

Habitat Regulations Assessment (HRA) – Addendum Note (Appendix 1)

Engineering Works (Raised Platform), Newport AI Centre

Introduction

This note has been prepared to support a planning application for engineering works at land within the Liberty Steel Works, Corporation Road, Newport, comprising the raising of ground levels surrounding an existing building.

It should be read alongside the previously submitted Habitat Regulations Assessment (HRA) Screening Report (November 2025), which accompanied the planning application for the change of use of the building to an AI/Data Processing facility.

The purpose of this addendum is to consider whether the proposed engineering works introduce any new pathways for likely significant effects (LSE) on European sites, in particular the River Usk Special Area of Conservation (SAC).

Summary of Previous HRA

The original HRA Screening Report assessed the potential for the change of use proposal to result in likely significant effects on the River Usk SAC, located approximately 150 metres to the west of the application site.

The assessment identified and screened all potential impact pathways, including:

- Direct land-take;
- Hydrological and water quality effects;
- Air quality and dust;
- Noise and vibration;
- Light disturbance; and
- In-combination effects.

All pathways were screened out, and the report concluded that the proposal would not give rise to likely significant effects on any European site, either alone or in combination.

Description of Additional Works

The current application relates solely to engineering works to raise ground levels surrounding the existing building to approximately 9.75m AOD, forming a raised platform.

The works:

- Are confined to previously developed industrial land;
- Do not alter the footprint or use of the building;

- Do not introduce new operational processes, emissions, or discharges; and
- Do not involve works within or adjacent to the River Usk SAC.

Review of Potential Impact Pathways

The previously assessed pathways have been reviewed in the context of the proposed engineering works.

Direct land-take / habitat loss

No change. The works are entirely within an existing industrial site with no encroachment into the SAC. This pathway remains screened out.

Hydrological and water quality effects

The proposed works involve raising ground levels within the site; however:

- There are no new drainage outfalls or connections to the River Usk;
- Surface water will continue to be managed within the existing site drainage network; and
- There is no direct hydrological pathway between the site and the SAC.

The development is supported by a Flood Consequences Assessment, which establishes baseline flood risk and confirms that flood behaviour will be appropriately managed. Detailed hydraulic modelling and any necessary mitigation measures will be addressed at the detailed design stage and secured through planning condition.

The works represent a flood mitigation measure, improving site resilience rather than increasing flood risk.

This pathway therefore remains screened out.

Air quality and dust

Construction works may generate limited, temporary dust; however, this will be short-term and controlled through standard measures. There are no operational emissions. This pathway remains screened out.

Noise and vibration

Construction noise will be temporary and localised within an existing industrial environment. No new operational noise sources are introduced. This pathway remains screened out.

Light disturbance

The proposal does not introduce additional external lighting beyond the existing industrial baseline. This pathway remains screened out.

In-combination effects

The proposed works represent a minor modification within an established industrial site and do not introduce new operational impacts. No in-combination effects are anticipated.

Screening Conclusion

The proposed engineering works do not introduce any new impact pathways that could give rise to likely significant effects on the River Usk SAC or any other European site.

The conclusions of the original HRA Screening Report remain valid.

It is therefore concluded that the proposed development, either alone or in combination with other plans or projects, will not result in likely significant effects on any European site.

Accordingly, Appropriate Assessment is not required under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Appendix 1 – Habitat Regulations Assessment (HRA) Screening Report

Application Site: Land at Liberty Steel Works, Corporation Road, Newport

Development Proposal: Change of use of existing industrial building (Use Class B2) to data centre (Use Class B8) including recladding of elevations and associated works

Applicant: Carbon3.AI

Prepared by: Egniol Planning Ltd

Date: November 2025

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 150 metres to the west of the application site.
- 1.3 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 planning permission for the change of use of an existing industrial building from Use Class B2 (General Industrial) to Use Class B8 (Data Centre), together with external recladding of the elevations and minor ancillary works.

- 2.2 The existing building lies within the operational Liberty Steel Works complex, which is a large, active industrial site. The proposal does not involve any increase in building footprint, ground disturbance, or the introduction of new emissions or discharges to air or water.
- 2.3 The development will be served by existing access, drainage and utilities infrastructure. Surface-water drainage will continue to discharge to the existing network within the Liberty Steel estate, with no direct outfall to the River Usk.
- 2.4 The internal works will comprise the installation of modular data-processing equipment, ancillary electrical infrastructure, and mechanical cooling systems within the existing building envelope.

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 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 steelworks 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 and contained within the existing building envelope. 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. Replacement façade lighting will be directional and shielded to avoid spill toward the river.
In-combination effects	Screened Out	The proposed change of use represents 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 reuse and refurbishment of an existing industrial building with minor external alterations and no increase in operational footprint.
- 5.2 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.
- 5.3 It is therefore concluded that the proposed development does not require Appropriate Assessment under Regulation 63 of the Habitats Regulations.