

HABITAT REGULATIONS ASSESSMENT (HRA) SCREENING REPORT

Proposed Modular Data Centre Development

Liberty Steel Works, Corporation Road, Newport

Prepared for Era4 Limited

EXECUTIVE SUMMARY

This Habitat Regulations Assessment (“HRA”) Screening Report has been prepared to inform Newport City Council, as competent authority, in respect of its duties under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). It considers whether the proposed modular data centre development at the former Liberty Steel Works, Corporation Road, Newport could, either alone or in combination with other plans or projects, give rise to likely significant effects on any European Site, or Ramsar site.

The proposed development comprises a compact, secure modular data centre compound on previously developed land within an established industrial complex. The development would include modular data processing units, associated electrical and cooling infrastructure, staff welfare accommodation, access, security fencing, surface water drainage infrastructure and biodiversity enhancement measures. It would not involve manufacturing, bulk chemical storage, process effluent discharge, combustion plant as a primary operational process, or public recreational use.

The application site extends to approximately 0.83 hectares and forms a discrete part of the wider Liberty Steel industrial estate. It lies outside the boundary of any European Site. The River Usk SAC lies approximately 500 metres to the west, while the Severn Estuary SAC, SPA and Ramsar site form part of the wider estuarine ecological network downstream and to the south, approximately 1km to the south. The site is physically separated from the River Usk by intervening industrial land, roads, railway infrastructure and existing built development.

The screening assessment has considered the same broad categories of effect typically examined in HRA screening, including direct habitat loss, disturbance, hydrological connectivity, water quality, air quality, noise, lighting, recreational pressure, invasive non-native species and in-combination effects. The assessment applies the source-pathway-receptor approach and adopts the precautionary principle. Where no credible pathway exists between the development and a designated receptor, likely significant effects can be excluded at Stage 1 of the HRA process.

The proposal differs materially from heavier industrial or energy-storage schemes that may require detailed Appropriate Assessment. It is a small-scale modular data centre on an existing industrial site, with limited operational staffing, limited vehicle movements, no direct water abstraction from the River Usk, no process wastewater discharge, no direct discharge to a European Site and no significant atmospheric emissions. Surface water will be managed through engineered drainage and sustainable drainage infrastructure, with detailed design capable of being controlled through reserved matters and planning conditions.

The assessment concludes that the proposed development is not likely to have a significant effect on the River Usk SAC, Severn Estuary SAC, Severn Estuary SPA or Severn Estuary Ramsar site, either alone or in combination with other plans or projects. No direct habitat loss would

occur; no functionally linked land has been identified within the application site; and no credible hydrological, air quality, disturbance or recreational pathway has been identified that would undermine the conservation objectives of the relevant designated sites.

Accordingly, the proposed modular data centre development screens out at Stage 1 of the HRA process and Appropriate Assessment is not required.

1. INTRODUCTION

1.1 Purpose of Assessment

This report has been prepared to inform Newport City Council's duties under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

The assessment considers whether the proposed development could result in likely significant effects upon any European site either:

- Alone; or
- In combination with other plans and projects.

The report adopts the precautionary principle in accordance with established case law and NRW guidance.

1.2 Structure of this Report

This report is structured to follow the main stages of HRA screening. It first describes the proposed development and its environmental context, then identifies the relevant European Sites and Ramsar sites, defines the potential zone of influence, considers possible impact pathways using a source-pathway-receptor approach, and reaches a conclusion on likely significant effects alone and in combination.

The report is intentionally limited to HRA screening. It does not seek to replicate a full ecological appraisal, drainage strategy, noise assessment or construction management plan. Those matters may provide supporting technical information at reserved matters or condition stage, but the HRA screening conclusion is based on whether there is a credible ecological pathway capable of giving rise to likely significant effects on designated sites.

1.3 Development Description

The application seeks outline planning permission for:

- Modular data centre units;
- Associated cooling equipment;
- Electrical infrastructure;
- Security fencing;
- Internal access arrangements;
- Engineering operations;
- Staff welfare accommodation;
- Sustainable drainage systems;
- Biodiversity enhancements to the land adjacent to the eastern site boundary.

The development will be located on underutilised previously-developed land within the Liberty Steel complex and will operate as an AI computing facility using electricity-powered

processing equipment. The development does not involve industrial production processes or manufacturing activities.

