

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

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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.