

9 September 2026

Attention: Hayley Jenkins-Jones
Environment Agency

SLR Project No.: 410.066261.00001

RE: Telehouse West 2 Environmental Permit Variation – Request for Information

We are writing on behalf of Telehouse International Corporation of Europe Limited (Telehouse), in response to the Request for Further Information (RF) issued on 25/08/2025, in support of the environmental permit (EP) variation application for Docklands Technical Centre, 1 Paul Julius Close, London, E14 2EH.

For clarity, the questions from the Environment Agency (EA) are listed below, with the relevant responses included after each question.

1. Form C2, Question 4, Environmental risk assessment – Emissions to Air **a) Provide the model files associated with the air quality assessment (AQA) report (separately to the AQA report).**

Reason: The model files are embedded within/attached to the AQA report as a .zip file, but we are unable to open or save the .zip file.

Response

Please find attached in Appendix A of this response the AERA model files.

b) Specify the sources at the Docklands Technical Centre campus (proposed and existing) that can or will operate within the same 24-hour period.

Reasons:

- *The AQA report states “West 2 will not be tested simultaneously with another data centre within the Campus” but does not specify which sources can operate within the same 24-hour period.*
- *For the modelled West 2 testing scenario (“MSM”), the maximum predicted daily mean oxides of nitrogen (NOX) process contribution at Saffron Avenue Pond Local Wildlife Site (LWS) is 94.9% of the NOX daily mean critical level of 200 µg/m³ (D-1 of Appendix D spreadsheet). If any other sources at Docklands Technical Centre operate within the same 24-hour period as the modelled West 2 source(s), the daily NOX critical level could be exceeded at Saffron Avenue Pond LWS.*
- *The permit for Telehouse North (TN) and Telehouse South (TS) (EPR/EP3507SL/V002) specifies the following:*
 - *Testing shall not be carried out for longer than 4 hours per building for the northern campus (TN) and 8 hours for the southern campus building (TS), in any 24-hour period.*

- *Testing shall not be carried out at more than two northern campus (TN) buildings, within any 24-hour period in which the southern campus building (TS) is also tested.*
- *Testing shall not be carried out at both the North and West buildings within the same 24-hour period.*

Response

Tests at other buildings could be undertaken within the same 24-hour period as West 2 without exceeding the Critical Level with the following limitations.

- For tests that occur for 1-hour where the SCR Warm-up emission rate applies, the following rules would apply:
 - West 2 sequential generator testing cannot be undertaken in the same 24-hour period as West.
 - West 2 sequential generator testing cannot be undertaken for more than 5 hours in the same 24-hour period as North and no other buildings may be tested.
 - West 2 sequential generator testing cannot be undertaken for more than 7 hours in the same 24-hour period as East and no other buildings may be tested.
 - West 2 sequential generator testing cannot be undertaken for more than 6 hours in the same 24-hour period as North 2 and no other buildings may be tested.
 - West 2 sequential generator testing cannot be undertaken for more than 8 hours in the same 24-hour period as TS and no other buildings may be tested.
- For tests that last for more than 1-hour where the SCR is fully warmed-up, given the already precautionary approach of using the 1-hour maximum to calculate to 24-hour exposure, the number of hours could be doubled (e.g. for Bimonthly UPS Wrap-around maintenance and Intermittent Part Load test)

c) Provide the modelled emission concentration(s) and emission rate(s) for ammonia (NH₃).

Reason: Annual mean NH₃ PCs were included in the Appendix D spreadsheet for impacts on critical levels, but the emission concentration(s) and emission rate(s) were not given for NH₃ in the AQA report.

Response

The emission concentrations and rates in the below table were applied in relation to ammonia (NH₃). This was applicable for generators at Telehouse South and West 2 only, given the presence of Selective Catalytic Reduction (SCR) abatement.

Parameter	South	West 2
Ammonia Concentration (mg/Nm ³)	10	10
Ammonia Emission Rate (g/s)	0.024	0.021



d) Provide contour plots for pollutants with process contributions above the insignificance criteria.

Reason: Our Environmental permitting: air dispersion modelling reports guidance states “You must provide contour plots for any PCs above the insignificant criteria”. Please see the “Carry out impact assessment” section of the guidance for further information.

Response

As impacts are limited to upper stories of buildings, isopleth of ground level impacts have been omitted as they would not meaningfully illustrate the impacts. This is consistent with the AERA submitted with the Permit Variation Application EPR/EP3507SL/V002 where process contributions above the insignificance criteria were not presented for the same reason. The impact assessment relies upon discrete receptor locations.

e) Model an emergency scenario based on a 72 hour outage.

Reason: The enhanced pre-application advice states that the standard emergency modelling scenario for data centres is 72 hours. The Environment Agency's data centre guidance states that:

"If there are no other factors, such as data centre contracting arrangements or fuel storage constraints, that justify a shorter duration, the EA considers a prolonged but reasonably foreseeable full-load outage to have a default duration of 72 hours."

