

Appendix 1 - Design & Access Statement

Era4

Liberty Steel, Corporation Road, Newport

March 2026

1 Introduction

- 1.1 This Design and Access Statement (DAS) has been prepared on behalf of Era4 in support of an outline planning application to Newport City Council for:

Outline planning application for the creation of a secure compound and the installation of external plant and equipment to create a modular data centre, together with associated equipment and structures, engineering operations, staff accommodation and associated works.

- 1.2 The proposal relates to the development of an area of open ground within the Liberty Steel Works complex on Corporation Road, approximately 2 km southeast of Newport city centre and 0.5km east of the River Usk.
- 1.3 The DAS explains the design principles and concepts that inform the development and how access, movement and appearance have been addressed, in accordance with Planning Policy Wales (Edition 12) and Technical Advice Note (TAN) 12: Design.

2 Assessment

Location and Context

- 2.1 The application site forms part of the operational Liberty Steel industrial estate, located on the east bank of the River Usk within a long-established heavy-industry area. Surrounding uses include steel production buildings, substations, and associated energy infrastructure.

Site Character

- 2.2 The site is within the Liberty Steel complex and forms an area of open associated with the steel works. The application site is situated to the east of the railway. The application site is within Flood Zone 1 and not at risk of flooding. The site is situated close to a series of balancing ponds and is located in an area that is not overlooked and where there is no

public access. The site does, however, benefit from immediate access to the existing services and mains connections within the Liberty Steel site.

Surrounding Environment

- 2.3 To the west lies the River Usk SAC/SSSI, separated from the site by existing industrial land and flood defences. To the north and east are other Liberty Steel operations and storage yards. The nearest residential properties are over one kilometre away, screened by the extensive intervening area of heavy industrial buildings and the A48 Southern Distributor Road.
- 2.4 Directly to the north and north west of the application site is the Solutia Chemical Complex and associated wind turbines. Solutia owns a substantial area of open ground directly to the east of the Liberty Steel site, creating an area that has no or very limited public access between the site and nearest public highway. This open space has a gradual gradient that rises up from the River Usk, and is interspersed with tree belts and established tall hedgerows. These act as barriers to views into the site, which when combined with the distances to the nearest view points means the application site is not visible from outside of the site boundary.

Access

- 2.5 Vehicle access is via the existing Liberty Steel main entrance from Corporation Road, connecting directly to the A48 SDR and the M4 motorway. No alterations to access or parking are required. Pedestrian access will continue from the same internal road network.
- 2.6 The proposed development forms an AI data centre facility and is designed to be secure. Public access will not be permitted and security staff will be on site continuously to prevent anyone but authorised maintenance staff to have access to the secure compound.
- 2.7 Accessibility to the site is not a consideration in this case. The development does not need to be easily accessible and accessibility to the site is not a driver of site location or the design of the development. Indeed, the opposite is true. This will need to be a secure facility that is not accessible to the public and it is purposeful design decision to make this difficult to approach or access.

Current Use

- 2.5 The site is currently vacant open ground, within the Liberty Steel complex, which was last used for general industrial purposes (Use Class B2).

3 Planning Policy

3.1 The design approach accords with:

- Future Wales: The National Plan 2040 – Policies 1, 3 and 12 support sustainable reuse of brownfield employment sites and digital-infrastructure investment within the Cardiff–Newport corridor.
- Planning Policy Wales (Ed 12, 2021) – Chapters 3 and 5 promote efficient use of land, high-quality design, and low-carbon development.
- TAN 12 (Design) – requires proposals to demonstrate character, community safety, accessibility and environmental sustainability.
- Newport Local Development Plan (2011–2026) – Policies SP1, SP17, EM3 and GP6 support reuse and modernisation of employment land and good-quality industrial design.

4 Design

Design Concept

- 4.1 The project's aim is to develop a secure AI data centre facility, using modular and prefabricated equipment, enabling rapid deployment and efficient operation of high capacity computing power.
- 4.2 The facility will be created by installing equipment on a concrete slab set within a secure perimeter. The design, appearance and operation of the facility is determined by the function, specification and requirements of the equipment to be installed, rather than by a requirement to deliver a high quality appearance or to integrate the equipment into a sensitive setting or street scene.
- 4.3 The layout of the equipment will be tailored to ensure the facility can operate at optimum efficiency, providing maximum computing power whilst using the lowest levels of power.
- 4.4 The design will, therefore, be something that is refined and given greater consideration at reserved matters stage, when the specification of the equipment to be installed will be known and operational parameters can be factored into the layout.
- 4.5 Notwithstanding the above, the development will be low in height, it will be set within a part of the site that it not visible from area external to the Liberty Steel complex, but it will meet all necessary standards, and be safe and efficient in operation. Indeed, the development will appear modern and will be continuously managed and kept tidy, reflecting the importance and professional approach to operation, maintenance and security.

Layout

- 4.2 The proposed site layout will be very similar to the illustrative plans submitted with this application. The equipment will be laid out to a grid formation, regimented and positioned to meet operational requirements.

Scale and Massing

- 4.3 The proposed development comprises equipment that are similar in appearance and scale to large shipping containers, with the smaller pieces of equipment being only a few square metres in footprint. The development will not be high and even with any future substitutions of plant or equipment, it is unlikely that the tallest pieces of equipment would ever exceed 5-6 metres in height.

Appearance and Materials

- 4.4 The equipment to be installed will be very similar to that shown on the drawings accompanying this planning application. The modules will be constructed from a metal profile material and will be painted in neutral colours, such as grey, brown, dark red. This will help to limit the visibility of the module in any distant views.
- 4.5 The modules will be acoustically and thermally insulated to ensure the optimum operating conditions are created inside. This environmental can also be managed to ensure the equipment can work at peak efficiency.

Landscape and Boundary Treatment

- 4.5 No soft landscaping or boundary changes are required within the application site. The existing security fencing, gated entrance to the site and lighting will be retained. There will be very little difference in terms of the appearance or operation of the site when viewed from outside the complex.

Sustainability

- 4.6 The modular units, combined with the liquid cooling will make the development extremely efficient by data centre standards, allow more of the power used by the development be directly to computing power rather than cooling.

5 Access

Movement and Accessibility

- 5.1 The site will be accessed solely by authorised staff and maintenance operators. Vehicular and pedestrian circulation will follow the existing Liberty Steel internal road network, which connects to Corporation Road and the A48.

Inclusive Design

- 5.2 Although the facility will not be open to the public, the internal fit-out will ensure accessible staff areas, level thresholds, and compliance with Building Regulations Part M. This will be demonstrated at reserved matters stage.

Security and Control

- 5.3 Access will be controlled through existing gatehouse procedures at Liberty Steel and site specific electronic entry systems, supported by CCTV and restricted access zones.

6 Conclusion

- 6.1 The proposal represents a sensitive, well-considered reuse of an underutilised area within an existing industrial complex. It maintains the site's employment function and introduces high-value, high-efficiency digital infrastructure without environmental impact.
- 6.2 The design responds positively to its industrial context, accords with Future Wales, PPW, and the Newport LDP, and meets the national requirements for a Design and Access Statement under the DMPO (Wales).
- 6.3 The scheme is therefore considered to deliver a sustainable, accessible and high-quality form of development appropriate to its setting and purpose.