will be included for maintenance workers who would visit the site periodically. No staff will be based at the substation site.

Maintenance of the substation would be undertaken approximately every three years, involving electrical isolation of equipment before it is worked on. Visual checks would be undertaken on a monthly inspection visit to the site.



SECTION 4 PRE-APPLICATION CONSULTATION



4.0 PRE-APPLICATION ENGAGEMENT

4.1 Pre-application Engagement with Newport City Council

4.1.1 A pre-application enquiry regarding the proposed development was submitted to Newport City Council on 26th June 2025. A formal written pre-application response (Ref. PRELET/PS/25/0088) was provided on 4th November 2025.

4.1.2 The pre-application advice comprised:

- **Principle of development:** The proposed development is considered to be acceptable in principle, subject to the justification of the loss of existing employment land.
- **Design/visual impact:** No concerns were raised with the visual impact or impact upon the character of the area.
- **Highway/Pedestrian Safety:** The Local Highways Authority raised no objection to the proposed development due to its location and likely low trip generation. A Transport Statement should support an application.
- **Flooding/Flood Risk:** The site is within Flood Zone 3 so any application would need a Flood Consequences Assessment. The response raised significant concerns with the siting of essential infrastructure within an area of high risk of flooding. Any application would need to fully justify the location and explain why alternative sites were discounted.
- **Contaminated land:** Concern was raised regarding potential contaminated land impacts particularly during the construction phase due to the previous uses on the site. Any application should be accompanied with surveys demonstrating current land conditions and any mitigation.
- **Ecology:** Due to the proposed demolition works, any application should be supported by bat and bird emergence surveys and a preliminary ecological survey. Details on the demolition and construction would be required to ensure no adverse impact upon the nearby ecological designations. A Green Infrastructure Statement and a shadow Habitats Regulation Assessment was recommended.
- **Drainage:** Sustainable Drainage Approval Body (SAB) will be required prior to work commencement and information detailing the sustainable drainage system to serve the development will be required.



SECTION 5 PLANNING POLICY CONTEXT



5.0 PLANNING POLICY CONTEXT

5.1 Introduction

5.1.1 The following section provides an overview of the relevant policy framework relating to the application proposals. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, this application should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

5.1.2 The development plan for this site comprises:

- Future Wales: The National Plan 2040 (published February 2021)
- Newport City Council Local Development Plan (Adopted January 2015)

5.1.3 In addition to the above, other key 'relevant material considerations' include, in particular, Government policy guidance contained within Planning Policy Wales (PPW) (Edition 12), Technical Advice Notes (TANs) and the Well-Being of Future Generations (Wales) Act 2015.

5.2 Future Wales: The National Plan 2040 (February 2021)

5.2.1 Future Wales: The National Plan 2040 ('Future Wales') is the national development framework for Wales with development plan status. The document sets the direction for development in Wales up to 2040. The Plan acknowledges the impacts of a climate emergency and an ecological emergency and identifies key priorities, risks and opportunities to achieve the sustainable management of natural resources, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of communities.

5.2.2 It is noted that it is vital that we reduce our emissions to protect our own well-being and to demonstrate our global responsibility. Future Wales together with PPW will ensure the planning system focuses on delivering a decarbonised and resilient Wales through the places we create, the energy we generate, the natural resources and materials we use and how we live and travel.

5.2.3 Regarding energy generation, Future Wales identifies that Wales can become a world leader in renewable energy technologies. Wales' wind and tidal resources, potential for solar generation, its support for both large and community scaled projects and commitment to ensuring the planning system provides a strong lead for renewable energy development meaning it is well placed to support the renewable sector, attract new investment, and reduce carbon emissions. Future Wales recognised the need for new strategic grid infrastructure to support the growth of renewable and low carbon electricity generation.



- 5.2.4 **Policy 1: Where Wales will grow** supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:
- Cardiff, **Newport** and the Valleys
 - Swansea Bay and Llanelli
 - Wrexham and Deeside
- 5.2.5 **Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking** requires the growth and regeneration of towns and cities to positively contribute towards creating sustainable places.
- 5.2.6 **Policy 8: Flooding** supports flood risk management that ensures sustainable strategic growth and regeneration in National and Regional Growth Areas. Development must not have adverse impacts on international and national statutory designated sites for nature conservation.
- 5.2.7 **Policy 9: Resilient Ecological Networks and Green Infrastructure** seeks to ensure the enhancement of biodiversity.
- 5.2.8 **Policy 17 - Renewable and Low Carbon Energy and Associated Infrastructure** states the Welsh Government's strong support for the principle of developing renewable and low carbon energy from all technologies and at all scales to meet future energy needs. It states that in determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales' international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency. The policy recognises the importance of the provision of new strategic grid infrastructure in delivering the growth in renewable energy provided that infrastructure is "designed to minimise visual impact on nearby communities". It goes on to state that the Welsh Government is committed to working with stakeholders including National Grid and reduce barriers to the implementation of new grid infrastructure.
- 5.2.9 **Policy 33 - National Growth Area – Cardiff, Newport and the Valleys** explains that the main areas for growth and investment in the South East region are Cardiff, Newport and the Valleys. Planning policy should acknowledge the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure. The Welsh Government supports stronger strategic role for Newport as a hub for sustainable, long-term growth and investment. It will collaborate with regional authorities in Wales and England to promote Newport's importance and ensure major investment decisions support the city's development.



