

ERA4

Land at Liberty Steel Works, Corporation Road, Newport

Newport AI Centre

Engineering Works - Supporting Planning Statement

March 2026

Prepared for

ERA4

Prepared by

Egniol Planning Limited

1	INTRODUCTION	3
2	BACKGROUND TO ERA4	5
3	THE SITE AND SURROUNDINGS	6
4	THE PROPOSED DEVELOPMENT	8
5	ENVIRONMENTAL EFFECTS	11
6	PLANNING POLICY CONTEXT AND COMPLIANCE	15
7	PLANNING BALANCE	19
8	CONCLUSIONS	20

Appendix 1 – HRA Addendum and Screening Report

Appendix 2 – Flood Consequence Report and Covering Note

Drawings

10544-ECL-XX-XX-DR-0009: Site Location Plan

10544-ECL-XX-XX-DR-0008: Cross Sections

10544-ECL-XX-XX-DR-0007: Site Layout

1 Introduction

1.1 This Planning Statement has been prepared by Egniol Planning Ltd on behalf of ERA4 in support of a full planning application submitted to Newport City Council for engineering works at land within the Liberty Steel Works, Corporation Road, Newport.

1.2 The application seeks planning permission for:

“Engineering works to raise ground levels surrounding the existing AI/Data Processing building to approximately 9.75m AOD, including the importation of fill material, formation of raised access and circulation areas, associated ramp, and surfacing works”

1.3 The proposed development relates to the AI/Data Processing facility currently being brought forward at the site. The works do not involve any alteration to the building itself, but instead comprise external ground level modifications designed to improve the operational resilience of the site.

1.4 The application has been prepared following discussions with the Local Planning Authority and other stakeholders in relation to flood risk. The site lies within a defended floodplain (Flood Zone C1), and the proposed engineering works form a proactive mitigation measure, raising external levels to provide a safe and resilient operating environment during extreme flood events.

1.5 The development will create a raised platform at approximately 9.75m AOD surrounding the building, with graded tie-ins to existing ground levels and provision of an access ramp. These works will ensure that access, servicing and external infrastructure are protected from flood risk, complementing the internal resilience measures already incorporated within the building.

1.6 The proposal forms part of ERA4’s wider strategy to deliver secure, sustainable and energy-efficient digital infrastructure across the UK. The Newport site represents a key location within this network, enabling the delivery of high-capacity AI processing infrastructure within an established industrial setting.

1.7 The development represents a logical and necessary enhancement to the approved/consented use of the site, ensuring that the facility can operate safely and effectively over the long term, without increasing built form or extending the footprint of development.

1.8 The purpose of this Statement is to:

- Describe the site and the proposed engineering works;
- Explain the rationale for the development, particularly in relation to flood risk and site resilience;

- Identify the relevant planning policy framework, including Planning Policy Wales (Edition 12), Future Wales: The National Plan 2040, and the Newport Local Development Plan (2015); and
- Demonstrate that the proposal accords with planning policy and represents sustainable development.

1.9 This Statement should be read alongside the accompanying plans and technical information submitted in support of the application. It demonstrates that the proposed engineering works will not give rise to any unacceptable environmental or amenity effects and will deliver clear operational and resilience benefits for the site and the wider area. The application site area is below 1 hectare and the development does not constitute major development; accordingly, a Design and Access Statement is not required.

2 Background to ERA4

- 2.1 ERA4 (formerly Carbon3.AI) is a UK-based technology and infrastructure company specialising in the delivery of advanced digital infrastructure, including AI and data processing facilities.
- 2.2 The company has recently rebranded from Carbon3.AI to ERA4 to reflect its evolving role in delivering next-generation digital and energy-efficient infrastructure across the UK.
- 2.3 References within this Statement to ERA4 therefore relate to the same organisation previously operating as Carbon3.AI, which is progressing the development of the Newport AI/Data Processing facility.

