

Flood Consequences Assessment – Supporting Note (Appendix 2)

Engineering Works (Raised Platform), Newport Data Centre

Introduction

This note has been prepared to accompany 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 the existing building 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 and how the proposed engineering works respond to and improve the flood risk position previously assessed.

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 to 10.75m AOD.

The FCA adopts a precautionary approach, identifying a design flood level of 10.75m AOD and incorporating a significant freeboard, resulting in internal operational levels of approximately 11.9m AOD.

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.

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 the lower bound of predicted extreme flood levels (circa 9.75m AOD); and
- Provides a substantial improvement over existing ground levels (~8.0m AOD).

The works therefore reduce the likelihood of floodwater affecting access and servicing areas, improve operational resilience and complement the internal mitigation strategy already established.

Floodplain Considerations

The proposed development involves the placement of engineered fill 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 at the detailed design stage; and
- Any required mitigation measures 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 site.

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 additional vulnerability.

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.



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Newport Data Centre

Flood Consequence Assessment

ECL.10544.R05.001 Rev: -

November 2025

Prepared for

**Carbon3.ai
The Oil Depot,
242 London Road,
Stretton-on-Dunsmore
CV23 9JA**

Prepared by

**Egniol Consulting Ltd
1st Floor,
1 Canon Harnett Court,
Warren Park,
Milton Keynes,
MK12 5NF**

Document Review

Rev	Date	Prepared By	Reviewed By	Approved By
-	14.11.2025	DH	DES	PD

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Company no: 06668552

Offices:

Llys Onnen, Ffordd y Llyn, Parc Menai, Bangor LL57 4DF
1 Canon Harnett Court, Warren Park, Wolverton, Milton Keynes MK12 5NF
Office 4, Botanical Gardens Business Centre, 3 Southbourne Rd, Sheffield S10 2QN
A323A, Business First, 25 Goodlass Road, Liverpool L24 9HJ

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Proposed Site Plan..... 1

Building Plan and Elevations 2

1.0 INTRODUCTION

- 1.0.1 Egniol Consulting Limited (Egniol) of 1 Canon Harnett Court, Warren Park, Milton Keynes have been appointed by Carbon3.ai to prepare a Flood Consequence Assessment (FCA) for the Newport Data Centre situated at the southern end of the former Liberty Steelworks off Corporation Road in Newport.
- 1.0.2 The FCA has been prepared in support of the planning application for the proposed Newport Data Centre and associated access (the 'Site'). The data centre will be installed upon a new sub-structure fitted within the existing steelworks building allowing the data centre to be located on first floor with parking provided at ground floor. The development will require additional electricity and data systems, security office and access.
- 1.0.3 The Site lies within the footprint of the existing steelworks building, all of which including adjacent land, is under the control of the Carbon3.ai thus ensuring suitable access to the public highway.
- 1.0.4 The Local Planning Authority (LPA) and Lead Local Flood Authority (LLFA) is Newport City Council (NCC). The drainage strategy set out within this FCA has been prepared in line with the authority's Sustainable Drainage System (SuDS) guidance and associated national requirements.

2.0 SITE CHARECTERISATION

2.1 Site Location

2.1.1 The Site is located within the southern end of the existing Liberty Steelworks building which extends north to south, parallel to the River Usk. The address for the Site is: Corporation Rd, Newport, NP19 4XE

2.1.2 The centre of the Site using national grid coordinates is:

Eastings 333291

Northings 184355

2.2 Site Description

2.2.1 The development proposals are limited primarily to within the existing steelworks building which is to remain in place given its utility. The proposed data centre as indicated is to be installed within the existing steel frame of the steelworks building; this will require the installation of a sub-structure effectively at first floor. The development is thus considered to be a change of use only. Figure 1 below illustrates the general dimensions and size of the building.

Figure 1: View with the existing steelworks building



2.2.2 The area designated as the data centre, excluding the access which is in place already, measures circa 1825m². The Site is at the southern end of the existing building; it represents a small portion of the existing steelworks building. This area is illustrated on the Existing Site plan (Appendix 1); further section information is provided on the Data Centre Floor Plan and Elevations (Appendix 2).

2.2.3 The topography within the Site and immediately external to the existing steelworks building is circa 8.0m AOD. The wider platform wherein the steelworks building lies is considered to lie at 8.0m AOD. Note the first and second floor heights above

ground level are 3.9m and 7.8m respectively, according to the Data Centre Floor Plan and Elevations (Appendix 2)

2.2.4 The steelworks building runs is positioned in a north-south orientation. To the west lies the River Usk and to the east runs a railway line that serves the local industrial area. It is noted that the railway levels fall from north to south at circa 1/400 from circa 10.0m AOD to the very north of the steelworks site to about 8.0m AOD in the south.

2.2.5 An existing vehicular access to the Site runs in a north to south direction along the west edge of the building. Given Carbon3.ai owns the whole Liberty Steelworks site access to the public highway is via Corporation Road to the northern edge of the steelworks site.

2.3 Surrounding Land Uses

2.3.1 Immediately to the west circa 100m from the Site is the River Usk; this is an identified Special Area of Conservation (SAC). It is noted that to the southern edge of the steelworks site runs Julians Reen watercourse; and at the confluence is Newport Uskmouth Sailing Club.

2.3.2 Further south lies the Afon Wysg Battey Energy Storage Site (BESS) recently constructed on the site of the decommissioned coal fired Simec Uskmouth Power station. Located to the southeast is the Nash Welsh Water Waste Water facility.

2.3.2 The scrub lands to the east beyond the railway line provide a buffer to farmland located further to the east. These lands are characterised by a series of lagoons.

2.4 Geology

2.4.1 The bedrock geology of the site according to the British Geological Survey (BGS) is as follows:

Bedrock geology: Mercia Mudstone Group-Mudstone
Superficial deposits: Tidal Flat deposits-Clay and silt

2.5 Hydrogeology

2.5.1 The Site lies within an area designated as Secondary B Aquifer according DEFRA's Magic portal with the BGS indicating the aquifer is a 'Moderately productive aquifer'.

2.5.2 Likely infiltration rates within the Superficial Deposits (Tidal Flats) comprising of clays and silts is likely to be poor. Adjacent boreholes indicate the superficial layers are > 10m in depth and overlain with made ground up to 2m depth.

2.5.3 The nearest Source Protection Zone (SPZ) according NRW's mapping is beyond Penhow to the east; this SPZ is in excess of 10km beyond the Site.

2.6 Hydrology

2.6.1 There are no ordinary watercourses within the Site however to the south of the Site along the ownership boundary lies Julian's Reen and to the west is the River Usk;

these rivers according to NRW mapping are designated main river.