Operational activity will principally comprise server processing, cooling equipment operation and periodic maintenance visits. Vehicle movements are expected to remain very low. A modular data centre is expected to be staffed 24 hours a day in a three shift pattern. This will include security staff and site management and maintenance staff. Any refit or scheduled maintenance works will be undertaken at specific times and this could involve support staff coming from other data centre sites within the business. However, vehicle movements are likely to be less than approximately 20 vehicles per day.

The modular format of the proposal is relevant to this assessment. The data centre would be formed from prefabricated units installed within a managed compound rather than from extensive permanent industrial buildings or process plant. Construction works will be limited to the installation of a concrete plinth on the site and the installation of cables and ducting. The modular pods and supporting equipment will arrive built and will need to be craned into place and connected together. This will limit the potential for environmental impacts during the construction phase. This will also limit the volume of construction traffic visiting the site, which will be managed through the preparation of a construction and environmental management plan.

The operational use would be controlled, secure and low occupancy, with activity primarily associated with data processing, routine maintenance, equipment inspection and site management.

The facility would not give rise to public access, recreational use or visitor attraction activity. It would therefore not increase recreational pressure on the Severn Estuary ecological network. Nor would it involve abstraction from the River Usk or discharge of process wastewater to the River Usk or Severn Estuary.

2. LEGISLATIVE FRAMEWORK

This assessment has been prepared with reference to:

- Conservation of Habitats and Species Regulations 2017 (as amended);
- Environment (Wales) Act 2016;
- Wildlife and Countryside Act 1981 (as amended);
- Planning Policy Wales Edition 12;
- Technical Advice Note 5 (Nature Conservation);
- NRW Habitat Regulations Assessment Guidance.

The assessment also reflects relevant European and domestic case law including:

In Wales, Ramsar sites, potential Special Protection Areas, possible Special Areas of Conservation and sites identified as compensatory habitat are treated as requiring equivalent consideration for planning purposes. This report therefore considers the Severn Estuary Ramsar site alongside the relevant SAC and SPA designations.

- People Over Wind and Sweetman v Coillte Teoranta (C-323/17);
- Holohan v An Bord Pleanála (C-461/17);
- Waddenzee (C-127/02).

2.1 HRA Screening Methodology

The Stage 1 screening test asks whether the project, either alone or in combination with other plans or projects, is likely to have a significant effect on a European Site in view of that site's conservation objectives. The test is precautionary. A likely significant effect is not limited to effects that are certain or probable; it includes possible significant effects where there is a credible ecological pathway.

This assessment applies a source-pathway-receptor model. A potential effect requires: a source arising from the proposed development; a pathway by which that source could reach or influence a designated receptor; and a receptor comprising a qualifying feature, supporting habitat or functionally linked land relevant to the conservation objectives of a European Site or Ramsar site. Where any one of these elements is absent, likely significant effects can be screened out.

Consistent with the legal principles established in People Over Wind, avoidance or reduction measures intended specifically to prevent likely significant effects are not relied upon at the screening stage. Good practice measures, such as construction environmental management, drainage design, lighting control and biodiversity enhancement, are identified where relevant as normal planning controls, but the screening conclusion is founded on the absence of credible impact pathways and the nature, scale and location of the modular data centre proposal.

3. SITE DESCRIPTION AND DEVELOPMENT CONTEXT

3.1 Application Site

The application site forms part of the former Liberty Steel industrial complex located on Corporation Road, Newport. It is a small parcel of previously developed land within a substantially urbanised and industrial setting. The site is not within, adjacent to, or functionally part of any European Site or Ramsar site.

The development area comprises disturbed industrial land characterised by:

- Historic industrial activity;
- Areas of hardstanding;
- Previously developed land;
- Existing internal roads and infrastructure.

The site lies east of the main railway corridor and remains physically separated from the River Usk by industrial infrastructure and developed land.

The character of the site is important to the HRA screening assessment. The development would reuse land already influenced by industrial activity and infrastructure. The proposal would not introduce a new land use into an undeveloped, sensitive or estuarine environment; rather, it would place modular digital infrastructure within an established industrial estate where existing baseline disturbance, lighting, built form and infrastructure are already present.