5.3 Newport Local Development Plan 2011-2026

5.3.1 The Newport Local Development Plan (LDP) was adopted by the Council in January 2015. The LDP sets out the spatial vision for the future of Newport and a framework for the distribution and delivery of growth and development. It sets out land-use planning policies and proposals which are used in the determination of planning applications and in guiding future opportunities for investment and growth. It was intended that the LDP would guide development up to 2026.

5.3.2 The adopted LDP Proposals Map shows that the site is located within the urban boundary and developed coastal zone and is a protected employment site (for B1, B2 and B8 uses) under **Policy EM2 Newport Docks**. Policy EM2 reads as follow:

“The existing 206 hectare employment site at Newport Docks is protected for B1, B2 and B8 uses. The council will support such development where it can be demonstrated that the development is complementary to and does not hinder the operational use of the port”.

5.3.3 The supporting text to this policy at paragraph 6.18 advises that there is a surplus of land within Newport Docks which could better meet Newport’s economic development objectives if brought into alternative, productive, employment generating uses within Use Class B1, B2 or B8. It goes on to advise that complementary uses should relate to the primary purpose of the port operation namely bulk handling, warehousing and storage facilities. Complementary uses may also include energy and infrastructure projects.

5.3.4 The following policies are also considered to be of relevance:

5.3.5 **Policy SP1 Sustainability** advises that proposals for development shall make a positive contribution to sustainable development by concentrating development in sustainable locations on brownfield land within settlement. Development will be assessed against their potential contribution to:

1. The efficient use of land;
2. The reuse of previously developed land and empty properties in preference to greenfield sites;
3. Providing integrated transportation systems, as well as encouraging the co-location of housing and other uses, including employment, which together will minimise the overall need to travel, reduce car usage and encourage a modal shift to more sustainable modes of transport;
4. Reducing energy consumption, increasing energy efficiency and the use of low and zero carbon energy sources;
5. The minimisation, re-use and recycling of waste;
6. Minimising the risk of and from flood risk, sea level rise and the impact of climate change;



7. Improving facilities, services and overall social and environmental equality of existing and future communities;
8. Encouraging economic diversification and, in particular, improving the vitality and viability of the city centre and district centres;
9. Conserving, enhancing and linking green infrastructure, protecting and enhancing the built and natural environment;
10. Conserving and ensuring the efficient use of resources such as water and minerals.

5.3.6 **Policy SP3 Flood Risk** explains that development should be located away from areas at risk of flooding and should not increase flood risk elsewhere. Development will only be permitted in flood risk areas in accordance with national guidance. A detailed technical assessment shall be required, where necessary, to show that the development can cope and withstand flood risk.

5.3.7 **Policy SP4 Water Resources** requires development to minimise water consumption, protect water quality during and after construction and cause no net increase in surface water run-off through the sustainable management of water resources.

5.3.8 **Policy SP9 Conservation of the Natural, Historic and Built Environment** requires all development to conserve, enhance and manage recognised site within the natural, historic and built environment.

5.3.9 **Policy SP18 Urban Regeneration** supports development which assists urban regeneration proposals. Criterion iii supports the reuse of vacant, underused or derelict land.

5.3.10 **Policy GP1 General Development Principles – Climate Change** advises that proposals should be designed to withstand the predicted changes in the local climate and manage flood risk effectively, minimise energy use through renewable or low-carbon sources, reuse or recycle on-site materials where possible, and meet relevant sustainability standards.

5.3.11 **Policy GP2 General Development Principles – General Amenity** advises that proposals will be permitted where they do not cause significant adverse effect on local amenity, do not cause detriment to the nearby occupiers or character of the area, the proposal designs out crime/anti-social behaviour, promotes inclusive design, and adequate amenity for future occupiers.

5.3.12 **Policy GP3 General Development Principles – Service Infrastructure** advises that proposals will be permitted where necessary and appropriate service infrastructure either exists or can be found.

5.3.13 **Policy GP5 General Development Principles – Natural Environment** sets out that principles for protecting the natural environment. It allows development only where proposals are designed and managed to protect and enhance biodiversity and ecological connectivity, avoid significant harm to important habitats and species, and include measures to compensate any negative impacts. The policy also requires that developments do not



unacceptably affect water quality, high-quality agricultural land, or landscape quality, and that appropriate landscape schemes are provided to enhance the site and its wider context. Proposals should also include appropriate tree planting or retention where necessary and not cause the loss of trees, woodland or hedgerow that had wildlife or amenity value.

