

Pure Data Centre – Permit Variation

784-B047734

Site Condition Report

Environmental Permit Variation Application

PDCG (Group Services Limited)

September 2023

**Document prepared on behalf of Tetra Tech Limited. Registered in England number:
01959704**



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1.0 EA SITE CONDITION REPORT TEMPLATE

1.0 Site Details

Name of the applicant	PDCG (Group Services Limited)
Activity address	JVC Business Park, Staples Corner, London, NW2 7BA
National grid reference	TQ 22296 87216

Document reference and dates for Site Condition Report at permit application and surrender	Sykes Partners – Site Condition Report – March 2021 Site Condition Report – September 2023
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Document references for site plans (including location and boundaries)	PURE/B047734/GEN/01 – Permit Boundary PURE/B047734/EPA/01 – Emission Points to Air GA PROPOSED SITE PLAN (EAST AND WEST)- PHASE 02 – Layout Plan.
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Note:

In Part A of the application form you must give us details of the site's location and provide us with a site plan. We need a detailed site plan (or plans) showing:

- Site location, the area covered by the site condition report, and the location and nature of the activities and/or waste facilities on the site.
- Locations of receptors, sources of emissions/releases, and monitoring points.
- Site drainage.
- Site surfacing.

If this information is not shown on the site plan required by Part A of the application form then you should submit the additional plan or plans with this site condition report.

2.0 Condition of the land at permit issue

Environmental setting including:

- geology
- hydrogeology
- surface waters

Site Setting

The site is located within the JVC business Park Staples Corner, London, NW2 7BA, which is centred at approximate National Grid Reference (NGR) TQ 22296 87216. The application site is detailed on Drawing Number PURE/B047734/GEN/01.

Access to the site is achieved by Priestley Way access road.

The immediate surroundings of the site are primarily Industrial in nature with Industry to the East and West and the A406 North Circular and further industry to the south. To the north of the site is the Brent Reservoir which is designated as a Site of Special Scientific Interest (SSSI), Local Nature Reserve (LNR) and Local Wildlife Site (LWS).

The Site's c.27,500m² surface covering currently comprises buildings, hard standing and limited (less than 1,200m²) of soft landscaping for grasses, shrubs, and small trees.

Beneath the surface cover, at least four separate intrusive site investigations have determined the presence of 1.8 to 6m deep deposits of Made Ground (variously described as clayey sand with gravel, and grey clay with brick, concrete, and rubble). The greatest deposits of which are located in the west of the Site where two c.6.5m deep lime pits have been infilled. The base of these pits are known to contain between 0.45 to 5.8m deep deposits of lime fill or spent calcium carbide.

The Made Ground predominantly lies above deposits of London Clay. The on-site depth extent of this clay deposit has not been determined but it is known to extend to at least 30 meters below ground level (mbgl). Along the northern boundary, an organic rich silty clay (likely to represent alluvial deposits associated with the Brent River and the Brent Reservoir) deposit of 2.5 to 3m thickness is also present above the London Clay deposits.

A discontinuous shallow groundwater body (1 to 4.8 mbgl) is known to be present on and within the London Clay deposits. Although undetermined, the flow direction of this water body is likely to be to the north and north-east, towards the Brent River and River Brent Reservoir. The Environment Agency consider the London Clay to be an unproductive stratum for groundwater resources, with low permeability (ranging from 1x10⁻¹¹ to 1x10⁻⁹ m/s) that represents a negligible significant contributor for water supply or river base flow.

The BGS Geology of Britain online map viewer shows the site to be located on a Principal Aquifer associated the Chalk Formation. Within a radius of 2km from the Site, no evidence

	of this aquifer being exploited by licenced abstractions has been identified, and the site is not located within a Source Protection Zone. c.50m to the north of the Site, the Brent River runs from east to west and flows into the Brent Reservoir located c.90m to the north-west. The Site is located within the Dollis Brook and Upper River Brent catchment areas. Both are considered to have moderate ecological quality status and good chemical quality status as defined by the Water Framework Directive. Within a radius of 2km, no evidence of licensed surface water abstractions has been identified. Two south to north running Thames Water surface water mains enter the southern boundary of the site and converge on the northern boundary before discharging into the River Brent. The site's surface waters are captured by a drainage network located along the northern boundary and pass through an interceptor prior to joining the Thames Water infrastructure and discharging to the River Brent. The River Brent Reservoir is a Site of Special Scientific Interest (SSSI) and a Local Nature Reserve, the boundaries of which abut the northern Site boundary. These areas were declared predominantly due to the presence of breeding wetland birds and due to the variety of plant species growing along the water's margins. A 'Nature and Heritage Conservation Screen' was requested from the Environment Agency. The results of the screen (EPR/QP3706LH/V002) are provided in the Environmental Risk Assessment (Appendix C) of the Environmental Permit application). The results of the screen identified the following within 1Km of the site: - • Brent Reservoir (120m N/NW); • Welsh Harp (120m N/NW); • Reed Beds (110m N/NW) and, • Dollis Hill Reservoir (805m S). The results of the screen are appended in the Environmental Risk Assessment (Appendix C of the main application) and the Receptor Plan.
Pollution history including: • pollution incidents that may have affected land • historical land-uses and associated contaminants • any visual/olfactory evidence of existing contamination	Between c.1920 to c.1955, three pits of c.2,000m² were present in the western portion of the Site. These 1.5 to 6.5m deep pits have been described as Lime Pits and were associated with the production of acetylene by the British Oxygen Company (BOC) located in the east of the Site. It is assumed that BOC used these pits to dispose of, and to dry, carbide lime wastes produced during the production of acetylene. BOC would have mixed water with calcium carbide to produce the acetylene, but the process also produces a highly alkaline (pH greater

