Environmental Permit Transfer Application for Newport Data Centre (CWL11/CWL12)

Supporting Information Document

PREPARED FOR

VDC CWL12 Limited

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Supporting Information Document

0764238

David Pollok
Partner

Environmental Resources Management Ltd
2nd Floor Exchequer Court
33 St Mary Axe
London
EC3A 8AA
United Kingdom

CONTENTS

APPLICATION CHECKLIST III

1. INTRODUCTION 1

1.1 BACKGROUND 1

2. SITE DESCRIPTION 1

2.1 SITE LOCATION 1
2.2 SITE CONDITION 1

3. SCOPE OF PARTIAL TRANSFER 4

3.1 SITE ACTIVITIES TO BE TRANSFERRED 4
3.2 EMISSION POINTS TO BE TRANSFERRED 6

4. ENVIRONMENTAL MANAGEMENT SYSTEM 10

LIST OF TABLES

TABLE 1 ACTIVITIES TO BE TRANSFERRED TO CWL12 DATA CENTRE 4
TABLE 2 ACTIVITIES TO BE UPDATED IN PERMIT EPR/BB3599CW FOR CWL11 DATA CENTRE 5
TABLE 3 EMISSION POINTS TO BE TRANSFERRED TO VDC CWL12 7

LIST OF FIGURES

FIGURE 1 CWL11, CWL12 AND CWL 13 SITE LOCATION 3
FIGURE 2 CWL 12 SITE LAYOUT, INSTALLATION BOUNDARY AND EMISSION POINTS 8
FIGURE 3 CWL11 SITE LAYOUT, INSTALLATION BOUNDARY AND EMISSION POINTS 9

ACRONYMS AND ABBREVIATIONS

Acronym	Description
DAA	Directly Associated Activity
EP	Environmental permit
ERM	Environmental Resources Management Ltd
HVO	Hydrotreated Vegetable Oil
IMS	Integrated Management System
MCP	Medium Combustion Plant
MW	Megawatt
MWth	Megawatt thermal
SCR	Site Condition Report
SCR	Selective Catalyst Reduction

Acronym	Description
STU	Stationary Technical Unit
VDC UK	Vantage Data Centers UK Limited
VDC CWL12	VDC CWL12 Limited

APPLICATION CHECKLIST

Requirement	Topic	Location in Report
Form A	About you	(in form)
Form D2 – Question 1	About people involved in the permit transfer	(in form)
Form D2 – Question 2	About the transfer	(in form)
Form D2 – Question 3	About parts of the permit being transferred	**Section 3** **Figure 1** **Figure 2** **Figure 3**
Form D2 – Question 4a, 4c	Competency	(in form)
Form D2 – Question 4d	Management Systems	**Section 4**
Form D2 – Question 5	Date of Transfer	(in form)
Form F1	Charges and Declarations	(in form)

1. INTRODUCTION

1.1 BACKGROUND

Vantage Data Centers UK Limited (VDC UK) currently operates the Newport Data Centre (CWL11/12) under Environmental Permit (EP), reference EPR/BB3599CW/V004, dated 17/3/2025. VDC CWL12 Limited (VDC CWL12) is proposing to take over operation of the CWL12 data centre and associated generators, which will require a partial transfer of the existing EP.

VDC CWL12 complies with the definition of a legal operator, as outlined in Regulatory Guidance Note RGN 1[1]. VDC CWL12 is a legal entity listed on Company House and will have control over the CWL12 data centre. This includes the day-to-day management of CWL12 site operations, ensuring permit conditions are complied with, responsible for staffing decisions, financial decisions, and ensuring that there are adequate controls in place in an emergency scenario.

Additionally, both CWL11 and CWL12 data centres will meet the legal definition of an installation following the transfer of the existing permit, as outlined in Regulatory Guidance Note RGN 2[2]. Both sites will comprise a stationary technical unit (STU) where a Schedule 1, Part 2, Part A(1) combustion activity will take place, this being the operation of the diesel generators. Both sites will also have several directly associated activities (DAA) undertaken which are connected to the listed activity. This is further discussed in **Section 3**.

