



**Era4**

**Land at Former Liberty Steel Works, Newport**

**Proposed Modular AI Centre - Supporting Planning Statement**

**March 2026**

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**Prepared for**

**Era4**

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# 1 Introduction

- 1.1 This Planning Statement has been prepared on behalf of Era4 in support of an outline planning application submitted to the Newport City Council for the development of a modular data centre within a secure compound, together with associated equipment and structures, engineering operations, staff accommodation and associated works on land to the east of the railway line at the former Liberty Steel works, on Corporation Road in Newport.
- 1.2 The proposal involves the creation of a secure compound and the installation of external plant and equipment on a hardstanding area to create a modular data centre within the former industrial complex. This will enable the rapid delivery of a modern, energy-efficient AI centre that will provide secure, sustainable and high-capacity computing infrastructure in support of the UK's digital and AI sectors.
- 1.3 In November 2025, the UK Government announced that South Wales has been designated a new "AI Growth Zone", identifying the region around Newport (stretching from the M4 corridor from Newport to Bridgend) as a nationally significant location for next-generation digital infrastructure and high-capacity AI computing investment. The Growth Zone is intended to accelerate delivery of strategic data-centre projects through enhanced planning support, targeted skills initiatives and improved energy-infrastructure coordination, with the potential to unlock more than 5,000 new jobs to harness over a gigawatt of data centre capacity by the early 2030's. The proposed Newport AI Centre aligns directly with this policy priority, providing one of the first schemes capable of supporting the Government's ambition to establish South Wales as a leading UK hub for AI, advanced computation and digital technology.
- 1.4 The application site forms part of a long-established industrial area at Newport, which forms a 'Protected Employment Site' under Policy EM3 Newport Local Development Plan (2015) (NLDP). The application site is also identified as being within the settlement boundary and therefore forms part of the urban area of Newport. The proposed AI Centre will represent a significant new employment-generating investment within an established industrial context, consistent with the strategic economic objectives of the NLDP and with the South Wales AI Growth Zone designation.
- 1.5 The proposal represents a major step in Era4's national programme to establish a distributed network of secure, sovereign and energy-efficient data-processing facilities across the UK. These AI computing centres will provide critical infrastructure to support the UK's rapidly growing artificial-intelligence and digital-economy sectors, enabling resilient processing capacity for research, innovation, cloud services and other high-performance computing applications.

- 1.6 The former Liberty Steel site in Newport presents a unique and highly suitable location for this form of development. The site has a rich industrial legacy, having operated as an aluminium smelting and steel works for several decades. The site continues to benefit from having retained high capacity electricity connections, mains drainage and water supplies.
- 1.7 As a large, previously developed employment site, set within and surrounded by wider industrial sites and uses, that benefits from existing access, utilities connections, and separation from sensitive receptors, it offers an ideal setting for the development and operation of a secure modern digital-infrastructure facility.
- 1.8 This Planning Statement explains how the proposed AI Centre:
- makes productive reuse of a long-established, under-utilised industrial site; contributes to employment growth, digital innovation and economic diversification in South Wales;
  - aligns with local and national planning policy, including the NLDP's protected employment site allocation; delivers a low-impact, energy-efficient modular AI facility and avoids material environmental effects; and
  - provides the necessary information for the Local Planning Authority to assess the proposal in accordance with the statutory development plan and all relevant material considerations
- 1.9 The remainder of this Statement is structured as follows:
- Section 2 – Background to Era4;
  - Section 3 – Site and Surroundings;
  - Section 4 – Proposed Development;
  - Section 5 – Environmental and Technical Considerations;
  - Section 6 – Planning Policy Context and Compliance;
  - Section 7 – Planning Balance; and
  - Section 8 – Conclusions.