- 5.3.14 **Policy GP6 General Development Principles – Quality of Design** requires good quality design, ensuring a safe, accessible, attractive and convenient environment. Design principles should be considered including site context, access, permeability and layout, preservation and enhancement, scale and form, materials and detailing, and sustainability.
- 5.3.15 **Policy GP7 General Development Principles – Environmental Protection and Public Health** does not permit development which would cause unacceptable harm to health due to land contamination, dust, instability or subsidence, air, heat, noise or light pollution, flooding, water pollution, or any other identified risk to the environment, local amenity or public health and safety.
- 5.3.16 **Policy CE9 Coastal Zone** does not permit development in the coastal area or adjoining the tidal river unless:
- In the undeveloped coastal area such development is required to be on the coast to meet an exceptional need which cannot reasonably be accommodated elsewhere;
 - The area is not itself at risk nor will the proposed development exacerbate risks from erosion, flooding or land stability.
- 5.3.17 Development which must be in a coastal location should be within the developed coastal zone.
- 5.3.18 **Policy EM3 Alternative uses of Employment Land** sets out that development proposals promoting alternative uses on existing employment sites will be resisted unless:
- The site has been marketed unsuccessfully for employment purposes for a minimum of 12 months;
 - There remains a sufficient range and choice of employment land and premises to meet LDP requirements and local demand;
 - The development has no adverse impact on existing or allocated employment sites;
 - The development has no adverse impact on amenity or the environment.

5.4 Planning Policy Wales Edition 12 (February 2024)

- 5.4.1 Planning Policy Wales (PPW), which was revised in February 2024, sets out the land use planning policies of the Welsh Government. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.



5.4.2 Figure 5 of PPW identifies five key planning principles and national sustainable placemaking outcomes as follows:

- Growing our economy in a sustainable manner;
- Making better use of resources;
- Facilitating accessible and healthy environments;
- Creating and sustaining communities; and
- Maximising environmental protection and limiting environmental impact.

5.4.3 Paragraph 2.14 advises that these principles will enable the goals, and five ways of working set out in the Well-being of Future Generations Act to be realised through land use planning. They provide the context and will act as a catalyst for the positive delivery of the planning system across Wales.

5.4.4 Paragraph 2.26 explains the need for planning authorities to take a balanced approach to implement the Wellbeing of Future Generations Act and its Sustainable Development Principle. It states there may be occasions when one benefit of a development proposal outweighs others, and in such cases robust evidence should be presented to support these decisions, whilst seeking to maximise contributions against all the well-being goals. It identifies a long list of key factors to consider in the assessment process. In summary, these include:

- How the proposal would support the achievement of a more prosperous, low carbon, innovative and resource efficient Wales;
- Whether environmental risks are prevented or appropriately managed;
- Whether the causes and impacts of climate change are fully taken into account through location, design, build, operation, decommissioning and restoration; and
- Whether a proposal supports decarbonisation and the transition to a low carbon economy.

5.4.5 Paragraph 3.30 of PPW notes that the Welsh Government declared a climate emergency in 2019, to co-ordinate action nationally and locally to help combat the threats of climate change. It further sets out that the planning system plays a key role in tackling the climate emergency through the decarbonisation of the energy system and the sustainable management of natural resources.

5.4.6 Paragraph 3.33 explains that the planning system plays a significant role in managing the significant risk of climate change to people, property, infrastructure and natural resources. It states *“development allowed today will be around for decades to come. The most important decision the planning system makes is to ensure the right developments are built in the right places”*.

5.4.7 Section 5.7 of PPW12 outlines the context to, and the requirements of, energy projects. Paragraph 5.7.1 sets out that low carbon electricity must become the main source of energy in Wales. Renewable electricity will be used to provide both heating and transport in



addition to power. This paragraph further emphasises that the future energy supply mix will depend on a range of established and emerging low carbon technologies.

- 5.4.8 Paragraph 5.7.2 acknowledges that overall power demand is expected to increase as a result of growing electrification of transport and heat. PPW highlights that to ensure future demand can be met, significant investment will be needed in energy generation, transmission and distribution infrastructure. The system will need to integrate renewable generation with storage and other flexibility services, to minimise the need for new generation and grid system reinforcement.
- 5.4.9 Paragraph 5.7.6 sets out that the planning system should secure an appropriate mix of energy provision, which maximises benefits to our economy and communities whilst minimising potential environmental and social impacts. This forms part of the Welsh Government's aim to secure the strongest economic development policies, to underpin growth and prosperity in Wales, recognising the importance of decarbonisation and the sustainable use of natural resources, both as an economic driver and a commitment to sustainable development.
- 5.4.10 Paragraph 5.7.7 presents that the benefits of renewable and low carbon energy, as part of the overall commitment to tackle the climate emergency and increase energy security, is of paramount importance. The continued extraction of fossil fuels will hinder progress towards achieving overall commitments to tackling climate change.
- 5.4.11 In terms of delivery, Paragraph 5.7.7 advises that the planning system should (inter alia):
- Integrate development with the provision of additional electricity grid network infrastructure;
 - Optimise energy storage;
 - Optimise the location of new developments to allow for efficient use of resources;
 - Maximise renewable and low carbon energy generation;
 - Minimise the carbon impact of other energy generation; and
 - Move away from the extraction of energy minerals, the burning of which is carbon intensive.
- 5.4.12 Section 5.9.19 sets out the key issues in determining applications for renewable and low carbon energy technologies. It states planning authorities should consider:
- The contribution a proposal will make to meeting identified Welsh, UK and European targets;
 - The contribution to cutting greenhouse gas emissions; and
 - The wider environmental, social and economic benefits and opportunities from renewable and low carbon energy development.
- 5.4.13 PPW at paragraph 5.9.20 advises that planning authorities should identify and require suitable ways to avoid, mitigate or compensate adverse impacts of renewable and low



carbon energy development. The construction, operation, decommissioning, remediation and aftercare of proposals should take into account:

- the need to minimise impacts on local communities, such as from noise and air pollution, to safeguard quality of life for existing and future generations;
- the impact on the natural and historic environment;
- cumulative impact;
- the capacity of, and effects on the transportation network;
- grid connection issues where renewable (electricity) energy developments are proposed; and
- the impacts of climate change on the location, design, build and operation of renewable and low carbon energy development. In doing so, consider whether measures to adapt to climate change impacts give rise to additional impacts.

