

Appendix 3 - Design & Access Statement

Carbon3.AI | Liberty Steel, Corporation Road, Newport
Rev P1 | November 2025

1 Introduction

- 1.1 This Design and Access Statement (DAS) has been prepared by Egniol Planning Ltd on behalf of Carbon3.AI in support of a planning application to Newport City Council for:

Change of use of existing industrial building (Use Class B2) to data centre (Use Class B8) including recladding of external elevations, installation of associated plant and equipment, and ancillary works

- 1.2 The proposal relates to the reuse and refurbishment of an existing industrial building within the Liberty Steel Works complex on Corporation Road, approximately 2 km south-east of Newport city centre.
- 1.3 The DAS explains the design principles and concepts that inform the development and how access, movement and appearance have been addressed, in accordance with Planning Policy Wales (Edition 12) and Technical Advice Note (TAN) 12: Design.

2 Assessment

Location and Context

- 2.1 The application site forms part of the operational Liberty Steel industrial estate, located on the east bank of the River Usk within a long-established heavy-industry area. Surrounding uses include steel production buildings, substations, and associated energy infrastructure.

Site Character

- 2.2 The site is entirely previously developed, surfaced and serviced. The existing building is a steel portal-frame industrial structure with profiled metal cladding and generous internal height. It is currently under-utilised but structurally sound and suitable for conversion.

Surrounding Environment

- 2.3 To the west lies the River Usk SAC/SSSI, separated from the site by existing industrial land and flood defences. To the north and east are other Liberty Steel operations and storage yards. The nearest residential properties are over 400 m away, screened by buildings and the A48 Southern Distributor Road.

Access

- 2.4 Vehicle access is via the existing Liberty Steel main entrance from Corporation Road, connecting directly to the A48 SDR and the M4 motorway. No alterations to access or parking are required. Pedestrian access will continue from the same internal road network.

Current Use

- 2.5 The building was formerly used for general industrial purposes (Use Class B2). The proposal will convert it to a data centre use (Class B8).

3 Planning Policy

- 3.1 The design approach accords with:
- Future Wales: The National Plan 2040 – Policies 1, 3 and 12 support sustainable reuse of brownfield employment sites and digital-infrastructure investment within the Cardiff–Newport corridor.
 - Planning Policy Wales (Ed 12, 2021) – Chapters 3 and 5 promote efficient use of land, high-quality design, and low-carbon development.
 - TAN 12 (Design) – requires proposals to demonstrate character, community safety, accessibility and environmental sustainability.
 - Newport Local Development Plan (2011–2026) – Policies SP1, SP17, EM3 and GP6 support reuse and modernisation of employment land and good-quality industrial design.

4 Design

Design Concept

- 4.1 The project's aim is to reclad and repurpose the existing building to create a secure, energy-efficient data-processing facility. The proposal is intentionally modest: it retains the building's form and structure while improving energy performance and appearance.

Use and Amount

- Existing Use: General industrial (B2).
- Proposed Use: Data centre (B8) with limited ancillary office/welfare areas.
- Floorspace: Approx. 1632sqm; no increase in GIA.

Layout

- 4.2 The external site layout, yard and access points remain unchanged. Internal configuration of data-hall modules and plant rooms is not fixed at this stage, allowing flexibility for future operational requirements.

Scale and Massing

- 4.3 No alteration to the building's height or massing is proposed.

Appearance and Materials

- 4.4 Existing profiled metal cladding will be replaced with insulated composite panels in a high-quality, rusty orange/corten type colour to match the aged industrial cladding (BS 4800 04 C 39 -Cooper Beach) designed to enhance the appearance of the building and improve thermal performance. The result is a cleaner, more contemporary façade that integrates with the wider Liberty Steel environment while improving thermal and acoustic performance.

Landscape and Boundary Treatment

- 4.5 No soft landscaping or boundary changes are required within this operational estate. Existing security fencing and lighting will be retained and upgraded with LED fittings to minimise light spill.

Sustainability

- 4.6 The recladding will significantly enhance the building's thermal envelope. All plant and lighting will use high-efficiency electrical systems.

5 Access

Movement and Accessibility

- 5.1 The site will be accessed solely by authorised staff and maintenance vehicles. Vehicular and pedestrian circulation will follow the existing Liberty Steel internal road network, which connects to Corporation Road and the A48.

Inclusive Design

- 5.2 Although the facility will not be open to the public, the internal fit-out will ensure accessible staff areas, level thresholds, and compliance with Building Regulations Part M.

Security and Control

- 5.3 Access will be controlled through existing gatehouse procedures at Liberty Steel and site-specific electronic entry systems, supported by CCTV and restricted access zones.

6 Conclusion

- 6.1 The proposal represents a sensitive, well-considered reuse of an existing industrial building. It maintains the site's employment function, improves its energy and visual performance, and introduces high-value digital infrastructure without physical expansion or environmental impact.
- 6.2 The design responds positively to its industrial context, accords with Future Wales, PPW, and the Newport LDP, and meets the national requirements for a Design and Access Statement under the DMPO (Wales).
- 6.3 The scheme is therefore considered to deliver a sustainable, accessible and high-quality form of development appropriate to its setting and purpose.