

26/0191

From: Ben Hooton <Ben@era4.com>

Sent: 04 June 2026 13:02

To: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>

Subject: Modular Data Centre Application

Dear Geraint,

I hope all is well.

I would be grateful if you could confirm receipt of this email and attachments.

We have reviewed the consultation responses to outline planning application 26/0191 for the modular data centre at the former Liberty Steel site in Newport and provide further information in this email in response to some of the comments raised. This will hopefully allow the application to move forward towards a determination.

A number of the statutory consultees have responded with comments of no objection. This includes Heneb (the Trust for Welsh Archaeology), South Wales Fire and Rescue Service, National Grid, Wales and West Utility Services, the HSE and the Local Highways Authority (subject to conditions requiring the provision of cycle storage and EV charging facilities).

The comments that have raised questions tend to relate to similar areas of interest across the different statutory bodies. These include water usage, protected species, land contamination, controlled waters, and surface and foul drainage.

Welsh Water raised a question over the quantum of potable water that is to be used at the site. The main water uses on the site during the day-to-day operation of the data centre will be the welfare facilities. The computer equipment that is to be installed will be cooled using a closed loop liquid cooling system. Once installed this system will not consume mains water or discharge water to the drainage network. The cooling equipment has the potential (subject to detailed design) to utilise adiabatic cooling in periods of extreme heat where external temperatures make evaporative cooling will be the most efficient means by which to control system temperature. Adiabatic cooling is where a fine mist of water is applied to a pad under which the closed loop cooling pipes pass. The evaporation of the water from this pad removes the heat from the system. The total amount of water used by the proposed development each year (including the use of adiabatic cooling) is expected to be less than that consumed by two large family houses. This will be significantly lower than the water consumed by the established industrial use at the site. Therefore, the existing infrastructure to the site should be more than adequate in terms of providing the capacity to meet the water needs of the proposed development. Therefore, we accept the condition suggested by Welsh Water stating:

"No premise shall be occupied until a potable water scheme to serve the development has been submitted to and approved in writing by the Local Planning Authority. The scheme shall demonstrate that the existing water supply system can

suitably accommodate the proposed development. If necessary, a scheme to reinforce the existing public water supply system in order to accommodate the development shall be delivered prior to the occupation of any building. Thereafter, the agreed scheme shall be constructed in full and remain in perpetuity."

Welsh Water have requested that a separate condition be added to any planning permission regarding surface water drainage specifying that this must not be disposed of via the public sewerage network. Welsh Water has also drawn attention to the potential need for a license to discharge any trade effluents (not applicable to this proposal) and explained the process of applying to connect to a public sewer. NRW has made a similar comment regarding foul drainage and has requested to be reconsulted if a private drainage system is to be installed as part of the development. At this stage details of the foul drainage proposals are not known. This information will come forward as part of the reserved matters application, at which stage both Welsh Water and NRW will be reconsulted.

NRW also note that the application site is outside of the flood zone. However, parts of the access road are within Flood Zone 3 (Sea). This applies to a wide area of land along the banks of the River Usk, and equally applies to the large steel works building to the west. There are tidal barriers in operation in this area and planning conditions have been added to permissions on other sites that could be affected by tidal flooding requiring the approval of an emergency plan and evacuation strategy before the development is brought into operation. We request the same approach be adopted here so that the strategy can be prepared to take account of the detailed design of the proposed development.

In terms of surface water drainage, the Sustainable Drainage Approving Body (SAB) has noted that a SAB application could be required for this development. NRW has also commented on surface water drainage and noted the potential for contamination to be present on site given the historic industrial uses. However, NRW also note that there should be a condition to prevent the use of infiltration systems to deal with surface water drainage, unless it can be demonstrated that there is no resultant unacceptable risk to controlled waters. Again, once a detailed scheme has been prepared for the site, it will be possible to design a surface water drainage system that collects and deals with the run off from the site development and creates a system that mitigates runoff to green field run off rates and allows for features such as reed beds to improve water quality. Such a SAB system may utilise land within the wider ownership of the applicant as this approach allows the optimum solution to be created to suit the detailed design of the development proposed at reserved matters stage. This will address both NRW and Welsh Waters comments and enable a wider landscaping scheme and green infrastructure plan to be created for the site and brought forward as part of the proposed development. These matters can be addressed by condition at this stage.

NRW has requested a number of conditions that deal with the potential for any contamination within the site that could be disturbed by the development and are satisfied that these conditions address any potential contamination risks. The inclusion of these conditions, including a requirement to prepare a construction and environment management plan, will address contamination to the satisfaction of NRW. NRW note that intrusive surveys and gas monitoring of the site will need to be

undertaken to establish the measures that need to be incorporated into the detailed design of the development. Ground stability, ground conditions and ground/soil samples were recently investigated and gas wells were installed across the site to check and to monitor for any gas production. It is our understanding that these works were undertaken by the owner of the site having recently acquired the premises and looking to implement best management practices.

The above site operations were referenced by the Ecological Officer, who notes that the value of any further assessments will be limited following the site clearance. It should be noted that only low value self-seeded scrub was cleared to enable the other necessary site investigations (subsequently listed as necessary by NRW) to take place. These works were undertaken outside of the breeding bird season and did not require planning permission. Furthermore, the site was visited by an ecologist prior to any works taking place to ensure no impact on any protected species. The presence of reptiles and Dormice were not noted (the self-seeded scrub habitat was considered sub-optimal for Dormice). Please see the attached note from the Ecologist. The only species that NRW has requested be surveyed is Great Crested Newts. An eDNA survey of the water bodies on site has been undertaken, and the results show that no great Crested Newts are present on site. The results from this eDNA survey are attached.

The conditions requested by NRW regarding contamination and surface water drainage will ensure that the development does not result in any offsite potential ecological impacts, which means there will be no impact on the Severn Estuary SAC/SPA/Ramsar sites. The development site is 0.83 ha development plot and was predominantly bare earth/gravel prior to any works being undertaken on site and formed part of a wider active industrial complex. The linkages between the proposed development site which is the subject of this application, and the habitats of higher ecological value are minimal. Therefore, the Ecologist was satisfied that the development would not have any impact on transient species like Otters. There are no ecological constraints to this development, and any environmental risks will be prevented by the conditions suggested by NRW, reflecting the efforts of the site owner to ensure best management practices are put in place to prevent or limit any environmental impacts.

In conclusion, the application site is not at risk of flooding, the development will not utilise large volumes of mains water, nor will it result in substantial discharges of water to the foul network. Indeed, the actual volume of water that will be used by this development is minimal and well below that used by the adjacent steel works. NRW and Welsh Water have requested a number of conditions be added to the permission to deal with water use, surface and foul drainage. In addition, NRW has recommended conditions that will allow any on site contamination to be dealt with satisfactorily and will prevent any offsite environmental impacts. The active use of the site will ensure the area is properly managed and maintained, and the proposed development will have a significant positive impact in terms of economic investment in the area, promoting wider economic growth and job creation across South Wales. This will help to meet the need and demand for digital technology and is a scheme that should be fully supported.

Kind regards,

Ben



Ben Hooton

Head of Planning

+44 7772398548 | Era4.com

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