



Newport City Council
Civic Centre
Godfrey Road
Newport
NP20 4UR

Dear Adam,

20 August 2025

Discharge of conditions 5 (LEMP), 7 (Contamination), 9a (Site Clearance CEMP) and 12 (Habitat Management Plan) of Planning Permission 24/0747 for the construction of an electricity substation compound comprising transformers, switchgears and electrical equipment, surface water drainage, means of access, landscaping, the installation of buried electricity transmission circuits, creation of a habitat compensation site and associated works.

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Vantage Data Centers Ltd hereafter 'Vantage' has instructed AtkinsRéalis to prepare an application to discharge conditions of planning permission 24/0747 for the construction of an electricity substation compound.

This application includes:

- This cover letter;
- Site Location Plan;
- Landscape and Ecological Management Plan;
- Construction Environmental Management Plan (Site Clearance Stage); and
- Ground Investigation Report;

An application fee of £200 (incl. Planning Portal fee) has been arranged by BACS transfer.

Details of the conditions this application seeks to discharge are presented below.

Condition 5 (LEMP)

Notwithstanding the details submitted to date, no development shall commence until a Landscape Ecological Management Plan (LEMP) for the provision, management, and maintenance of the landscape and ecological features at the site, has been submitted to and approved in writing by the Local Planning Authority. The LEMP should build upon

the current 'Landscape and Ecological Management Plan, Vantage Data Centers' by AtkinRéalais (December 2024). The LEMP should include:

- *Details of habitats, landscape, and ecological features present or to be created at the site;*
- *Details of the desired condition of features (present and to be created) at the site;*
- *Details of scheduling and timing of activities;*
- *Details of short and long-term management, monitoring and maintenance of new and existing habitat, landscape, and ecological features at the site to deliver and maintain the desired condition;*
- *Details of monitoring of landscape, species, and ecological features;*
- *Details of replacement measures should any landscape features die, be removed, or become seriously damaged or diseased;*
- *Details of management and maintenance responsibilities;*
- *Details of timescales, length of plan, the method to review and update plans (informed by monitoring) at specific intervals as agreed.*

The LEMP shall thereafter be implemented in strict accordance with the approved details and timetable.

The Landscape and Ecological Management Plan (LEMP) has been prepared by AtkinsRéalais and has been submitted to Natural Resource Wales as part of the submission for a dormouse license. This LEMP outlines the principles which will ensure the long-term management of the proposed landscape and ecological mitigation, compensation, and enhancement measures for the Proposed Scheme. The LEMP will remain adaptive during the 30-year period to allow for adaptive management and remedial actions to be taken and agreed with NRW and the LPA, to ensure the delivery of the mitigation and compensation habitats

Condition 7 (Contamination)

No development shall commence until the following components of a scheme to deal with the risks associated with contamination at the site, has been submitted to and approved in writing by the Local Planning Authority.

1. *A preliminary risk assessment which has identified:*
 - *all previous uses;*
 - *potential contaminants associated with those uses;*
 - *a conceptual model of the site indicating sources, pathways, and receptors;*
 - *potentially unacceptable risks arising from contamination at the site.*
2. *A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.*

3. *The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.*
4. *A verification plan providing details of the data that will be collected to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance, and arrangements for contingency action. The remediation strategy and its relevant components shall be conducted in accordance with the approved details.*

A Ground Investigation Report is submitted to fully discharge Condition 7. The report document presents the factual and interpretative findings of the ground investigation in relation to geotechnical and land contamination aspects and should be read in conjunction with the Geotechnical Engineering Factual Ground Investigation Report, presented within Appendix A. It assesses the geotechnical characteristics of the soils and rock underlying the site, and the potential risks to human health, controlled waters and property receptors from potential sources of contamination

The Report summarises ground investigations carried out and interprets the findings of the investigations. It presents a geotechnical ground model and recommendations for foundation design, refining the Conceptual Site Model and presenting the findings of a Generic Quantitative Risk Assessment to assess the potential risks to human health and controlled waters at the site.

The Report draws the conclusion that potential risks are considered to be a low/moderate risk to human health and low risk to controlled waters and low to low/moderate risk to property. It is considered that no further ground investigation, remediation or monitoring is required. On this basis, the Ground Investigation Report is considered sufficient to fully discharge condition 7. Confirmation from the local planning authority that no further information is sought to discharge clauses (3) and (4) of the condition.