Therefore, the 72-hour emergency operation scenario has been used for modelling purposes.

Please note that your proposed testing regime appears to be higher than would normally be expected. Environment Agency guidance (Emergency backup diesel engines on installations: best available techniques (BAT) - GOV.UK) states that diesel engine testing should be minimised, limited to less than 50 hours per year, and that no more than one engine should be tested at any one time. The suitability of the proposed testing regime will therefore be considered in more detail during the determination of the application.

Response

A hypothetical outage scenario of 26 hours has been considered for an outage involving all buildings at once (i.e. TN and TS). This scenario was established during the original TN EP application (EPR/SP3237JU) and carried through to the TS Variation (EPR/EP3507SL/V002). This is detailed in Section 5.2.2 of the AERA.

This was therefore carried through to the present permit variation application and supporting AERA.

In relation to the test regime hours, these are considered to be in line with Environment Agency guidance. Our understanding is that the BAT limitation derives from EPR Regulations Schedule 25B ‘Specified Generators’ definition of an ‘excluded generator’ which states “back-up generators operated for the purpose of testing for no more than 50 hours per year”. The West 2 generators will operate for no more than 50 hours per year, which has been modelled in the AERA. Note, as detailed in Table 5-2 of the AERA, there are several tests where a range of hours or occurrences is presented e.g. “between 15 and 60 minutes”, “up to 10 times per year”. In these instances, the upper/maximum of the range has been adopted which may overestimate the actual testing hours and they would be less than assessed (i.e. <50 hours). Further, as preferable, the majority of testing is undertaken on an individual basis (one SBG at a time), with the testing of multiple generators at one time minimised where possible i.e. 42 hours (individual) vs. 8 hours (multiple).



2. Form C3, Question 3a, Technical standards:

- a) **Please confirm that the new engines proposed at TW2 are emissions optimised and not fuel optimised.**
- b) **Please confirm that the stacks for the new engines proposed at TW2 are unobstructed by caps and cowls.**

Response

We can confirm that the new engines proposed for TW2 are emissions optimised, and the stacks for these engines will be unobstructed by caps and cowls.

The new engines proposed at TW2 are the Cummins C3750 D5e. The 'e' suffix indicates that the engines are emissions optimised (rather than fuel-optimised). This is how the nomenclature works¹, including for Cummins engines.

The drawing (No: TW2001-TSP-TW2-ZZ-DR-A-120412) included within Appendix B for this response is from the reserved matters planning application (Tower Hamlets reference: PA/22/02552/A2) and depicts the unobstructed/exposed stacks on the south façade of the West 2 building.

3. Form C3, Appendix 1, Classification of activity:

In the document, 'Best Available Techniques and Operating Techniques' section 1 states that, 'TN: Existing (comprising East, West, North and North2 data centre units): 27 SBGs with a total thermal rated input of 145 MWth.'

This matches the existing permit.

Table 2.1 in the document, 'Best Available Techniques and Operating Techniques' states that there are,

'26 existing engines at TN, totalling 139.61 MWth.'

Please confirm which section is correct and re-submit any updated documents to reflect this change.

Response

There are 27 standby generators (SBGs) permitted within the existing Telehouse environmental permit. The most recent three generators were permitted during the most recent permit variation in 2024 and are listed within Table S1.1 of the permit as '3 future generators (total thermal input of 19 MWth, individual thermal input as approved through pre-operational condition PO1), as they had not been installed at the time of permit issue.

The permitted aggregated total rated thermal input of these 27 SBGs is 145 MWth.

Since this permit variation in 2024, two of these three generators have been installed, meaning that while 27 SBGs are permitted, there are currently only 26 installed at the facility.

The aggregated total rated thermal input of these 26 installed SBGs is 139.61 MWth.

This explains the discrepancy between the two phrases within the BATOT report.

Section 2.0 states that *A summary of all the SBGs which will be in place at TN is provided in Table 2-1.* Indicating that the table is referring to SBGs which will be installed at the site, rather than the total permitted number of SBGs. As such, an updated BATOT has not been included with this response.

¹ [Understanding EU & US Tier Standards for Diesel Generators – Jubaili Bros](#)



4. Enhanced pre-application advice

Please provide proof of payment for the enhanced pre-application advice you received in relation to EPR/EP3507SL/P001.

Response

Please find enclosed as Appendix C to this response letter, the following documents in relation to the enhanced pre-application advice meeting and proof of payment for the pre-application fees:

- Pre-Application Advice Purchase Order;
- Environment Agency Invoice 456338; and
- TW2 Pre App Payment Redacted.

Yours Sincerely,

SLR Consulting Limited



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Attachments:

- Appendix A Modelling Files.
- Appendix B Stack Drawing
- Appendix C Pre-App Payment Details.

