ARUP

Amazon Data Services UK Limited

Linmere Island Data Centre – Emergency Back-up Generation Facility

Non-Technical Summary – Environmental Permit Application

Reference: 302321-ARP-XX-XX-RP-Z-1002

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Contents

1. Introduction

Ove Arup & Partners Ltd (Arup) has been commissioned by Amazon Data Services UK Limited (Amazon) (henceforth known as 'the Operator') to prepare a bespoke application for an Environmental Permit for Linmere Island Data Centre – Emergency Back-Up Generation Facility only (not including the whole data centre).

The application is made by Amazon Data Services UK Limited which is the legal entity that will be responsible for operating the generating installation. The data centre will be located in Houghton Regis, Bedfordshire, UK, approximately 7 km north-west of Luton town centre and accessed from A5505 Woodside Link off the M1 (hereafter referred to as 'the site'). The data centre, is also referred to as the 'Proposed Development'.

As shown in the Site Location Plan[1], the site, bounded by the Dunstable Northern Bypass to the north; the A5505 Woodside Link to the east; B5790 to the south; and Sundon Road to the west. The intersections of the A5505 with the B5790 and the B5790 with Sundon Road are round-abouts. The surrounding area is characterised by a mix of warehouse and industrial uses that are currently under development or recently built. There is a public park to the west, a supermarket and residential developments to the south, and a Lidl Distribution Centre to the east.

An earth bund (also referred to as a soil embankment) occupies the north side of the site, adjacent to the Dunstable Northern Bypass. The remainder of the site comprises fields, trees, the remains of an orchard associated with the demolished Charlton Cross Farm Buildings, and a former car park. The site is classified as greenfield and was agricultural land until circa 2015, after which it is assumed to have been used as a construction compound for development in the wider area.

The wider area forms part a wider network of sites that comprise a strategic mixed-use development for the area, known as 'HRN1' (Horton Regis North 1). The strategic development is subject to an extant outline planning consent (Central Bedfordshire Council reference CB/12/03613/OUT).

This outline consent is for:

'Development to comprise: up to 5,150 dwellings (Use Class C3); up to 202,500 sqm gross of additional development in Use Classes: A1, A2, A3 (retail), A4 (public house), A5 (take away); B1, B2, B8 (offices, industrial and storage and distribution); C1 (hotel), C2 (care home), D1 and D2 (community and leisure); car showroom; data centre; petrol filling station; car parking; primary substation; energy centre; and for the laying out of the buildings; routes and open spaces within the development; and all associated works and operations including but not limited to: demolition; earthworks; engineering operations.'

A full planning application for:

'*Construction of two data centre buildings, substation compound, car & cycling parking, access, landscaping, technical plant and associated works'* was submitted on 04/11/2024 to Central Bedfordshire Council.

The data centre will be staffed on a 24-hour basis and will have a maximum of 100 operational staff. The majority of staff will be present during normal office hours, there is expected to be around 20 operational night-shift staff.

This Non-Technical Summary (NTS) provides a summary of the activities that will be undertaken at the data centre, an explanation of what is being applied for, and a summary of the key technical standards and control measures that will be implemented at the site.

[1] Installation Permit Boundary (Drawing reference: 302321-ARP-XX-XX-DR-Z-0001)

2. Environmental Permit Application

2.1 Environmental Permit Type

2.1.1 Scheduled Activity

The Site will comprise 42 standby backup diesel generators for emergency use in the event there is a loss of power from the National Grid. The total installed thermal capacity onsite of approximately 324.6 MWth. The generators will also be routinely tested in accordance with manufacturers maintenance requirements.

Of the 42 generators, four are secondary back-ups ('catcher') and two are smaller ('house') generators to cover non-critical loads (e.g., office lights, office fire system) during an emergency. All will be run individually for maintenance tests and will exhaust through individual flues. It is the intent that the generators will run on Hydrogenated Vegetable Oil (HVO) if it can be sourced in the local area, however diesel will be used if HVO is unavailable. In addition, there will also be one generator with a thermal input capacity of 0.39MWth present in the substation building.

Each generator has an individual flue terminating at 25m above ground, the locations of which are provided in the Installation Permit Boundary[1] and Point Source Emissions[2].