## 2 Background to Era4

- 2.1 As of the 6 March 2026, Era4 is the new name for the business formerly known as Carbon3.AI. Era4 is a UK-based digital-infrastructure company established to develop a national network of sovereign, energy-efficient and secure AI computing centres. Its mission is to provide advanced, high-capacity data-processing capability to support the UK's transition to a digitally enabled and innovation-driven economy.
- 2.2 The company focuses on delivering state-of-the-art AI and high-performance computing (HPC) facilities designed to meet the growing demand from industry, academia, public-sector organisations and commercial cloud providers. Each Era4 facility is engineered to provide resilient, scalable and sustainable computing power, enabling the rapid processing and storage of complex datasets required for artificial intelligence, machine learning, simulation and advanced analytics.
- 2.3 All Era4 facilities are designed around three core principles:
- **Sustainability** – incorporating energy-efficient liquid cooling, modular data-hall technology, high-performance insulation and the potential to utilise private-wire or low-carbon energy sources;
  - **Security & Sovereignty** – ensuring that sensitive data and AI-related processing remain within secure UK-based facilities with robust physical and cyber-security systems; and
  - **Scalability** – enabling modular expansion through flexible building layouts, pre-fabricated plant systems and adaptable internal data-hall configurations.
- 2.4 Era4's delivery model is based on the strategic phased redevelopment of brownfield and former industrial land across the UK. By locating new AI centres on previously developed and often under-utilised employment sites, the company supports local economic regeneration while minimising environmental impact and avoiding unnecessary greenfield development. This approach aligns with national sustainable development objectives and enables efficient connection to existing utilities and power infrastructure.
- 2.5 As an AI Growth Zone with strong potential for skills growth and technological investment, South Wales provides an ideal context for the delivery of a high-quality, next-generation AI centre.
- 2.6 Newport represents an especially strategic location for Era4's expansion. The site's long industrial history as the former Liberty Steel Works, its subsequent safeguarding for employment uses under NLDP Policy EM3, and its separation from sensitive receptors make it well-suited for digital-infrastructure development. This will expand and bolster the existing and planned Era4 distributed computing network supporting AI research, commercial innovation, and cloud infrastructure within the UK. Newport represents a strategically located site within the South East Wales National Growth Area, benefiting from

proximity to Cardiff, Bristol, and the Severn corridor, all of which are identified in Future Wales: The National Plan 2040, as key digital and economic growth locations.

- 2.7 The site's location within the Liberty Steel Works presents a unique opportunity to repurpose underutilised industrial land and leverage the site's existing power infrastructure. The proposal aligns with Era4's wider sustainability goals as there could be the opportunity to use private-wire energy from nearby renewable or low-carbon generation sources, helping to decarbonise the data-processing sector.
- 2.8 Era4's operational model seeks to complement, not compete with, traditional industrial activity. The AI centre would coexist within the existing Liberty Steel industrial complex, providing synergies in energy management, security, and logistics, and supporting Newport's ambitions to become a hub for advanced technology and green industry within the Cardiff Capital Region.
- 2.9 The proposed development at Newport therefore represents both a strategic digital infrastructure investment and an environmental upgrade of an existing brownfield site, delivering national and regional economic benefits while ensuring compliance with the Welsh Government's sustainability and placemaking objectives.
- 2.10 The Newport AI Centre forms a key part of Era4's ambition to create a distributed national network of digital-processing nodes, providing regional resilience, redundancy and capacity across the UK. The proposed development at Newport will complement existing and planned Era4 sites by strengthening coverage across Wales and the western UK, and by contributing to a geographically balanced and energy-efficient AI infrastructure system.

### **AI Growth Zone Context**

- 2.11 In November 2025, the UK Government confirmed that South Wales has been designated an "AI Growth Zone", recognising the region as a priority location for next-generation AI infrastructure, data-centre investment and associated employment growth. The designation is expected to enable over 5,000 new jobs and harness over one gigawatt of computing power by the early 2030's, supported by streamlined planning pathways, enhanced grid-connection support and targeted skills programmes. This strategic policy commitment directly reinforces Era4's plans in Newport, positioning the proposed AI Centre to play a pivotal role in delivering the Government's vision for South Wales as a nationally significant hub for digital technologies, AI research and energy-efficient data processing.
- 2.12 By delivering a modern AI Centre on a long-established industrial site, Era4 will contribute to the transformation of Newport into a new focal point for technological investment in South Wales. The project

aligns with both national and local objectives to grow the digital economy, create high-value employment and support sustainable economic development.

### 3 The Site and Surroundings

#### Site Location

- 3.1 The application site is located within the former Liberty Steel Works complex, off Corporation Road, approximately 2 kilometres south-east of Newport city centre. The wider Liberty Steel work occupies a substantial area on the eastern bank of the River Usk, forming part of Newport's established industrial and employment corridor, with industrial, commercial and infrastructure uses surrounding the site. The Design and Access Statement in **Appendix 1**, provides further details of the character of the application site and surrounding area.
- 3.2 Access to the site is taken via the existing Liberty Steel main entrance from Corporation Road, which connects directly to the A48 Southern Distributor Road (SDR) and provides excellent links to the M4 motorway (Junction 24) and the wider South East Wales and Severnside corridor.
- 3.3 The application relates to an open area of open ground to the east of the railway line.

#### Surrounding Land Uses

- 3.6 The immediate surroundings are characterised to the north and north-east by large-scale industrial, manufacturing and logistics premises along Corporation Road, to the west by the Liberty Steel rolling mills and portside uses, and to the south and south east by large infrastructure sites including a sewerage works and the Uskmouth Power Station.
- 3.7 The land to the east is largely open ground, forming part of the Solutia Chemical Works site, the main built up component of which remains directly north of the application site. Further east are agricultural uses interspersed by small hamlets.
- 3.8 To the west, beyond the steelworks boundary, lies the River Usk, a tidally influenced corridor forming part of the River Usk Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). The river edge comprises managed embankments, wharfage and associated industrial infrastructure.
- 3.9 The nearest residential receptors are located approximately 1km to the north-west, separated by intervening industrial premises. There are no community facilities or sensitive land uses within the immediate vicinity. The existing industrial context, therefore, provides an appropriate environment for the proposed use without risk of adverse amenity effects.

