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**VDC LHR11 LIMITED**

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# Environmental Permit Application: Site Condition Report

LHR-11/12, CHANDOS ROAD, PARK ROYAL,

# Environmental Permit Application: Site Condition Report

LHR-11/12, Chandos Road, Park Royal,

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## Introduction

Ramboll UK Limited (“Ramboll”) was commissioned by VDC LHR11 Limited (“VDC” or the “Client”) to provide environmental permitting support in relation to the proposed installation and operation of emergency generators at a planned data centre site. The data centre is to be located at Chandos Park Industrial Estate, Chandos Road, Park Royal, London, NW10 6NF (the “site”). The data centre and associated generators will be operated by VDC.

This site condition report is intended to satisfy the EA’s request for such a report as part of the application for an Environmental Permit and has been developed following the guidance and template provided in the EA’s Guidance for Applicants (H5) – Site Condition Report document<sup>1</sup>, including the application of the tabular format contained within the template.

### **Reliance and General Limitations**

The conclusions presented in this report represent Ramboll UK Limited’s best professional judgment based upon the information available and conditions existing as of the date of the review. In performing its assignment, Ramboll UK Limited must rely upon publicly available information, information provided by the client and information provided by third-parties. Accordingly, the conclusions in this report are valid only to the extent that the information provided to Ramboll Limited was accurate and complete. This review is not intended as legal advice, nor is it an exhaustive review of site conditions or facility compliance. Ramboll UK Limited makes no representations or warranties, express or implied, about the condition of the site.

Ramboll UK Limited’s scope of work for this assignment did not include collecting samples of any environmental media. As such, this review cannot rule out the existence of latent conditions.

<sup>1</sup> Environmental Permitting: H5 Site Condition Report, Environment Agency, Published 13 May 2013,

## 1. Site Details

Site Details	
Name of the applicant	VDC LHR11 Limited
Activity Address	Chandos Park Industrial Estate, Chandos Road, Park Royal, London, NW10 6NF
National Grid Reference	521140, 182390
Document reference and dates for Site Condition Report at permit application and surrender	Site Condition Report at Permit Application: 1620009615-002_Chandos Road Site Condition_02 report, prepared by Ramboll UK Limited, October 2023

## 2. Condition of the Land at Permit Issue

The table below provides a description of the site’s environmental setting from a review of publicly available information and previous third-party site investigation reports.

Condition of the Land at Permit Issue	
<p>Environmental setting including:</p> <ul style="list-style-type: none"> <li>• geology</li> <li>• hydrogeology</li> <li>• surface waters</li> </ul>	<p><b>2.1 Geology</b></p> <p>Information on the geology underlying the site and the area surrounding the site was obtained from electronic mapping and publicly available borehole records the British Geological Society (BGS) website.</p> <p>The site is underlain by bedrock geology of the London Clay Formation (clay, silt and sand). No superficial deposits are recorded as being present at the site however, given the site history, it is considered likely that a thickness of Made Ground is present directly above the bedrock. The London Clay Formation is further underlain by the Lambeth Group (clay, silt, sand and gravel) and the Upper Chalk Formation (white chalk) at depth.</p> <p>The thickness of the underlying London Clay Formation within the surrounding area is known to be at least 70m thick. Groundwater within the London Clay Formation is likely to be discontinuous given the unproductive nature of this bedrock geology.</p> <p>A publicly available borehole record (BGS Reference: TQ28SW987) located approximately 500m to the west of the site, indicates the base of the stratum is at approximately 75m bgl.</p> <p>Between July and August 2020 an intrusive geo-environmental ground investigation was undertaken at the site by Geotechnical Engineering Limited (GEL) under the technical supervision of Ramboll. The ground investigation comprised drilling of seven cable percussion boreholes to depths between 20.0m and 25.0m bgl and seven shallow windowless sample boreholes to depths of up to 6.0m bgl. Thirty soil and four groundwater samples were collected and analysed by a laboratory for a suite of environmental analysis and a further 432 samples were obtained for geotechnical testing. Ground gas monitoring was undertaken on three occasions and groundwater monitoring was undertaken on four occasions.</p> <p>Made Ground soil was encountered beneath asphalt and concrete hardstanding at thicknesses of between 0.3 and 1.6m and generally comprised granular materials and re-worked clay. The London Clay Formation was encountered underlying the Made Ground and proven to a depth of 25.0m bgl. Visual and odour evidence of contamination was limited to a hydrocarbon odour and sheen from perched water at one location (CP01, 0.25m bgl) and a solvent type odour at another (WS05, 1.0-1.2m bgl in clay).</p> <p>It is noted that the Lambeth Group (identified on the BGS mapping) was not encountered by GEL during the intrusive investigation.</p> <p><b>2.2 Hydrogeology</b></p> <p><b>2.2.1 Aquifer Designations</b></p> <p>The Environment Agency (EA) Aquifer Designation for the London Clay Formation underlying the site is Unproductive</p>

