

Carbon3.AI

Land at Liberty Steel Works, Corporation Road, Newport

Newport Data Centre

Change of Use - Supporting Planning Statement

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Prepared for

Carbon3.AI

Prepared by

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1 Introduction

- 1.1 This Planning Statement has been prepared by Egniol Planning Ltd on behalf of Carbon3.AI in support of a full planning application submitted to Newport City Council for the change of use of an existing industrial building (Use Class B2) to a data centre (Use Class B8), together with external alterations including re-cladding of the elevations and associated ancillary works, at land within the Liberty Steel Works, Corporation Road, Newport.
- 1.2 The proposal involves the adaptation and reuse of an existing building within the established Liberty Steel industrial complex, enabling the delivery of a modern, energy-efficient data centre that will provide secure, sustainable and high-capacity computing infrastructure in support of the UK's digital and AI sectors.
- 1.3 The proposal represents the next phase in Carbon3.AI's strategy to deliver a distributed network of sovereign, secure and sustainable AI computing facilities across the UK. These facilities will provide high-capacity AI compute resources powered by low-carbon and renewable energy sources, supporting the UK's transition to a digitally enabled and energy-efficient economy.
- 1.4 The existing building is of substantial industrial construction and benefits from suitable floor loading, power supply potential and access arrangements. The proposed development will refurbish the structure through the installation of new external cladding, minor elevational amendments, and internal fit-out to accommodate modular data-hall equipment and associated plant. No extension of the building footprint or change to the established site access arrangements is proposed.
- 1.5 The development represents an efficient reuse of brownfield industrial land and is consistent with national and local policy objectives promoting sustainable economic growth, digital infrastructure investment, and decarbonisation.
- 1.6 The purpose of this Statement is to:
- Describe the site, the existing building and the proposed works;
 - Identify the relevant planning policy framework, including Planning Policy Wales (Edition 12, 2021), Future Wales: The National Plan 2040, and the Newport Local Development Plan (2015); and
 - Demonstrate that the proposal accords with planning policy and represents a sustainable, policy-compliant reuse of existing industrial infrastructure.
- 1.7 This planning application provides the necessary information for the Local Planning Authority to assess and determine the proposal, confirming that the development will not give rise to any material

environmental or amenity effects and will deliver significant operational, economic and sustainability benefits to Newport and the wider South East Wales region.

2 Background to Carbon3.AI

- 2.1 Carbon3.AI is a UK-based technology and infrastructure company established to deliver a network of sovereign, sustainable, and secure artificial intelligence (AI) data centres across the United Kingdom. Its mission is to provide advanced computing capacity to support the UK's transition to a digital, low-carbon economy, ensuring data security, energy efficiency, and resilience in line with national infrastructure priorities.
- 2.2 The company's strategy focuses on repurposing previously developed industrial land and co-locating new digital infrastructure alongside existing energy and utilities networks. This model allows Carbon3.AI to deliver state-of-the-art data processing capacity while minimising environmental impact, construction footprint, and reliance on grid-intensive energy sources.
- 2.3 Each Carbon3.AI facility is designed around three core principles:
- Sustainability: using energy-efficient cooling, heat recovery, and private-wire energy connections to reduce operational carbon intensity;
 - Security: ensuring data sovereignty through UK-based infrastructure and secure physical and digital architecture; and
 - Scalability: enabling modular expansion through flexible, prefabricated units designed to meet evolving AI and cloud-computing demand.
- 2.4 The Newport site forms part of Carbon3.AI's planned rollout of regional data-centre nodes. These will collectively provide a distributed computing network supporting AI research, commercial innovation, and cloud infrastructure within the UK. Newport represents a strategically located site within the South East Wales National Growth Area, benefiting from proximity to Cardiff, Bristol, and the Severn corridor, all of which are identified in Future Wales: The National Plan 2040 as key digital and economic growth locations.
- 2.5 The site's location within the Liberty Steel Works presents a unique opportunity to repurpose underutilised industrial land and leverage the site's existing power infrastructure. The proposal aligns with Carbon3.AI's wider sustainability goals by exploring opportunities to use private-wire energy from nearby renewable or low-carbon generation sources, helping to decarbonise the data-processing sector.
- 2.6 Carbon3.AI's operational model seeks to complement, not compete with, traditional industrial activity. The data centre would coexist within the existing Liberty Steel industrial complex, providing synergies in

energy management, security, and logistics, and supporting Newport's ambitions to become a hub for advanced technology and green industry within the Cardiff Capital Region.