3 The Site and Surroundings

Site Location

- 3.1 The application site is located within the Liberty Steel Works, off Corporation Road, approximately 2 kilometres south-east of Newport city centre. The wider Liberty Steel complex occupies a substantial area on the eastern bank of the River Usk and forms part of Newport's established industrial and employment corridor.
- 3.2 The application site extends to approximately 0.95 hectares and comprises previously developed land within the operational Liberty Steel Works complex. Access to the site is taken via the existing Liberty Steel main entrance from Corporation Road, which connects directly to the A48 Southern Distributor Road (SDR) and provides convenient access to the M4 motorway (Junction 24) and the wider South East Wales and Severnside corridor.
- 3.3 The application relates to land surrounding an existing industrial building within the operational boundary of the Liberty Steel complex. The site comprises hardstanding and operational yard space associated with the building.
- 3.4 Existing ground levels across the site generally range between approximately 7.3m and 8.2m AOD, with the building floor level circa 8.0m AOD. The site is therefore relatively low-lying in relation to the surrounding floodplain context.

Surrounding Land Uses

- 3.5 The immediate surroundings are characterised by large-scale industrial and infrastructure uses, including the Liberty Steel rolling mills to the north and west, and other manufacturing and logistics premises along Corporation Road.
- 3.6 To the west, beyond the steelworks boundary, lies the River Usk, a tidally influenced corridor forming part of the River Usk Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). The river edge comprises managed embankments, wharfage and associated industrial infrastructure.
- 3.7 The nearest residential receptors are located approximately 1 kilometre to the north-west, separated by intervening industrial development. There are no sensitive land uses in the immediate vicinity, and the site is well contained within an established heavy industrial environment.

Site Designations and Constraints

- 3.8 The site lies within a safeguarded employment area identified in the Newport Local Development Plan 2011–2026 (Policy EM3), where industrial and employment uses are supported.
- 3.9 The site is located within Flood Zone C1 as defined in Technical Advice Note (TAN) 15: Development and Flood Risk, indicating a defended area that remains at risk of flooding during extreme events. Flood risk is therefore a key consideration for the ongoing and proposed use of the site.
- 3.10 The proximity of the River Usk SAC/SSSI (approximately 150 metres to the west) represents an environmental constraint; however, the site itself comprises entirely previously developed land with no intrinsic ecological value.
- 3.11 There are no listed buildings, scheduled monuments or other designated heritage assets within or adjacent to the site. The surrounding townscape is industrial in character.
- 3.12 The site contains no public rights of way and is served entirely by private internal estate roads within the Liberty Steel complex.

Summary

- 3.13 The site comprises previously developed industrial land within an established heavy-industry location, with existing access, infrastructure and services in place.
- 3.14 Its location within a defended floodplain (Flood Zone C1) is a defining characteristic of the site and forms the principal constraint to be addressed through the proposed engineering works.
- 3.15 The surrounding industrial context, separation from sensitive receptors and absence of environmental or heritage constraints make the site well suited to the proposed works, which are limited to ground level modifications within an already developed area.

4 The Proposed Development

Description of Development

4.1 The proposed development is described on the planning application forms as follows:

“Engineering works to raise ground levels surrounding the existing AI/Data Processing building to approximately 9.75m AOD, including the importation of fill material, formation of raised access and circulation areas, associated ramp, and surfacing works”

4.2 The application relates solely to external engineering operations. No changes are proposed to the AI building, its footprint, height, or use.

Overview

4.3 The proposed development comprises the formation of a raised external areas for access, servicing and circulation surrounding the AI/Data Processing building in order to improve flood resilience.

4.4 The works will raise external ground levels from existing levels of approximately 7.3m–8.2m AOD to a consistent platform level of approximately 9.75m AOD.

4.5 The raised area will extend around the building to create a continuous operational surface, ensuring that access, servicing and external infrastructure are protected during extreme flood events.