#### Site Designations and Constraints

- 3.10 The site lies within a safeguarded employment area identified in the Newport Local Development Plan 2011–2026 (Policy EM3), where continued employment and industrial activity is supported. No landscape, conservation area or visual designations apply.
- 3.11 The application site is located in **Flood Zone 1** and as defined in Technical Advice Note (TAN) 15: Development and Flood Risk, this area is not at risk from river or tidal flooding. A Flood Consequences Assessment (FCA) accompanies the application confirming the site is not at risk of flooding and will not increase flood risk or flows elsewhere (**Appendix 2**).
- 3.11 The proximity of the River Usk SAC/SSSI (approximately 500 metres west) means that a Habitat Regulations Assessment (HRA) screening has been undertaken to confirm there are no likely significant effects on designated ecological features (**Appendix 3**). A Preliminary Ecological Assessment is provided in **Appendix 4** and concludes the site is of little ecological value and recommends that a check for breeding/ground nesting birds and newts be undertaken before development commences.
- 3.12 The site contains no public rights of way and all vehicular and pedestrian access will continue to be taken from the Corporation Road the existing private industrial estate roads with the site.
- 3.13 There are no listed buildings, scheduled monuments or heritage assets within or adjacent to the application site. While the Liberty Steel complex contributes to Newport's industrial heritage, the proposed development will appear as part of the infrastructure supporting the industrial use, and will not affect the character or setting of any designated heritage assets. Indeed, the development represents a substantial investment in the site and the Newport area and will deliver much needed digital infrastructure and a high capacity compute resource that will support wider economic investment and job creation across a broad range of sectors, industries, businesses and research fields. This is entirely in keeping with the aim and objectives of identifying this part of South Wales as an AI Growth Zone.

### Summary

- 3.14 In summary, the site comprises previously developed industrial land within an established heavy-industry location, served by existing utilities, access, and drainage infrastructure. Its isolation from residential areas, proximity to major transport routes, and connection to grid and energy infrastructure make it ideally suited to the proposed AI-centre use.

## 4 The Proposed Development

### Description of Development

- 4.1 The proposed development is described on the planning application forms as follows:

***“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.”***

- 4.2 The proposed Newport AI Centre forms a key component of Era4’s national programme to deliver a distributed network of secure, sovereign AI-computing facilities. This facility will form part of a UK mesh network and comes at a pivotal point in the evolution of the Era4 business and offering.
- 4.3 The scheme proposed by this application does not involve constructing new buildings and is consistent with a low-impact, sustainable form of development that utilises a previously developed site of low ecological value. The proposed development should be viewed in similar way to the creation of a substation or other form of infrastructure, as this will enable and support wider economic investment and job creation across South Wales.
- 4.4 The drawing pack submitted in support of this application provides examples of the plant and equipment that it is ***intended*** to install within the proposed secure compound area. However, this needs to be considered with flexibility, as modular data centre technology, together with that of the supporting plant and equipment, is continuously evolving. Technology is becoming more efficient, more powerful and is providing a higher density of computing power in increasingly smaller footprints, and it is more efficient and quieter in operation. Therefore, the specification and availability of the equipment shown on the drawings that support this planning application could change between a planning permission being issued and the point at which the equipment is ordered and installed. This is why an outline application has been issued in this instance, to enable the details of the ***actual*** plant and equipment to be set out and applied for at the reserved matters stage.
- 4.5 Notwithstanding this, any permission for a modular data centre of the type proposed will need to allow the equipment to be moved, removed, replaced, upgraded or substituted at any time after installation within the confines of the secure compound. This flexibility can be introduced through a series of suitably worded planning conditions, that ensure any potential, albeit unlikely, impacts of the operation of the data centre are appropriately managed and mitigated. This is one of the attractions of modular equipment, in that it provides greater flexibility for upgrades either in whole or in part, ensuring the facility continues to provide cutting edge technology throughout the lifecycle of the data centre.

