

Natural Resources Wales Permitting Decisions

Vantage Data Centres CWL11/CWL12 Data Centre Partial Transfer

Decision Document

Application for a Partial Transfer

The application number is: PAN-030347

The permit transfer and variation number is: EPR/BB3599CW/T005

The new permit number (as a result of the partial transfer) is: EPR/DB3699CY

The Transferor is: Vantage Data Centres UK Limited

The Transferee is: VDC CWL12 Limited

The Installation is located at: CWL11/CWL12, Newport Data Centre, Imperial Park, Celtic Way, Marshfield, Newport, NP10 8BE

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise, we have accepted the applicant's proposals.

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1. Executive summary

1.1. Application summary

An application has been made to transfer part of the environmental permit for CWL11/CWL12 Newport Data Centre, located at Imperial Park, Celtic Way, Marshfield, Newport, NP10 8BE from Vantage Data Centers UK Limited (the “transferor”) to VDC CWL12 Limited (the “transferee”).

The original permit EPR/BB3599CW was granted for the use of diesel generators under emergency scenarios or testing. The latest version of the permit prior to the partial transfer allowed for the use of 194 backup generators for emergency use due to power loss and annual testing of the engines. The site is subject to Schedule 1 Part 2 Section 1.1 Part A(1)(a) of the Environmental Permitting (England and Wales) Regulations 2016 (as amended) (EPR) due to aggregation of multiple combustion units to more than 50 MW net rated thermal input (MW_{th}). Each unit is less than $20MW_{th}$ and all are classed as Medium Combustion Plant (MCP).

The application is to transfer the 53 of the generators and the directly associated activities (DAA) on the CWL12 part of the site from Vantage Data Centers Limited to VDC CWL12 Limited. The remaining 141 units associated with CWL11 will be retained by Vantage Data Centers Limited.

The generators and directly associated activities transferred to VDC CWL12 Limited are to be regulated under a new permit (ref. EPR/DB3699CY). The existing permit (ref. EPR/BB3599CW) for the activities retained by Vantage Data Centers Limited has been varied to reflect the changes as a result of the partial transfer.

1.2. Our decision

We have decided to grant the partial transfer for Vantage Data Centers CWL11/12 from Vantage Data Centers UK Limited to VDC CWL12 Limited.

Permit number EPR/BB3599CW will continue to be operated by Vantage Data Centers UK Limited. A new permit EPR/DB3699CY has been issued to VDC CWL12 Limited to transfer the relevant parts of the facility.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

2. Receipt of the application

The application was received on 03/09/2025. In order for us to be able to consider the application duly made, we needed more information. We requested the following:

- An amended site plan showing the installation boundary for CWL12 in red and the installation boundary for CWL11 in green; and
- A more detailed summary of the environmental management systems and operating techniques used by VDC CWL12 Limited, and any changes to the existing operating techniques for CWL11 as a result of the transfer.

A letter requesting this information was sent to the applicant on 22/04/2026. Upon receipt of this information, on 21/05/2026, we were able to consider the application duly made. This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we would need to complete that determination.

3. Confidential information

The applicant made a claim for no claim for commercial confidentiality, and we have not received information in relation to the application that appears to be confidential in relation to any party.

4. Legislation

The transfer will be granted under Regulation 21 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an *installation* as described by the IED;
- subject to aspects of the Well-Being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 which also have to be addressed.
- Medium Combustion Plant Directive 2018.

We address the legal requirements directly where relevant in the body of this document. NRW is satisfied that the decision on this application is consistent with its general purpose of pursuing the sustainable management of natural resources (SMNR) in relation to Wales and applying the principles of SMNR. In particular, NRW acknowledges that it is a principle of sustainable management to take action to prevent significant damage to ecosystems. We consider that, in granting the transfer a high level of protection will be maintained for the environment and human health through the operation of the Installation in accordance with the permit conditions. NRW is satisfied that this decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources

5. The Installation

The permitted regulated facilities have changed as a result of the partial transfer.

The permit activities for the site under the permit EPR/BB3599CW/V004, prior to the partial transfer consisted of 194 compression ignition engines that aggregate to a Section 1.1 Part A(1) (a) Burning any fuel in an appliance with a rated thermal input of

50 or more megawatts installation. This consisted of 132 “new” engines (put into operation on or after 20th December 2018) and 62 “existing engines” (put into operation before 20th December 2018).

Vantage Data Centers UK Limited are transferring the engines associated with CWL 12 to VDC CWL12 Limited. The engines being transfer are 53 x 3.252 MW_{th} diesel engine (Kohler KD45V20-5DFS (KD1800-F) equipped with Selective Catalytic Reduction (SCR) for oxides of nitrogen (NO_x) control and an Ammonia Slip Catalyst (ASC)). The emissions of these engines were listed as emission points A143-A195 in permit EPR/BB3599CW/V004.