3.0 POLICY, LEGISLATION AND GUIDANCE

3.1 Local Policy

3.1.1 The key relevant local policy has been identified and set out in Table 1 below for background information.

Table 1: Local Policy

Local Policy	Key Provisions
Newport Local Development Plan (2011-2026)	SP3 states that 'Newport's coastal and riverside location necessitates that development be directed away from areas where flood risk is identified as a constraint and ensure that the risk of flooding is not increased elsewhere. Development will only be permitted in flood risk areas in accordance with national guidance. Sustainable solutions to manage flood risk should be prioritised.'
	SP4 states 'development proposals should minimise water consumption, protect water quality during and after construction & result in no net increase in surface water run-off through the sustainable management of water resources by: i. The use of sustainable drainage systems; ii. The reuse of water and reduction of surface water run-off through high quality designed developments; iii. Careful consideration of the impact upon finite water resources, particularly in terms of increased pressures on abstraction and the impact of climate change. iv. Ensuring development is appropriately located and phased so that there is capacity in the waste water, sewerage and water supply as well as the protection of water quality.'
Local Flood Risk Management Strategy (draft 2024-2030)	The aim of this Local Flood Risk Management Strategy is to reduce the risk to people and communities from flood and coastal erosion over the next five years and also to: • Improve our understanding and communication of risk • Be prepared and build resilience to flood events • Prioritise investment to the most at risk communities • Prevent more people being exposed to flood risk • Provide an effective and sustained response to flooding • Set out how the council plans to meet these challenges

3.2 National Policy

3.2.1 The relevant national policy has been identified and set out in Table 2 below for background information.

Table 2: National Policy

Policy/Regulations	Key Provisions
Technical Advice Note (TAN) 15: Development and Flood Risk	The TAN provides technical guidance to supplement the policy set out within Planning Policy Wales. The guidance relates to sustainability principles and provides a framework to allow risks arising from river flooding, coastal flooding and additional run-off from developments to be determined.

Planning Policy Wales	The policy sets out the land use planning policies of the Welsh Government. Chapter 13 outlines the Welsh Government's objectives in terms of addressing flood risk. It is noted that section 13.4 states: "Development proposals in areas designed as being of high flood hazard should only be considered where: • New development can be justified in that location, even though it is likely to be at risk from flooding; and • The development proposal would not result in the intensification of existing development which may itself be at risk; and • New development would not increase the potential adverse impacts of a flood event."
Flood Consequence Assessments: Climate change allowances (September 2021)	'This guidance sets out the climate change allowances to be used in flood consequence assessments submitted in support of relevant planning applications, and to inform development plan allocations. In line with TAN15, the allowances are informed by latest available information on climate change projections and different scenarios of increased global mean surface temperatures caused by greenhouse gas emissions to the atmosphere.'
Met Office Climate Data Portal's Time-mean Sea Level Projections to 2100	Sea level projections to 2100 from the UK Climate Projections (UKCP18) are presented as the projected change (or 'anomaly') in the time-mean sea-level relative to the average value for the period 1981-2000. Link: Time-mean Sea Level Projections to 2100 (cm) The Met Office climate data portal

3.3 Guidance

3.3.1 Relevant guidance has been identified and set out in Table 3 below; it is a list of standards and best practice considered in preparing the FCA.

Table 3: Guidance

Standards	Key Provisions
BS 8533: 2017 Assessing and managing flood risk in development – Code of Practice	This BS gives recommendations and guidance on the appropriate assessment and management of flood risk in developments. It is intended to provide practical assistance to address flood risk associated with a proposed development.
BS 8582: 2013 Code of Practice for surface water management for development sites	The focus of this BS is on the sustainable management of flood risks arising from surface water run-off on development sites, although criteria relating to the management of a wider suite of environmental risks is given.
Ciria The SuDS Manual (Cira 753)	General guidance to sustainable drainage and best practice.
BS 85500:2025 Flood resilient construction – Improving the flood performance of buildings	Guide to flood resilient construction in the UK.

4.0 CLIMATE CHANGE

4.1 General

- 4.1.1 The Site, located on the west bank of the River Usk in Newport, lies within the Severn River Basin District. The corresponding climate change allowances are set out in the following sections. The climate change allowances are derived from the Welsh Government guidance on climate change dated September 2021.

4.2 Rainfall

- 4.2.1 The corresponding climate change allowances for rainfall are set out in Table 4

Table 4: Change to extreme rainfall intensity (1961-90 baseline)

Applies across all of Wales	Total potential change anticipated for 2020s (2015-2039)	Total potential change anticipated for 2050s (2040-2069)	Total potential change anticipated for 2080s (2070-2115)
Upper estimate	10%	20%	40%
Central estimate	5%	10%	20%

4.3 River flood water

- 4.3.1 The corresponding climate change allowances for river flood flows are set out in Table 5.

Table 5: Changes to river flood flows by river basin district (1961-90 baseline)

	Total potential change anticipated by the 2020s	Total potential change anticipated by the 2050s	Total potential change anticipated by the 2080s
Severn			
Upper end estimate	25%	40%	70%
Change factor /central estimate	10%	20%	25%
Lower end estimate	0%	5%	5%

4.4 Sea level allowance

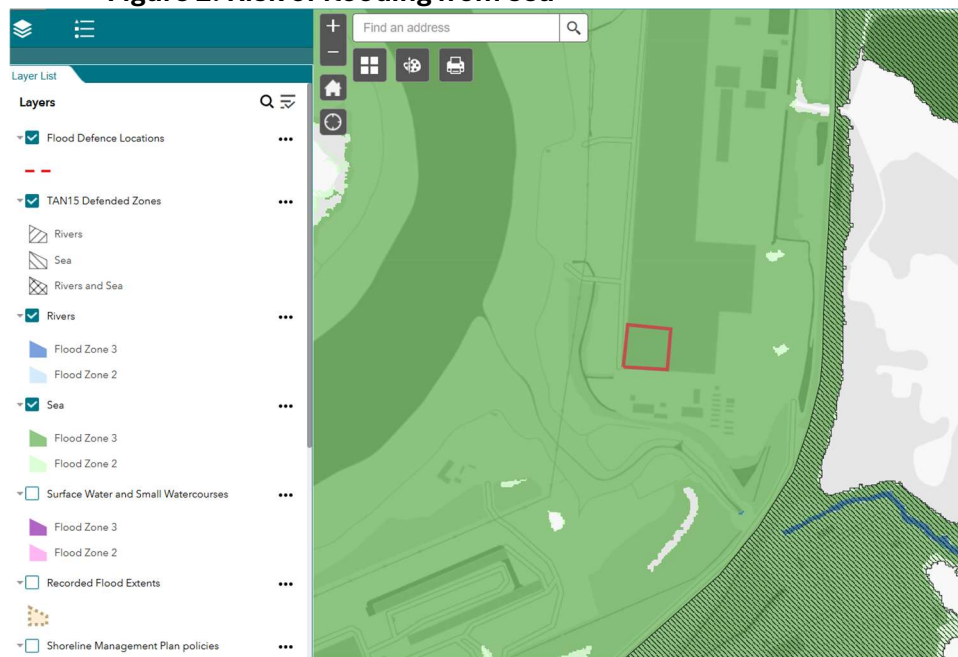
- 4.4.1 A further consideration to be undertaken at detailed design stage is sea level rise changes resulting from climate change. Guidance states that development proposals should be assessed against the relevant regional 70th percentile to inform design levels. An assessment should also be made against the 95th percentile to inform mitigation measures, access and egress routes and emergency evacuation plans.