3.2 Surrounding Environment

The surrounding land uses comprise:

- Existing industrial operations;
- Employment premises;
- Rail infrastructure;
- Port and logistics activities;
- Areas of developed brownfield land.

The environment is therefore heavily modified and substantially influenced by historic industrial activities.

The River Usk corridor and the wider Severn Estuary designations are ecologically important, but the application site is separated from those receptors by intervening land uses and infrastructure. This separation materially reduces the likelihood of direct disturbance, habitat loss, functional land take or uncontrolled discharge pathways arising from the proposed modular data centre.

3.3 Key Characteristics Relevant to HRA Screening

- The site is previously developed and industrial in character.
- The proposal is compact in scale, extending to approximately 0.83 hectares.
- The development involves the construction of a concrete plinth and the installation of pre-fabricated and pre-assembled plant and equipment.
- The use is operationally low occupancy and not open to the public.
- The facility would not involve process wastewater discharge, industrial effluent or water abstraction from designated watercourses.
- Operational vehicle movements would be limited and intermittent.
- The principal operational environmental considerations are cooling plant noise, lighting and surface water management, all of which are capable of normal planning control.

4. EUROPEAN SITES CONSIDERED

4.1 River Usk SAC

The River Usk SAC lies approximately 500 metres west of the application site.

Qualifying features include:

Annex II Species

- Atlantic salmon (*Salmo salar*)
- Sea lamprey (*Petromyzon marinus*)
- River lamprey (*Lampetra fluviatilis*)
- Twaite shad (*Alosa fallax*)
- Otter (*Lutra lutra*)

Annex I Habitat

- Watercourses of plain to montane levels with *Ranunculus fluitantis* and *Callitriche-Batrachion* vegetation.

4.2 Severn Estuary SAC

Designated for:

- Estuarine habitat;
- Mudflats and sandflats;
- Atlantic salt meadows;
- Reefs;
- Migratory fish species.

The River Usk SAC forms part of the wider estuarine ecological network.

4.3 Severn Estuary SPA

Qualifying interests include internationally important populations of non-breeding:

- Bewick's Swan;
- Shelduck;
- Dunlin;
- Redshank;
- Greater white-fronted goose;
- Assemblages of over-wintering waterbirds.

4.4 Severn Estuary Ramsar Site

Designated under the Ramsar Convention due to:

- Internationally important wetland habitats;
- Waterbird populations (including breeding, migratory and wintering species);
- Migratory fish populations.

4.5 Scope and Zone of Influence

The screening assessment has focused on European Sites and Ramsar sites that could reasonably be affected by the proposed development having regard to distance, ecological connectivity, hydrological connectivity, mobility of qualifying features and the nature of the proposed use. The River Usk SAC and the Severn Estuary SAC, SPA and Ramsar site are therefore the principal receptors considered.

No European Site lies within the application site boundary. The assessment has nevertheless considered whether mobile qualifying species, including otter, migratory fish and breeding, overwintering or passage birds, could be affected through disturbance, water quality, air quality, hydrological change or loss of functionally linked land.

The application site has been assessed to determine whether it comprises functionally linked land supporting the qualifying features of the River Usk SAC or the Severn Estuary SAC, SPA or Ramsar site. The Site comprises previously developed industrial land characterised by areas of hardstanding, disturbed ground and limited scrub vegetation contained within the wider Liberty Steel complex. It does not include intertidal habitat, wet grassland, grazing marsh, mudflat, saltmarsh, riparian habitat or other habitats capable of supporting the qualifying features of the designated sites e.g. as a high tide roost. Furthermore, the Site is enclosed within an established industrial environment and is physically separated from the River Usk and Severn Estuary by existing development and transport infrastructure.

Having regard to the nature of the existing habitats, the absence of ecological connectivity and the surrounding industrial land uses, the application site does not comprise functionally linked land for qualifying migratory fish, otter or the internationally important assemblages of breeding, overwintering and passage waterbirds associated with the Severn Estuary SPA and Ramsar site. Accordingly, no functionally linked land has been identified within the application site.

On the basis of the site's industrial character, physical separation from designated habitats and absence of direct ecological linkage, no functionally linked land has been identified within the application site.

5. IDENTIFICATION OF IMPACT PATHWAYS

The following impact pathways have been considered using the source-pathway-receptor approach. This table provides the screening framework for the more detailed assessment in Section 6.