- 5.4.14 Chapter 6 of PPW explains that Green Infrastructure plays a fundamental role in shaping places and our sense of well being, and is intrinsic to the quality of the spaces we live, work and play in. Paragraph 6.2.4 advises that the planning system must maximise its contribution to the protection and provision of green infrastructure assets and networks as part of meeting society's wider social and economic objectives and the needs of local communities. PPW further advises that a green infrastructure statement should be submitted with all planning applications and that this will be proportionate to the scale and nature of the development proposed describing how green infrastructure has been incorporated into the proposal. The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question.
- 5.4.15 Section 6.4 describes biodiversity and ecological networks and provides a summary of the Step-Wise Approach and how it should be used to *"maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then for minimised, mitigated, and as a last resort compensated for."* Paragraph 6.4.12 states *"providing evidence in the Green Infrastructure Statement that the step-wise approach has been followed, a scheme of enhancements must be provided to ensure a net benefit for biodiversity."*
- 5.4.16 In relation to trees, woodland and hedgerows, paragraph 6.4.37 sets out their importance for biodiversity and *"connecting habitats for resilient ecological networks and make an essential wider contribution to landscape character, culture, heritage and sense of place..."*
- 5.4.17 Paragraph 6.4.39 further advises that the planting of new trees, hedgerows, groups of trees and areas of woodland should be promoted as part of new development. Existing trees/ groups of trees, hedgerows and areas of woodland must be protected *"where they have ecological value, contribute to the character or amenity of a particular locality, or perform a beneficial green infrastructure function."*



- 5.4.18 In terms of the protection for Sites of Special Scientific Interest PPW12 advocates a strengthened approach to the protection of SSSIs, with increased clarity on the position for site management and exemptions for minor development necessary to maintain a 'living landscape'. Other development is considered unacceptable as a matter of principle. Exceptionally, a planned approach may be appropriate where necessary safeguards can be secured through a development plan.

5.5 Technical Advice Notes

- 5.5.1 Technical advice notes provide detailed planning advice. Local planning authorities take them into account when they are preparing development plans.
- 5.5.2 The following Technical Advice Notes (TAN) are considered relevant to the proposal:
- TAN 5: Nature Conservation and Planning (2009);
 - TAN 14: Coastal Planning (1998);
 - TAN 15: Flood Risk (2025);
 - TAN 18: Transport (2007); and
 - TAN 23: Economic Development (2014).

5.6 The Cardiff Capital Region Energy Strategy (2021)

- 5.6.1 The Cardiff Capital Region Energy Strategy Plan aims to decarbonise the regional energy system and achieve a net-zero energy system by 2050. It focuses on creating the environment for a transition to a carbon neutral economy and society in the CCR using low carbon energy as an enabler of economic regeneration. The strategy priorities the following:
- a) Energy efficiency and heat
 - b) Electricity and flexibility
 - c) Decarbonise transport
 - d) Grow business and jobs
 - e) Coordination, planning, regional support and ownership of the plan

5.7 Newport City Council's Local Area Energy Plan (2022)

- 5.7.1 In November 2021, Newport City Council declared an Ecological and Climate Emergency, committing Newport to reach net zero carbon by 2050. Following this, in March 2022 Newport City Council published their Local Area Energy Plan (LAEP), establishing the vision for what a zero-carbon energy system could look like in 2050. The vision for Newport's future energy system is to *"Develop a net zero energy system for Newport, as a city on the rise"*.
- 5.7.2 The LAEP includes six actions to enable the delivery of the visions. Of most relevance to the proposal is action three *"Electricity distribution network upgrades"* which states the following: *"Network upgrades are a priority intervention to allow new generation assets to connect to the distribution electricity network."*



5.8 Replacement Local Development Plan 2021-2036

- 5.8.1 Newport City Council is currently preparing their Replacement Local Development Plan (RLDP). The proposed Preferred Strategy (Pre-Deposit Plan) was consulted on between the 25 October 2023 to 20 December 2023. The timetable for the RLDP's preparation is set out within the Delivery Agreement. However, Newport City Council is behind on these timeframes, so discussions are ongoing regarding the timeframes in the delivery agreement. The Council are aiming to consult in the first half of 2026, subject to approval.
- 5.8.2 Until the Replacement LDP is formally adopted, the Newport LDP 2011-2026 will continue to be used for all planning decisions, in accordance with Welsh Government guidance.



SECTION 6 PLANNING ASSESSMENT



6.0 PLANNING ASSESSMENT

6.1 Introduction

- 6.1.1 We turn now to assess the proposed development drawing on the supporting technical information provided by others where relevant.