Combustion activities are regulated under The Environmental Permitting (England and Wales) Regulations 2016 (EPR). The regulations enact both the Industrial Emission Directive (IED) and the Medium Combustion Plant Directive (MCPD) in England. Operators undertaking any of the activities identified under these regulations require an environmental permit to carry out these activities.

The "activities" that are proposed are defined in the EPR:

Section 1.1 Part A(1)(a) burning any fuel in an appliance with a rated thermal input of 50 or more megawatts. In accordance with the EPR:

"…where two or more appliances with an aggregate rated thermal input of 50 or more megawatts are operated on the same site by the same operator, those appliances must be treated as a single appliance with a rated thermal input of 50 or more megawatts."

The total aggregated capacity of the generators is above 50 MWth and will therefore be permitted under the IED. However, because the individual combustion is below 15 MWth the installation will be permitted as an IED Chapter II installation but not a Chapter III (Large Combustion Plant) installation. This means the installation will not be required to meet the Best Available Technique (BAT) Conclusions for the Large Combustion plant. The permit will therefore follow the guidelines set out under the MCPD.

The generators will not be used to provide a balancing service or for demand side response operations such as triad avoidance or fast frequency response. No electricity generated from the site will be exported off-site or fed back into the National Grid.

2.1.2 Directly Associated Activity

Schedule 1, Part 1 Regulation 2(1) of the EP Regulations provides that a Directly Associated Activity (DAA) is an operation that, in relation to any other activity:

- Has a technical connection with the activity;
- Is carried out on the same site as the activity; and
- Could have an effect on pollution.

As the purpose of the on-site fuel storage is to serve the generators and the Scheduled Activity above, this storage of fuel therefore constitutes a DAA to be covered in this Permit Application.

[2] Point Source Emissions (Drawing reference: 302321-ARP-XX-XX-DR-Z-0002)

Diesel fuel will also be stored in two top-up fuel tanks (one for each data centre hall) with a volume of 40,000 litres. This will be used to fill the 'belly tanks' of the generators, each of 16,000 litres in volume. As the purpose of this fuel storage is to serve the generators and the 'combustion' Scheduled Activity, this storage of fuel therefore constitutes a DAA to be covered in this Permit Application.

All tanks will be above ground and integrally bunded. The main top-up tank will be contained within a bund with a capacity of 110% of the storage capacity of the tank.

Each belly tank is containerised and integrally bunded to contain 110% of the storage capacity of the tank. All tanks will comply with the Oil Storage Regulations (SI 2001/2954. The Control of Pollution (Oil Storage) (England) Regulations 2001).

2.2 Application Contents

The application comprises the following elements:

- Environmental Permit Application forms (Parts A, B2, B3 and F1);
- Non-Technical Summary[3];
- Summary Technical Report with supporting Appendices[4];
- Site Condition Report with supporting Appendices[5];
- Environmental Risk Assessment with supporting Appendices[6];
- Air Quality Assessment[7];
- Installation Permit BoundaryDrawing[1]; and
- Point Source Emissions Drawing[2].

[3] Non-technical Summary – Environmental Permit Application (2024) (Document ref 302321-ARP-XX-XX-RP-Z-1002)

[4] Summary Technical Report– Environmental Permit Application (2024) (Document ref 302321-ARP-XX-XX-RP-Z-1003)

[5] Site Condition Report – Environmental Permit Application (2024) (Document ref 302321-ARP-XX-XX-RP-Z-1004)

[6] Environmental Risk Assessment – Environmental Permit Application (2024) (Document ref 302321-ARP-XX-XX-RP-Z-1005)

[7] Air Quality Assessment - Environmental Permit Application (2024) (Document ref 3302321-ARP-XX-XX-RP-Z-1006)

3. Site Condition Report

A Site Condition Report[5] (SCR) has been prepared in accordance with the Environment Agency's H5 Guidance Note on SCR[8].

The SCR describes and presents detailed information on the condition of the land and groundwater at the site at the time of permit application. It also serves as a baseline so that it can be demonstrated to the EA that the land and groundwater have been protected during the lifetime of the site and that the land is in a satisfactory state on permit surrender.

Sections 1 to 3 of the EA's SCR template have been completed in the preparation of this document, which comprises the following:

- Site details;
- Condition of the land at permit issue;
    - Environmental site setting (including geology, hydrogeology and surface water/hydrology);
    - Pollution history (including unexploded ordnance);
    - Evidence of historic contamination;
    - Relevant baseline soil and groundwater data; and
- Permitted activities.