5.0 FLOOD RISK

5.1 Flood Maps for Planning

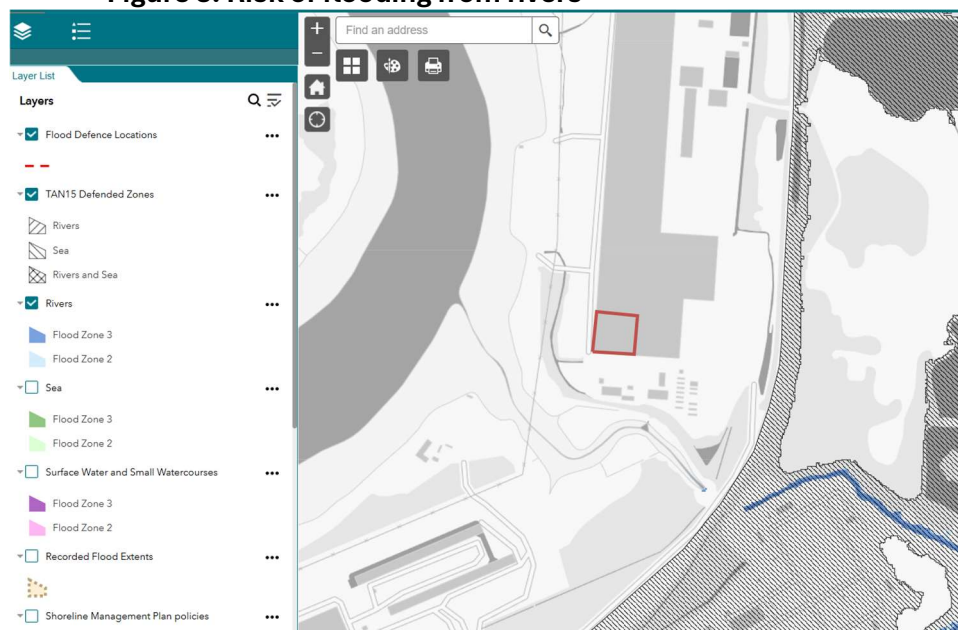
- 5.1.1 The Flood Maps for Planning (FMfP) for Wales produced by Natural Resources Wales (NRW) identifies the Site as being in Flood Zone 3 (sea). Refer to the FMfP extract for sea in Figure 2.

Figure 2: Risk of flooding from sea



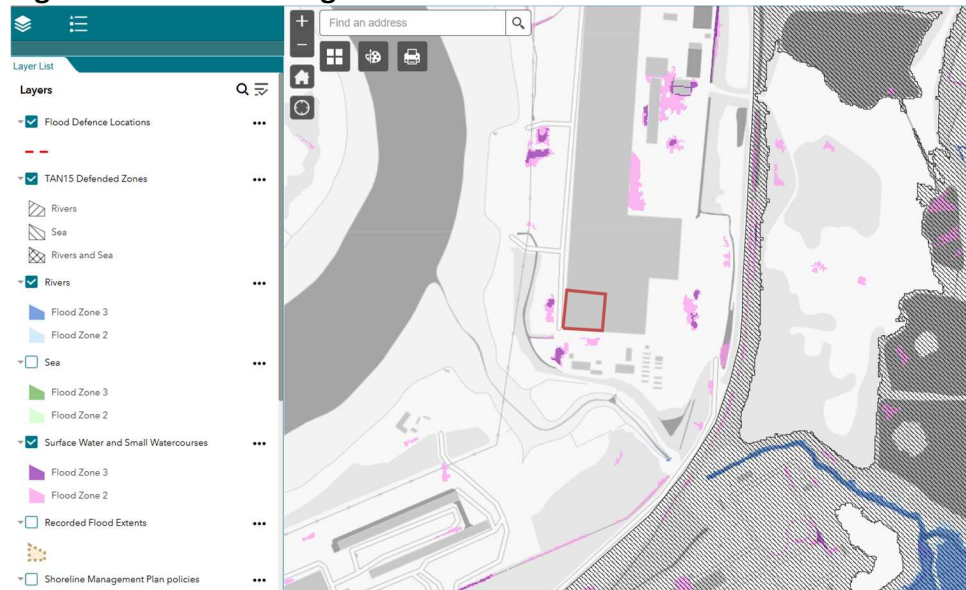
- 5.1.2 The FMfP extract for rivers is provided in Figure 3.

Figure 3: Risk of flooding from rivers



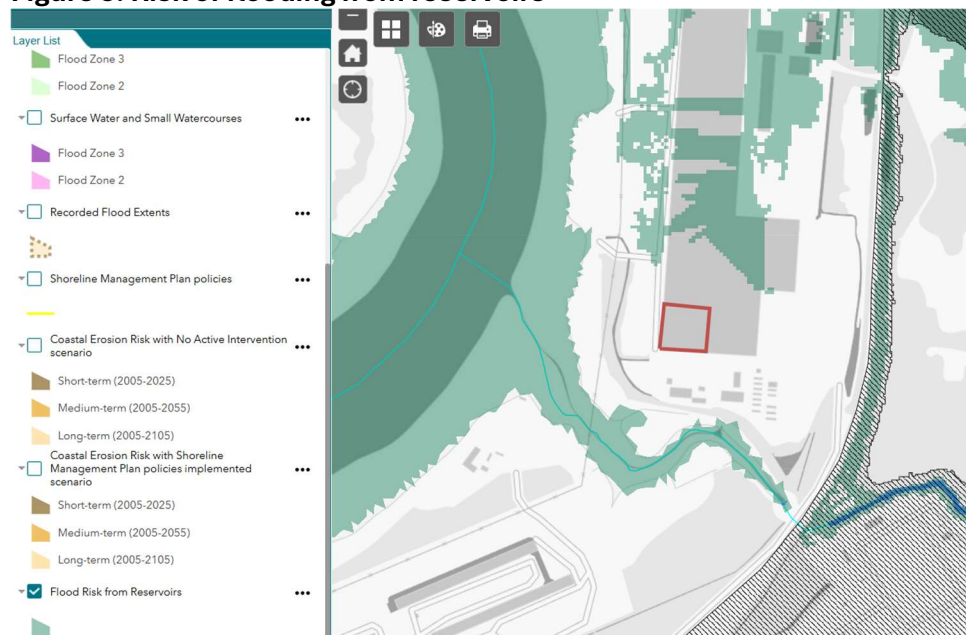
5.1.3 The FMfP extract for surface water is provided in Figure 4.

