

Appendix 3 – Habitat Regulations Assessment (HRA) Screening Report

Application Site:	Land at Liberty Steel Works, Corporation Road, Newport
Development Proposal:	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.
Applicant:	Era4 Limited
Date:	March 2026

1. Introduction

- 1.1 This report provides a screening assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) (“the Habitats Regulations”). It determines whether the proposed development, either alone or in combination with other plans or projects, is likely to have a significant effect on any European Site.
- 1.2 The need for this assessment arises from the site’s proximity to the River Usk Special Area of Conservation (SAC) and River Usk Site of Special Scientific Interest (SSSI), located approximately 500 metres to the west of the application site.
- 1.3 The application site is also approximately 1.3km from the RSPB Reserve at Newport Wetlands. This is a National Nature Reserve and part of the wetland SSSI, parts of which overlap with the protected areas of the Severn Estuary, including a Special Protection Area (SPA) and the River Usk SAC.

- 1.4 The screening has been undertaken with regard to published Natural Resources Wales (NRW) guidance on HRA and in accordance with the precautionary principle established in *People Over Wind & Sweetman v Coillte Teoranta* (C-323/17).

2. Description of the Proposed Development

- 2.1 The proposal seeks outline planning permission for the creation of a modular data centre on open and underutilised ground within the Liberty Steel complex in Newport. The proposal represents a low impact form of development, through the creation of a concrete pad and the siting of prefabricated modular units and equipment.
- 2.2 The proposal will use electricity to power computer processes that provide high capacity AI compute facilities. The only emissions will be warm air and low level noise, neither of which will cause any localised or wider adverse impacts. The development does not produce emission of gases, particulates or odours, it does not involve the use of any hazardous materials and utilises closed loop liquid cooling to make it the most energy efficient AI process currently available. The development will minimise ground disturbance and will utilise sustainable drainage systems connected to the existing surface water balancing ponds and features to regulate surface water discharge from the site, with no direct runoff or outfall to the River Usk.
- 2.3 The application relates to an area of open ground to the east of the railway line, which forms a boundary to extreme tidal flood events. The application site is situated in Flood Zone 1, meaning it is not at risk of flooding.
- 2.5 The ground conditions at the application site provide a suitable base upon which to install a concrete slab area and place sealed modular data centre units and other equipment to form a data centre. The development will not significantly disturb the ground.
- 2.6 Surface water from the slab will be clean and will be collected by an appropriate surface water drainage system and discharged at an agreed rate into the existing balancing ponds. These details will be agreed as part of the reserved matters submission.

- 2.7 The application site will be served by the existing highway connections and internal road systems. The development will generate only limited vehicle movements being limited to security and maintenance staff. The facility will not be open to the public nor will it be visited by customers or clients. The application is supported by a preliminary ecological assessment.

3. European Sites Considered

- 3.1 The River Usk SAC is designated for a range of aquatic and riparian habitats and species, including:
- Atlantic salmon (*Salmo salar*);
 - Sea lamprey (*Petromyzon marinus*);
 - River lamprey (*Lampetra fluviatilis*);
 - Twaite shad (*Alosa fallax*);
 - Otter (*Lutra lutra*); and
 - Watercourses with *Ranunculus fluitantis* and *Callitriche-Batrachium* vegetation.
- 3.2 The SAC extends along the River Usk from its headwaters to its estuary (where it meets the RSPB Newport Wetlands area) and lies adjacent to the Liberty Steel complex. The SSSI underpinning the SAC shares the same boundaries and interest features.
- 3.3 No other European sites lie within 5 km of the application boundary.

4. Pathways for Potential Effects

4.1 Potential impact pathways have been reviewed in the context of the proposal's nature and scale. The following pathways were considered and screened as set out below:

Potential Pathway	Screening Outcome	Justification
Direct land-take or habitat loss	Screened Out	The site lies entirely within an existing industrial estate, separated from the SAC by other industrial land and infrastructure. No land within or adjacent to the SAC will be affected.
Hydrological or water-quality effects	Screened Out	The proposal does not involve new drainage outfalls, surface water connections, or effluent discharge. Existing drainage systems within the site are retained and managed under existing permit conditions.
Air quality and dust deposition	Screened Out	The development involves no combustion plant, quarrying, or dust-generating operations. Construction activity is limited to recladding and internal fit-out with negligible emissions.
Noise and vibration	Screened Out	The operational noise from the data centre (fans and plant) will be minimal. Predicted external noise levels are below those generated by existing steelworks operations.
Light disturbance	Screened Out	The site already experiences high baseline lighting associated with the steelworks. The lighting within the modular data centre will be directional and shielded to avoid spill toward the river, which is separated from the application site by the existing Liberty Steel buildings.
In-combination effects	Screened Out	The proposed development is a minor intensification within an established industrial complex. No other nearby developments with potential additive effects have been identified through NCC's planning register.

5. Screening Conclusion

- 5.1 The proposal is limited to the development of a small digital infrastructure facility, on an area of underutilised ground within the existing industrial complex. The development involves only limited vehicle movements, it does not produce any emissions of smoke, dust or gases, there are no discharges of liquids and no hazardous substances are to be used.
- 5.2 The development involves minimal ground disturbance (construction details are dependent on the specification of the equipment to be installed and will be finalised at reserved matters stage) and will form a barrier over the existing ground. Surface water from the site will be clean and will be discharged via sustainable drainage systems that will control the discharge rates into the existing balancing pond system at an agreed rate. Again, these details will be confirmed at reserved matters stage.
- 5.3 There are no identified impact pathways that could give rise to likely significant effects on the River Usk SAC or any other European site, either alone or in combination with other plans or projects.
- 5.4 It is therefore concluded that the proposed development does not require Appropriate Assessment under Regulation 63 of the Habitats Regulations.