Appendices are also provided to evidence the previous ground investigation and present drawings of the site.

Section 4 to 7 of the SCR template will be maintained during the life of the permit and Sections 8 to 10 will be completed and submitted in support of the application to surrender the permit.

[8] Environment Agency (2013). *Environmental Permitting Regulations Site Condition Report – guidance and templates*. [Online]. Available at: https://assets.publishing.service.gov.uk/media/5a7c788040f0b62aff6c1e60/LIT_8001_38258e.pdf (Accessed 11/07/2024).

4. Environmental Risk Assessment

An Environmental Risk Assessment (ERA)[6] has been undertaken in accordance with the EA guidance 'Risk assessments for your environmental permit'[9] and is included with the EP application.

The ERA is a simple effective tool for identifying potentially hazardous or polluting consequences of activities and providing mitigation systems that reduce the risk of those activities causing pollution.

The primary risks to the environment as a result of the Installation are considered to be from emissions to air as a result of the generator use, together with the potential for leaks from the associated fuel tanks and delivery systems affected water and land. Other potential environmental risks also covered including Noise and Vibration, Odour, Accidental and Fugitive Emissions and Global Warming Impact.

Overall, with the design and operational measures in place to manage potential risks, no significant environmental risks have been identified at the site.

[9] Environment Agency and Department for Environment, Food & Rural Affairs (2016). *Risk assessments for your environmental permit*. [Online] Available at: https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit (Accessed 11/07/2024)

5. Air Quality Assessment

The primary risk to the environment as a result of the Installation is considered to be from emissions to air from the generator use. A detailed stand-alone Air Quality Assessment[7] has therefore been undertaken as part of the EP application.

The 40 main generators have a thermal input of 8 MWth and the two house generators have a thermal input of 2.1 MWth and are considered in the assessment. The single generator in the substation building however has not been included in the modelling due to its small size (<1 MWth) relative to the other 42 generators and its impact is assumed to be negligible.

The assessment has been undertaken to consider the potential impact of the use of generators during individual routine testing and maintenance (31 hours per year per generator), commissioning, and in the unlikely event of an emergency power outage for the full site.

Following the assessment of each of the testing scenarios, it is considered that there would be no significant effects as a result of the testing of the generators. For the emergency scenario, it was found that the probabilities of an hourly exceedance of nitrogen dioxide (NO_2) for run times of 55 hours and 48 hours were unlikely (less than 5%) and highly unlikely (less than 1%) respectively. For a run time of 72 hours in an emergency scenario, the probability was found to be likely (52%) at one receptor and unlikely (less than 5%) for all other receptors. The receptor which was found to have a potential exceedance of the hourly NO_2 hourly mean was HR17. It should be noted that the chances of this scenario ever occurring however are considered to be highly unlikely, based on the reliability of the electrical distribution network and in-built design resilience, with the maximum grid outage not expected to last more than a few hours. There are predicted exceedances of the critical level for daily mean oxides of nitrogen (NOx), however the chances of this scenario also occurring is considered to be unlikely and therefore no likely significant effects are anticipated.

The modelling considered and assessed emissions of NO_x, NO_2, particulate matter (PM_{10} and $PM_{2.5}$), sulphur dioxide (SO_2) and carbon monoxide (CO).

An extensive flue stack height determination study was undertaken during the design process for the data centre, seeking to minimise the potential impact to local air quality, and identify a stack height which would ensure that no significant impacts were likely. This assessment concluded on a height of 25m above ground level for all generator stacks.

The summary of this is that significant impacts are considered unlikely from any of the modelled routine or unplanned events at sensitive human or ecological receptors.

6. Key Design and Operational Information

A review of the key design and operational information is provided as part of the Summary Technical Report[4] (STR) is included with the EP application. The STR been undertaken in accordance with the following regulations and guidance pertinent to the 'combustion' Scheduled Activity and Directly Associated Activity for the on-site diesel fuel storage:

1. The Environmental Permitting (England and Wales) Regulations 2016, SI2016/1154.
2. EU, 2010 Directive 2010/75/EU of the European Parliament and the Council on industrial emissions (IED).
3. EU, 2015. Directive (EU) 2015/2193 on the limitation of emissions of certain pollutants into the air from medium combustion plant (MCPD).
4. The Control of Pollution (Oil Storage) (England) Regulations 2001
5. Best available techniques (BAT): environmental permits[10]
6. Risk assessments for specific activities: environmental permits[9]
7. Environment Agency Data Centre FAQ Headline Approach[11]
8. Reference Document - Best Available Techniques on Emissions from Storage 2016[12]
9. CIRIA, 2014. Containment systems for the prevention of pollution (C736F)[13].