6.2 Principle of Development

- 6.2.1 National planning policy provides clear support for strengthening and upgrading Wales's electricity network, particularly as part of the transition towards a net-zero energy system.
- 6.2.2 The proposed development aligns with Future Wales Policy 17, as it is necessary to enhance the resilience and capacity of the local distribution network. This improvement will help accommodate rising electricity demand in Newport and the wider region. Wales has committed internationally to generating 70% of its electricity consumption from renewable sources by 2030 (and 100% by 2035), and Policy 17 specifically recognises the need for new strategic grid infrastructure to achieve this. The scheme will therefore play an important role in enabling emerging low-carbon technologies and supporting decarbonisation in the Cardiff Capital Region which includes Newport, consistent with Future Wales Policies 1, 17 and 33.
- 6.2.3 The overarching aim of PPW is to ensure that the planning system contributes positively to sustainable development and supports the social, economic, environmental, and cultural well-being of Wales. It seeks to balance development needs with conservation priorities, encouraging the efficient use of land, the sustainable management of natural resources, and the protection and enhancement of both the built and historic environment.
- 6.2.4 PPW also establishes objectives relating to the electricity grid network. It highlights that a reliable and well-functioning grid is essential for meeting the Welsh Government's renewable and low-carbon energy ambitions.
- 6.2.5 Paragraph 5.7.2 highlights the anticipated rise in energy demand due to the increasing electrification of transport and heating. To meet this future demand, PPW identifies the need for substantial investment in energy generation, transmission, and distribution networks.
- 6.2.6 PPW emphasises that planning for energy generation and grid infrastructure should be integrated. Additional grid capacity will often be required to support new renewable energy projects. Paragraph 5.7.10 advises that planning authorities should plan positively for grid infrastructure and that development plans should facilitate the grid infrastructure required to support the renewable and low carbon energy potential for the area. It further advises that planning authorities should support appropriate grid developments, whether or not the developments to be connected are located within their authority.



- 6.2.7 Furthermore, paragraph 5.7.11 requires planning authorities and the energy sector to work collaboratively so that development plans properly reflect grid infrastructure needs. It also emphasises the importance of aligning transmission and distribution investment with the potential for renewable and low-carbon energy generation and with the increasing electrification of transport and heating.
- 6.2.8 The proposed development will help facilitate the continued expansion of renewable energy generation across the UK. By enabling additional renewable capacity to connect to the grid, it will contribute to the decarbonisation of the electricity system as low-carbon sources replace fossil fuel-based generation. This supports the UK Government's ambition for a fossil fuel independent electricity system by 2035 and the Welsh Government's targets of achieving net zero greenhouse gas emissions by 2050.
- 6.2.9 The proposal involves the construction of a new 33/11kV primary substation. The Newport LDP was adopted in 2015 and thus pre-dates Future Wales. The LDP does not contain specific policies relating to substations. However, the site is located within the urban boundary and comprises previously developed brownfield land, meaning that the proposal meets the requirements of LDP Policy SP1 which promotes the efficient use of land and the reuse of previously developed land. The proposal also complies with LDP Policy SP18, which supports regeneration, particularly where it involves the reuse of vacant, underused, or derelict land. The site's location within an existing industrial area makes it an appropriate and sustainable location for the proposed development.

Loss of Employment Land

- 6.2.10 Policy EM2 (Newport Docks) of the adopted LDP safeguards the Docks for employment and port-related uses. The policy seeks to ensure that land within this area remains available for activities that contribute to Newport's economic base and the operational needs of the Port. However, EM2 does not impose an absolute restriction on alternative uses; rather, it requires that proposals do not undermine the overall employment function or hinder the operational integrity of the Docks.
- 6.2.11 Importantly, the policy supports development that is complementary to the operational use of the Port, with the supporting text at paragraph 6.18 confirming that such complementary uses may include energy and infrastructure projects. On this basis, the proposed substation is considered to comply with Policy EM2.
- 6.2.12 The merits of this location are also addressed in LDP para 6.19 where it is stated, in respect of energy generation, that the docks have "certain locational advantages, including ... distance from residential or other uses upon which there might be an impact."
- 6.2.13 Given compliance with Policy EM2 as a 'complementary use', we do not consider Policy EM3 to be a relevant consideration. However, for the sake of robustness we consider compliance with Policy EM3, below.



6.2.14 Policy EM3 (Alternative Uses of Employment Land) provides the framework for considering alternative uses on existing employment sites. It states that proposals will be resisted unless:

- i) The site has been marketed unsuccessfully for employment purposes for a minimum of 12 months;
- ii) There remains a sufficient range and choice of employment land and premises to meet LDP requirements and local demand;
- iii) The development has no adverse impact on existing or allocated employment sites;
- iv) The development has no adverse impact on amenity or the environment.

Criterion (i): Marketing

6.2.15 The site has been vacant for a number of years and is not in active employment use. As set out earlier in this statement, the land contains several dilapidated structures, including container units and an existing substation building. Bringing the site forward for employment use would require complete redevelopment, as the existing units are not fit for occupation.

6.2.16 We are advised by the landowners, ABP, that the site has not been formally marketed because it comprises a very small 0.3 ha infill parcel within the wider port estate. Its limited size significantly restricts its ability to accommodate modern industrial or port-related uses. Contemporary employment uses within the Docks typically require large footprints, extensive yard space, and significant vehicle circulation areas. As such, the site does not form part of ABP's formal marketing strategy for the Port.