Impact Pathway	Potential Link?	Assessment Required
Direct habitat loss	No	Screened Out
Impact on Qualifying features	Theoretical	Considered
Habitat fragmentation	No	Screened Out
Construction impacts	Limited	Considered
Water quality effects	Theoretical	Considered
Surface water discharge	Theoretical	Considered
Groundwater effects	No	Screened Out
Air quality effects	Limited	Considered
Noise disturbance	Theoretical	Considered
Lighting impacts	Theoretical	Considered
Recreational pressure	No	Screened Out
Invasive Non-Native species	Theoretical	Considered
In-combination effects	Possible	Considered

6. SCREENING ASSESSMENT

6.1 Direct Habitat Loss

The proposal is entirely confined to an area of previously developed industrial land within the Liberty Steel complex. No land within the River Usk SAC, Severn Estuary SAC, Severn Estuary SPA or Severn Estuary Ramsar site would be directly affected. The development would not require works within the River Usk, the estuary, intertidal habitat, saltmarsh, mudflat or any other designated habitat.

The proposed biodiversity enhancement plan will provide a mechanism for securing appropriate site-level enhancement and management. However, the conclusion of no likely significant effect in relation to direct habitat loss does not rely on enhancement or mitigation. It is based on the absence of designated habitat within the application boundary and the absence of any requirement for the development to use land forming part of a European Site or providing functionally linked land.

Conclusion

No Likely Significant Effect

6.2 Assessment of Qualifying Features

The qualifying features of the River Usk SAC and the Severn Estuary SAC, SPA and Ramsar site have been considered having regard to the nature of the proposed development and the potential source-pathway-receptor relationships.

River Usk SAC

The application site is located approximately 500m east of the River Usk and comprises previously developed industrial land. No works are proposed within the River Usk, its banks or associated riparian habitat.

Otter (*Lutra lutra*)

The proposed development would not result in the loss or fragmentation of riparian habitat or known commuting corridors. The application site does not provide functionally linked habitat for otter associated with the River Usk SAC. Furthermore, no lighting is proposed within the River Usk corridor and the intervening industrial development and transport infrastructure provide substantial physical separation between the Site and the SAC. Consequently, no pathway exists by which the proposal could adversely affect this qualifying feature.

Atlantic salmon, sea lamprey, river lamprey and twaite shad

The proposal does not include works within the River Usk or any connected watercourse. There will be no abstraction of water, no alteration to river flows, no in-channel works, no bank stabilisation works and no process water discharge. Similarly, the scale and nature of the development do not present a credible pathway for sediment mobilisation or pollution to affect the River Usk SAC. Accordingly, no likely significant effects are identified in respect of these qualifying fish species.

Ranunculus fluitantis and Callitriche-Batrachion vegetation

The proposal would not affect the River Usk or its associated aquatic habitats, and there is therefore no mechanism through which the qualifying habitat could be affected.

Severn Estuary SAC, SPA and Ramsar Site

The application site does not comprise intertidal habitat, supporting habitat or functionally linked land for the qualifying bird populations of the Severn Estuary SPA or Ramsar site. The development would not result in habitat loss, recreational pressure, disturbance or changes to estuarine hydrology. Consequently, no likely significant effects are identified in relation to the qualifying habitats or species of these internationally designated sites.

Conclusion

No Likely Significant Effect

6.3 Hydrological Effects

The proposal does not involve:

- Water abstraction from the River Usk;
- Direct discharge to the River Usk;
- Process wastewater generation;
- Effluent treatment works.

Surface water will be managed through site drainage infrastructure and controlled discharge arrangements. The intention is to develop a surface water collection and management system. This will be water from the hard surfaces within the development, which will be clean and will not involve contact with any chemicals or processes. The system will then use a combination of interceptors and reed beds to improve the quality of the surface water. This will then be discharged via the existing surface water system. The proposal does not create a direct hydrological pathway to the River Usk SAC or Severn Estuary designations. The modular data centre use also does not require operational abstraction from designated watercourses or discharge of cooling water, process water or effluent to designated sites.

The concrete plinth and engineered surface water system are relevant because they enable runoff from the compound to be intercepted, attenuated and controlled before leaving the site. This provides a clear distinction between the proposed modular data centre and development types involving exposed stockpiles, major earthworks, river engineering or direct discharge infrastructure.