## Overview of the Proposed Development

- 4.6 The application seeks outline planning permission to create a modular data centre to be sited on a new concrete slab. Each module includes a containerised computer unit, supported by a separate container housing electrical transformer and regulation equipment, along with external pumps, chillers and air handling units. These pieces of equipment are connected via pipes and ducting and collectively form a single 'module' that delivers 1 MW of IT compute power. The proposed development contains twenty modules, enclosed by a secure perimeter with gated access and a prefabricated security unit/office.
- 4.7 The equipment that will form the modular facility is shown on the submitted drawings, with the power unit and compute containers being very similar in appearance to standard shipping containers. These pieces of equipment are not of a significant scale and massing and will not be visible from outside of the site. The other pieces of equipment are smaller and will be positioned at a low level.
- 4.8 The development will start by creating the concrete slab that will cover the majority of the proposed compound area. The equipment will be lifted on to the slab by crane and connected by pipes, cabling and ducting runs. The modules will be surrounded by a secure post and mesh fence system.
- 4.9 Whilst the layout shown as part of the application pack is the intended configuration for installation, the design and specification of the equipment could change in the period between planning permission being issued and the equipment being ordered and/or manufactured. Details of the actual equipment to be installed will be confirmed at the reserved matters stage.
- 4.10 The proposal represents a low impact form of development, and is set within an industrial area. The computer processing activities take place within the sealed modules which generate little to no external noise. The pumps, coolers and air handling units are standard pieces of equipment with specified noise ratings. Based on similar installations proposed elsewhere, the proposal on this site will not be audible at the nearest sensitive receptor, which is a kilometre away and is separated from the site by heavy industrial uses. A Noise Assessment has not been undertaken at this stage as the details and specification of the equipment to be installed at the site is not yet known and will not be confirmed until the reserved matters stage. This is covered in more detail in Section 5 of this Statement.
- 4.11 The data centre will not produce any odours, gaseous emissions or liquid discharges. Power is consumed by the modules and the only emissions are warm air and the limited and localised levels of noise from the equipment.
- 4.12 The AI Module will utilise a closed loop liquid cooling system, hence the requirements for ducts, pumps, chillers and air handling units. The liquid cooling system does not draw water from the mains, it is a sealed

system with no discharges or outfalls. The liquid in the system can absorb and remove heat from the computer processors much more effectively than air. Extracting the heat from the liquid within the closed loop system is energy efficient, lowering the temperature of the liquid which is then recirculated through the system and the process is repeated. It is similar to the closed loop system operating within a fridge or air conditioning system.

- 4.13 Compared to the more efficient versions of traditional air-cooled data centres which have a Power Utilisation Efficiency (PUE) of 1.2, the modular facilities proposed by this application have a PUE of 1.05-1.1. This means that for every 1 kW of power used for IT load, the proposed facilities will use 15-20% more of that power for actual computer processing rather than for cooling, as it takes 50% less power to cool and support each 1 kW of compute.
- 4.14 The former Liberty Steel facility used a considerable amount of power when fully operational. The electricity cable connections that delivered power to site remain in situ and can be utilised by the proposed data centre. This is a considerable advantage of this site as most major data centre developments are delayed by the upgrades or extensions that are needed to the transmission grid network.
- 4.15 There has also been a substantial investment in recent years to improve and upgrade the fibre networks around South Wales. Access to high speed fibre networks are critical to the effective operation of a data centre. Investigations have shown that the necessary fibre connections and upgrades to the site are straightforward and can be delivered to enable a rapid deployment of the modular equipment in this location.
- 4.16 Apart from electricity and fibre connectivity, data centre sites require standard water and drainage connections. Again, these facilities are already available at the former Liberty Steel site.

### **Operational Characteristics**

- 4.17 The AI centre will operate continuously (24 hours per day, 365 days per year), but with limited on-site personnel. Typical occupation will comprise security personnel and a small team of technical and maintenance staff, with visiting contractors for periodic servicing.
- 4.18 The proposal does not involve the import or storage of hazardous materials. All operations are confined within the modules and compound, ensuring no external processing, dust, or odour emissions. Again, a useful comparison is the development of a large substation complex.
- 4.19 Vehicular access will continue via the established estate-road network. Traffic generation is expected to be significantly lower than previous industrial operations, comprising mainly staff and servicing vehicles,

with negligible HGV movements. It is expected that, on average, there will be less than ten vehicle movements in a typical day associated with the normal operation of the data centre.

### **Summary**

- 4.20 The proposed creation of a modular data centre involves positioning pre-fabricated containerised and standalone equipment on a slab. It is a low impact form of development on a previously developed site of little to no ecological value, that will not be visible from any area outside of the site. However, as noted above, the design and specification of the modular and supporting equipment is continuously evolving and so the actual design and specification of the equipment that will be installed might vary from that shown in the plans and documents submitted with this application. In order to achieve the flexibility required, it is proposed that a condition be attached to the planning permission that allows alternative, replacement and additional equipment to be installed within the compound without the need for planning permission, provided the equipment is below a height of 6.5m. The suggested wording is as follows:

*“Alternative, replacement and/or additional equipment may be installed within the red line of the application site without the need for a further planning application provided the structure/equipment does not exceed 6.5m in height, unless otherwise approved in writing”.*

- 4.21 It is suggested that the red line plan be an approved plan and the other documents submitted with this application are identified as being illustrative only. This will enable the level of flexibility required by this development and ensure that there is no conflict between the plans approved and any variation with the equipment that is installed on site.