evidence of damage to pollution prevention measures	than 12) lime slurry that would have also contained heavy metals, ammonium hydroxide and silicates. One of these pits was excavated and backfilled with ash, gravel, wood, brick and clay sometime after 1955. The other two pits were covered over sometime prior to the 1960s. As well as containing an estimated 22,000m3 of spent carbide, these pits are also known to contain discrete layers of ash, clay, gravel, wood, brick, and concrete. Between 1955 and 1999, the Site's identifiable land-use types included a depot, a works, a warehouse, and a factory; the exact activities associated with these land-use types is unknown. c.1977, two fenced-off electrical sub-stations (now owned and operated by UK Power Networks) were installed in the west of the Site and sometime shortly after, a third was installed in the east of the Site. Since 2005, the Site was used as JVC's UK and its European headquarters (offices and distribution warehouse) until its closure in c.2010. All the above land-use activities have the potential to cause land contamination and impact the Made Ground, the London Clay and the shallow groundwaters on the site. In addition, the Environment Agency record two pollution incidents relating to this Site. In 1990, a significant surface water pollution event involving unknown chemicals was recorded at the combined storm outflow discharging from the Site. A minor incident was then recorded in 1991 at the same discharge point. By 2015, this consented discharge was surrendered and all discharges from this point are now thought to have ceased.
Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)	Since 2002, a number of intrusive site investigations have determined that the Made Ground is impacted with heavy metals (lead, copper, nickel, and zinc), inorganics (sulphide, sulphate, and cyanide) asbestos containing materials and asbestos fibres (crocidolite, chrysotile and amosite). The greatest concentrations of these contaminants were located within the areas where the pits had been located. To mitigate a potential risk associated with the horizontal migration of impacted shallow groundwaters towards the Brent River, in 2004 the lime pits were subjected to an encapsulation and containment remedial method. This incorporated the installation of a vertical barrier encircling the pits and tied into the underlying London Clay to a depth of 1m. Post barrier installation monitoring has determined that the shallow groundwater levels within this area remain constant and that there is no evidence of the contained waters presented an unacceptable risk to the river or reservoir to the north. Within the barrier installation, shallow groundwaters are known to have high pH, alkalinity, ammoniacal nitrogen and naphthalene levels. When compared against background

	concentrations, these contaminants are also elevated across the remainder of the Site. The verification report for the installation of the vertical barriers makes no reference as to whether an impermeable layer was installed over the lime pit areas and details the northern section where buried infrastructure was encountered preventing complete installation as per the specification. Consequently, there is a potential risk that groundwaters within these pits could rise and top-over the installed vertical barriers, and or penetrate the barrier to the north. To monitor this potential risk, annual groundwater level and chemical composition monitoring has been conducted at the site since 2017 and, to date, no evidence of either potential occurrence has been identified.
Baseline soil and groundwater reference data	On the basis of the information available, the range of chemical constituents within the Made Ground on the Site have been collated and summarised in Table 1. Baseline previously monitored ground gas data is presented in Table 2, surface water chemical composition in Table 3, and site-wide shallow groundwater composition in Table 4.
Supporting information	• Buro Happold – Interpretative Geotechnical and Contamination Assessment Report (Report Reference 7236, dated October 2002); • CJ Associates Geotechnical Limited – Site Investigation Factual Report (ref P0230, dated April 2003); • Buro Happold – Phase 2 Interpretative Geotechnical and Contamination Assessment Report (ref 7236, dated May 2003); • Ramboll – Harpview Business Park, Priestley Way, Staples Corner, London, NW2 7BA Sustainability Review (ref UK14-23954, dated March 2017); • Ramboll – Harpview Business Park, Priestley Way, Staples Corner, London NW2 7BA – Phase II Environmental Site Investigation (Dated March 2017); • Ramboll – Harpview Business Park, Staples Corner, London NW2 7BA – Drainage Survey and Sampling (ref LUK14-24569_1, dated July 2017); • Ramboll – Harpview Business Park, Staples Corner – Additional Environmental Investigation (Stage 1 and Stage 2) (ref L1700000548_1, dated February 2018); • Ramboll - JVC Business Park, Staples Corner – Groundwater Monitoring, Round 3 of 3, December 2018 (ref R1700000548, dated January 2019); • Ramboll – JVC Business Park, Staples Corner – Detailed Groundwater Quantitative Risk Assessment (ref 1700000548_1, dated March 2019);

