

Ein cyf/Our ref: CAS-303532-G8J0
Eich cyf/Your ref: 25/1071

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 10 April 2026

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: INSTALLATION OF AN UNDERGROUND CABLE
CONNECTION FROM 132KV SUBSTATION TO A DATA CENTRE.**

**LLEOLIAD/LOCATION: LAND IN THE VICINITY OF DYFFRYN LANE, IMPERIAL
PARK, NEWPORT.**

Thank you for re-consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 18 March 2026.

We continue to have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following conditions to any planning permission granted:

- **Construction Environmental Management Plan**
- **Landscape Ecological Management Plan**

We also advise that based on the information submitted to date, the documents identified below should be included in the approved plans and documents condition on the decision notice.

- **Imperial Park Cable Connection – Design And Access Note By DWD, Undated**
- **Imperial Park Cable Route - Preliminary Ecological Appraisal By RPS, Dated December 2025**
- **Imperial Park Cable Route - Otter, Water Vole And Great Crested Newt Survey By RPS, Dated October 2025**
- **Drawing Number 0596-BPS-XX-XX-DR-EAS-2101 Titled IMPERIAL PARK Cable Connection Red Line Boundary Plan By Unknown, Revision P04 Dated 03.10.25**

Without the inclusion of these conditions and document we would object to this planning application.

Protected Sites

The red line boundary of the application site is located partially within the Gwent Levels - St Brides Site of Special Scientific Interest (SSSI). The SSSI is notified for its range of aquatic plants and invertebrates associated with the interconnected reens and ditches of the drainage system. In summary, the special interests of the SSSI are dependent on the water quality, water quantity, the existence of the drainage system and its continued management. Any development which has an adverse impact on any of these factors will have an adverse impact on the wildlife for which the area was notified.

The decision as to whether the proposed development's location partially within a SSSI is justified, is entirely a matter for your Authority, having followed the step-wise approach in PPW. Our advice provided below focuses on the likelihood and significance of impacts on the notified features of the SSSI from the proposed development.

Habitats

In line with the stepwise approach set out in Planning Policy Wales, loss of SSSI habitat should be avoided. Where this loss is unavoidable, there must be adequate mitigation or compensation. The PEA states that the development would seek to provide a Net Benefit for Biodiversity, with enhancement of surrounding grassland (outside of the SSSI) proposed. We note that section 5.2.9 states that final 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) and that long term implementation will be secured as a condition of successful planning consent. We agree with this approach and advise that this is secured via a condition.

Grassland enhancement is proposed outside of the SSSI. We would welcome consultation on any management plans and planting list. We advise that seed mixes should be of UK provenance and suitable for the SSSI. Our preference is for locally sourced seed. For seeding within the SSSI, our preference would be for the applicant to source the seed from Great Traston (Solutia) Gwent Wildlife Trust reserve.

We previously advised that the proposed planting of hazel within the SSSI, specifically in areas of marshy and neutral grassland should be avoided. We note that in the additional supporting information submitted (Response to Ecology Comments, by Tetra Tech, dated 17/03/2026, reference ECO22202_LPA Response Re 01) confirms that scrub planting in the SSSI will be restricted to areas of existing scrub in unfavourable condition. We are therefore satisfied with this approach, as there will be no loss of grassland habitat within the SSSI.

Shrill Carder Bee

The PEA concludes that an adverse effect on shrill carder bee is unlikely with horizontal directional drilling (HDD) techniques implemented, and we welcome that the PAC report confirms that prior to vegetation removal a check for shrill carder bee and their nests (depending on the time of year) will be undertaken.

Reen and Ditch Network

The proposed cabling crosses multiple reens and ditches and we note that HDD is proposed to be used on sections which cross watercourses. This should reduce the likelihood of adverse impact to the reen and ditch network of the SSSI.

To protect the SSSI, buffer zones of a minimum of 7m from works to the top of the ditch bank, and 12.5m to the top of the reen bank should be implemented in the Gwent Levels and we welcome that the PAC report has confirmed that these will be maintained and incorporated into the Construction Environmental Management Plan (CEMP) when submitted.

Where possible there should not be any storage of materials including soil piles or fuel storage within these buffer zones. This is to ensure that contamination of reens and impacts on the interest features of the SSSI are avoided.

Construction Environmental Management Plan

We welcome that a construction environmental management plan (CEMP) will be produced, this will need to set out pollution prevention measures to be implemented to avoid any adverse impact to the SSSI. However, this has yet to be produced and must be in place before any site clearance and construction works can take place.