Key Components of the Development

4.6 The proposed engineering works include:

- Importation of engineered fill material (anticipated to include impermeable material such as clay);
- Formation of a raised platform to approximately 9.75m AOD;
- Grading of the platform edges to tie into existing ground levels, typically at 1:2 side slopes;
- Provision of an access ramp to the platform, with an approximate gradient of 1:12;
- Surfacing of the platform (e.g. tarmac or similar hardstanding);
- Localised regrading of surrounding areas.

4.7 The development is illustrated on the submitted plans and cross-sections, which show the relationship between existing and proposed levels and the extent of the raised platform.

Relationship with Existing Building

- 4.8 The existing building, as approved under the separate planning application for the change of use to an AI/Data Processing facility, will remain unchanged in terms of its footprint, height, external appearance and internal arrangement.
- 4.9 The proposed engineering works relate solely to the land surrounding the building and will raise external ground levels to improve the resilience of the approved development and its immediate operational environment, particularly in relation to access points and ground-level infrastructure.

Purpose and Function

- 4.10 The primary purpose of the development is to provide a flood-resilient external environment for the AI/Data Processing facility.
- 4.11 The site lies within Flood Zone C1, and while the building incorporates internal resilience measures, the existing external ground levels remain susceptible to flooding during extreme events.
- 4.12 The proposed raised platform will:
- Reduce the likelihood of floodwater affecting access and servicing areas;
 - Provide a safe and consistent level for operational use;
 - Complement internal flood resilience measures within the building.
- 4.13 The development therefore represents a proactive and necessary mitigation measure, rather than enabling additional built development.

Construction Approach

- 4.14 The works will involve the importation and placement of suitable fill material to achieve the required levels, followed by compaction and surfacing.
- 4.15 Construction will be undertaken within an existing industrial environment and will utilise established access routes within the Liberty Steel complex.

Summary

- 4.16 The proposed development comprises straightforward engineering operations to raise ground levels around an existing building.
- 4.17 The works do not introduce new built form, do not alter the use of the site, and do not extend the footprint of development.
- 4.18 The proposal is specifically designed to address the site's floodplain context and ensure the safe and continued operation of the facility over the long term.

5 Environmental Effects

- 5.1 The proposed development has been reviewed against the key environmental topic areas typically associated with engineering operations of this nature. The works comprise the raising of ground levels within an existing industrial site and do not introduce new built form or change the use of the site. The potential environmental effects are therefore limited and are summarised below.

Flood Risk and Drainage

- 5.2 The site lies within Flood Zone C1 as defined by TAN 15: Development and Flood Risk and is therefore identified as being at risk of flooding during extreme events.
- 5.3 A Flood Consequences Assessment (FCA) was previously prepared in support of the planning application for the change of use of the existing building to an AI/Data Processing facility (Ref: ECL.10544.R05.001, November 2025) and is submitted in support of this application alongside an explanatory note (Appendix 2).
- 5.4 The FCA confirms that the site may be affected by a 1 in 200 year (plus climate change) flood event, with predicted flood levels in the order of approximately 9.75m to 10.75m AOD. A precautionary approach has been adopted, with a design flood level of 10.75m AOD and internal operational levels set significantly above this level.
- 5.5 The proposed engineering works, which raise external ground levels to approximately 9.75m AOD, have been directly informed by the flood levels identified within the FCA and represent a proportionate mitigation response.
- 5.6 The raised platform will:
- Reduce the likelihood of floodwater affecting access and servicing areas;
 - Provide a consistent and more resilient operational level; and
 - Complement the internal flood resilience measures incorporated within the approved building.
- 5.7 The proposed development therefore represents a betterment in flood risk terms, improving the resilience of the site without increasing its vulnerability.
- 5.8 The potential effects of the land raising on floodplain storage and flow will be considered in further detail at the detailed design stage. In line with discussions with Natural Resources Wales, it is proposed that:

- Detailed hydraulic modelling and assessment of floodplain displacement are undertaken post-consent; and
- Any necessary mitigation measures are secured through appropriately worded planning conditions.