Strata. The site is further underlain by a Secondary A Aquifer associated with the Lambeth Group and a Principal Aquifer associated with the Upper Chalk Formation.

The site is not located within an EA designated groundwater source protection zone (SPZ).

The EA does not currently classify the underlying groundwater body at the site under the Water Framework Directive classification scheme, likely due to the unproductive nature of the London Clay Formation.

#### 2.2.2 Licensed Groundwater Abstractions

According to a third-party environmental database (Envirocheck), there are six groundwater abstraction locations within a 2km radius of the site, the closest of which is located approximately 1.5km to the south. This abstraction is for 'other industrial/commercial/public services: non-evaporative cooling' and is licensed to London and Quadrant Housing Trust. An abstraction for potable drinking water is located 1.58km south-east of the site, operated by Peninsula Water Limited.

The closest groundwater abstraction lies in excess of 1.5km south of the site.

#### 2.2.3 Groundwater Sensitivity

The site is considered to be situated in an area of low to moderate sensitivity with respect to groundwater resources due to the underlying Unproductive Strata, Secondary A and Principal Aquifers. The site is not located within a groundwater SPZ. The low permeability London Clay Formation will provide some protection to the underlying Lambeth Group.

### 2.3 Hydrology

#### 2.3.1 Nearest Identified Surface Watercourse

The nearest surface watercourse is the concrete lined Grand Union Canal (Paddington Branch) located 280m north-east of the site. The site is located within the catchment of the Lower Brent River which is located some 2.4km north-west of the site. The EA currently classifies the River Brent as being of 'moderate' ecological quality and it failed its chemical quality assessment under the Water Framework Directive classification scheme (2019 dataset).

According to mapping in the publication *The Lost Rivers of London*, the former route of the Stanford Brook passed approximately 2.23 km south-west of the site within a minor tributary located approximately 700m east of the site (through Wormwood Scrubs Park). The former watercourses are anticipated to be culverted in the vicinity of its former route.

#### 2.3.2 Licensed Surface Water Abstractions

No licensed surface water abstractions are recorded within the Envirocheck database within 1km of the site.

#### 2.3.3 Flood Risk

According to publicly available EA flood mapping, the site lies within a Flood Zone 1 (Low Probability). This zone comprises land assessed as having a less than 1 in 1000 annual probability of river or sea flooding (<0.1% in any



