

Flood Consequences Assessment – Supporting Note (Appendix 2)

Engineering Works (Raised Platform), Newport Data Centre

Introduction

This note has been prepared to supplement the previously submitted Flood Consequences Assessment (FCA) prepared by Egniol Consulting Ltd (Ref: ECL.10544.R05.001, November 2025), which supported the planning application for the change of use of part of an existing building on the old Liberty Steel site to an AI/Data Processing facility.

The current application seeks planning permission for engineering works to raise ground levels surrounding the building to approximately 9.75m AOD.

This note explains how the findings of the submitted FCA remain applicable, how the proposed engineering works improve the flood risk position previously assessed and, is provided to address comments raised by NRW in their consultation response letter to Newport City Council dated 5th May 2026.

Baseline Flood Risk Position

The FCA confirms that the site lies within an area at risk of flooding associated with the River Usk, with flood mapping indicating a potential 1 in 200 year (plus climate change) flood level in the order of 9.75m.

The FCA concludes that the proposed development (change of use) can be made safe through:

- Raising sensitive equipment above predicted flood levels; and
- Incorporating flood resilient construction measures.

The FCA also confirms that detailed hydraulic modelling will be undertaken at a later design stage to refine flood levels and inform detailed mitigation measures.

Relationship to Proposed Engineering Works

The current application introduces external ground level raising to approximately 9.75m AOD, forming a platform around the building to exclude flood water.

These works are directly informed by the flood levels identified within the FCA and represent a proportionate and logical mitigation response.

The proposed platform level:

- Aligns with previously predicted flood levels at circa 9.75m AOD; and
- Provides significantly improved flood protection for the proposed facility when compared to maintaining existing surrounding ground levels at approximately 8.0m AOD.

These proposed works therefore reduce the potential for floodwater to impact the immediate access around the building, the building itself and any servicing areas immediately adjacent to the building. They improve operational resilience and complement the internal mitigation strategy already established.

Floodplain Considerations

The proposed development involves the placement of engineered fill around the proposed facility to exclude flood water, within an existing industrial site.

At this stage, the application is supported by the existing FCA, which establishes baseline flood risk and mitigation principles.

In line with discussions with Natural Resources Wales, it is proposed that:

- Detailed hydraulic modelling and assessment of floodplain displacement is undertaken during later design stages; and
- Any required additional mitigation measures that may be identified are secured through appropriately worded planning conditions.

This approach is considered appropriate given that the proposed works represent mitigation rather than an intensification of development. The building and its use have already been assessed and accepted in flood risk terms, and the works themselves will improve the overall resilience of the proposed facility.

Consideration of Overland Flow Routes

The intended raised platform around the proposed AI facility to exclude flood water will not materially affect the characteristics of the remainder of the site during any flooding event. The only material change will be that the AI facility is protected from flooding. All other existing conveyance routes across the remainder of the site will not be affected during a flood event by the introduction of this small flood protection platform.

Summary

The previously submitted FCA provides a robust assessment of flood risk at the site and establishes appropriate design flood levels and mitigation principles.

The proposed engineering works:

- Are consistent with the findings of the FCA;
- Represent a betterment in flood resilience; and
- Do not introduce any additional vulnerability or impacts to existing conveyance routes across the site.

It is therefore considered that the FCA can be relied upon to support this application, with detailed modelling and any further mitigation measures to be secured through planning condition.