Condition

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

- Construction methods: details of materials, how waste generated will be managed
- General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containment areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan. GPP5 Works and maintenance in or near water is relevant for this development.
- Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details.
- Biodiversity Management: details of tree and hedgerow protection; invasive species management; species and habitats protection, avoidance and mitigation measures
- Control of Nuisances: details of restrictions to be applied during construction including timing, duration and frequency of works; details of measures to minimise noise and vibration from piling activities, for example acoustic barriers; details of dust control measures; measures to control light spill and the conservation of dark skies.

Justification: A CEMP should be submitted to ensure necessary management measures are agreed prior to construction and implemented for the protection of the environment during construction.

Protected Species

Dormice

We have reviewed the below documents submitted in support of the planning application:

- Email titled '*RE: 25/1071 - Land in the vicinity of Dyffryn Lane (Major) V2 - NRW Response NRW:06552743*' by Rob Booth, dated 18 March 2026
- Drawings titled '*Dormouse Conservation Strategy: Habitat Creation, Enhancement, and Restoration*' by RPS, dated 09/01/2026

We note from the above email that a final version of the Dormouse Conservation Strategy is to be prepared as either as a standalone document secured by a condition, or to include dormouse conservation measures in a detailed Landscape and Ecological Management Plan.

Landscape Ecological Management Plan

On the basis of the information reviewed, we advise the following condition is attached to any planning permission granted:

Condition

No development, including site clearance, shall commence until a Landscape and Ecological Management Plan (LEMP) has been submitted to and approved in writing by the Local Planning Authority. The LEMP should build upon the principles outlined in the '*Imperial Park Cable Route - Dormouse Conservation Strategy*' by RPS Group Plc, dated January 2026, and include, but not necessarily be limited to:

- The submission of a long-term site management plan to ensure the management of habitats for dormice that includes:
 - details of habitats and ecological features present or to be created, both in written form and shown on appropriate drawings, including planting plans, indicating species mix and size
 - details of the enhancements to be undertaken in the areas noted as "Restored and Enhanced Scrub" (marked in purple horizontal hatch on the drawings titled '*Dormouse Conservation Strategy: Habitat Creation, Enhancement, and Restoration*' by RPS, dated 09/01/2026)
 - details of replacement measures, should any landscape or environmental features die, be removed, or become seriously damaged or diseased
 - details of the desired condition for each habitat (present and to be created) and criteria to determine when habitats have achieved this including defined aims and objectives, and key performance indicators for long term monitoring indicators of habitat condition
 - details of short and long-term habitat management prescriptions to both achieve and maintain the desired condition
 - details of monitoring methodologies for habitat(s) and species
 - details of scheduling and timings of activities

- details of timescales; length of plan; and the method and proposed dates to review and update plans (informed by monitoring) at specific intervals as agreed
- persons or bodies responsible for undertaking management and surveillance together with required skills and competencies
- licensing requirements for undertaking habitat management and surveillance

The LEMP shall be carried out in accordance with the approved details.

Justification: A LEMP should be submitted to ensure necessary management of habitats for European Protected Species is agreed prior to commencement and implemented to ensure the site's environmental features are adequately managed long term.

Flood Risk

The planning application proposes less vulnerable development. The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zones 2 and 3 (Rivers and Sea).

Given the nature of the proposed development (below ground cable), we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks and consequences. We would also expect the developer to take the opportunity to incorporate flood resilient design where feasible.

Guidance on resilient design can be found in Chapter 13 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025, which references advice from Construction Industry Research and Information Association, including a Code of Practice and Guidance for Property Flood Resilience.

We provide advice on our website [Natural Resources Wales / Preparing for a flood](#) which may be useful for the developer or occupant of the proposal.

Other Matters

The advice in this letter relates to matters which are included on our [consultation topics list](#). We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

Advice for the Developer

Internal Drainage District (IDD)

The proposal runs adjacent to and crosses an Internal Drainage District (IDD) maintained watercourses (The Nantymoor and SDR East Reen). Therefore, a Land Drainage Consent (LDC) will need to be applied for. Please see link below.

[Natural Resources Wales / Apply for land drainage consent](#)

Please note that a LDC is independent of planning approval and is required for permanent and temporary works.

Ditch management

Ditch restoration is proposed within the PEA. For any works which do not form part of this planning permission, assent will be required from NRW for works which fall within the SSSI. Please contact emma.sharp@cyfoethnaturiolcymru.gov.uk for further discussion on any proposed ditch management or restoration work.

If you have any queries about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

K Murphy

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: southeastplanning@cyfoethnaturiolcymru.gov.uk

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.