<p>Pollution history including:</p> <ul style="list-style-type: none"> <li>• pollution incidents that may have affected land</li> <li>• historical land-uses and associated contaminants</li> <li>• any visual/olfactory evidence of existing contamination</li> <li>• evidence of damage to pollution prevention measures</li> </ul>	<p>year). The closest area of land recorded as having an elevated risk of flooding is located over 2km north-west of the site.</p> <p>The site is considered to be in an area of low sensitivity with regards to surface water, due to the distance between the site and the closest identified surface water features (Grand Union Canal and the River Brent). Shallow groundwater underlying the site is considered unlikely to be in direct hydraulic continuity with surface water in the River Brent.</p> <p><b>2.3.4 Ecological Designated Sites</b></p> <p>A Local Nature Reserve, Wormwood Scrubs, is located approximately 590m south-east of the site. There are no other ecologically sensitive sites within a 1km radius of the site nor, are there any other statutory designated sites identified within 1km of the site (sites of special scientific interest, special protection areas, special areas of conservation or Ramsar sites).</p> <p><b>2.4 Pollution Incidents</b></p> <p><b>2.4.1 Recorded Pollution Incidents</b></p> <p>A third-party environmental database (Envirocheck) holds no records of pollution incidents on site.</p> <p>A total of 15 pollution incidents to controlled waters have been recorded within 1km of the site. The nearest of these was located 240m north-east of the site, relating to a release of oils into an unknown watercourse. The incident occurred in April 1993 and, was classified by the EA as a Category 3 - Minor Incident.</p> <p>There have been three substantiated pollution incidents recorded within 1km of the site, as detailed below:</p> <ul style="list-style-type: none"> <li>• An atmospheric pollutant release occurred 570m north-east of the site in November 2010. The event was considered to be a Significant Incident – Category 2 (Air); and No Impact– Category 4 (Water and Land).</li> <li>• An atmospheric pollutant release (smoke) occurred 860m east of the site in April 2012. The event was considered to be a Significant Incident – Category 2 (Air); and No Impact– Category 4 (Water and Land).</li> <li>• An oil (diesel) spillage occurred 910m north of the site in April 2009. The event was considered to be a Significant Incident – Category 2 (Land); a Minor Incident – Category 3 (Air); and No Impact– Category 4 (Water).</li> <li>• These incidents pre-date the development of the site for use as a datacentre and are located off-site. They are considered unlikely to have resulted in long-term impacts within the installation boundary.</li> </ul> <p><b>2.4.2 Contaminated Land Register Entries</b></p> <p>None recorded within 2km of the site.</p> <p><b>2.4.3 Prosecutions or Enforcement Actions</b></p> <p>None recorded within 2km of the site.</p>
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## 2.5 Historical Land Uses

### 2.5.1 On Site

Historical ordnance survey maps have been obtained from, a third-party environmental database (Envirocheck). A summary of historical land use on-site and in the surrounding area is shown below.

Period	On-site	Surrounding Area
1850	Undeveloped	Undeveloped except for a road running north-east to south-west approximately 40m south-east of the site.
1874	Undeveloped	The "South Western Junction Railway" was depicted adjacent to the east running north to south and a "Naphtha Works" was present 290m north-east of the site.
1896	Undeveloped	A "Brick & Tile Works" was depicted from 180m north of the site and "Willesden Paper & Canvas Works" 250m east.
1915	"Rotax Works (Motor Accessories)" occupied the site.	No change
1920	No change	"Brick & Tile Works" expanded, a large "Carriage Shed" 290m south-east, a "Printing Works" and "Engineering Works" 330m south and an "Engine Shed" 430m east of the Site.
1935	The Rotax Works facility had expanded to occupy the northern half of the site and was relabelled as "Rotax Works (Aircraft Equipment)". A "Mattress Factory" also encroached onto the south of the site.	The "Mattress Factory" extended off-site to the south-east and the surrounding area included several industrial developments, including: a "Vaseline Works" 30m east, "Metal Refinery" 30m north-west with several tanks, "Cable Works" 30m south-west and an "Engineering Works" 50m north-west. The clay pit associated with the "Brick & Tile Works", to the north-east had also been redeveloped with a rectangular

		building and railway tracks.
1955	The "Rotax Works" central building shown as having expanded to the north and east, with an electricity sub-station at the western boundary of the site.	The Vaseline works shown to be replaced by a "Petroleum Jelly Works" with two tanks and a "Timber Yard" 200m north-west.
1967	Site redeveloped to its current configuration, including two large "Works" buildings in the north and three adjacent "Warehouse" buildings in the south.	The previous engineering works to the north-west had been replaced by a "Power Station" from 20m north and a "Rotax Works" was adjacent to the north.
1970	No changes	A "Meat Production Factory" and adjacent "Abattoir" were depicted 60m north-east of the Site.
1980	No changes	"Meat Production Factory" and adjacent "Abattoir" both replaced by a "Superstore".
1995	No changes	The power station to the north no longer in place.
2020	Chandos Park Industrial Estate, comprising two terraces of industrial warehouse-type units occupied the site.	No change.