Figure 4: Risk of flooding from surface water



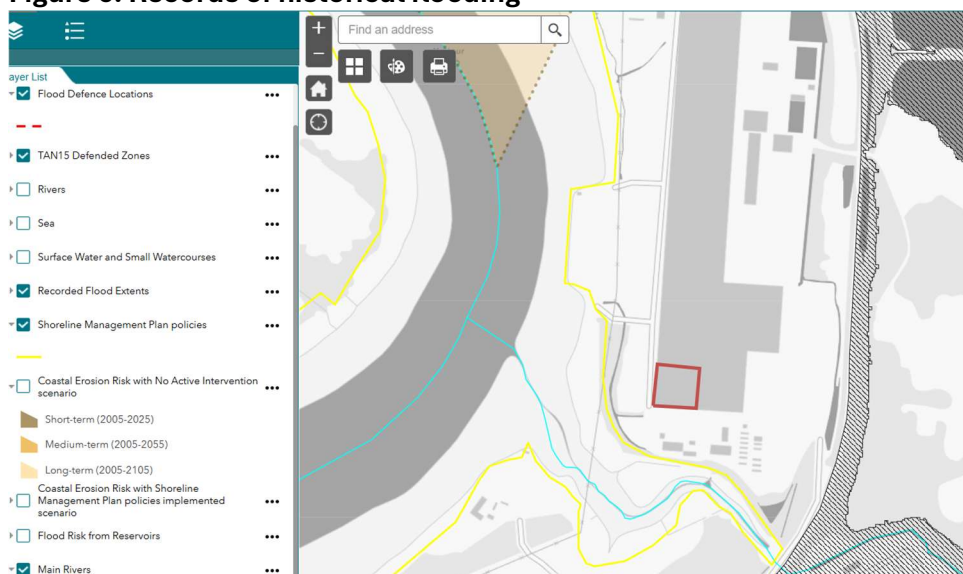
5.1.4 The FMfP extract for reservoir is provided in Figure 5. It is noted there is a of flooding to the wider only.

Figure 5: Risk of flooding from reservoirs



5.1.5 The FMfP also identifies historical flooding some 500m to the north of the Site however there is no flooding within the Site or in the local area. Refer to Figure 6 overleaf.

Figure 6: Records of historical flooding



5.2 River Usk

Hydraulic River Modelling

- 5.2.1 An initial technical response from NRW has been received regarding River Usk hydraulic modelling. Hydraulic river modelling and related work is planned in order to determine modelled flood levels and flood depths within the Site or immediately adjacent.

Flood Warning Area

- 5.2.2 The NRW's associated mapping identifies the Site as being in a Flood Warning Area (FWA).

5.3 Flood risk summary

- 5.3.1 An overview of flood risk is provided below in Table 6.

Table 6: Summary of long term flood risk categorisation

Flood type	Flood risk
Sea	Very high
Fluvial	Low
Surface water	Low
Groundwater	Low to moderate
Reservoirs	Low to moderate
Existing sewers	Low

6.0 FLOOD RISK MITIGATION

6.1 Development Setting

6.1.1 The Site consists of a new data centre to be built with the upper floors of the existing steelworks building an associated access which is formed of an existing hardstanding. The development is categorised as a change of use. The primary works involve the construction of the following:

- secondary steelwork within the existing building to provide a first and second floor
- car parking at ground level
- installation of required services appropriate for data centre

6.1.2 The surface water drainage system is to remain unchanged; there will be no net increase in impermeable area and no change to the drainage method and outfall which is understood to be to the River Usk.

6.2 Data Centre

6.2.1 The installation of the data centre equipment will be facilitated by installation of secondary steelwork. The estimated floor levels are 11.9 and 15.8m AOD based on the ground floor level of 8.0m AOD. Based on available open source information, anticipated design flood levels are likely to range between 9.75m and 10.75m AOD across the wider site.

6.2.2 The design approach generally shall, where deemed appropriate or possible, include construction techniques that are flood resilient and/or flood resistance in accordance with BS 85500:2025 and related best practice.

6.3 Access and Car Park

6.3.1 The ground floor car park will be formed at the ground floor level of the existing building; the level of this is expected to be circa 8.0m AOD.

6.3.2 The operational management of the data centre will be in accordance with an approved Flood Warning Evacuation Plan (FWEP). Access and egress will be via the existing hardstandings (shown on the Site Plan in Appendix 1). In terms of access, supplementary flood defence measures shall be considered as part of the FWEP.

6.4 SuDS Approval Body (SAB)

6.4.1 As part of the second phase of design works it is expected that a SAB application will need to be completed. It is however noted that the approving authority will need to consider the development setting namely the absence of any additional hardstandings. The development form comprises of existing roof or concrete.

6.4.2 Supplementary SuDS features may be considered at the second design phase given the nature of the development; these include the following:

- Water butts
- Rainwater harvesting

7.0 FOUL WATER DRAINAGE

7.1 General

- 7.1.1 The foul waste discharge from either office or plant is to be directed to the nearby foul drainage system serving the existing steelworks building.
- 7.1.2 The method of conveyance will likely be via a new gravity system, subject to levels and requirements of the data centre.
- 7.1.3 Foul waste potentially will be generated during the construction stage resulting in the requirement to install the permanent or a temporary system at an early stage. This is subject to detailed design.

8.0 SURFACE WATER MANAGEMENT

8.1 General

- 8.1.1 The existing surface water drainage serving the steelworks building will be retained and re-used subject to being in a satisfactory condition. In areas of concern a condition survey is advisable.
- 8.1.2 The responsibility for maintenance of the drainage lies with the developer and owner of the data centre. Maintenance to be in accordance with an agreed Surface Water Management Plan.

8.2 Pollution hazard

- 8.2.1 In terms of pollution hazard as set out under the SuDS Manul, the development will not be a pollution hazard; there is no byproduct as a result off the process. And minimal staff requirements also suggests that parking demand will be very low.