The activities which will be transferred to VDC CWL12 as part of the transfer are not expected to undergo any operational changes.

The partial transfer application and supporting information presented in this report for the proposed CWL12 Data Centre, hereafter referred to as the 'Site', has been prepared by Environmental Resources Management Limited (ERM) on behalf of VDC CWL12. The supporting information document is based on information provided by VDC UK and VDC CWL12 and publicly available environmental data.

2. SITE DESCRIPTION

2.1 SITE LOCATION

The Newport Data Centre (CWL11/12) is located at Imperial Park, Celtic Way, Marshfield, Newport, NP10 8BE (328200, 184600).

The address of the CWL12 Data Centre is North Lake Drive, Celtic Lakes, Newport, South Wales, NP10 8DE.

The proposed installation boundaries for CWL11 and CWL12 following the permit transfer are shown in **Figure 1.**

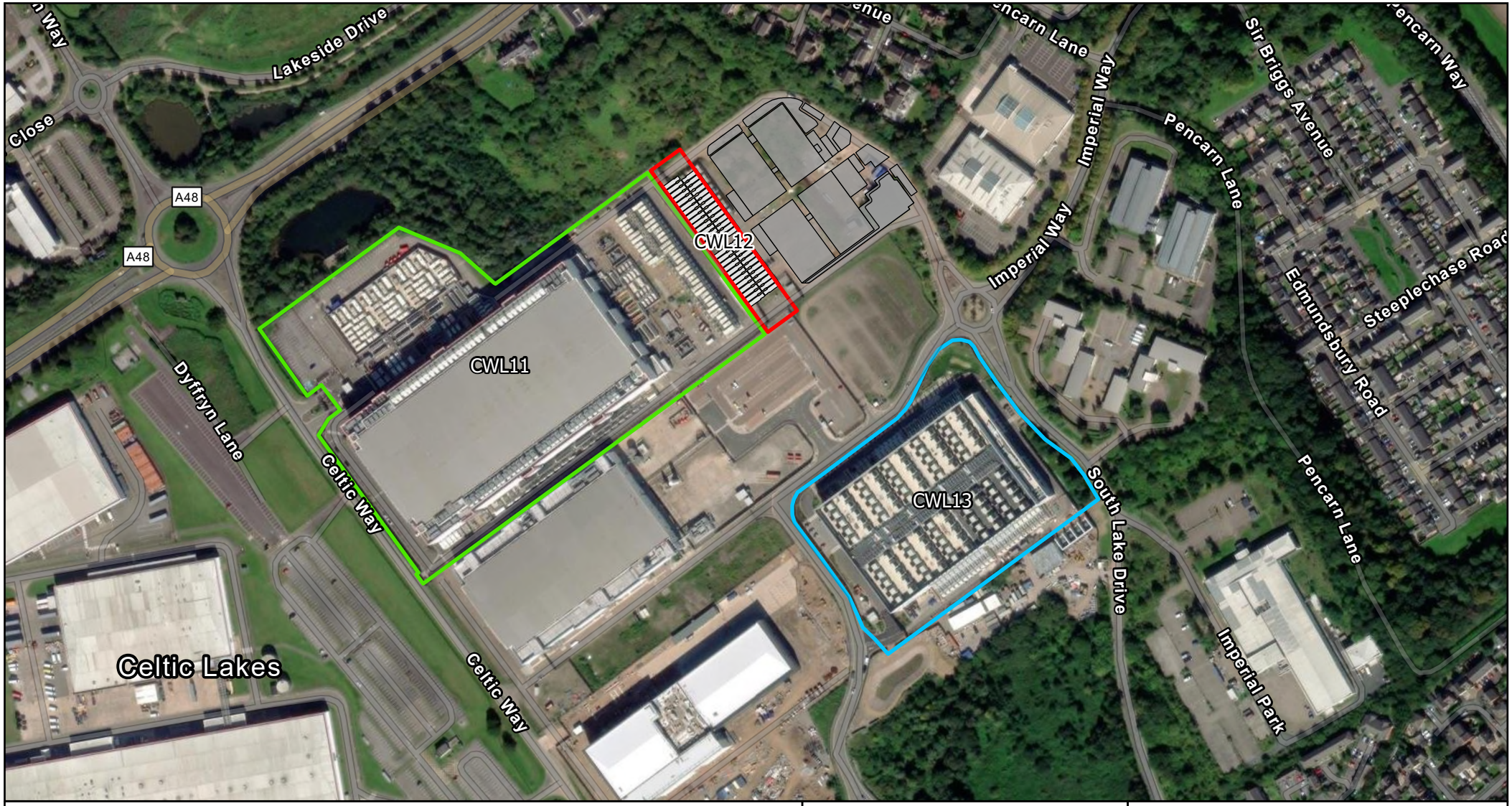
2.2 SITE CONDITION

The Site is currently part of an existing permitted site and does not require any additional land as part of the transfer. A Site Condition Report (SCR) was submitted as part of the original permit application in 2018, and the SCR was updated in 2021 to extend the boundary as part of an

[1] RGN 1 Understanding the meaning of 'operator'
[2] rgn-2-understanding-the-meaning-of-regulated-facility.pdf

application to vary the permit (variation V003). VDC CWL12 understand they are taking on liability for the Site, including potential remediation of the Site if there is a deterioration from the Site baseline. This may include any potential pollution of the Site during VDC UK's operation of it.

The SCR will be updated to reflect the separate boundaries for CWL11 and CWL12.



Approximate Installation Boundaries:

- CWL11 Data Centre
- CWL12 Data Centre
- CWL13 Data Centre

- Proposed CWL12 Site Layout