2.5.2 Waste Management Facilities

There are no current or former landfill sites recorded in the Envirocheck Database within a 1km radius of the site. There are records of ten Licensed Waste Management Facilities within 1km of the site, the closest of which are located:

- 260m north-east, Operator: Space Rubbish Limited, household, commercial and industrial transfer station, License Issued: August 1994, modified in August 2011.
- 270m south-west, Operator: Environmental Tyre Disposals Ltd, transfer stations taking non-

biodegradable wastes, License Issued: November 2002; Revoked: November 2014.

- 320m south, Operator: Quattro (UK) Limited, household, commercial and industrial transfer stations, License Issued: July 2003; Surrendered: May 2019.
- 345m north, Operator: Quattro (UK) Limited, household, commercial and industrial transfer stations, License Issued: January 1996; Surrendered: July 1999.

There are two registered Waste Treatment or Disposal Sites within 1km of the site:

- 780m east, License Holder: A Digby & Sons Ltd., scrapyard, no known restriction on source of waste, dated January 1994, not operational as far as is known.
- 840m east, License Holder: Mayer Parry Recycling Ltd., scrapyard, no known restriction on source of waste, dated March 1999, operational as far as is known.

There are six Part A(1) Permit records within 2km of the site The closest of which is licensed to Vale Europe Ltd, located 140m west of the site for non-ferrous metals.

There are no Part A(2) Permits within 2km of the site.

There are 52 Part B Permits within 2km of the site. Permits within 250m of the site include:

- 60m south-west, Lumitron Ltd, coating of metal and plastic, status: revoked.
- 170m south-west, White Rose Laundries Ltd, dry cleaning, status: permitted.
- 180m west, Dyn-Metal Ltd, copper and copper alloy processes, status: permitted.
- 240m south-west, Citygate Dealerships Ltd, respraying of road vehicles, status: permitted.

## 2.6 Evidence of Historical Contamination

Based on Ramboll's review of historical information sources, it is considered likely that various chemicals, including fuels, oils, solvents were historically used at the site. With the absence of additional information regarding the historical storage and use of chemicals at the site, Ramboll cannot rule out the potential that historical site uses have impacted the subsurface of the site (soils and groundwater).

According to a UXO Pre-Desk Study Assessment for the site obtained by Ramboll from Zetica UXO<sup>2</sup>, readily available records indicate that, that several HE bombs fell in close proximity to the site during World War II (WWII). The subsequent Zetica UXO Desk Study and Risk Assessment<sup>3</sup> indicated that no sources of UXO hazard are present on the site and no records have been identified to indicate that the site was bombed. Zetica concluded that the site has a low UXO hazard level.

<sup>2</sup> Further information can be found online at: <https://zeticauxo.com/>

<sup>3</sup> Zetica, Chandos Park Industrial Estate – UXO Desk Study and Risk Assessment, dated July 2020, Document Ref. P9762-20-R1

It is understood that the site was initially developed in mid-1970s, before the general ban of asbestos from use in construction materials in the UK in 1999. Therefore, the presence of asbestos in current building materials and within on-site soils (associated with the demolition of former on-site buildings) cannot be ruled out.

#### 2.6.1 Previous Use of the Site

Based on information obtained during the 2020 site visits undertaken by Ramboll as part of the Phase I geo-environmental assessment, the previous on-site activities included:

- administration/office activities;
- music rehearsal studios and secure storage space;
- wholesale storage and sale of building materials;
- manufacture and sales of commercial glass and glazing; and
- the operation of three electricity substations.

Ancillary activities also included waste, fuel and oil storage and were likely to include small-scale internal chemical storage (i.e. cleaning chemicals, general maintenance chemicals/products as well as chemicals used).

The site was occupied by two terraces of industrial warehouse-type units, electricity substations and an above ground diesel storage tank. Based on available information and site visits (limited to external areas), on-site activities included some potentially contaminative processes (e.g. chemical storage, fuel storage, process wastewater, glass treatment processes and waste storage). The general housekeeping of external areas of the site were generally good however, evidence of moderate to heavy staining was observed within the vicinity of some external hazardous material storage and waste storage areas. External chemical storage was observed by Ramboll to be limited.