9.0 CONCLUSION

- 9.0.1 This FCA has been produced in support of the planning application for the proposed Newport Data Centre to be installed within the former Liberty Steelworks building located to the south of Newport.
- 9.0.2 The NRW's flood mapping service indicates that the Site is located within Flood Zone 3; a result of the flood risk posed by the River Usk which is tidally influenced. TAN 15 indicates that this flood risk equates to a greater than 1 in 200 (0.5%) chance of flooding in a given year, including climate change.
- 9.0.3 The installation of the data centre is to be undertaken by construction of secondary sub-structure within the existing steelworks building, allowing the data equipment to be raised to the first floor or above. The estimated first floor height of 11.9m AOD is expected to be well above predicted flood levels for the 200 year Climate Change horizon.
- 9.0.4 Hydraulic river modelling is to be undertaken as part of second stage of design, to establish accurate flood levels and depths for the Site and also adjoining areas. Based on available open source information, anticipated design flood levels are likely to range between 9.75m and 10.75m AOD, notably lower than estimated first floor levels.
- 9.0.5 The method of collection and disposal of surface water runoff from the existing building is to remain unchanged; surface water to collect within the existing surface water system and discharge to the River Usk. This section of the River Usk is tidally influenced, surface water discharge has no material effect on the river levels or the associated flood risk.
- 9.0.6 The design of the data centre where possible should include construction techniques that are flood resilient and/or flood resistance in accordance with best practice. In terms of pollution risks associated with the development, this is considered to be very low.
- 9.0.7 The foul waste discharge from either office or plant is to be directed to a suitably sized system; this is subject to detailed design. According to United Utilities asset plans there are no public sewers within close proximity of the site.
- 9.0.8 The management of the surface water drainage system is to be in accordance with an approved SWMP. In terms of the operational management of the data centre this is to be in accordance with an approved FWEP.
- 9.0.9 A SAB submission is likely to be required and if required this will form part of the second phase of design works.

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Flood Consequence Assessment
ECL.10544.R05.001 Rev -

November 2025

Appendix 1

Proposed Site Plan

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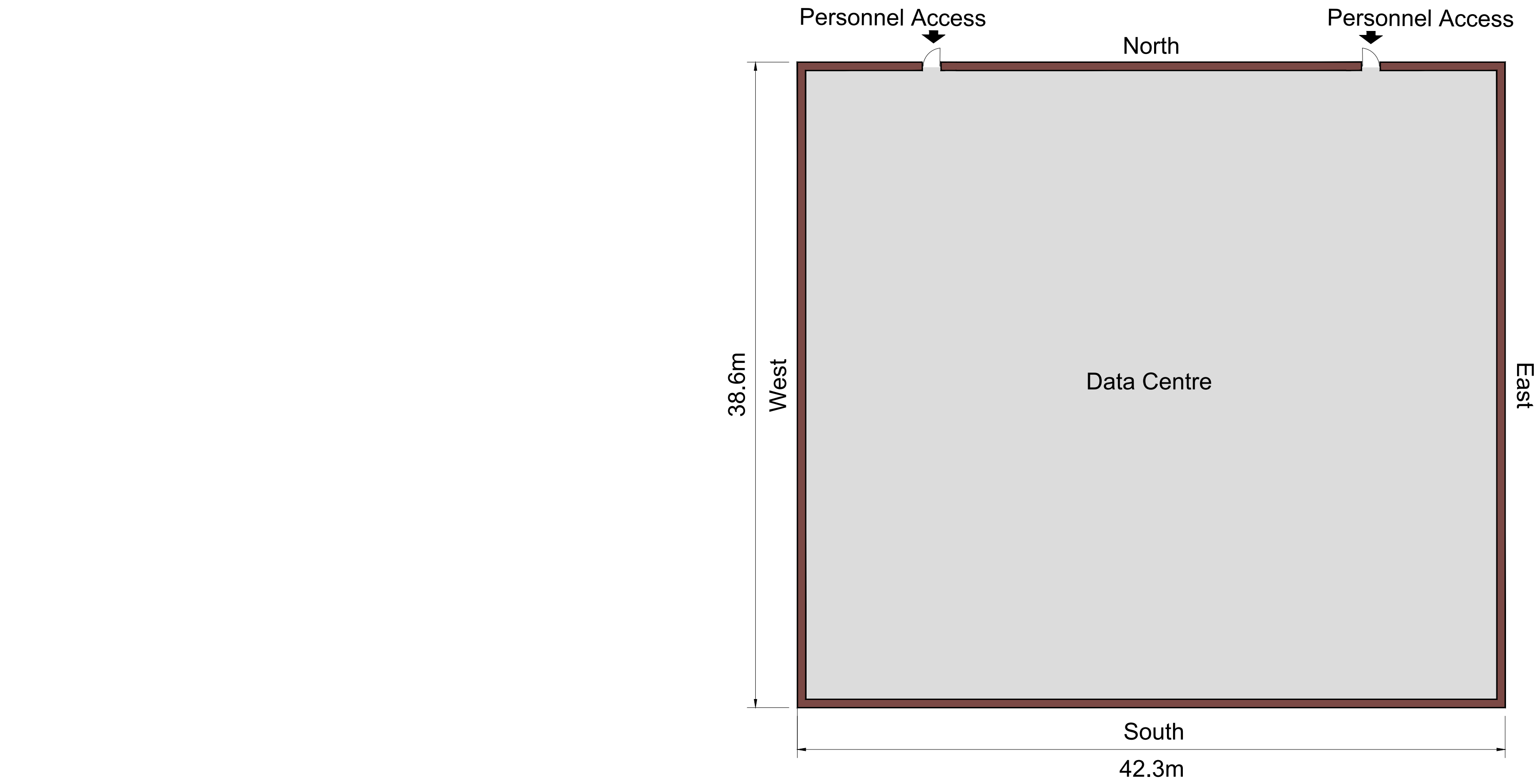
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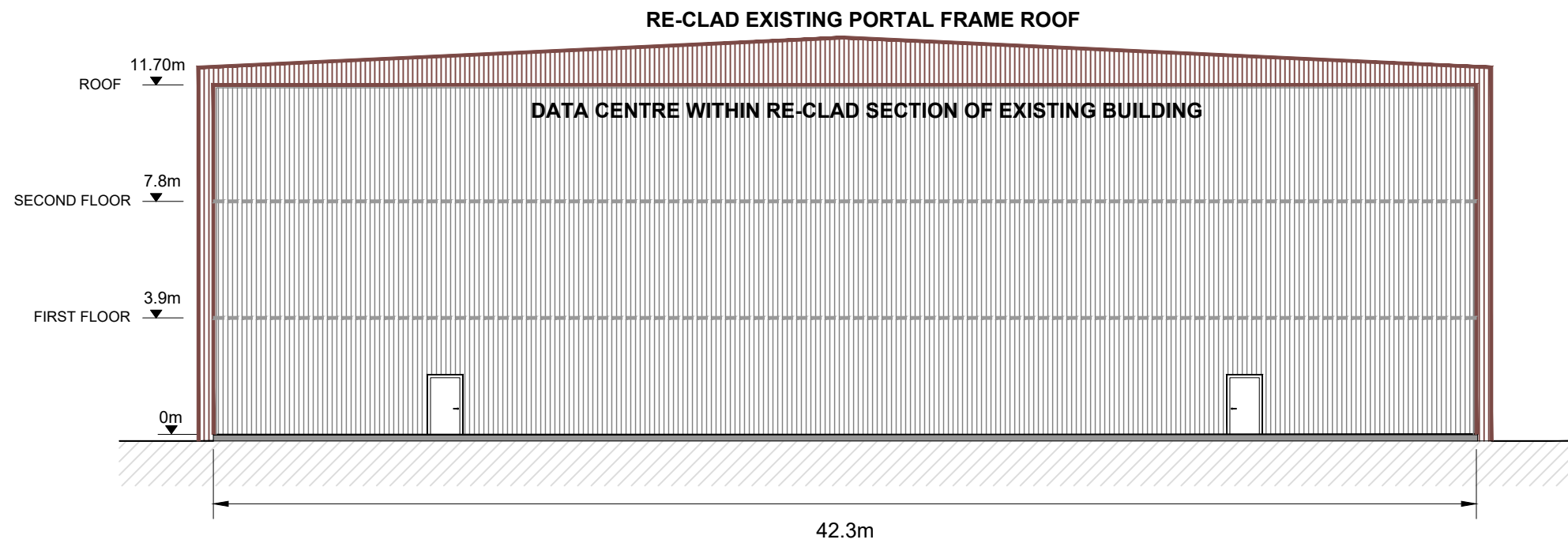
November 2025