Vantage Data Centers UK Limited will retain the remaining 141 engines and associated emission points (A63-A111 and A113-A142) with a total thermal input of 348 MW.

Vantage Data Centers UK Limited’s permit will retain the following the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations:

- Section 1.1 Part A(1) (a) Burning any fuel in an appliance with a rated thermal input of 50 or more megawatts – made up of 141 medium combustion plants.

and the following directly associated activities:

- Fuel storage – fuel tanks provide generators with fuel (HVO or diesel) for the above Schedule 1 activity;
- Surface water drainage system servicing area in which the Schedule 1 activity takes place ; and
- Chemical storage – AdBlue storage tanks for the SCR system associated with the operation of the above schedule 1 activity.

VDC CWL12 Limited’s permit will be for the following listed activities:

- Section 1.1 Part A(1) (a) Burning any fuel in an appliance with a rated thermal input of 50 or more megawatts – made up of 53 engines classed as medium combustion plants.

and the following directly associated activities:

- Fuel storage – fuel tanks provide generators with fuel (HVO or diesel) for the above Schedule 1 activity;
- Surface water drainage system servicing area in which the Schedule 1 activity takes place ; and
- Chemical storage – AdBlue storage tanks for the SCR system associated with the operation of the above schedule 1 activity.

Both permits will have the same primary activity as the original permit: *Section 1.1 Part A(1) (a) Burning any fuel in an appliance with a rated thermal input of 50 or more megawatt.*

Both sites fall under this activity via the aggregation of combustion units which are each individually rated at <20 MW_{th} and which that aggregate to a total net rated thermal input of >50 MW. All engines are classed as medium combustion plants under Schedule 25A: Medium Combustion Plant (MCP) of EPR and the Medium Combustion Plant Directive (MCPD).

As they were commissioned after December 2018, the engines on the part of the permit that has been transferred are all classed as new MCPs.

Both permits following the transfer have the same directly associated activities as the previous (combined) permit (EPR/BB3599CW/V004).

Definition of installation

We have reviewed the request for a partial transfer against the guidance:

- RGN2¹ - Understanding the meaning of regulated facility, including appendix 1 and appendix 2; and
- the best available techniques FAQ for data centres

¹ [Regulatory Guidance Note No. 2 Understanding the meaning of regulated facility](#) and [Regulatory Guidance Note No. 2 Understanding the meaning of regulated facility - Appendices 1 and 2](#)

to determine the extent of the definition of a “single Installation” and any technical connection between the two sites (CWL11 and CWL12) after the partial transfer.

The following were considered;

- Operator – Is each site to be operated under separate legal entity.
- Technical connections of directly associated activities – site drainage, fuel storage and chemical storage.

VDC CWL12 Limited and Vantage Data Centres UK Limited are registered as separate legal entities with Companies House. VDC CWL12 limited is registered in Jersey, and the applicant had provided a copy of the Jersey Financial Services commission registry of VDC CWL12 limited as part of the application.

Each nest of engines (within the 53 being transferred) have their own dedicated fuel and chemical (AdBlue) storage. As such there will be no shared fuel or chemical storage between the two sites and therefore no technical connection for these listed DAA between the two sites. However, following the transfer the permits will share a surface water discharge (at CWL11) and is therefore defined as a single installation under RGN2. It should be noted that the applicant has applied to vary the permit (PAN-030648) to add a new surface water discharge point, among other changes which, if issued, would remove this technical connection and the two sites would become separate installations.

6. Requests for information

Further information was requested during determination by way of a Schedule 5 Notice requiring the applicant to provide further information relating to operating techniques and/or an agreement between the transferee and transferor to prevent CWL11 and CWL12 testing engines cells at the same time.

The Schedule 5 Notice was sent on 03/07/2026 with a deadline for response of 20/07/2026.

The applicant's response to the Schedule 5 Notice was provided on 16/07/2026. The additional information supplied satisfied the requirements of the Schedule 5 Notice.

A copy of the information notice(s) and e-mails requesting further information were placed on our public register as were the responses when received.

7. Operation of the installation

7.1. Operator competence

The new operator will control part of the installation.

We are satisfied that the new operator is the person who will have control over the operation of the part of Installation after the permit is partially transferred and that they will be able to operate the Installation so as to comply with the conditions included in the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator².

7.1.1 Relevant Convictions

The new operator has declared they have no relevant convictions

NRW's COLINS Database has been checked to ensure to confirm are no relevant convictions. No relevant convictions were found.

The new operator satisfies the criteria in RGN 5 on Operator Competence³

7.1.2 Financial Provision

The new operator has declared they have no current or past bankruptcy or insolvency.