6.2.17 Notwithstanding this, ABP has confirmed that if enquiries are made regarding potential vacant plots within the Port, this site would have been put forward to prospective occupiers. Despite this, the site has remained vacant for several years, and ABP has confirmed that no interest has been shown by any party other than NGED.

Criterion (ii): Range and Choice of Employment Land

6.2.18 The Council's most recent Employment Land Review (February 2022), which forms part of the evidence base for the Replacement LDP, advises that employment allocations provide a land supply of approximately 157 ha. Together with employment land available within infill locations (5.67 ha) and the Docks (55.4 ha), this equates to around 218 ha of employment land for B class uses within Newport.

6.2.19 Employment land forecasts for 2021–2036 project a demand of 77 ha (including a five-year buffer and the Regional Employment Study's recommendation of an additional 15 ha). Against the overall supply, this results in a surplus of 141 ha.

6.2.20 Within the Docks specifically, the Employment Land Review identifies 55.4 ha of vacant and brownfield land suitable for employment uses. The application site measures just 0.3 ha, meaning that 99.5% of available employment land within the Docks would remain.



- 6.2.21 Given the significant surplus of employment land, the long-standing vacancy of the site, and the very limited area affected, the proposal would not have a harmful impact on the overall provision of employment land. A site of this scale makes only a marginal contribution to the employment land resource safeguarded under EM3, and its release would not compromise the operational capacity of the Port or the strategic employment function of the Newport area. Criterion (ii) is therefore satisfied.

Criteria (iii) and (iv): Impact on Employment Sites, Amenity and Environment

- 6.2.22 The proposed substation would not adversely affect existing industrial uses, nor would it harm amenity or the environment. It is a low-impact use that is compatible with the surrounding industrial context. As noted above, this is specifically recognised in LDP para 6.19. These criteria are therefore satisfied.
- 6.2.23 The proposed development - a new electricity substation - constitutes essential strategic energy infrastructure required to reinforce the local grid, support renewable energy generation, and improve energy resilience for businesses, industry, and communities across Newport. Planning Policy Wales and Future Wales both place strong emphasis on enabling such infrastructure to support decarbonisation, economic growth, and long-term resilience.
- 6.2.24 A substation is a low-impact use suited to a site of this scale and character. It generates minimal traffic, has no adverse impact on port operations, and is fully compatible with the surrounding industrial environment. Importantly, it will support economic activity by ensuring adequate energy capacity for existing and future employment uses within the Docks and the wider city.
- 6.2.25 Development plan policies often “pull in different directions”, with some supporting a proposal and others weighing against it. In such circumstances it is necessary for the decision maker to read the Development Plan as a whole, which includes Future Wales (and Policy 17) and requires recognition that the LDP pre-dates this higher order Plan. While the proposal does not fully comply with criterion (i) of EM3 due to the absence of formal marketing, the development is in accordance with Policy EM2 and the general intent of Policy EM3. The development comprises a complementary use under Policy EM2 and the use of allocated employment land would have no negative impact on the general employment function of Newport Docks. Indeed, the proposal delivers clear and significant public benefits
- 6.2.26 Accordingly, the development is considered appropriate, justified, and compliant with the Development Plan when read as a whole.

6.3 Visual Impact

- 6.3.1 The form and appearance of the proposed development is primarily shaped by the functional and safety requirements associated with its operation as a substation. The design includes only those components essential to ensure the substation operates effectively, efficiently and safely.



- 6.3.2 With regard to visual impact, the existing landscape context is industrial in character. The Newport Docks provide a dominant backdrop, meaning that key views are already influenced by substantial industrial features. As a result, the proposed development would not materially alter the existing visual character of the area.

As discussed later, the proposal also includes a Landscaping Plan that integrates existing landscape and ecological features with the existing brownfield site. Consequently, the development is not expected to generate any adverse effects on visual amenity or the character of the surrounding area.

6.4 Green Infrastructure and Ecology

- 6.4.1 Paragraph 6.2.12 of PPW requires all planning applications to be accompanied by a Green Infrastructure (GI) Statement proportionate to the scale and nature of the development. The statement must demonstrate how GI has been incorporated into the design and how the proposal contributes to the wider GI network.
- 6.4.2 At the local level, criterion (vi) of Newport LDP Policy GP5 requires development proposals to include an appropriate landscaping scheme. Policy GP5 also seeks to protect and enhance biodiversity and ensure that ecological interests are fully considered.
- 6.4.3 This section summarises the GI and ecological considerations relevant to the proposed development, drawing on the Preliminary Ecological Appraisal (PEA) undertaken in June 2025, the subsequent Preliminary Roost Assessment (PRA), and the submitted GI Statement and Landscape Plan.
- 6.4.4 The PEA provides an ecological overview of the site, including a Phase 1 habitat survey comprising a walkover and preliminary assessment of habitats, land use and ecological features. The site comprises previously developed land within Newport Docks, characterised by hardstanding, buildings, scrub, and limited boundary vegetation.

Designated Sites

- 6.4.5 The PEA confirms that the scale and nature of the proposed development are such that no impacts on statutory or non-statutory designated sites are anticipated. Although several designations exist within the wider area, these are sufficiently separated from the site to avoid any likely significant effects. No pathways for impact were identified.

Priority and Protected Species

Bats

- 6.4.6 Local biological records indicate the presence of several bat species in the wider area. The PEA identified that buildings within the site may offer potential roosting opportunities due to their accessibility.