- 2.7 The proposed development at Newport therefore represents both a strategic digital infrastructure investment and an environmental upgrade of an existing brownfield site, delivering national and regional economic benefits while ensuring compliance with the Welsh Government's sustainability and placemaking objectives.

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, forming part of Newport's established industrial and employment corridor.
- 3.2 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 excellent links to the M4 motorway (Junction 24) and the wider South East Wales and Severnside corridor.
- 3.3 The application relates to an existing industrial building situated within the operational boundary of Liberty Steel. The structure is of modern portal-frame construction with profiled cladding, a concrete floor slab, and clear internal headroom suitable for heavy industrial or processing use. The building is currently under-utilised and presents an opportunity for beneficial reuse as a data-processing facility requiring no material increase in footprint or height.

Surrounding Land Uses

- 3.4 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.
- 3.5 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.
- 3.6 The nearest residential receptors are located approximately 1km to the north-west, separated by intervening industrial premises. There are no community facilities or sensitive land uses within the immediate vicinity. The existing industrial context therefore provides an appropriate environment for the proposed use without risk of adverse amenity effects.

Site Designations and Constraints

- 3.7 The site lies within a safeguarded employment area identified in the Newport Local Development Plan 2011–2026 (Policy EM3), where continued employment and industrial activity is supported. No landscape, conservation area or visual designations apply.

- 3.8 The site is located within Flood Zone C1 as defined in Technical Advice Note (TAN) 15: Development and Flood Risk, indicating that it is defended and served by existing flood-risk infrastructure. A Flood Consequences Assessment (FCA) accompanies the application to confirm that the change of use and minor external alterations will not increase flood risk and that appropriate resilience measures are in place **(Appendix 2)**.
- 3.9 The proximity of the River Usk SAC/SSSI (approximately 150 metres west) means that a Habitat Regulations Assessment (HRA) screening has been undertaken to confirm there are no likely significant effects on designated ecological features **(Appendix 1)**.
- 3.10 There are no listed buildings, scheduled monuments or heritage assets within or adjacent to the application site. While the Liberty Steel complex contributes to Newport's industrial heritage, the proposed recladding and reuse of the building will maintain its functional industrial appearance and will not affect the character or setting of any designated heritage assets.
- 3.11 The site contains no public rights of way and all vehicular and pedestrian access will continue to be taken from the existing private industrial estate roads.

Summary

- 3.12 In summary, the site comprises previously developed industrial land within an established heavy-industry location, served by existing utilities, access, and drainage infrastructure. Its isolation from residential areas, proximity to major transport routes, and connection to grid and energy infrastructure make it ideally suited to the proposed data-centre use.
- 3.13 The proposal represents a sustainable reuse and modernisation of an existing building, maintaining the industrial character of the area while introducing a high-value digital-infrastructure use fully consistent with the policy objectives of Future Wales, Planning Policy Wales, and the Newport LDP.

4 The Proposed Development

Description of Development

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

“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.”

- 4.2 The description reflects that the proposal involves the reuse of an existing building within the Liberty Steel Works, with no enlargement of the footprint or extension of the built form. The scheme comprises external refurbishment and internal adaptation only, consistent with a low-impact, sustainable form of development.

Overview

- 4.3 The application seeks full planning permission for the change of use of an existing industrial building (Use Class B2 – General Industrial) to a data centre (Use Class B8 – Storage and Distribution), together with external recladding of elevations, installation of plant and associated ancillary works.
- 4.4 The development forms part of Carbon3.AI’s national programme to deliver secure, energy-efficient data-processing facilities across the UK. The proposed use will involve the internal adaptation of the existing building to accommodate data-hall modules, supporting electrical and cooling infrastructure, and ancillary staff accommodation, with no change to the external footprint or building height.
- 4.5 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 groundfloor.
- 4.6 The external works comprise the replacement of existing wall cladding with a modern, insulated panel system 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.
- 4.7 The proposal does not include any extension of the building, modification of the existing access, or introduction of new drainage outfalls. All works will be undertaken within the established Liberty Steel industrial-estate boundary.
- 4.8 The internal layout of the data centre is not fixed at this stage. The detailed internal arrangement of data-hall modules, plant rooms and associated welfare facilities will

depend on the operational requirements of the future occupier and evolving technical specifications for computing and cooling systems. This application therefore seeks approval for the change of use and all external works in full, while reserving the detailed internal layout for future agreement through a the discharge of condition process.

- 4.9 The internal layout of the proposed data centre will ensure that all critical plant, servers, and data-processing chips are positioned above the predicted extreme-event flood level identified in the accompanying Flood Consequences Assessment. Sensitive electrical and IT equipment will be installed on raised platforms or mezzanine structures within the existing building, with only non-essential, water-resistant components located at ground level. This arrangement ensures the facility can remain safe and secure in the unlikely event of floodwater ingress and that the proposed change of use does not increase vulnerability in accordance with TAN 15: Development and Flood Risk and LDP Policy SP3 (Flood Risk).