- Proposed CWL12 Generator Layout

0 50 100 150

Metres

N

Figure 1 - CWL11, CWL12 & CWL13
Site Location Newport, Wales

SCALE: See Scale Bar	VERSION: A02
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VANTAGE DATA CENTERS

PROJECTION: British National Grid

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3. SCOPE OF PARTIAL TRANSFER

The existing permit, reference EPR/BB3599CW/V004, will be partially transferred to VDC CWL12, giving VDC CWL12 operational control of CWL12 and associated generators.

Figure 1 shows the current proposed installation boundary of CWL11 and CWL12 following the partial permit transfer to VDC CWL12.

CWL12 will operate 53 generators, all of the same type, split across 5 cells in a 'n+1' configuration.

Each engine is considered a 'new Medium Combustion Plant'[3] (MCP) and subject to Schedule 25A of the EPR. The engines are Limited Operating Hours MCP, operating less than 500 hours per year.

The planned testing and maintenance scenarios across both sites will remain the same.

Additionally, it is proposed that the site name on the VDC UK permit (EPR/BB3599CW) is updated from 'Newport Data Centre' to 'CWL11 Data Centre'.

3.1 SITE ACTIVITIES TO BE TRANSFERRED

Table 1 identifies the Schedule 1 listed activities that will be transferred from VDC UK to VDC CWL12, along with any directly associated activities (DAA).

Table 2 identifies the changes to the current VDC UK permit which will require updating based on the Site's new thermal input following the transfer.

Note that the Schedule 1 activities will remain the same on both permits, however VDC CWL12 will have operational responsibility of the CWL12 generators, while VDC UK will have operational responsibility of the CWL11 generators, which will impact total thermal MW input for each site. See updates in **BOLD** in the tables below.