6.1 Generator type

The EA's Data Centre FAQ[11] acknowledges that diesel generators are presently the default technology for standby generators in data centres.

The STR[4] details the justification for the choice of engine with a review of potential alternatives and sets out the need for the installed configuration and sizing of engines.

Diesel/HVO engines are considered to be BAT for this data centre on the basis of:

- Diesel/HVO fuelled engines have been chosen due to the ability to store the required volumes of diesel on site and therefore maximise energy security in the system;
- Instantaneous supply of electricity is required in the event of power loss to the site, which diesel engines provide;
- The technology is well established, replacement parts are readily available, and the maintenance costs are low; and
- The size of the engines has been selected in order to ensure fast start up and shut down can be achieved as this is a fundamental requirement of the emergency back-up nature of the generators.

[10] Environment Agency and Department for Environment, Food & Rural Affairs (2016). *Best available techniques: environmental permits*. [Online]. Available at: https://www.gov.uk/guidance/best-available-techniques-environmental-permits (Accessed 11/07/2024)

[11] Environment Agency (2022) *Data Centre FAQ Headline Approach*. [Online]. Available at: https://pixl8-cloud-techuk.s3.eu-west-2.amazonaws.com/prod/public/bb871ef0-8316-4127-89dc63c6b3b7cd04/Environement-Agency-Roundtable-Data-Centre-FAQ-v21-Everything-Working-Draft-Released-to-TechUK.docx (Accessed 11/07/2024)

[12] European Commission (2006) *Reference Document - Best Available Techniques on Emissions from Storage*. [Online]. Available at: https://eippcb.jrc.ec.europa.eu/sites/default/files/2022-03/efs_bref_0706_0.pdf (Accessed 11/07/2024)

[13] CIRIA (2014) *Containment systems for the prevention of pollution (C736F)*. [Online]. Available at: https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS (Accessed 11/07/24)

6.2 Emissions to air

Standby backup diesel generators for emergency use which are >1 MWth are exempt from MCPD Emission Limit Values (ELVs) because they operate for less than 500 hours per year.

The planned testing and maintenance regime is for a total of 31 hours per year per generator. This is significantly less than the 50 hours per year expectation set out in the EA Data Centre FAQ[11] to minimise the potential for adverse air quality impacts and minimised diesel usage.

Whilst standby backup generators for emergency use have no ELVs, the guidance specifies the BAT as *"2g TA-Luft or US EPA Tier II (or equivalent standard) with NO_x emission levels in the range of 2000 mg/m3 at 5% oxygen and reference conditions"*. Therefore the main generators to be installed state NO_x emission concentrations of 2,232 mg/m^3 at 5% oxygen and reference conditions and are2g TA-Luft compliant.

During the design stage, 25m stacks were considered and assessed to be BAT as they resulted in no significant adverse impacts during either routine or unplanned scenarios.

Monitoring ports which comply the EA's MCERTS (monitoring certification scheme) will be included on the flue stacks to allow the sampling of NO_x and CO.

In addition to the stacks, all fuel storage tanks (generator belly tanks and top up tanks) will be fitted with an air vent. No monitoring of air emissions from fuel storage tanks are proposed.

6.3 Emissions to water/land

There are no point source emissions to and from the generators or associated fuel storage to water or land.

Uncontaminated surface water runoff from the generator area will be directed to the attenuation pond located in the southwest corner of the site. The attenuation pond will be fitted with an impermeable liner to ensure any potential contamination cannot infiltrate into the ground. Downstream of the attenuation pond the surface water will pass through an oil separator before ultimately leaving the site to the wider Anglian Water network. Discharge of surface water will be restricted to run-off from the roof hardstanding and paved areas. In relation to surface water runoff from the permitted installation there will be one point source emission referred to as SW1, the location of which is shown on Drawing 2 Point Source Emissions[2].

