

Natural Resources Wales  
William Wallace, Senior Officer, Installation and  
RSR permitting  
By email

**DATE**

15 July 2026

**SUBJECT**

CWL11/CWL12 partial transfer, application ref. PAN-030347

**REFERENCE**

0724643

Dear William,

In response to the Schedule 5 Notice dated 03/07/2026 requesting further information on the above application, further information is provided below.

This response has been prepared by Environmental Resources Management Limited (ERM) on behalf of VDC CWL12, based on information provided by Vantage Data Centers UK Limited (VDC UK) and VDC CWL12 Limited (VDC CWL12).

## 1. CELL TESTING

### NRW Request:

- Action: Provide evidence and/or an agreement between VDC CWL12 Limited and Vantage Data Centers UK Limited to prevent cell testing of both CWL11 and CWL12 occurring between the two sites at the same time.

*Reason: At present the Permit EPR/BB3599CW/V004, specifies that if engines in a cell are started/run up for testing purposes, there is to be no overlapping testing with other cells. We need to ensure that the conditions, operating techniques and management systems of the two permits after the variation will have the same environmental impact as the original permit. As such we need evidence of co-ordination between the two permit holders to prevent testing of the cells of both CWL11 and CWL12 occurring at the same time.*

### VDC Response:

- All cell tests are scheduled via ServiceNow, which covers the CWL1 campus (CWL11, CWL12 and CWL13). This system will be configured to block maintenance of a particular type, or on particular assets, where a test is already scheduled.
- The CWL11 and CWL12 site teams will have visibility of both sites' Planned Preventative Maintenance (PPM) and black building schedules to schedule cell tests effectively, ensuring there is no overlap.
- A similar approach is used on other data centre campuses (e.g. in Germany), where the various sites coordinate to ensure that they do not run cell tests at the same time.
- The Change Advisory Board (CAB) process will interrogate any PPM and black building change requests with conflicting schedule requests being discussed as part of this process.

- For 'normal' and 'expedited' change requests, the CAB meets on a bi-weekly basis, coordinated by the Change and Incident Manager, with the weekly agenda being set automatically via ServiceNow.
- Emergency change requests are dealt with by the Emergency Change Advisory Board (ECAB) which is a subset of the CAB responsible for reviewing and approving Emergency Changes.
- When an emergency change request is raised, the ECAB meet the same day as required. Therefore, if there was a need to schedule a cell test within 24 hours, this would be captured by the ECAB and reviewed to ensure there was no overlap in testing prior to the change being approved.
- Since the CWL12 generators have not yet been commissioned, asset and maintenance data are not yet set up in the system. When these are set up, sessions will be scheduled with the site teams to make them aware. It is anticipated that the tests will be scheduled in the system in Q4 2026 and first tests undertaken in 2027.

Please let me know if you require any further information.

Yours sincerely,

Kate Riley