Existing Building

- 4.10 The existing building is of steel portal-frame construction with profiled metal cladding and a reinforced concrete floor slab. The entire building is 70,800sqm but the area to be used for the data centre is only part of the building with a gross internal area of approximately 1632 sqm, with clear internal height suitable for data-hall fit-out and supporting plant.
- 4.11 The structure is currently under-utilised within the Liberty Steel complex and is served by existing vehicular access, on-site parking, and utilities connections. The floor loading, headroom, and secure location make it ideally suited for reuse as a data-processing facility.

Proposed Works

- 4.12 The proposed development will deliver the following:
- Change of use of the existing building to a data centre (Use Class B8);
 - Internal fit-out to provide modular data-hall suites, plant rooms, and limited ancillary office and welfare accommodation;
 - Replacement of all external cladding with a high-performance insulated system in rusty orange/corten type colour to match the aged industrial cladding; and
 - Retention of vehicular access and yard circulation, with no change to site levels or hardstanding extent.

Operational Characteristics

- 4.13 The data centre will operate continuously (24 hours per day, 365 days per year), but with limited on-site personnel. Typical occupation will comprise a small team of technical and maintenance staff, with visiting contractors for periodic servicing.
- 4.14 The proposal does not involve the import or storage of hazardous materials. All operations are confined within the building, ensuring no external processing, dust, or odour emissions.
- 4.15 Vehicular access will continue via the established estate-road network. Traffic generation is expected to be significantly lower than previous industrial operations, comprising mainly staff and servicing vehicles, with negligible HGV movements.

5 Environmental Effects

- 5.1 The proposed development has been reviewed against the key environmental topic areas that would normally require technical assessment for new-build proposals of this scale. Owing to the limited physical works involved, the reuse of an existing industrial building, and the industrial character of the surrounding area, the scheme does not give rise to any significant environmental effects. Each topic is summarised below.

Flood Risk and Drainage

- 5.2 The site lies within Flood Zone C1 as defined by TAN 15: Development and Flood Risk, indicating a defended area served by existing flood-risk management infrastructure. The proposal does not increase building footprint or vulnerability, involves no changes to site levels or drainage routes, and will not affect floodplain storage or flow paths. The internal layout of the proposed data centre will ensure that all critical plant, servers, and data-processing chips are positioned above the predicted extreme-event flood level identified in the accompanying Flood Consequences Assessment (**Appendix 2**).

Transport and Access

- 5.3 The proposal reuses an existing access and yard network within the Liberty Steel estate. Vehicle movements will be significantly lower than the former general-industrial use, being limited to a small number of staff vehicles and occasional service vans. No new access or highway works are proposed; therefore a full Transport Assessment is not required. The existing estate road connects directly to the A48 Southern Distributor Road, providing safe and efficient access to the strategic highway network.

Ecology and Biodiversity

- 5.4 The site comprises entirely hard-surfaced industrial land with negligible ecological value. It lies approximately 150 metres east of the River Usk SAC/SSSI, but is separated by existing industrial infrastructure. The accompanying HRA Screening Report (**Appendix 1**) confirms that there are no likely significant effects on the SAC or other designated sites. No vegetation clearance or external lighting increase is proposed; hence no ecological surveys are required.

Landscape and Visual Effects

- 5.5 The building sits within a large-scale industrial landscape characterised by steelworks structures, substations and storage yards. The proposed recladding will improve the appearance of the existing structure without increasing height or bulk. There are no public viewpoints offering close-range visibility,

and the site is well enclosed within the Liberty Steel complex. The development will therefore have no material landscape or visual impact, and a Landscape and Visual Assessment is not necessary.

Heritage

- 5.6 There are no designated heritage assets within or adjoining the site. The Liberty Steel complex forms part of Newport's industrial heritage context, but the proposed recladding will respect this character through use of neutral, functional materials typical of the area. The nearest listed buildings are over 500 metres distant and screened by modern industry. Accordingly, the development will have no effect on heritage significance, and no Heritage Assessment is required.

Noise

- 5.7 The site is located a substantial distance from the nearest noise-sensitive receptors, which are situated more than 400 metres away and separated by large industrial buildings and the A48 Southern Distributor Road. The proposals will operate within the existing industrial sound environment of the Liberty Steel Works. Given the distance, screening and existing ambient conditions, the development will not result in any perceptible noise effects, and a formal Noise Assessment is not required.