#### 2.6.2 Historical Use of the Site Surrounds

In general, the surroundings are considered to have a similar, if not greater, contaminative potential than the site. The potential for off-site contaminants to migrate onto site would be dependent on the underlying geological and hydrogeological conditions.

### 2.7 Baseline Soil and Groundwater Reference Data

Baseline soil and groundwater reference data has been obtained from the Ramboll Phase II Geo-Environmental Site Investigation Report that was completed in 2020.

For the purposes of this SCR, diesel fuel and glycol are the only 'relevant hazardous substances' which will be in use at the site. Diesel storage and use is proposed to take place in two banks of diesel-powered generators to be installed; in total, 37 (17 in a generator building and 20 on a gantry) generators will be present at the site, with an aggregated

net rated thermal input capacity of approximately 208 MW. Activities directly associated with the Installation are limited to the handling (e.g. receipt), storage and distribution of fuel, lubrication oils and engine coolants (glycol).

Based on this, the SCR presents baseline reference data for contaminants which have the potential to be associated with the site's historical uses, and also with the current / future storage of diesel fuel and glycol; namely hydrocarbons and VOCs including:

- Speciated total petroleum hydrocarbons (TPH-CWG) in the carbon range C5 to C44 (aliphatic and aromatic compounds);
- Sixteen commonly occurring speciated polycyclic aromatic hydrocarbons (speciated PAHs);
- Volatile aromatic hydrocarbons (VOCs) including benzene, toluene, ethylbenzene and xylenes (BTEX).

The Phase II report is provided in Appendix 3 of this document.

#### 2.7.1 Soil Baseline Reference Data

In summary, the following exploratory locations were in the vicinity of the data centre's generator housing and diesel storage:

- Boreholes CP05, WS04 and WS07.

The exploratory hole logs do not identify field evidence of hydrocarbon contamination (staining, odours).

Additional exploratory holes were advanced across the wider site (comprising boreholes and trial pits). Of these, selected samples were analysed for TPH CWG, speciated PAHs and VOCs:

- Total PAHs were below the Generic Assessment Criteria (GAC) in all 22 samples detected. Total PAHs were recorded above the limit of detection at three locations only: CP04, WS03 and WS06 at concentrations of 1.6 mg/kg, 1.7 mg/kg and 1.7 mg/kg respectively.
- TPH and BTEX concentrations were below the GAC in all 22 samples tested. Slightly elevated TPH concentrations were detected in Made Ground at two locations only: CP01 (1,433 mg/kg) and WS02 (2,667 mg/kg).
- VOC concentrations were below the respective GAC for 15 out of 16 soil samples tested. One sample taken from CP01 identified a single exceedance for vinyl chloride (chloroethene) at CP01 (48 µg/kg compared to the GAC of 38 µg/kg)

#### 2.7.2 Groundwater Baseline Reference Data

Four groundwater samples were analysed (CP01, CP02, CP03 and CP05) and the results were screened against relevant GACs for controlled waters.

TPH, PAH and VOC exceedances were identified for samples taken from CP01 and CP03. The elevated concentrations of PAHs detected were not considered significant in the context of the site's setting, and VOC and TPH exceedances were consistent with visual and olfactory evidence of contamination in perched water at CP01, which were not considered to be indicative or significant for widespread contamination.

Due to the site's low permeability geology and low sensitivity environmental setting, it was considered that potential for migration of contaminants was reduced, and therefore the potential for impact to controlled waters was considered to be low.

Published EA guidance for datacentre operation states "The groundwater monitoring of fuel storage tanks and distribution pipework using GW [groundwater] boreholes is risk based for the site condition report (SCR) and IED 5-yearly monitoring. Should GW monitoring be required for underground tanks and/or the SCR, the boreholes should be positioned for whole site surveillance (for the SCR) rather than as a very local control immediately around the buried fuel oil tanks (i.e. not be just an addition to double skinned tanks already protected by leak detection and hence ignoring distribution pipework etc)."

and,

"10-yearly soil sampling under IED is normally not needed but still needs some justification."