The wider data centre, not the permitted installation, will be connected to the municipal combined sewer system for discharges of domestic grey water / sanitary effluent (sinks, toilets, cleaning water, etc.). In relation to foul water discharge generated within the permitted installation from the surface water in the refuelling laybys, there will be two point source emission locations to water, referred to as WW1 and WW2, the location of which is indicated on Drawing 2 Point Source Emissions[2].

Appendix 03-03 Drainage Strategy includes a Flood Risk Assessment[14], appended to which is a Drainage Strategy Drawing that shows a plan for surface and foul water drainage.

No process waters will be generated by operation of the installation, hence there will be no associated process water discharge to ground or groundwater.

6.4 Noise and vibration

A Noise and Vibration Assessment[15] has been completed and provided as part of the EP application within Appendix 03-06. The generators are located within noise attenuating container units and associated exhausts 25m above ground level.

Modelling carried out predicts that during both routine and unplanned scenarios, adverse effects at the nearest sensitive receptors are considered to be unlikely.

[14] Drainage and Flood Risk Assessment (FRA) Report – Environmental Permit – Appendix 03-03

[15] Noise and Vibration Assessment – Environmental Permit – Appendix 03-06

6.5 Fugitive emissions / leaks

Management systems will be in place at the facility to ensure that the risk from fugitive emissions to air is minimised, for example through regular inspection and maintenance of plant. Protection systems will include automatically triggered safe plant emergency shutdown in the event of major faults in equipment. Scheduled maintenance of fuel tanks will be incorporated into the Environmental Management System (EMS) to minimise the risk of fugitive emissions of fumes to air.

The standby generation diesel fuel storage, fuel delivery and engine lubrication oil systems have been designed to consider the potential impact of leaks / spillages on the site.

The principal guidance for the design of the oil storage and associated infrastructure is the Control of Pollution (Oil Storage) (England) Regulations 2001. Additionally, the requirement for the safe environmental storage of fuel on-site (including transport of fuel) is covered within the EPR. BAT Reference (BREF) document 'Emissions from storage' for sites regulated under the IED has also been considered as part of the design.

There are two central fill points serving the main and house generators, one serving Building A and one serving Building B. The fuel fill tanker will park on a dedicated layby with an impermeable surface which will be served by a full retention oil separator with a capacity of 10,000L which is enough to hold at least one fuel tanker compartment. The layby will be kerbed and will slope to the low point drain which is served by the oil separator. The location of the refuelling laybys are shown in Site Location Plan[1]. Surface water collected in the separator will be discharged from the site via the foul water system.

The refuelling will be carried out by trained fuel tanker drivers. This reduces any significant risk of spillages and leaks. Spill kits will also be available to deal with any leaks. Relevant spill response equipment will be situated at various locations around the site, designed for the particular hazard characteristics of the materials (fuel) present.

Fuel will be delivered to the site using fuel tankers. There will be two 40,000L litres top up tanks (one for each data centre hall) which the fuel tankers will dispense fuel to. The top up tanks will be contained within a secondary containment bund which can hold 110% of the capacity. The bund will be constructed with materials which are suitable to contain diesel/HVO. 40,000L of diesel is needed to meet the requirement to be able to provide uninterrupted power for three days without any external assistance. The tank has integral level alarms remotely monitored via the Energy Power management System (EPMS) allowing instant accurate assessment of the filling level.

From the top up tank, fuel will be distributed via fuel pipes to individual generator belly tanks located beneath the generators. Each belly tank will have a capacity of 16,000 litres. All fuel storage tanks will be integrally bunded with 110% capacity. Fuel pipelines located below ground will be double skinned and fitted with leak detection, where possible below ground pipelines will be kept to a minimum. Where the pipes are above ground, they will be single skinned pipes and be located as close to building perimeters as is possible. All pipework will be regularly maintained and inspected and inspected prior to use. The belly tanks will also monitor pressure loss and fill (high/low) levels.

Fuel integrity is maintained with each generator housing a fuel polishing unit to constantly circulate and filter the fuel. The fuel polisher will be fitted with a leak detection which will be connected to the EPMS.