- 6.4.7 In line with the PEA recommendations, a Preliminary Roost Assessment (PRA) was undertaken for the five buildings on site. Two buildings contained several minor potential roost features, and two contained a single minor feature; however, no evidence of bat presence was recorded in any of these structures. The remaining building was assessed as having no roost potential.
- 6.4.8 Tree lines and scrub vegetation to the south and south-east, as well as the wider Docks area to the west, provide some foraging and commuting opportunities for bats. However, the industrial nature of the surrounding environment limits overall suitability. The local habitat is therefore assessed as having low bat potential.
- 6.4.9 The PRA concludes that no further bat surveys are required.

Reptiles

- 6.4.10 Local records indicate the presence of reptile species in the surrounding area. Scrub and areas of exposed rock or bare ground within the site may provide suitable habitat for reptiles. To avoid disturbance or harm, the PEA recommends pre-works inspections to confirm presence/absence and ensure appropriate avoidance measures are implemented if required.

Nesting Birds

- 6.4.11 The PEA notes a high number of local records for nesting birds. Although tree cover on the site is limited, some potential for nesting birds remains and so it is recommended that the removal or maintenance of habitat (e.g. scrub and trees) should take place outside of the breeding bird season (removal between September and February inclusive).

Green Infrastructure and Landscaping

- 6.4.12 A GI Statement and Landscape Plan accompany the application in accordance with PPW and LDP Policy GP5.
- 6.4.13 The GI Statement confirms that a 47-metre length of native hedgerow is proposed along the northern boundary to strengthen existing vegetation. All open areas outside the proposed hardstanding will be cultivated and sown with a species-rich seed mix appropriate to local conditions, enhancing biodiversity and contributing to the wider GI network.
- 6.4.14 The Landscape Plan demonstrates that existing tree planting and vegetation will be retained and enhanced wherever possible. New native hedgerow planting is proposed, and locally sourced wildflower seed mixes will be used to reinforce and improve the ecological value of existing verge areas.



Mitigation and Enhancement Measures

- 6.4.15 The following measures will be implemented to ensure compliance with wildlife legislation and to safeguard ecological interests:
- Pre-works reptile checks in suitable habitat areas.
 - Timing of vegetation clearance outside the nesting bird season, or pre-works nesting checks where required.
 - Retention and enhancement of boundary vegetation to maintain foraging and commuting opportunities.
 - Use of native hedgerow and wildflower planting to deliver biodiversity enhancement.
 - Sensitive lighting design to avoid unnecessary illumination of vegetated areas.
- 6.4.16 The ecological assessments undertaken demonstrate that the site supports limited ecological interest, reflecting its industrial and previously developed nature. No impacts on designated sites are anticipated, and potential effects on protected species can be effectively managed through standard mitigation measures.
- 6.4.17 The proposed GI and landscaping measures will enhance the ecological value of the site, strengthen boundary vegetation, and contribute positively to the wider green infrastructure network.
- 6.4.18 The proposed development therefore accords with the requirements of PPW and the Newport LDP. With the recommended mitigation and enhancements in place, the scheme will avoid adverse ecological effects and provide opportunities for biodiversity enhancement.

6.5 Flooding

- 6.5.1 A review of the Flood Map for Planning shows that the site is within Zone 3 area in terms of rivers and sea. Accordingly a Flood Consequence Assessment (FCA) has been prepared to support of the application.
- 6.5.2 The FCA identifies that NRW holds no record of historic flooding at the site. It also confirms that the site is not at risk from fluvial or surface water flooding
- 6.5.3 In relation to tidal flooding, the FCA notes that the site is currently at low risk due to the presence of existing tidal defences. However, when considering the 0.5% AEP tidal event with climate change allowances, the site is shown to be at risk.
- 6.5.4 To address this, the FCA recommends mitigation based on design flood levels and ground raising within the compound. Ground levels are proposed to be raised to 9.4m AOD, ensuring that all site infrastructure and electrical equipment are positioned above the relevant design flood level and that flood risk to the development is appropriately mitigated.



- 6.5.5 As outlined previously, the site is located within Newport Docks, a long-established industrial and employment area identified in the Newport LDP as a key location for port-related and employment uses. The site comprises previously developed (brownfield) land within the operational dock estate, where industrial and utility infrastructure forms a characteristic part of the local townscape.
- 6.5.6 The proposed development is a substation, which is categorised as essential infrastructure under TAN 15. It represents a critical component of the local electricity network and supports the continued operation and growth of employment uses within Newport Docks and the wider city. Due to operational requirements, the substation must be located close to existing grid infrastructure and the load it is intended to serve. No reasonably available alternative sites exist outside the flood zone that could meet these functional requirements without compromising network efficiency and resilience.
- 6.5.7 Although the site lies within Flood Zone 3, the FCA demonstrates that the substation can be designed to remain safe and operational during the design flood event. All critical electrical equipment will be set above predicted flood levels, and the development will not increase flood risk elsewhere, with site levels and drainage designed to ensure no adverse impacts.
- 6.5.8 The proposal therefore represents the redevelopment of brownfield land within an established employment area, does not introduce a more vulnerable land use into the floodplain, and delivers essential infrastructure that underpins the functioning of Newport Docks and the wider local economy. Having regard to Planning Policy Wales and TAN 15, the development is considered an appropriate and justified form of essential infrastructure within Flood Zone 3 and acceptable in flood risk terms.