5.9 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 improve the overall resilience of the site.

5.10 Surface water drainage arising from the raised platform will be managed through an appropriate drainage strategy, ensuring that runoff is controlled and does not adversely affect existing drainage infrastructure.

Transport and Access

5.11 The proposed development will utilise the existing access arrangements within the Liberty Steel complex, with no changes to the established access points from Corporation Road.

5.12 The engineering works will not materially alter traffic generation once completed. During construction, there will be temporary vehicle movements associated with the importation of fill material; however, these will be short-term and can be managed through standard construction practices.

5.13 The development will not result in any significant effects on the local highway network.

Ecology and Biodiversity

5.14 The application site comprises previously developed industrial land within the Liberty Steel Works and is of negligible ecological value. The site is located approximately 150 metres east of the River Usk Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), which represent the nearest designated ecological sites.

5.15 A Habitat Regulations Assessment (HRA) Screening Report (November 2025) was previously prepared in support of the change of use application and is submitted alongside this application, together with an Addendum Note (Appendix 1).

5.16 The original HRA Screening Report assessed all relevant impact pathways, including direct land-take, hydrological effects, air quality, noise, lighting and in-combination effects, and concluded that the development would not give rise to likely significant effects on the River Usk SAC.

5.17 The HRA Addendum Note confirms that the proposed engineering works, comprising the raising of ground levels around the existing building, do not introduce any new impact pathways. In particular:

- The works are confined to previously developed land with no encroachment into the SAC;
- There are no new drainage outfalls or direct hydrological connections to the River Usk;
- No new emissions, lighting or operational effects are introduced; and
- The works represent a flood mitigation measure, improving site resilience rather than increasing environmental risk.

5.18 The Addendum further confirms that flood risk considerations are addressed through the accompanying Flood Consequences Assessment, with detailed modelling and any required mitigation to be secured at the detailed design stage.

5.19 On this basis, the conclusions of the original HRA Screening Report remain valid, and it is confirmed 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.

Landscape and Visual Effects

5.20 The site is located within a large-scale industrial environment characterised by steelworks buildings, plant and infrastructure.

5.21 The proposed raising of ground levels will not introduce new built form and will be visually contained within the existing industrial context. Changes in levels will be gradual and integrated into the surrounding land through graded slopes.

5.22 The development will not be visible from sensitive receptors and will not give rise to any material landscape or visual effects.

Heritage

5.23 There are no designated heritage assets within or adjacent to the site.

5.24 The proposed works do not affect the character or setting of any heritage assets and will have no impact on heritage significance.

Noise

- 5.25 Construction activities associated with the importation and placement of fill material will generate temporary noise; however, these effects will be short-term and can be managed through standard construction controls.
- 5.26 Once completed, the development will not introduce new noise sources or alter the existing operational characteristics of the site. No significant noise effects are therefore anticipated.

Air Quality

- 5.27 Construction activities may give rise to temporary dust generation; however, this can be controlled through standard mitigation measures such as damping down and good site management.
- 5.28 The completed development will not introduce new emission sources and will not have any material effect on air quality.

Summary

- 5.29 The proposed development comprises engineering operations within an existing industrial site and does not introduce new built development or intensify the use of the site.
- 5.30 The assessment demonstrates that the development will not give rise to any significant environmental effects. In particular, the proposed raising of ground levels represents a beneficial intervention in respect of flood risk, improving the resilience of the site without resulting in unacceptable off-site impacts.
- 5.31 Overall, the proposal is considered to be environmentally acceptable and does not require detailed technical assessment beyond that provided in support of the application.