² [RGN 1 Understanding the meaning of 'operator' \(naturalresources.wales\)](#)

³ [regulatory-guidance-note-5-operator-competence.pdf \(naturalresources.wales\)](#)

There is no known reason to consider that the new operator will not be financially able to comply with the permit. The decision was taken in accordance with RGN 5 on Operator Competence.

7.1.3 Technical competence

The new transferee satisfies the criteria in RGN 5 on Operator Competence⁴

VDC CWL12 have submitted a copy of the operating techniques for the transferred permit as evidence of operator competence. The operating techniques aligned with the Environment Agencies Data centres FAQ and are the same that had been used on the existing permit.

7.2. Environmental Management System

The new operator has stated in the application that they will implement an Environmental Management System (EMS) that will meet the requirements for an EMS in our “How to comply with your environmental permit guidance”⁵

The Transferor will continue to use the existing management systems that were previously assessed. This is to be updated to reflect the multi-operator installation aspect of the site. We have put in an improvement condition for the operator to submit an updated environment management system which includes the incorporation of the engine testing of CWL11 and CWL12 to prevent overlap.

The Transferee has submitted a summary of the EMS with their application. The new EMS will follow the same parts as the EMS used on the existing permit (Integrated Management System (IMS)).

⁴ [regulatory-guidance-note-5-operator-competence.pdf \(naturalresources.wales\)](#)

⁵ [Natural Resources Wales / Guidance to help you comply with your environmental permit](#)

The transferee will integrate the EMS for CWL 12 into the multi-site EMS that includes the existing CWL 11 site, certified to ISO14001.

We have reviewed the application and are satisfied that appropriate management systems and management structures will be in place for this Installation, and that sufficient resources are available to the operator to ensure compliance with all the permit conditions.

8. The Permit Conditions

8.1 Changes to permit conditions

The permit conditions have been changed as a result of the partial transfer.

Condition 1.5 Multiple operator installations has been included in both of the permits produced by the partial transfer. This requires both permit holders to notify each other in the event of incidents, accidents and permit breaches.

Condition 2.2 of both permits makes reference to a new site plan in Schedule 7 which shows the extent of the installation controlled by the original permit holder (edged in green) and the extent of controlled by the new permit holder (edged in red).

We have put in the following limitation to Table S1.1 in both permits:

- **CWL 11:**
 - *Engine cell testing at CWL11 shall not be carried out concurrently with engine cell testing at CWL12 (EPR/DB3699CY).*
 - *Engine cell testing at CWL11 shall not be carried out on the same day as engine cell testing at CWL12 (EPR/DB3699CY).*
 - *Individual engine testing at CWL11 shall not be carried out concurrently with individual engine testing at CWL12 (EPR/DB3699CY)*

- **CWL 12:**
 - *Engine cell testing at CWL12 shall not be carried out concurrently with engine cell testing at CWL11 (EPR/BB3599CW).*
 - *Engine cell testing at CWL12 shall not be carried out on the same day as engine cell testing at CWL11 (EPR/BB3599CW).*
 - *Individual engine testing at CWL11 shall not be carried out concurrently with individual engine testing at CWL12 (EPR/BB3599CW)*

This limitation was put to ensure that number of engines being fired under the testing scenarios of the two permits remains the same as the previous consolidated permit (V004). We have also included their statement outlined in the schedule 5 response dated 16/07/2026 in operating techniques (table S1.2) of the permit and in the limit of specified activity (table S1.1).

A new consolidated permit has been issued to the transferee.

Emission limits, monitoring and reporting conditions of the new permit to the transferee and the permit retained by the transferor will be the same as the permit prior to the partial transfer. The emission points to surface water (W1 and W2) will be retained on the existing permit. Surface water run-off from the transferred site (CWL12) will discharge via W2 on the existing permit (CWL11).

New reporting forms have been sent to the transferee and transferor to reflect the parameters from each permit.

8.2 Improvement conditions

The previous permit has outstanding or continuous improvement conditions. The relevant improvement conditions that covered both parts of the site as a whole (including engines A143-A195 transferred to the new operator) have been incorporated into the new permit. The improvement conditions for the engines retained by the existing permit holder have been left in the existing permit.

IC11 was not copied to the transferred part of the permit as this only relates to the engines of CWL11, and none of those associated with CWL12.

8.3 Other changes

The site name for EPR/BB3599CW has been changed from Newport Data Centre to CWL11 Newport Data Centre to differentiate from the parts of the permit being retained by the transferor (Vantage Data Centers UK Limited) from parts of the permit for CWL12 (EPR/DB3699CY) being transferred.

9. OPRA

The OPRA score has changed as a result of this transfer;

- The new agreed score for the existing permit retained by the transferor is now 127 (was 165).
- The agreed score for the new permit held by the transferee is 90

This will form the basis for ongoing subsistence fees for both permit holders.

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