Appendix 2

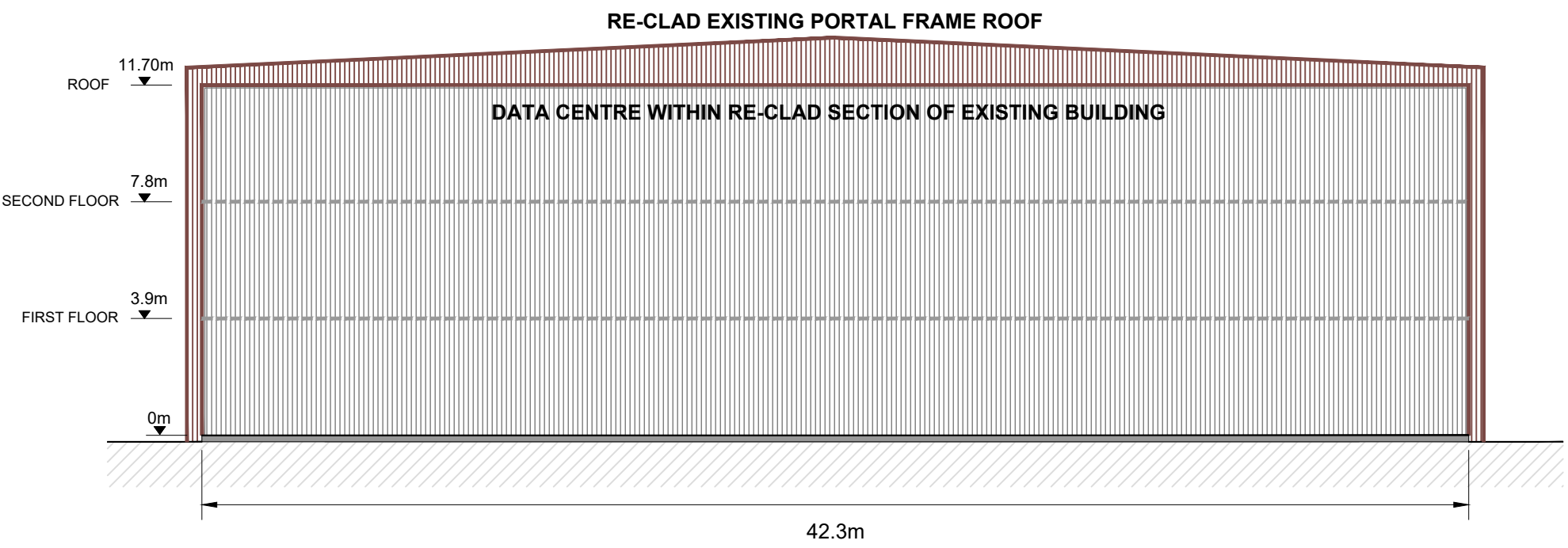
Data Centre Floor Plan and Elevations



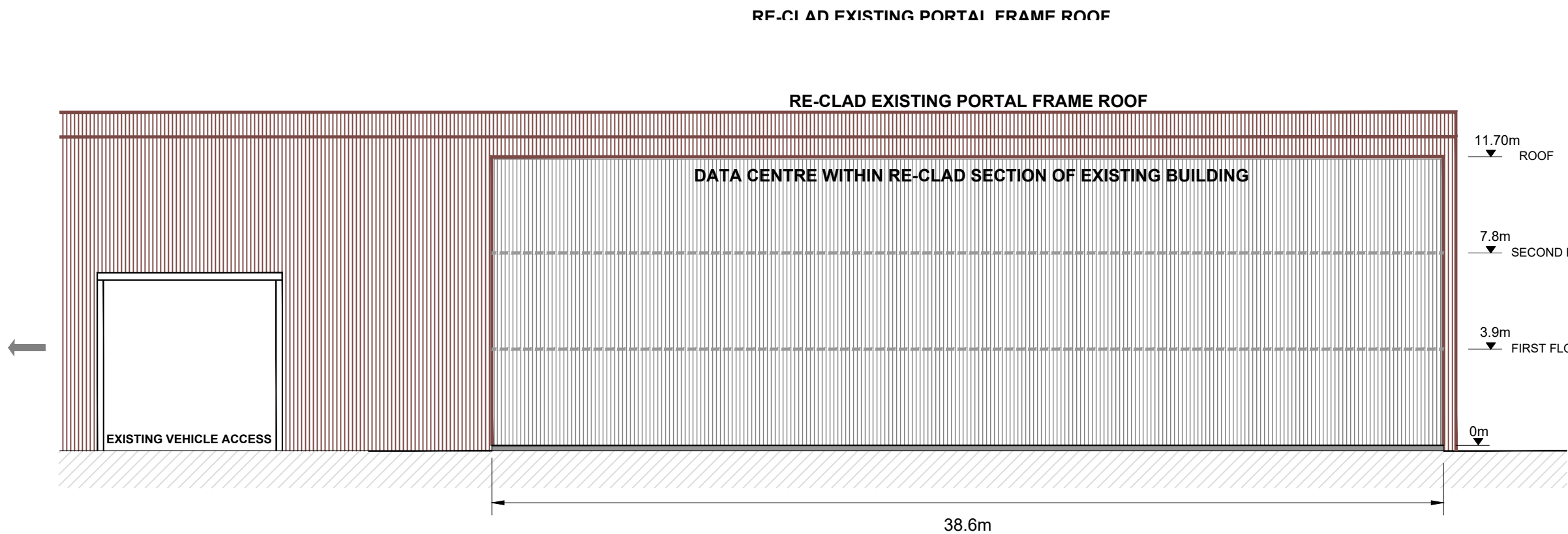
Plan View
Scale 1:200



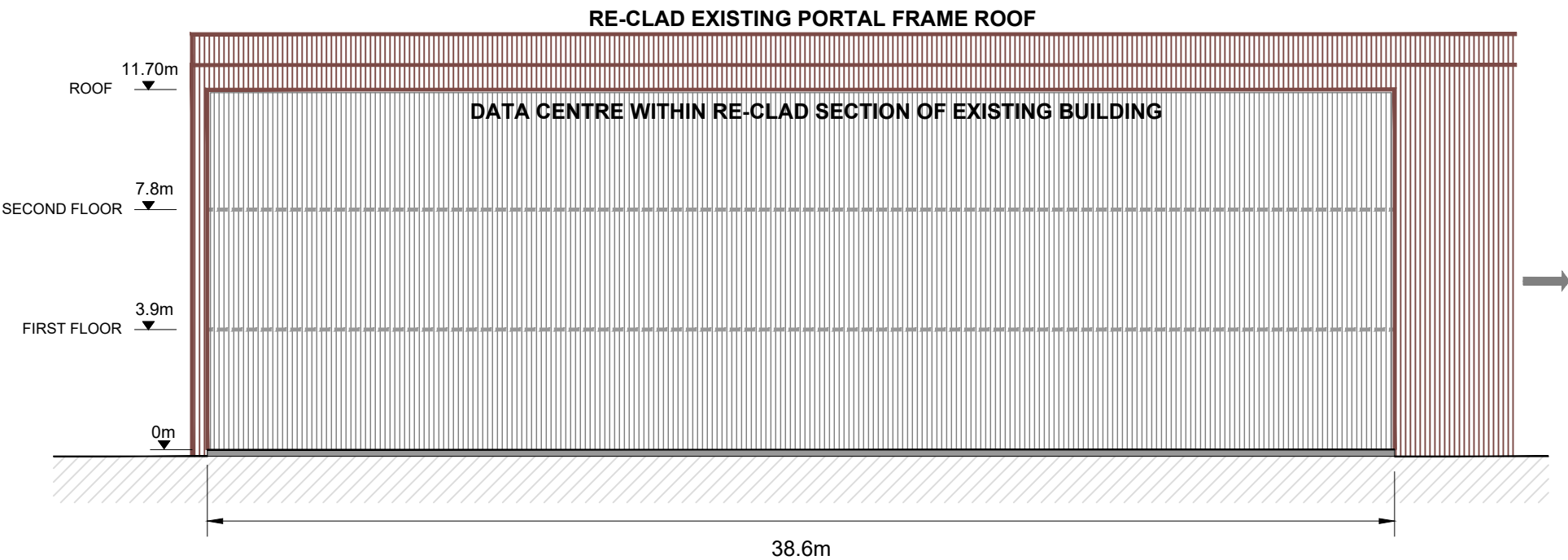
Building Elevation - North
Scale 1:200



Building Elevation - South
Scale 1:200



Building Elevation - West
Scale 1:200



Building Elevation - East
Scale 1:200

- Notes
1. This drawing is to be read in conjunction with all other relevant site information available.