TABLE 1 ACTIVITIES TO BE TRANSFERRED TO CWL12 DATA CENTRE

Activity	Description of activity	Limits of Specified activity
Activities listed in Schedule 1 of the EP Regulations		
Schedule 1 Part 2 Section 1.1 Part A(1)(a): Burning any fuel in an appliance with a rated thermal input of 50 or more megawatts. Consisting of individual Schedule 25A: Medium Combustion Plant (MCP)	**53 engines** (new MCP) each with Selective Catalytic Reduction (SCR) for NOx control and an Ammonia Slip Catalyst (ASC) (A143-A195): • 53 x 3.252 MWth	*Refer to EP Schedule 1 – Table S1.1 for limits of specified activities.* *Updates made to stack arrangements/IDs below:* **Engines A143-A195 stack height of 10.39 m.**

[3] New MCP means a medium combustion plant put into operation after 20th December 2018. Refer to Paragraph 2(1) of Schedule 25A of the Environmental Permitting (England and Wales) 2016 (as amended) . Available from: The Environmental Permitting (England and Wales) Regulations 2016

Activity	Description of activity	Limits of Specified activity
Combustion of hydrotreated vegetable oil (HVO) and/or diesel in **53** compression ignition engines for the purpose of electricity generation with a **total thermal input of 172.4 MW** Operation consisting only of: • Planned operation of the engines for testing purposes (single engine / single cell • Unscheduled testing following unplanned repair (single engine / single cell) • Unplanned emergency operation for backup power provision in the event of failure of supply from the National Grid (initially all engines, followed by load shedding).		
Directly Associated Activities		
Directly associated activity	Fuel storage – Fuel tanks provide generators with fuel (HVO or diesel) for the above Schedule 1 activity.	From receipt of fuel to use in emergency standby generators.
Directly associated activity	Chemical storage – AdBlue storage tanks for the above Schedule 1 activity.	From receipt of AdBlue, to dispatch for use in emergency generators fitted with Selective Catalytic Reduction (SCR).
Directly associated activity	Surface water drainage system servicing area in which schedule 1 activity takes place	Input to site drainage system until discharged into wider business park drainage system.

Note: Surface water drainage from CWL12 currently flows into a CWL11/12 drainage system that discharges via emission points (W1 and W2) located within the CWL11 boundary (see **Figure 3**). A separate application is being submitted, in parallel with this transfer application, to vary the CWL12 permit. This includes changes to the CWL12 surface water drainage system, and the addition of a new emission point.

TABLE 2 ACTIVITIES TO BE UPDATED IN PERMIT EPR/BB3599CW FOR CWL11 DATA CENTRE

Activity	Description of activity	Limits of Specified activity
Activities listed in Schedule 1 of the EP Regulations		
Schedule 1 Part 2 Section 1.1 Part A(1)(a):	62 engines (existing MCP) (A1-A62): • 10 x 1.97 MWth	*Refer to EP Schedule 1 – Table S1.1 for limits of specified activities.*

Activity	Description of activity	Limits of Specified activity
Burning any fuel in an appliance with a rated thermal input of 50 or more megawatts. Consisting of individual Schedule 25A: Medium Combustion Plant (MCP) Combustion of hydrotreated vegetable oil (HVO) and/or diesel in **141** compression ignition engines for the purpose of electricity generation with a **total thermal input of 348 MW** Operation consisting only of: • Planned operation of the engines for testing purposes (single engine / single cell • Unscheduled testing following unplanned repair (single engine / single cell) • Unplanned emergency operation for backup power provision in the event of failure of supply from the National Grid (initially all engines, followed by load shedding).	• 29 x 1.457 MWth • 18 x 1.311 MWth • 5 x 3.226 MWth **79 engines (new MCP) (A63-A111, A113-A142):** • **61 x 2.987 MWth** • **18 x 3.504 MWth** **A94-A111 each fitted with Selective Catalytic Reduction (SCR) for NOx control and an Ammonia Slip Catalyst (ASC)**	*Updates made to stack arrangements/IDs below:* **Engines A1-A82 stack heights ranging from 3.18 m – 3.94 m as specified in the permit applications.** **Engines A83-A93, A113-A142 stack height of 9.3 m.** **Engines A94-A111 stack height of 10.39 m.**
Directly Associated Activities		
Directly associated activity	Fuel storage – Fuel tanks provide generators with fuel (HVO or diesel) for the above Schedule 1 activity.	From receipt of fuel to use in emergency standby generators.
Directly associated activity	Chemical storage – AdBlue storage tanks for the above Schedule 1 activity.	From receipt of AdBlue to dispatch for use in emergency generators fitted with Selective Catalytic Reduction (SCR).
Directly associated activity	Surface water drainage system servicing area in which schedule 1 activity takes place	Input to site drainage system until discharged into wider business park drainage system.