Air Quality

- 5.8 The proposal does not introduce combustion processes, traffic emissions or dust-generating activity. Any backup generators will operate infrequently for testing only and will comply with modern emission standards. The nearest sensitive receptors are several hundred metres away and screened by other industrial uses. Consequently, the development will have negligible air-quality impact, and no assessment is required.

Summary

- 5.9 In summary, the proposal represents a low-impact reuse of an existing industrial building within an established industrial estate. The works are confined to recladding and internal fit-out, with minimal external change. The environmental appraisal confirms that the development will not result in any significant effects in respect of flood risk, highways, ecology, landscape, heritage, noise or air quality, and that no additional technical studies are necessary to support the determination 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, regional 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 regeneration and infrastructure investment.

6.3 Relevant Future Wales objectives include:

Policy	Objective	Compliance Summary
Policy 1 – Where Wales Will Grow	Focus growth within existing settlements and brownfield land.	The proposal reuses an existing industrial building within a defined employment area, fully aligned with brownfield-first principles.
Policy 3 – Supporting Urban Growth and Regeneration	Encourage intensification and reuse of under-used employment land.	The development brings an under-utilised building back into active use for high-value digital employment.
Policy 12 – Regional Connectivity and Digital Infrastructure	Promote investment in digital infrastructure and data networks.	The proposal directly delivers new regional digital capacity, supporting national objectives for resilience and technological innovation.

Planning Policy Wales (Edition 12, 2024)

6.4 PPW 12 emphasises placemaking, sustainable reuse of existing resources, and climate-resilient design. It requires development to contribute to the well-being goals of the Well-being of Future Generations (Wales) Act 2015.

6.5 Key principles relevant to this proposal include:

- Efficient Use of Land (Chapter 3): Priority should be given to previously developed land. The scheme redevelops a brownfield industrial plot, avoiding greenfield loss.
- Productive and Enterprising Places (Chapter 5): Planning should enable modern employment uses. The data-centre use aligns with digital-economy objectives and strengthens Newport's employment base.
- Sustainable Resource Management (Chapter 6): Encourage energy-efficient design and climate-resilient development. Recladding enhances insulation; flood resilience is embedded.
- Infrastructure and Connectivity (Chapter 5): Support essential infrastructure including digital communications. The proposal represents exactly the type of low-impact, high-tech infrastructure envisaged by PPW.

Technical Advice Notes (TANs)

6.6 The following TANs are of relevance:

TAN	Topic	Relevance
TAN 12 – Design	Promotes sustainable, contextual design.	The recladding improves energy performance and visual quality while respecting industrial character.
TAN 15 – Flood Risk	Requires assessment of flood consequences.	Addressed through accompanying FCA confirming acceptability of the defended C1 location.
TAN 18 – Transport	Seeks safe, sustainable access.	Existing estate access via Corporation Road and A48.
TAN 5 – Nature Conservation	Protects biodiversity and European Sites.	HRA Screening concludes no likely significant effects on the River Usk SAC.

Local Planning Policy

Newport Local Development Plan (2011–2026)

6.7 The LDP sets out the local framework for development management. The site lies within a safeguarded employment area under Policy EM3, where employment and industrial uses are supported.

6.8 The following policies are of particular relevance:

Policy	Title	Compliance Summary
SP1 – Sustainability	Development to contribute to sustainable outcomes.	The reuse of an existing building minimises waste and carbon emissions.

Policy	Title	Compliance Summary
SP3 – Flood Risk	Manage risk in accordance with TAN 15.	The FCA demonstrates safe, defended development with no additional risk.
SP17 – Employment Land Provision	Maintain an adequate supply of employment land.	The proposal safeguards employment use and introduces new digital-sector jobs.
EM3 – Protected Employment Sites	Employment uses supported; non-employment uses resisted.	The data-centre use (B8) remains an employment use consistent with EM3.
GP1 – General Development Principles	Require good design, access and amenity protection.	No adverse impacts; improved façade and reduced operational traffic.
GP6 – Quality of Design	Promote context-responsive, sustainable design.	Recladding enhances visual quality and thermal performance.
GP8 – Access, Movement and Parking	Ensure safe and efficient access.	Existing arrangements retained; vehicle generation reduced.
CE6 – Archaeology and Heritage	Protect heritage assets and setting.	No designated assets affected; industrial context preserved.