## 5 Environmental Effects

- 5.1 This section considers the potential environmental effects of the proposed development. The application site comprises open and vacant ground within a previously developed industrial site and is located within a long-established employment area, surrounded by heavy industrial and large scale infrastructure uses. The modular AI Centre will be manufactured offsite within a factory, optimising the uses of resources and minimising waste and emissions. Once installed, the facility will operate with low traffic movements, minimal emissions and involves no external industrial processes, nor use of hazardous materials. The development will not, therefore, give rise to any significant environmental impacts during either construction, manufacture or in operation.

### Flood Risk and Coastal Resilience

- 5.2 The site does not lie within an area at risk of flooding, as demonstrated by the Flood Consequence Assessment in **Appendix 2**. The proposal introduces only a limited area of impermeable surfaces within the site, with surface drainage to be controlled and managed using a sustainable drainage system, discharging into the existing surface water features and balancing ponds. The development will not significantly change site levels or drainage routes, and will not affect floodplain storage or flow paths.
- 5.3 Surface-water drainage will be managed through a SuDS-compliant strategy that ties into the existing drainage network on site to ensure the proposal does not increase off-site flood risk. The details of this will be provided as part of the reserved matters submission.
- 5.4 For clarity, it is important to emphasise that the proposed liquid cooling system does not draw significant volumes of water from the mains like a more traditional air cooled data centre system. The system will, however, reduce energy usage of the facility as less energy will be needed to cool the processors. The main user of water on site will be the welfare and staff facilities. The overall volume of water used annually by this facility is expected to be no greater than that consumed by approximately two average four bedroom family houses. The operation of the proposed development will not result in a material increase in mains water extraction or drainage flows over the current state of the site as a vacant former industrial complex. The operation of the proposed facility will not result in an increased flood risk from drainage flow rates.

### Transport and Access

- 5.5 The proposed AI Centre will generate very low levels of traffic that will not be noticeable on the local network, with only a small number of staff movements and periodic maintenance visits. Traffic generation will be significantly lower than historic industrial activity associated with the former Liberty Steel complex

and considerably lower than many B2/B8 uses permitted under the site's employment allocation. The site will, however, be staffed 24 hours a day, which will provide wider site security and help to prevent unauthorised site access, antisocial behaviour and vandalism.

- 5.6 The development reuses existing estate-road connections at Newport and does not require any alterations to the public highway or strategic road network. As such, a full Transport Assessment is not necessary, and there are no anticipated highway capacity, safety or access concerns.

### **Ecology and Biodiversity**

- 5.7 The application site comprises open ground within the industrial complex and is of little ecological value. An Ecological Assessment has been undertaken and is included as **Appendix 4**. No priority habitats or semi-natural features are present within the development footprint, with the only recommendation being to undertake a check for breeding/ground nesting bird and great crested newts prior to development commencing.
- 5.8 The application site lies within a heavily industrialised coastal zone with no ecological designations within or directly adjacent to it. The proposed works will not involve significant vegetation clearance or excessive lighting in sensitive areas, and no impact on designated ecological sites is expected.
- 5.9 The proposal nevertheless offers opportunities for proportionate biodiversity enhancement, such as integrated bird/bat features on elevations.

### **Landscape and Visual Effects**

- 5.10 The proposed modular data centre development sits within a large-scale industrial landscape, with the Liberty Steel site, Uskmouth Power Station and Solutia Chemical works forming the immediate environs and backdrop to the proposed development. The presence of the existing balancing ponds also creates separation between the application site and the ownership boundary of the Liberty Steel site. Given the low rise nature of the proposed development and the distances involved, this limits the visibility of the development outside of the site boundary. The land rises gently from the River Usk and there are open fields to the east that form part of the Solutia Chemical Works site. These fields are interspersed by tree belts and extensive hedgerows along field boundaries. These screen views of the application site from any publicly accessible area. The development will not, therefore, have a material landscape or visual impact, and a Landscape and Visual Assessment is not necessary.

**Heritage**

- 5.11 There are no designated heritage assets within or adjoining the site. The Liberty Steel complex forms part of Newport's industrial heritage context, but the proposed development will respect this character. The nearest listed buildings are over 500 metres distant and screened by modern industry. Accordingly, the development will have no effect on heritage significance, and no Heritage Assessment is required.