3.2 EMISSION POINTS TO BE TRANSFERRED

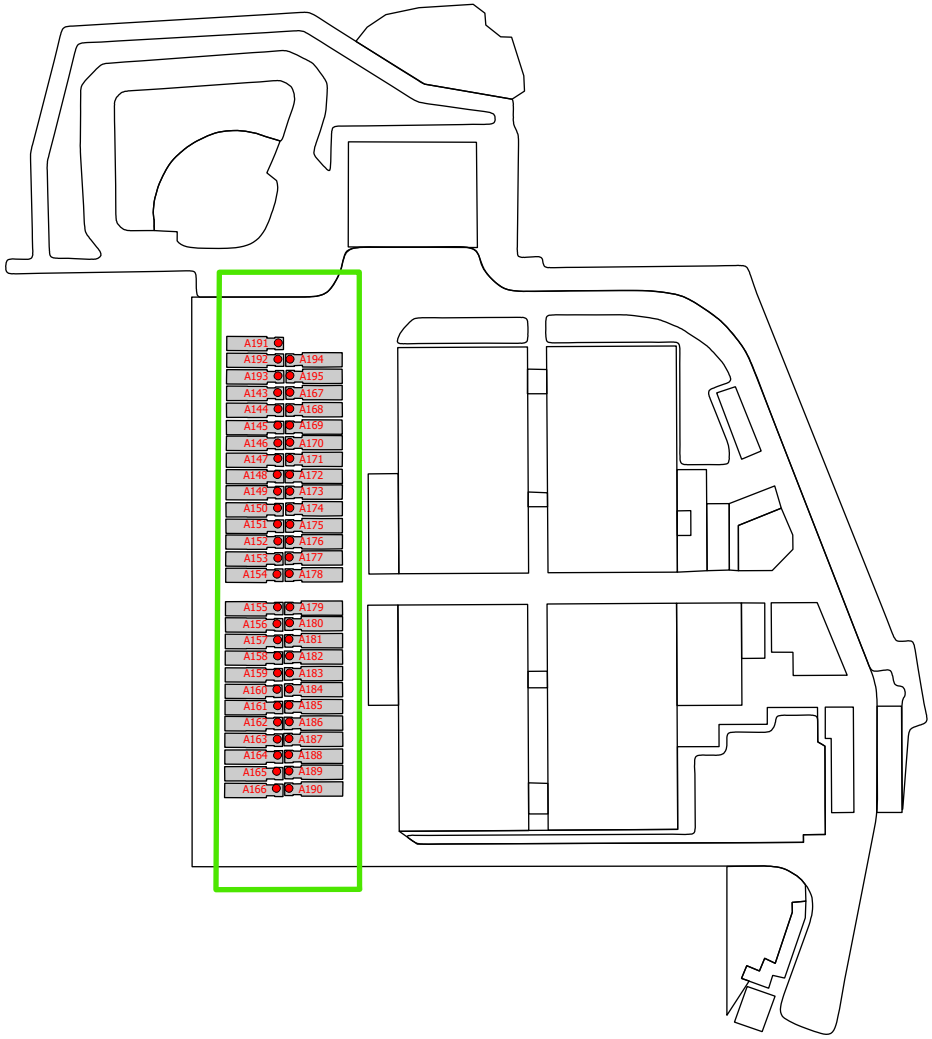
Emission points that will be transferred with this application are listed in **Table 3** below and shown in **Figure 2**. Emission points that will remain with CWL11 (permit EPR/BB3599CW) are shown in **Figure 3**.