The generators, fuel storage and any above ground pipelines will be located on or over hardstanding. The uncontaminated surface water from the generator areas, fuel storage and any surfacing beneath above ground fuel transport lines will be directed towards the attenuation pond in the south west corner of the site. The attenuation pond will be fitted with an impermeable liner to ensure any potential contamination cannot infiltrate into the ground. A Penstock valve will be installed to prevent site water from entering the attenuation pond in the event of an emergency which requires the closing of the surface water drainage system. On the downstream side of the attenuation pond, the flow of the surface water leaving the site will be controlled by a flow meter. An oil interceptor will be located downstream of the flow control device which will have an oil compartment capacity of 225L. An alarm will be triggered when the oil compartment capacity if full. The surface water will then leave the site via SW1 as shown on Installation Permit Boundary[1] and Point Source Emissions[2] drawings.

All tanks, pipes and valves are designed to appropriate industry standards and flanged connections between pipes are kept to a minimum by the proximity of the tanker fill point.

The operator will also carry out daily checks for signs of smaller leakage not notified by the alarm system. There are multiple alarm systems including: high, low, block and leak alarms. All spillages will be logged, investigated and corrective action will be taken.

It is anticipated that fugitive emissions of odour will not be significant for the facility. Diesel will be contained within vented tanks and therefore would only be a potential source of odour if a spill were to occur. Procedures will be incorporated within the EMS to ensure the potential for spills is minimised and they are dealt with swiftly should they occur.

No powders or other dry materials will be used or stored at the installation and therefore fugitive emissions of dust are unlikely to occur.

6.6 Energy Efficiency

The data centre is exempt from the Energy Efficiency Directive (EED) requirements as the total installed planned maintenance and testing schedule falls below the 1,500-hour threshold (42 generators x 31 hours each = 1,302 hours).

Operation of the back-up generators will be for emergency back-up only. The efficiencies of the main emergency generators, the smaller 'house' generators and the substation generator at the data centre are 35% each, with a total installed thermal input of 324.59 MWth and a rated electrical output rating of 113.4 MWe.

The provision/implementation of combined heat and power (CHP) is not applicable as the back-up generators will each operate for substantially less than 500 hours per annum for the provision of emergency power generation.

Energy recovery is not reasonably practicable for engines of this emergency nature with such small anticipated operational hours and the provision of combined heat and power is not considered to be feasible. However, improving energy efficiency will form part of the Operator's Environmental Management System, with an objective to monitor energy use and evaluate opportunities to influence energy efficiency, and achieve as low a Power Usage Effectiveness (PUE) ratio as possible.

Energy efficiency will form part of on-site staff training.

6.7 Network reliability

National Grid's National Electricity Transmission System Performance Report 2022-23[16] states that the overall reliability of supply during 2022 – 2023 was: 99.999981%.

During 2022 – 2023, the report states that there were 412 National Grid Electricity Transmission events where transmission circuits were disconnected either automatically or by urgent manual switching. The vast majority of these events had no impact on electricity users with 11 resulting in loss of supplies to customers. The total estimated unsupplied energy for these 11 incidents during 2022-23 was 7.1 MWh. The longest loss of supply lasted 762 minutes (12.7 hours) at Tinsley Park substation in Sheffield. Of the 11 incidents the closest was at Watford South Substation located approximately 30km south of the Site.

6.8 Environmental Management Systems

The Operator will establish an EMS on site and will cover those elements required for environmental permitting. The EMS will follow certain aspects of the EMS standard ISO 14001:2015.

The EMS will place particular importance on:

[16] National Grid ESO (2023). *National Electricity Transmission System Performance Report 2022-2023.* [Online] Available at: https://www.nationalgrideso.com/document/289196/download (Accessed 11/07/24)

- Reducing risks to the environment to a level that is as low as reasonably practicable using best available techniques;
- Integrating EMS responsibilities within line management;
- A commitment to personnel environmental awareness and competence;
- The ongoing monitoring and review of environmental performance; and
- A commitment to working to achieve continuous improvement in environmental performance.

The EMS will be underpinned by an Environmental Policy which clearly defines the operator's commitment to continual improvement and to developing objectives and targets aimed at preventing pollution and improving environmental performance. All staff and external contractors will be made aware of the environmental policy as part of the induction training and a copy will be made available on site.

The Operator will also implement a record keeping system on site as part of its management system.

7. The Operator has a multi-site ISO 14001:2015 certification (See Appendix 07 - 07) covering its data centres in eight countries including England. Once operational this Linmere Island data centre site will be included in the certification scope. Conclusion

The overall conclusion from the studies undertaken as part of the EP application is that there is unlikely to be a significant environmental impact as a result of the operation of generators at the data centre.

The data centre operator is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industry practices.