 2. Do not scale from this drawing. The Engineer shall be notified immediately, in writing, should any errors or discrepancies be found prior to the commencement or continuation of any works.
 3. Existing building floor level estimated to be circa 8.00m AOD based on preliminary survey information
 4. Building cladding colour 'British Standards BS4800 04-C-39 Copperbeech'.

Rev	Modification	By	Chk	App	Date



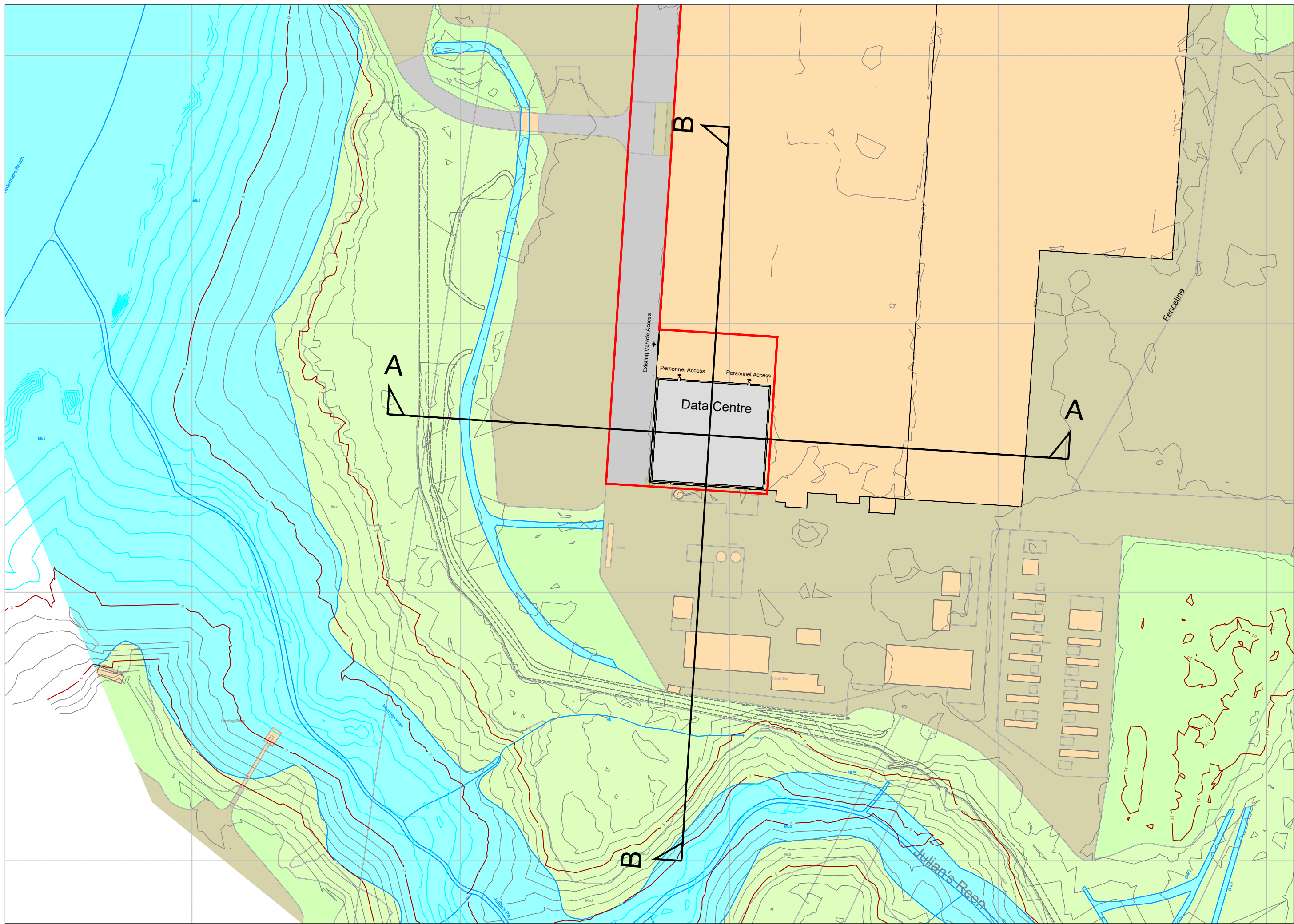
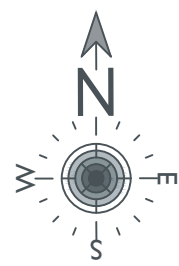
Egniol Consulting Limited
Unit 7 Llys Onnen, Ffordd y Llyn,
Parc Menai, Bangor,
LL57 4DF
Telephone: 01248 355996
Email: info@egniol.com