6 Planning Policy Context and Compliance

Introduction

6.1 This section identifies the relevant planning policy framework and demonstrates how the proposed development accords with national and local planning policy. The assessment draws upon:

- Future Wales: The National Plan 2040 (2021);
- Planning Policy Wales (PPW), Edition 12 (December 2024);
- Technical Advice Notes (TANs) issued by Welsh Government; and
- The Newport Local Development Plan (LDP) (Adopted 2015, covering 2011–2026).

National Planning Policy

Future Wales: The National Plan 2040

6.2 Future Wales sets the spatial strategy for sustainable growth across Wales. Newport forms part of the South East Wales Metro Region and the Cardiff–Newport Growth Corridor, identified for continued economic growth and infrastructure investment.

6.3 The proposed development supports the objectives of Future Wales by facilitating the continued operation of strategic employment infrastructure within an established industrial area and ensuring its long-term resilience.

6.4 In particular, the proposal aligns with:

- Policy 1 (Where Wales Will Grow) by supporting development within an existing employment area on previously developed land; and
- Policy 3 (Supporting Urban Growth and Regeneration) by maintaining and enhancing the functionality of established employment land.

Planning Policy Wales (Edition 12, 2024)

6.5 Planning Policy Wales (PPW) promotes sustainable development, the efficient use of land, and climate resilience. It requires development to respond positively to environmental constraints, including flood risk.

6.6 The proposed development accords with PPW by:

- Efficient Use of Land (Chapter 3): The works are confined to previously developed industrial land and do not extend the footprint of development.
- Productive and Enterprising Places (Chapter 5): The proposal supports the continued operation of a high-value employment use within a strategic industrial location.
- Climate Change, Decarbonisation and Resilience (Chapter 6): The development directly responds to flood risk by improving site resilience and reducing vulnerability to extreme weather events.
- Infrastructure and Connectivity (Chapter 5): The works support the continued operation of critical digital infrastructure.

Technical Advice Notes (TANs)

6.7 The following TANs are of relevance:

- TAN 15 – Development and Flood Risk: This is the key policy consideration. TAN 15 requires development in flood risk areas to be safe and to minimise risk. The proposed engineering works directly address this requirement by raising ground levels and improving the resilience of the site.
- TAN 5 – Nature Conservation and Planning: The application is supported by a Habitat Regulations Assessment and Addendum, which confirm that there are no likely significant effects on the River Usk SAC.
- TAN 18 – Transport: The development utilises existing access arrangements and does not materially affect the highway network.

Local Planning Policy

Newport Local Development Plan (2011–2026)

6.8 The site lies within a safeguarded employment area identified under Policy EM3, where employment uses and associated infrastructure are supported.

6.9 The following policies are of particular relevance:

- SP1 – Sustainability: The proposal represents sustainable development by improving the resilience and long-term viability of an existing employment site.
- SP3 – Flood Risk: Development must be safe and not increase flood risk. The proposed works reduce vulnerability and improve flood resilience, in accordance with TAN 15.
- SP17 – Employment Land Provision: The proposal supports the continued use of employment land within Newport.
- EM3 – Protected Employment Sites: The works support and enable the continued operation of an employment use within a designated employment area.
- GP1 – General Development Principles: The development does not give rise to adverse impacts in terms of amenity, environment or infrastructure.
- GP6 – Quality of Design: The works are functional engineering operations appropriate to the industrial context and do not adversely affect the character of the area.
- GP8 – Access, Movement and Parking: Existing access arrangements are retained, and no adverse transport impacts arise.

Assessment Against Policy Objectives

- 6.10 The proposed development is fully consistent with the strategic and local planning framework. The site comprises previously developed land within an established industrial area, representing a sustainable location for the proposed works. The development directly addresses flood risk by raising ground levels and improving resilience, in accordance with TAN 15 and Policy SP3. It supports the continued operation of a high-value employment use within the site, while the accompanying Flood Consequences Assessment and Habitat Regulations Assessment (and associated addendum) confirm that there are no unacceptable environmental effects. The works are limited to ground level modifications and are appropriate to the industrial context, ensuring that the development integrates effectively with its surroundings.