The site meets the requirements of BAT for above ground diesel storage. All infrastructure associated with the transport and use of diesel is located above ground, in areas of hardstanding with secondary containment which meets BAT. Based on this, and the available baseline data, it is recommended that:

- In line with the IED monitoring requirements for groundwater, groundwater monitoring wells are installed within the superficial deposits (Langley Silt / Terrace Gravels) at most five years after issue of the Environmental Permit.
- Should a release of a dangerous substance (diesel or glycol) occur during the first five years of the installations life, there may be a requirement to undertake intrusive investigation and install groundwater monitoring wells sooner.
- The monitoring wells should be located to provide information on groundwater quality up and down hydraulic groundwater gradient of the generator enclosure, and of the soakaways.
- The well locations, drilling and construction should be designed and supervised by a suitably quality environmental professional. Agreement may need to be obtained from the Environment Agency before the wells are installed.

**Supporting information and sources**

- Groundwater monitoring and sampling from the installed wells should be undertaken at a minimum of five yearly intervals and analysed for hydrocarbons; this is envisaged to be speciated TPH-CWG, BTEX compounds and 16 speciated PAHs.
- An approach to the data assessment should be developed, which would include comparison against the available baseline groundwater data and against available / relevant water quality standards. There may also be a requirement to undertake statistical assessment and / or trend analysis.
- The results of each round of monitoring should be compiled and the site condition report should be updated after each round of monitoring.
- A procedure should be developed should the monitoring identify an increase in hydrocarbon concentrations. For example, this may include reviewing diesel storage and handling arrangements and stock records, records of spills / leaks, designing and implementing an enhanced groundwater and (if necessary) soil monitoring programme.
- The need for soil sampling would depend on the findings of the groundwater monitoring programme, and also whether there are any releases of a dangerous substance at the installation. The need (or otherwise) for soil sampling will require justification by the operator.
- Any soil sampling programme should be designed and supervised by a suitably quality environmental professional. Agreement may need to be obtained from the Environment Agency. The SCR should be updated with the results of any soil sampling.
- Site location plan and layout plan reproduced in Appendix 1, Figure 1 and 2 respectively
- Site drainage plan reproduced in Appendix 1, Figure 03623B-001
- Phase I Environmental Site Assessment, November 2020 (see Appendix 2)
- Geo-Environmental Ground Investigation, October 2020 (see Appendix 3)
- Publicly available online geological mapping at [www.bgs.ac.uk](http://www.bgs.ac.uk)
- Environmental Risk Assessment, provided in Appendix 6

### 3. Permitted Activities

**Details of Activities at the Installation**



<p>Permitted Activities</p> <p>Non-Permitted Activities Undertaken</p> <p>Document References For:</p> <ul style="list-style-type: none"><li>• plan showing activity layout; and</li><li>• environmental risk assessment.</li></ul>	<p>EPR Schedule 1, Part 2, Chapter 1, Section 1.1 of the Environmental Permitting (England and Wales) Regulations 2016 (as amended) - the burning of any fuel in an appliance with a rated thermal input of 50 or more megawatts.</p> <p>The Installation will comprise the operation of 37 diesel fired generators, with 17 generators (associated with LHR11) located within a dedicated Generator Building, and 20 generators (associated with LHR12) located on a gantry, as a back-up power supply for two datacentres. The Installation will include associated activities of handling (e.g., receipt), storage, and distribution of fuel, lubrication oils and engine coolants.</p> <p>Operation of the data centre.</p> <ul style="list-style-type: none"><li>• Appendix 1 – Site Location Plan, Figure 1</li><li>• Appendix 1 -Site Layout Plan, Figure 2</li><li>• Appendix 1 – Site Drainage Plan Figure 3</li><li>• Appendix 7 – Environmental Risk Assessment</li></ul>
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## Appendix 1

### Figures

Figure 1: Site Location

Figure 2: Site Boundary and Layout

Figure 3: Site Drainage Plan

Appendix 2  
Chandos Park, Chandos Road, London, NW10 6NF, Phase I  
Environmental Site Assessment

Appendix 3  
Chandos Road, Park Royal, Geo-Environmental Ground  
Investigation (Phase II GI Report)

## Appendix 4 Environmental Risk Assessment