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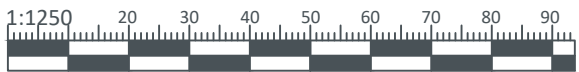
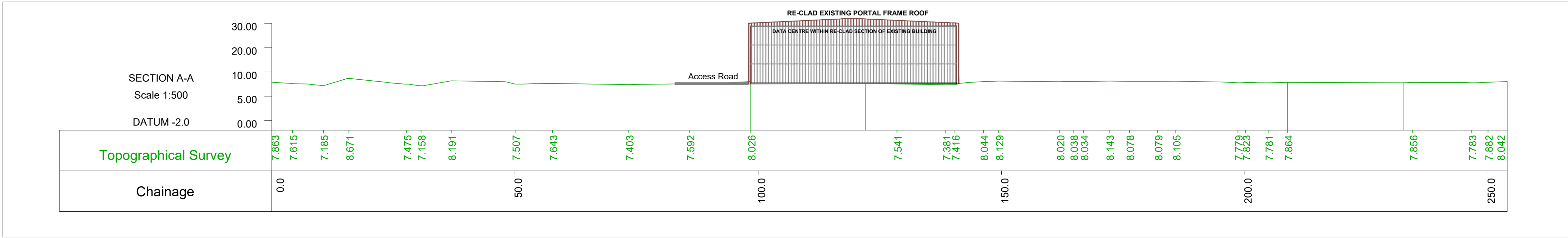
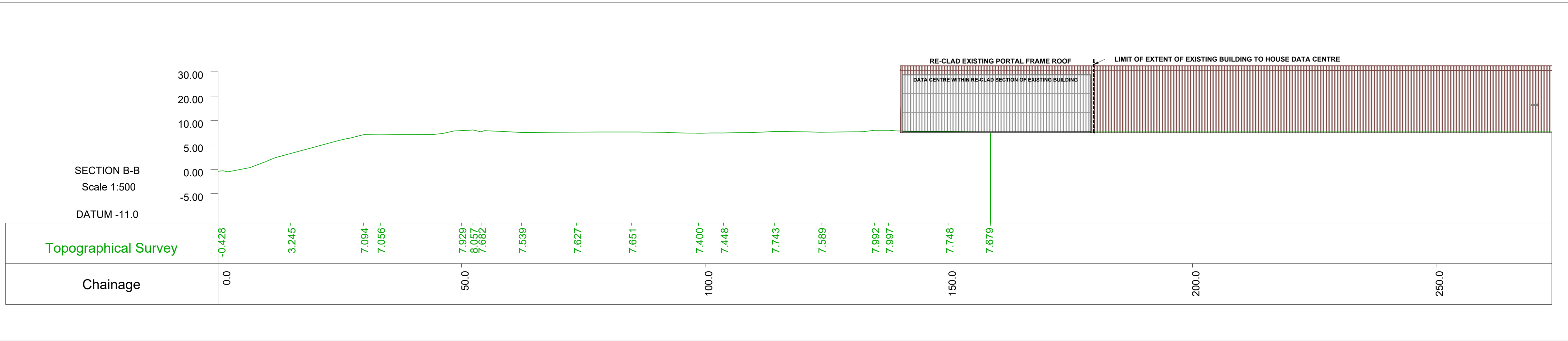
Newport Data Centre

Data Centre Floor Plan
and Elevations

Drawn by LE	Checked by PD	Approved by PD
Date 11/11/2025	Date 11/11/2025	Date 13/11/2025
Status PLANNING	Scale @ A1 1:200	
Drawing Number 10544-ECL-XX-XX-DR-C-0004	Revision P01	



Plan View showing Section Lines
Scale 1:1250



Notes

1. This drawing is to be read in conjunction with all other relevant site information available. At the time of production, no topographical survey was available.
2. This drawing is produced to National Grid coordinates with all levels in metres Above Ordnance Datum (m AOD) Newlyn.
3. The OS mapping is provided under copyright licence AC0000829824.
4. Do not scale from this drawing. The Engineer shall be notified immediately, in writing, should any errors or discrepancies be found prior to the commencement or continuation of any works.
5. The topographical drone survey undertaken Sept. 2025; provided by Valencia Waste Management Ltd.
6. The design details presented must be reviewed in conjunction with the wider site information and site constraints which may not be evident on drawing and must be requested if not already provided. This includes, but not limited to, buried utilities and services, ground conditions including groundwater levels (geotechnical and geo-environmental), remnant obstructions, ecology tree protection and topography.
5. Demolition works are ongoing: extent shown may vary.
6. Existing building floor level estimated to be circa 8.00m AOD based on preliminary survey information

Key:

- Planning application boundary
- Major contour (5m)
- Minor contour (1m)

Rev	Modification	By	Chk	App	Date
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Egniol Consulting Limited
Unit 7 Llys Onnen, Ffordd y Llyn,
Parc Menai, Bangor,
LL57 4DF
Telephone: 01248 355996
Email: info@egniol.com

Carbon3.ai

Newport Data Centre

Proposed Data Centre
Sections through Site

Drawn by LE	Checked by PD	Approved by PD
Date 11/11/2025	Date 11/11/2025	Date 13/11/2025
Status PLANNING	Scale @ A1 As Shown	

Drawing Number 10544-ECL-XX-XX-DR-C-0005	Revision P01
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