Conclusion

No Likely Significant Effect

6.4 Water Quality Effects

The operation of a modular data centre differs fundamentally from industrial manufacturing processes.

The facility will not generate:

- Trade effluent;
- Process chemicals;
- Contaminated runoff
- Gaseous emissions or odours;
- Polluting discharges.

The proposal therefore lacks any realistic mechanism for adversely affecting SAC water quality interests. Construction activities will be temporary, localised and confined entirely within the application site, which comprises previously developed industrial land. No works are proposed within the River Usk SAC, the Severn Estuary SAC, SPA or Ramsar site, nor are any in-channel works, bank modifications, watercourse diversions or other activities proposed that could directly affect the designated sites or their qualifying features.

Potential construction effects are therefore limited to the normal risks associated with construction activities, such as accidental spillages, localised sediment mobilisation and temporary surface water runoff. Given the scale and nature of the proposed works, together with their separation from the designated sites, these do not give rise to a credible impact pathway capable of resulting in likely significant effects. Any residual construction risks would be managed through standard good practice measures secured through a Construction Environmental Management Plan, although these measures are not relied upon to reach the screening conclusion.

Conclusion

No Likely Significant Effect

6.5 Air Quality Effects

The operational facility will be electrically powered.

No:

- Combustion processes;
- Chimneys;
- Manufacturing emissions;
- Dust-generating industrial activities

form part of the proposal.

Construction works would be temporary, localised and limited in scale. They would not involve demolition or large-scale earthworks comparable with major industrial redevelopment. Any dust-generating activities would be short-term and capable of normal good-practice control. Given the distance to designated receptors and the industrial context of the site, no likely significant air quality effect is identified.

Conclusion

No Likely Significant Effect

6.6 Noise and Vibration

Potential operational noise sources include:

- Cooling equipment;
- Ventilation systems;
- Maintenance activities;
- Construction activities, albeit these are limited as the equipment arrives pre-built.

The development sits within an established industrial environment historically characterised by substantially greater industrial activity than that proposed. The likely operational noise profile would be limited to cooling and ventilation plant associated with modular data processing units, together with occasional maintenance activity. Such sources are materially different from piling, heavy process industry or high-frequency HGV operations. In addition, the equipment within the modular data centre is inherently sensitive to vibration. Any vibration arising from the proposed plant and equipment will therefore be limited, dampened and managed as part of the operational design in order to prevent vibration from adversely affecting the operation of the scheme itself. Consequently, the development will not give rise to any vibration impact that would be perceptible outside the site boundary.

During the construction phase, development works will be limited to the installation of a concrete plinth with service ducts. The equipment will be delivered to site pre-built and will

be craned into place and connected. The scope for impact on and off site are therefore limited.

The River Usk SAC and Severn Estuary SAC, SPA and Ramsar site are separated from the application site by intervening industrial land and infrastructure. The proposal would not introduce disturbance within the river corridor, intertidal habitats or known supporting habitats for SPA waterbirds. Any detailed plant noise limits can be addressed through reserved matters or condition control, but the screening conclusion is based on the absence of a credible disturbance pathway capable of affecting qualifying features at the designated sites.

No significant effects upon otter or aquatic qualifying interests are predicted.

Conclusion

No Likely Significant Effect

6.7 Lighting Effects

Potential effects on commuting otter and bird populations have been considered.

However, the potential for significant lighting effects is limited because:

- Existing industrial lighting establishes elevated baseline conditions;
- The site is separated from the river corridor;
- Lighting can be controlled through planning conditions;
- Lighting will be directional and shielded.

The proposal would not require lighting of the River Usk corridor or the Severn Estuary. A sensitive lighting strategy can ensure that any external lighting is directional, downward-facing, shielded and limited to operational and security requirements. This is consistent with normal planning control for industrial and employment sites and does not represent mitigation required to avoid a likely significant effect.

Conclusion

No Likely Significant Effect

6.8 Recreational Pressure

The development will not provide:

- Public access;
- Visitor attractions;
- Recreational facilities.

The facility is not intended for public use and operational staffing levels will be relatively low given the modest scale of the development proposed.