Conclusion

- 6.11 The proposed development represents a proportionate and policy-compliant response to the site's flood risk context. The works do not introduce new built form or extend the footprint of development, but instead improve the safety and resilience of the site while supporting the continued use of an established

employment location. The accompanying assessments confirm that the development does not give rise to any unacceptable environmental or amenity effects.

- 6.12 The proposal is therefore fully aligned with Future Wales, Planning Policy Wales, relevant Technical Advice Notes, and the Newport Local Development Plan. Accordingly, the development represents sustainable development and should be supported.

7 Planning balance

- 7.1 The proposed development represents a proportionate and sustainable form of development comprising engineering works within an established industrial site. The works are specifically designed to address flood risk and improve the resilience of the site, without introducing new built form or intensifying the use of the land.
- 7.2 In this context, the proposal delivers clear planning benefits. It directly responds to the site's location within Flood Zone C1 by raising ground levels and improving the safety and operability of the site during extreme flood events. This aligns with the requirements of TAN 15 and national policy objectives relating to climate resilience and adaptation.
- 7.3 The development also supports the continued operation of a high-value employment use within a safeguarded employment area, ensuring the long-term viability of the site and contributing to Newport's economic base.
- 7.4 Importantly, the works are confined to previously developed land and do not extend the footprint of development. The proposal does not give rise to any unacceptable impacts in respect of flood risk, ecology, amenity, transport or the wider environment.
- 7.5 The proposal therefore represents a clear case of environmental betterment, reducing vulnerability to flooding while maintaining the established industrial function of the site.
- 7.6 Having regard to the Development Plan and all other material considerations, there are no adverse impacts that would outweigh the identified benefits. The proposal is fully compliant with national and local planning policy and represents sustainable development.
- 7.7 It is therefore respectfully requested that planning permission is granted.

8 Conclusions

- 8.1 This Planning Supporting Statement has been prepared in support of a full planning application by ERA4 for engineering works at land within the Liberty Steel Works, Corporation Road, Newport, comprising the raising of ground levels surrounding the existing AI/Data Processing building.
- 8.2 The proposed development represents a proportionate and targeted intervention within an established industrial site, designed to address the site's flood risk context. The works do not involve any alteration to the building itself and do not introduce new built form or extend the footprint of development.
- 8.3 The proposal has been informed by the accompanying Flood Consequences Assessment and supporting note, which confirm the baseline flood risk position and demonstrate that the works will improve the resilience of the site. The development therefore represents a clear betterment in flood risk terms.
- 8.4 The assessment demonstrates that the proposal is fully compliant with national and local planning policy, including Future Wales, Planning Policy Wales (Edition 12) and the Newport Local Development Plan (2011–2026). In particular, the development aligns with the requirements of TAN 15 by reducing vulnerability and improving the safety of development within Flood Zone C1.
- 8.5 The accompanying environmental assessments, including the Habitat Regulations Assessment and Addendum, confirm that the development will not give rise to any likely significant effects on the River Usk SAC or any other environmental receptors. No unacceptable impacts are identified in respect of ecology, flood risk, amenity, transport or the wider environment.
- 8.6 The proposed works support the continued operation of an established employment use within a safeguarded employment area and contribute to the long-term viability and resilience of the site.
- 8.7 Taken together, the development delivers clear environmental and operational benefits with no associated harm. It accords with the Development Plan when read as a whole and represents sustainable development.
- 8.8 In the context of Section 38(6) of the Planning and Compulsory Purchase Act 2004, there are no material considerations that indicate otherwise.
- 8.9 Accordingly, it is respectfully requested that Newport City Council grants planning permission for the proposed engineering works.

Drawings

Appendix 1 – HRA Addendum and Screening Assessment

Appendix 2 – Flood Consequences Report and Covering Note