**Noise**

- 5.12 The nearest residential receptors are located approximately one kilometre from the application site. AI Centre operations generate limited noise, confined primarily to cooling infrastructure and occasional service activity. Assessments undertaken for facilities where it is proposed to install equipment of the type that is likely to be developed at Newport, have indicated that the potential for noise impacts on sensitive receptors are limited.
- 5.13 The maximal sound pressure level from the equipment is around 68 dB(A) at the worst-case site boundary (based on a total sound power level of 107 dB(A)) and over the distance to the nearest sensitive receptor at Newport, and with intervening heavy industrial uses, the operation of the modular facility is unlikely to be audible. Indeed, calculations suggest a conservative sound level of less than 25 dB, which would be considered very low in accordance with BS 4142. Given this, and that this position can be confirmed at reserved matters stage, there is considered to be no requirement to undertake a Noise Assessment at this stage.
- 5.14 The development will not give rise to any adverse noise effects at residential or community locations, and is, therefore, considered to be suitable for this location. The need for a Noise Assessment can be reviewed at reserved matters stage when the technical details of the equipment to be installed on site are known.

**Air Quality**

- 5.15 The proposal introduces no combustion processes, no dust-generating activity, and only limited vehicle movements. Backup generators, if required, would operate infrequently for maintenance only and would comply with modern emission standards.
- 5.16 There are no sensitive receptors in close proximity, and baseline air quality is not expected to change as a result of the development. No Air Quality Assessment is required.

**Summary**

- 5.17 In summary, the proposal represents a low-impact reuse of existing industrial site within an established industrial setting. The works are confined to the erection of a post and mesh fence to create a secure compound, creation of a concrete slab, and the siting of external plant and equipment. The assessments and work undertaken in support of this application confirms that the development will not result in any significant effects in respect of flood risk, highways, ecology, landscape, heritage, noise or air quality. As a consequence, no additional technical studies are necessary to support the determination of the application beyond the Ecological Assessment and Flood Consequence Assessment appended to this Planning Statement.

## 6 Planning Policy Context and Compliance

### Introduction

6.1 This section identifies the relevant planning policy framework and demonstrates how the proposed AI Centre accords with national, regional and local planning policy. The assessment draws upon:

- Future Wales: The National Plan 2040 (2021);
- Planning Policy Wales (Edition 12, 2024);
- Relevant Technical Advice Notes (TANs);
- The Newport Local Development Plan (NLDP), adopted 2015, covering the period 2011-2026; and
- Material considerations, including the UK Government's designation of South Wales as an AI Growth Zone.

### Future Wales: The National Plan 2040

6.2 Future Wales sets the spatial strategy for sustainable growth across Wales. Newport forms part of the South East Wales Metro Region and the Cardiff-Newport Growth Corridor, identified for continued economic regeneration and infrastructure investment.

6.3 Relevant Future Wales objectives include:

| Policy Objective                                                         | Compliance Summary                                                                                                                                                                                            |
|--------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Policy 1 – Where Wales Will Grow</b>                                  | Supports growth within existing settlements and on brownfield land. The proposal redevelops previously developed industrial buildings and site at Newport, fully consistent with brownfield-first principles. |
| <b>Policy 2 – Shaping Urban Growth and Regeneration</b>                  | Encourages intensification and productive reuse of safeguarded employment land. The AI Centre introduces a high-value digital use on employment Policy EM3.                                                   |
| <b>Policy 8 - Flooding</b>                                               | Focus development on areas not at risk of flooding (site in Flood Zone A) and adopting nature-based schemes for flood management.                                                                             |
| <b>Policy 9 – Resilient Ecological Networks and Green Infrastructure</b> | To maintain and enhance biodiversity, the use of green infrastructure and nature-based solutions.                                                                                                             |
| <b>Policy 12 – Regional Connectivity and Transport</b>                   | Prioritises development accessible to strategic transport routes. The site is well connected to the local and regional road network.                                                                          |
| <b>Policy 13 – Digital Communications &amp; Technology</b>               | Supports investment in digital infrastructure and data networks. The development directly delivers nationally significant AI and data-processing capability.                                                  |

### Planning Policy Wales (Edition 12, 2024)

6.4 PPW 12 emphasises placemaking, sustainable reuse of existing resources, and climate-resilient design. It requires development to contribute to the well-being goals of the Well-being of Future Generations (Wales) Act 2015.