Condition 9a (Site Clearance Stage CEMP)

No development, including site clearance, shall commence until a Site Clearance stage Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The Site Clearance stage CEMP should include:

- *General site management: details of the site clearance programme,*
- *Pollution prevention: demonstrate how relevant Guidelines for Pollution Prevention (GPP) (particularly GPP5: Works and maintenance in or near water) and best practice will be implemented, including details of emergency spill procedures and incident response plan;*
- *Details of persons and bodies responsible for activities associated with the Site Clearance Stage CEMP and emergency contact details.*

The Site Clearance stage CEMP shall be implemented as approved during the site clearance phase of the development

A Site Clearance Stage Construction Environmental Management Plan (CEMP) has been prepared by Vantage's appointed construction contractor Afan Group. The CEMP sets out the programme of works and the measures that will be taken to ensure and hazards have been considered, and the appropriate measures will be implemented to ensure a safe and secure site. The CEMP will be a live document which will be updated and refined as the construction phase develops. This will then be resubmitted to fulfil the criteria set out in part b of Condition 9.

Condition 12 (Habitat Management Plan)

No development shall commence until a Habitat Management Plan for the compensation area has been submitted to and approved in writing by the Local Planning Authority. The habitat management plan shall build upon the principles and commitments for protected species mitigation and compensation contained within the documents 'Landscape and Ecological Management Plan (LEMP) and SSSI Grassland Management Strategy Reference: 293651-ARP-XX-XX-RP-YE-0002 Rev 3 dated 12 December 2023' and 'Dormouse Conservation Strategy Reference: 293651-ARP-XX-XX-RP-YE-0004 Rev 2 dated 12 December 2023', and shall include:

- *Details of habitats and ecological features present or to be created on and off site, including planting schedules*
- *Details of the desired conditions of habitats (present and to be created) on and off site*
- *Details of short- and long-term management, monitoring and maintenance of new and existing habitats at the site, to deliver and maintain the desired condition*
- *Details of scheduling and timing of activities*
- *Measures to restrict human access to habitat creation areas*
- *Details of monitoring of ecological features*
- *Details of replacement measures should any landscape or environmental features die, be removed or become seriously damaged or diseased within years of completion of development*
- *Details of management and maintenance responsibilities*
- *Details of measures to eradicate invasive non-native species, including Cotoneaster spp*

A written report on the delivery of the habitat management plan shall be submitted to the LPA at the completion of construction, and thereafter at 5-year intervals post construction for a 10-year period. The report shall include an updated habitat management plan which incorporates recommended changes arising from the monitoring and the 5-yearly review which shall be undertaken after the review is approved. The habitat management plan shall be carried out in accordance with the approved details.

The 'Landscape and Ecological Management Plan (LEMP) and SSSI Grassland Management Strategy Reference: 293651-ARP-XX-XX-RP-YE-0002 Rev 3 dated 12 December 2023' and 'Dormouse Conservation Strategy Reference: 293651-ARP-XX-XX-RP-YE-0004 Rev 2 dated 12 December 2023 listed in this condition were not submitted alongside application ref: 24/0747 and therefore do not relate to this development. The documents were listed as part of another application (app. ref. 23/0878) submitted to the Local Planning Authority by Welsh Government and the condition has been copied into this permission without updating the documentation reference numbers correctly.

A separate Habitat Management Plan has not been produced for this application and instead the responses to each of the bullet points have been embedded into the LEMP that accompanies this application. The LEMP complies with all other parts of Condition 12, and the version of the LEMP (ref: 5222535-ATK-XX-XX-RP-E-0004) and Dormouse Conservation Strategy (ref: 5222535-ATK-XX-XX-RP-E-0001) that accompanied application ref: 24/0747. The LEMP outlines the principles which will ensure the long-term management of the proposed landscape and ecological mitigation, compensation, and enhancement measures for both the on-site and off-site compensation related to application ref: 24/0747.

I trust that the information provided is sufficient to discharge conditions 5, 7, 9a and 12 of planning permission 24/0747.

Yours Sincerely

For and on behalf of AtkinsRéalis

Avigayil Fishburn

Senior Planner