Assessment Against Policy Objectives

6.9 The proposed development is fully consistent with the strategic and local planning framework:

- Sustainable Location: The site is brownfield, serviced and within a key employment corridor.
- Economic Benefit: The use supports Newport's regeneration and diversification into high-value digital infrastructure.
- Environmental Protection: The FCA and HRA demonstrate acceptable flood and ecological risk.
- Design Quality: Recladding delivers visual and thermal improvement consistent with TAN 12 and LDP Policy GP6.
- Transport Sustainability: No new access or highway capacity required; traffic significantly reduced compared with the existing industrial use.

Conclusion

6.10 The proposal satisfies the key aims of Future Wales 2040, PPW 12, relevant TANs, and the Newport LDP by:

- Reusing an existing industrial building, avoiding new land take;
- Delivering digital infrastructure of regional significance;

- Operating safely within a defended flood zone;
- Maintaining and enhancing the appearance of the industrial estate; and
- Achieving a sustainable, low-impact form of economic development.

6.11 Accordingly, the proposed change of use and recladding of the existing building at Liberty Steel represents a policy-compliant and sustainable form of development that should be supported by Newport City Council.

7 Planning balance

- 7.1 The development constitutes a sustainable, low-impact reuse of an existing building within a defined employment area. It delivers environmental and economic gains in line with the Well-being of Future Generations (Wales) Act 2015.
- 7.2 The proposal contributes to sustainable placemaking in accordance with Planning Policy Wales, by:
- Reusing existing resources and minimising waste;
 - Improving building performance and visual quality;
 - Supporting digital infrastructure;
 - Reducing traffic and emissions compared with the existing use; and
 - Strengthening Newport's employment and innovation base.
- 7.3 The proposal meets the overarching tests of sustainable development and accords with the objectives of Future Wales 2040, the Newport Local Development Plan, and all material planning considerations.
- 7.4 The proposed change of use and recladding of the existing building at Liberty Steel, Corporation Road, Newport complies with the spatial and economic strategy of Future Wales and the LDP, represents a high-quality design that enhances the existing industrial environment and delivers a sustainable, policy-compliant reuse of brownfield land.
- 7.5 The proposal therefore satisfies all relevant policy requirements and constitutes sustainable development under Section 39 of the Planning and Compulsory Purchase Act 2004 and Planning Policy Wales (Edition 12).

8 Conclusions

- 8.1 This Planning Supporting Statement has been prepared in support of a full planning application by Carbon3.AI for the change of use of an existing industrial building (Use Class B2) to a data centre (Use Class B8), including recladding of external elevations, and associated works within the Liberty Steel Works, Corporation Road, Newport.
- 8.2 The proposal represents the sustainable reuse of a modern industrial structure within an established employment area. The development involves no increase in footprint, no new access, and no material change to operational intensity. It will deliver a high-quality, low-impact digital-infrastructure facility consistent with the strategic objectives for the Cardiff–Newport Growth Corridor.
- 8.3 The assessment demonstrates that the proposal is fully compliant with national, regional and local planning policy, including Future Wales 2040, Planning Policy Wales (Edition 12, 2024) and the Newport Local Development Plan (2011–2026).
- 8.4 The principal conclusions are:
- **Acceptable in Principle:** The site lies within a safeguarded employment area where continued employment use is supported. The data-centre use maintains this function while diversifying Newport’s economic base.
 - **Design Quality:** Recladding and refurbishment will improve building performance and visual quality in accordance with TAN 12 and LDP Policy GP6.
 - **Environmental Effects:** The reuse of the existing building ensures negligible environmental impact. The site is distant from sensitive receptors, and there are no significant effects on ecology, landscape, heritage, air quality or noise.
 - **Flood Risk:** The accompanying Flood Consequences Assessment confirms that the site is within a defended C1 zone; the proposed “less vulnerable” use is acceptable under TAN 15, with resilience measures in place.
 - **Transport and Access:** The development will generate fewer trips than the previous industrial use. Access, servicing and parking are unchanged and acceptable under TAN 18 and LDP Policy GP8.

Conclusion

- 8.5 Taken together, the proposed development delivers clear economic and environmental benefits with no adverse effects. It accords with the development plan when read as a whole and supports Welsh Government's objectives for productive, low-carbon, digitally-enabled growth.
- 8.6 In the context of Section 38(6) of the Planning and Compulsory Purchase Act 2004, there are no material considerations that indicate otherwise, and the proposal represents sustainable development as defined by Planning Policy Wales.
- 8.7 Accordingly, it is respectfully requested that Newport City Council grants planning permission for the proposed change of use and recladding of the existing building at Liberty Steel Works, in recognition of its compliance with policy, positive design contribution and strategic value to the regional digital economy.

Figures

Appendix 1 – HRA Screening Assessment

Appendix 2 – Flood Consequences Report

Appendix 3 – Design and Access Statement