6.5 Key principles relevant to this proposal include:

- **Efficient Use of Land (Chapter 3):** Priority should be given to previously developed land. The scheme redevelops a brownfield industrial plot, avoiding greenfield loss.
- **Productive and Enterprising Places (Chapter 5):** Planning should enable modern employment uses. The AI-centre use aligns with digital-economy objectives and strengthens Newport's employment base.
- **Sustainable Resource Management (Chapter 6):** Encourage energy-efficient design and climate-resilient development. Developing an area formerly used to dispose of arisings from the steel works and turning this area, which is outside of the flood zone, into an important AI facility that will help to meet the objectives of the South Wales AI Growth Zone. This critical element of digital infrastructure will be manufactured in a factory, helping to ensure a high quality of equipment, built efficiency with minimal waste.
- **Infrastructure and Connectivity (Chapter 5):** Support essential infrastructure including digital communications. The proposal represents exactly the type of low-impact, high-tech infrastructure envisaged by PPW.

| PPW Topic (Edition 12)                                | Relevance and Compliance                                                                                                                                      |
|-------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Efficient Use of Land (Chapter 3)</b>              | Prioritises the reuse of brownfield land. The proposal redevelops the former Liberty Steel Works, a large previously developed industrial site                |
| <b>Productive and Enterprising Places (Chapter 5)</b> | Supports modern employment uses and diversification. The AI Centre provides high-value skilled jobs and reinforces South Wales's role in the digital economy. |
| <b>Sustainable Resource Management (Chapter 6)</b>    | Requires climate-responsive design. The site is not within a flood zone.                                                                                      |
| <b>Infrastructure and Connectivity (Chapter 4)</b>    | Encourages investment in essential digital infrastructure. The scheme delivers strategic AI and HPC capacity within South Wales.                              |
| <b>Well-being Goals (WFG Act 2015)</b>                | Promotes long-term economic, environmental and social benefits. The proposal regenerates an underutilised site while supporting high-skilled economic growth. |

### Technical Advice Notes (TANs)

6.6 The following TANs are of relevance:

| TAN           | Topic               | Relevance / Compliance Summary                                                                                                                                                                          |
|---------------|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>TAN 5</b>  | Nature Conservation | The site is with a previously developed site with limited ecological features; Preliminary Ecological Assessment submitted. HRA Screening concludes no likely significant effects on the River Usk SAC. |
| <b>TAN 12</b> | Design              | The modular building's form, materials and layout will create a highly efficient digital infrastructure facility.                                                                                       |
| <b>TAN 15</b> | Flood Risk          | The application site is located in Flood Zone 1 and not at risk of flooding.                                                                                                                            |
| <b>TAN 18</b> | Transport           | The AI Centre will generate minimal traffic and uses existing access along Corporation Road, requiring no highway works.                                                                                |

### Local Planning Policy

#### Newport Local Development Plan (2011–2026)

6.7 The LDP sets out the local framework for development management. The site lies within a safeguarded employment area under Policy EM3, where employment and industrial uses are supported.

6.8 The following policies are of particular relevance:

| Policy                                      | Relevance/Compliance Summary                                                                                                                                                                                                                                                  |
|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>SP1 – Sustainability</b>                 | Development to contribute to sustainable outcomes. The proposal uses vacant/open ground at a previously developed site to provide highly efficient digital infrastructure.                                                                                                    |
| <b>SP3 – Flood Risk</b>                     | Manage risk in accordance with TAN 15. The FCA demonstrates the application site is in Flood Zone A and is not at risk of flooding.                                                                                                                                           |
| <b>SP17 – Employment Land Provision</b>     | Maintain an adequate supply of employment land. The proposal safeguards employment use and introduces new digital-sector jobs, whilst providing an AI facility that will help to bolster the regional economy and generate significant additional investment and expenditure. |
| <b>EM3 – Protected Employment Sites</b>     | Employment uses supported; non-employment uses resisted. The AI data-centre use remains an employment use consistent with EM3.                                                                                                                                                |
| <b>GP1 – General Development Principles</b> | Require good design, access and amenity protection. No adverse impacts; low level and not visible outside of the site boundary, and reduced operational traffic.                                                                                                              |
| <b>GP6 – Quality of Design</b>              | Promote context-responsive, sustainable design. The design of the development creates maximum efficiencies in operation, using fewer resources to provide significant computing power.                                                                                        |

|                                           |                                                                                                   |
|-------------------------------------------|---------------------------------------------------------------------------------------------------|
| <b>GP8 – Access, Movement and Parking</b> | Ensure safe and efficient access. Existing arrangements retained; vehicle generation reduced.     |
| <b>CE6 – Archaeology and Heritage</b>     | Protect heritage assets and setting. No designated assets affected; industrial context preserved. |

## Material Considerations

### South Wales AI Growth Zone

- 6.9 In November 2025, the UK Government designated South Wales as an AI Growth Zone, identifying the region, including South Wales, as a nationally significant hub for AI, data-centre development and high-capacity digital infrastructure. The initiative is expected to unlock major investment, improved grid coordination, and enhanced skills pathways.
- 6.10 The proposed AI Centre directly supports these objectives and is one of the first major private-sector developments capable of delivering tangible benefits under the Growth Zone framework.