Note that in the existing permit, the CWL12 Kohler engine model is incorrectly given as Kohler KD45V20-5DFS (KD1650-F), however this should be KD45V20-5DES (KD1650-E). All other engine specifications are correct. Please see engine name update in **bold** within the table below.

TABLE 3 EMISSION POINTS TO BE TRANSFERRED TO VDC CWL12

Emission point and source	**Parameter**	**Limit**	**Reference Period/**	**Monitoring frequency**	**Monitoring standard or method**
A143 – A195 Generator exhausts (new MCP) 53 x 3.252 MWth Kohler KD45V20-**5DES** (**KD1650-E**)	Carbon Monoxide	No limit	In line with web guide: Monitoring stack emission: low risk MCPs and specified generators	After 3 times the maximum average annual operating hours have elapsed and no less frequent than every 5 years.	Representative engine monitoring in line with web guide: Monitoring stack emissions: low risk MCPs and specified generators.

No emission points to water or sewer are being transferred to VDC CWL12.



CWL12 Installation Boundary

Emission Point to Air

0 20 40 60

Metres

N

Figure 2 - CWL12 Site layout, Installation Boundary and Emission Points

SCALE: See Scale Bar	VERSION: A01
SIZE: A4	DRAWN: RW
PROJECT: 0764238	CHECKED: VT
DATE: 01/07/2025	APPROVED: KR

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CWL11 Installation Boundary

Emission Point to Water

Emission Point to Air

0 20 40 60

Metres

N

Figure 3 - CWL11 Site layout, Installation Boundary and Emission Points

SCALE: See Scale Bar	VERSION: A01
SIZE: A4	DRAWN: RW
PROJECT: 0764238	CHECKED: VT
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4. ENVIRONMENTAL MANAGEMENT SYSTEM

VDC CWL12 will operate under a new Integrated Management System (IMS) which will replicate the current IMS in place for CWL11/12. The IMS focuses on quality, health and safety, information security and environment. It is anticipated that the IMS will be certified to ISO 14001:2015.

The following is a summary of the contents of the VDC CWL12 IMS:

1. Purpose
2. Organisational Context
    - 2.1 Organisation and Its Context
    - 2.2 Needs and Expectations of Interested Parties
    - 2.3 Determining the Scope of the Management System
    - 2.4 Management System and its Processes
3. Leadership
    - 3.1 Leadership & Commitment
    - 3.2 IMS Policy
    - 3.3 Organisation Roles Responsibilities and Authorities
    - 3.4 Consultation and Participation of Workers
4. Planning
    - 4.1 Actions to address risks and opportunities
    - 4.2 IMS Objectives and Planning to Achieve Them
    - 4.3 Planning of Changes
5. Support
    - 5.1 Resources
    - 5.2 Competence
    - 5.3 Awareness
    - 5.4 Communication
    - 5.5 Documented Information
6. Operation
    - 6.1 Operational Planning and Control
    - 6.2 Requirements for Products and Services
    - 6.3 Design and Development of Products and Services
    - 6.4 Control of Externally Provided Processes, Products and Services

6.5 Production and Service Provision

6.6 Release of Products and Services

6.7 Control of Nonconforming Process Outputs, Products and Services

6.8 Control of Emergency situations/Emergency Preparedness and response

7. Performance Management

7.1 Monitoring, Measurement, Analysis and Evaluation

7.2 Internal Audit

7.3 Management Review

7.4 Communication

7.5 Document Management

8. Improvement

8.1 General

8.2 Incident, Nonconformity and Corrective Action

8.3 Preventive actions

8.4 Continual Improvement

9. Document Control

9.1 Revision Control

9.2 Annual Review

10 Appendices

10.1 Appendix 1. Operational Process Interaction

10.2 Appendix 2. In Scope Sites

10.2 Appendix 3. Environmental Management Lifecycle

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ERM's London Office
2nd Floor Exchequer Court
33 St Mary Axe
London
United Kingdom
EC3A 8AA

T: +44 20 3206 5200
F: +44 20 3206 5440

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