6.6 Arboriculture

- 6.6.1 An Arboricultural Assessment, prepared by TR33 Environments, has been prepared in support of the application, assessing the potential effects of development on trees and puts forward proposals for mitigation where appropriate.
- 6.6.2 The Assessment states that subject to following the tree protection measures set out within the Arboricultural Method Statement, the proposal can be achieved without significant adverse arboricultural effects. It also goes on to explain that the proposal does not create any major adverse arboricultural effects, nor does it impact any tree, or hedge, which is of importance in from an arboricultural, conservation or public amenity perspective.

6.7 Archaeology

- 6.7.1 An Archaeological Desk Based Assessment (DBA), prepared by Heneb, has been prepared in support of the application, assessing the nature, extent and significance of the historic environment within the site and its surroundings. It also establishes the impact of the proposed development on the historic environment.



- 6.7.2 The DBA concludes that there are no designated assets within the site boundary. The proposal would have minimal effects on the Grade I listed Transporter Bridge northeast of the site and would not have an impact on the setting of the Bridge.
- 6.7.3 It recommends an archaeological watching brief during the geotechnical works prior to the construction of the substation, and a photographic record and identification of any visible Railway Sidings and Features.
- 6.7.4 It goes on to states that *“with appropriate archaeological measures in place, any proposed development within the Site will be in accordance with national legislation, and with local and national policy.”*

6.8 Traffic and Transport

- 6.8.1 As outlined earlier, the proposed development will operate as an unmanned substation and will therefore generate very low levels of operational traffic, limited to periodic inspection and maintenance visits.
- 6.8.2 A Construction Traffic Management Plan (CTMP) has been prepared to support the application. The (CTMP) explains how construction-related traffic will be managed safely and efficiently throughout the anticipated 18-month construction period.
- 6.8.3 The application site is located within the operational Associated British Ports (ABP) estate at Alexandra Docks and is surrounded by established industrial and port-related uses. Access to the dock estate is controlled via security barriers. Construction vehicles will enter through the East Way Road Gate and travel along Alexandra Docks Road to reach the site. No new access onto the public highway is required.
- 6.8.4 Construction traffic will primarily comprise deliveries of engineered fill and construction materials during the initial earthworks and ground-raising phase, followed by deliveries of building materials, electrical equipment and transformers during later stages
- 6.8.5 Typical construction traffic levels are expected to be:
- Around 10 HGV movements per day on an average day, rising to up to 20 HGV movements per day during peak activity periods; and
 - Approximately 20 workforce vehicle movements per day, rising to up to 30 movements during peak periods.
- 6.8.6 Traffic levels will vary throughout the programme, with the highest activity anticipated during ground raising and key delivery periods.
- 6.8.7 All construction vehicles will be managed to ensure they can enter, unload, turn and exit within the site boundary wherever practicable. Banksman will be deployed where necessary to assist safe manoeuvring, particularly during larger deliveries. Abnormal Indivisible Loads (AILs) are not expected to be required for the proposed development.



- 6.8.8 Given the site's location within an established industrial dock environment, construction traffic will utilise existing port estate roads and will not pass through residential areas. Deliveries will be coordinated with ABP estate operations to avoid disruption to port activities.
- 6.8.9 Measures will be implemented to safeguard the estate road network and public highways, including visual inspection of vehicle wheels, sheeting of loads where necessary, and road sweeping if required. Wheel washing is not anticipated to be necessary due to the hardstanding nature of the site.
- 6.8.10 Proportionate measures will also be adopted to reduce emissions from construction traffic, including discouraging unnecessary engine idling and consolidating deliveries where practicable.
- 6.8.11 Overall, this CTMP demonstrates that construction of the substation can be undertaken in a controlled and responsible manner, without unacceptable impact on the surrounding highway network or the operational dock estate.



SECTION 7 CONCLUSION



7.0 CONCLUSION

- 7.1.1 This Planning Statement has demonstrated that the proposed development is acceptable in planning terms and accords with the relevant national and local policy framework. The development responds to an identified need for modern, resilient electricity infrastructure and will support the wider delivery of strategic energy objectives.
- 7.1.2 The assessment confirms that the site is suitable for the proposed use, with no technical or environmental constraints that would prevent the development from coming forward. Supporting documents, including the Flood Consequences Assessment, Preliminary Ecological Assessment, Ground Investigation Report and other and technical reports, demonstrate that any potential effects can be appropriately managed, mitigated or controlled through established best practice and, where necessary, planning conditions.
- 7.1.3 The proposed development will deliver essential infrastructure with limited environmental effects, minimal operational impacts, and no unacceptable harm to local amenity, landscape character, highway safety or the wider environment. The scheme represents sustainable development in accordance with the principles of Future Wales and Planning Policy Wales.
- 7.1.4 The proposed substation will enhance the resilience and capacity of the local distribution network and accommodate forecast increases in demand driven by new housing, business growth, and the uptake of low-carbon technologies. It will also enable future connections for both demand customers and electricity generation.
- 7.1.5 For these reasons, it is considered that the proposed development is compliant with the development plan when read as a whole, and there are no material considerations that indicate planning permission should be refused. Planning permission should therefore be granted.