### Assessment Against Policy Objectives

- 6.11 The proposed development is fully consistent with the strategic and local planning framework:
- Sustainable Location: The site is brownfield, serviced and within a key employment corridor.
  - Economic Benefit: The use supports Newport's regeneration and diversification into high-value digital infrastructure.
  - Environmental Protection: The FCA and HRA demonstrate acceptable flood and ecological risk.
  - Design Quality: highly efficient modular prefabricated units, delivering critical AI infrastructure.
  - Transport Sustainability: No new access or highway capacity required; traffic significantly reduced compared with the existing industrial use.

## Conclusion

- 6.12 The proposal satisfies the key aims of Future Wales 2040, PPW 12, relevant TANs, and the Newport LDP by:
- Reusing an existing industrial site, avoiding new land take;
  - Delivering digital infrastructure of regional significance;
  - Operating safely on a site that is not at risk of flooding;
  - Achieving a sustainable, low-impact form of economic development.

- 6.13 Accordingly, the proposed modular AI facility at Liberty Steel represents a policy-compliant and sustainable form of development that should be supported by Newport City Council.

## 7 Planning balance

- 7.1 The proposed development represents a sustainable and policy-compliant regeneration of part of a large, previously developed employment site at the former Liberty Steel plant in Newport. The scheme delivers substantial economic, technological and environmental benefits in accordance with the Well-being of Future Generations (Wales) Act 2015 and the placemaking principles within Planning Policy Wales.
- 7.2 The AI Centre will contribute to sustainable placemaking by:
- Regenerating underutilised brownfield land in a safeguarded employment area (NLDP EM3);
  - Delivering a high-value digital infrastructure facility of regional and national significance in an area that is not at risk of flooding;
  - Supporting the UK Government's South Wales AI Growth Zone objectives;
  - Providing high-skilled employment opportunities and supply-chain benefits;
  - Delivering energy-efficient data modules manufactured offsite to modern design standards;
  - Generating very low levels of traffic, significantly below historic industrial activity;
  - Ensuring no significant environmental effects, with no impacts on ecology, heritage, air quality, landscape or residential amenity.
- 7.3 The proposal meets the overarching tests of sustainable development by balancing economic growth, environmental responsibility and social well-being. The development accords with the strategic direction of Future Wales, the NLDP and the UK's national digital-infrastructure policy agenda.
- 7.4 Given the site's safeguarded industrial status, the absence of harm, and the clear and compelling benefits arising from the delivery of a modern AI Centre at the former Liberty Steel site in Newport, the planning balance weighs strongly in favour of the proposed development.

## 8 Conclusions

- 8.1 This Planning Supporting Statement has been prepared in support of an outline planning application by Era4 for the development of a modular data centre within a secure compound, associated equipment and structures, engineering operations, staff accommodation and associated works at the former Liberty Steel at Newport.
- 8.2 The proposal represents the sustainable reuse of an industrial site within an established employment area. The development involves the siting of external plant and equipment, no new access, and no material change to operational intensity. The scheme delivers a high-quality AI-centre facility that will contribute to South Wales's economic resilience, digital capacity and long-term regeneration objectives.
- 8.3 The assessment confirms that the proposal is fully compliant with national, regional and local policy, including:
- Future Wales 2040;
  - Planning Policy Wales (Edition 12);
  - Relevant Technical Advice Notes; and
  - South Wales & Gwynedd Joint Local Development Plan (2017–2032).
- 8.4 The principal conclusions are:
- Acceptable in principle – The site is allocated for B-class employment uses; the AI Centre is a compatible digital-processing use.
  - Design efficiency – the external plant and equipment and modules that will form the data centre are manufactured offsite to high standards, efficiently and with minimum waste.
  - Operational efficiency - the energy performance of the proposed data centre far exceeds that of standard air cooled data centres, reducing overall energy consumption per kilowatt of computing power used.
  - Environmental safeguards – The scheme avoids significant environmental effects
  - Transport and access – The development generates very limited traffic and requires no changes to the public highway.

- Economic and strategic value – The proposal aligns with the UK Government's AI Growth Zone designation for South Wales, positioning South Wales as a key location for future digital infrastructure.

8.5 Taken together, the development constitutes a sustainable form of economic growth with clear environmental, technological and employment benefits. It accords with the development plan when read as a whole, and no material considerations indicate otherwise.

8.6 Accordingly, it is respectfully requested that the Local Planning Authority grants planning permission for the proposed AI Centre at Newport in recognition of its policy compliance, strategic importance and positive contribution to South Wales and the wider South Wales region.

## Figures

## **Appendix 1 – Design and Access Statement**

## **Appendix 2 – Flood Consequences Report**

### **Appendix 3 – Habitat Regulations Assessment (HRA) Screening**

## **Appendix 4 – Preliminary Ecological Assessment**