Conclusion

No Likely Significant Effect

6.9 Invasive Non-Native Species

The HRA screening has considered whether the proposed development could introduce or spread invasive non-native species to designated aquatic or estuarine habitats. The application site is a contained industrial parcel and no works are proposed within the River Usk, estuary, riparian corridor or intertidal habitat. No credible pathway has been identified by which invasive species could be transferred from the modular data centre compound to the European Sites.

Standard biosecurity and construction management procedures may nevertheless be secured through a Construction Environmental Management Plan, particularly if any invasive species are identified during pre-commencement site checks. Those measures would be good practice and would not be relied upon to exclude a likely significant effect.

Conclusion

No Likely Significant Effect

7. IN-COMBINATION ASSESSMENT

The in-combination assessment considers whether effects that are not significant alone could combine with other plans or projects to give rise to likely significant effects on the relevant European Sites or Ramsar site. The proposed modular data centre has been assessed as giving rise to no credible impact pathway for direct habitat loss, hydrological change, water quality deterioration, significant air emissions, recreational pressure, disturbance or invasive species spread.

- Very low traffic generation;
- No significant noise emissions;
- No wastewater discharge;
- No atmospheric emissions;
- Absence of habitat loss;
- Absence of functionally linked land.

Given the absence of an identified impact pathway from the proposed modular data centre, there is no mechanism through which it could combine with other projects to create likely significant effects upon European Sites. The proposal does not add materially to pressures associated with traffic, water quality, public access, disturbance, atmospheric emissions or habitat loss.

In reaching this conclusion, specific consideration has been given to other relevant nearby committed and consented development, including the consented battery energy storage facility development approved at the Uskmouth Power Station site and the change of use permission for the creation of a modular data centre within part of the Liberty Steel Building to the west of the application site. The approved and proposed developments have been identified by searching the planning portal and using a 1km radius. Having regard to the nature, scale and operational characteristics of those developments, and the absence of any identified residual pathway from the proposed modular data centre to the relevant European Sites, no in-combination likely significant effect is identified.

Conclusion

No Likely Significant Effect In Combination

8. MITIGATION

The assessment demonstrates that mitigation is not required to exclude likely significant effects at HRA Stage 1. This is because the proposal does not create a credible source-pathway-receptor linkage to the River Usk SAC, Severn Estuary SAC, Severn Estuary SPA or Severn Estuary Ramsar site.

Nevertheless, the following good practice and regulatory control measures may be secured through planning conditions or reserved matters to ensure the development proceeds in an environmentally responsible manner:

- Construction Environmental Management Plan;
- Lighting Strategy;
- Surface Water Drainage Strategy;
- Biodiversity Enhancement Strategy;
- Noise Management Plan.

Consistent with *People Over Wind*, these measures have not been relied upon to reach the screening conclusion.

These measures are appropriate to the nature of a modular data centre and should be framed as general environmental management and design controls rather than HRA mitigation. They would assist in securing a high-quality development but are not necessary to avoid a likely significant effect on the relevant European Sites or Ramsar site.

9. HRA SCREENING CONCLUSION

This HRA Screening Report has considered the proposed modular data centre development at Liberty Steel Works, Corporation Road, Newport in view of the qualifying features of the River Usk SAC, Severn Estuary SAC, Severn Estuary SPA and Severn Estuary Ramsar site. Having regard to:

- The scale and nature of the proposed development;
- Its location on previously developed industrial land;
- The separation distances from designated sites;
- The absence of direct habitat loss;
- The absence of loss of functionally linked land;
- The absence of hydrological pathways;
- The absence of significant emissions;
- The absence of in-combination effects;

It is concluded that the proposed modular data centre development at Liberty Steel Works, Corporation Road, Newport is **not likely to have a significant effect**, either alone or in combination with other plans and projects, upon:

- River Usk SAC;
- Severn Estuary SAC;
- Severn Estuary SPA; and
- Severn Estuary Ramsar Site.

The proposal therefore **screens out at Stage 1 of the HRA process**, and **Appropriate Assessment is not required pursuant to Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended)**. Newport City Council can therefore determine the application on the basis that the proposed development would not adversely affect the integrity of the relevant European Sites or Ramsar site, either alone or in combination with other plans or projects.

References: Newport modular data centre planning documentation, relevant HRA guidance, Welsh planning policy, and conservation objectives for the River Usk SAC and Severn Estuary designations.