- Ramboll - Harpview Business Park, Staples Corner – Groundwater Monitoring, Round 2 of 3, July 2018 (ref R1700000548_2, dated September 2019);
- Ramboll – JVC Business Park, Staples Corner, Annual Groundwater Monitoring 2019 (referenced 1620008335, dated January 2020); and,
- Geotechnical & Environmental Associates Ltd report titled Desk Study & Ground Investigation Report, JVC Business Park, Staples Corner, London (referenced J20117B, dated October 2020).

All above reports are available on request.

Table 1 - Baseline Chemical Composition of Near-surface Made Ground

Heavy Metals	
Arsenic (inorganic)	9.3 to 120
Beryllium	0.7 to 1.8
Boron	0.7 to 9.3
Cadmium	<0.2 to 4.1
Chromium	20 to 140
Chromium (VI)	<0.3 to 4.2
Copper	25 to 66,000
Lead	16 to 9,600
Mercury	<0.3 to 29
Nickel	3.6 to 380
Selenium	<1.0 to 2.7
Vanadium	21 to 87
Zinc	85 to 7,900
Inorganics and soil parameters	
Asbestos	<0.001 to 0.14% w/w (Chrysotile, Crocidolite and Amosite)
Free Cyanide	<1 to 5
Total Cyanide	<1 to 14
Total Sulphate	4.4
Sulphide	<1.0 to 540
pH	7.83 to 11.8
Organics	
Acenaphthene	<0.05 to 31.5
Acenaphthylene	<0.05 to 9.4
Anthracene	<0.05 to 115
Benzo(a)anthracene	<0.05 to 164
Benzo(a)pyrene	<0.05 to 143
Benzo(b)fluoranthene	<0.05 to 240
Benzo(g,h,i)perylene	<0.05 to 73

Benzo(k)fluoranthene	<0.05 to 67
Chrysene	<0.05 to 145
Dibenzo(a,h)anthracene	<0.05 to 15.8
Fluoranthene	<0.05 to 465
Fluorene	<0.05 to 54.4
Indeno(1,2,3-cd)pyrene	<0.05 to 82
Naphthalene	<0.05 to 10.5
Phenanthrene	1 to 412
Pyrene	1 to 351
Aliphatic EC 5-6	<0.1
Aliphatic EC >6-8	<0.1
Aliphatic EC >8-10	<0.1
Aliphatic EC >10-12	<0.1 to 13.9
Aliphatic EC >12-16	<0.1 to 79
Aliphatic EC >16-35	<0.1 to 7,040
Aromatic EC >5-7	<0.1
Aromatic EC >7-8	<0.1
Aromatic EC >8-10	<0.1
Aromatic EC >10-12	<0.1 to 15.7
Aromatic EC >12-16	<0.1 to 368
Aromatic EC >16-21	12 to 3,364
Aromatic EC >21-35	63 to 10,409
MTBE	<0.1
Benzene	<0.1
Toluene	<0.1
Ethylbenzene	<0.1
o-xylene	<0.1
m-xylene	<0.1
p-xylene	<0.1
VOCs	<0.1
SVOCs	<0.1
Dioxins, Furans, PCBs	<0.1
Phenol	<0.1 to 0.6

All units in mg/kg unless otherwise stated. Sources:

1. Buro Happold – Interpretative Geotechnical and Contamination Assessment Report (Report Reference 7236, dated October 2002);
2. CJ Associates Geotechnical Limited – Site Investigation Factual Report (ref P0230, dated April 2003);
3. Buro Happold – Phase 2 Interpretative Geotechnical and Contamination Assessment Report (ref 7236, dated May 2003);
4. Ramboll – Harpview Business Park, Priestley Way, Staples Corner, London NW2 7BA – Phase II Environmental Site Investigation (Dated March 2017); and,
5. Ramboll – Harpview Business Park, Staples Corner – Additional Environmental Investigation (Stage 1 and Stage 2) (ref L1700000548_1, dated February 2018).

Table 2- Baseline Ground Gas Conditions

Gas	
Methane	Up to 30 %v/v
Carbon Dioxide	Up to 5.8 %v/v
Carbon Monoxide	<0.05 %v/v
Hydrogen Sulphide	0 ppm
Acetylene	<1 ppm
Total VOCs	<1.7 ppm

Sources:

1. Buro Happold – Phase 2 Interpretative Geotechnical and Contamination Assessment Report (ref 7236, dated May 2003;
2. Ramboll – Harpview Business Park, Priestley Way, Staples Corner, London NW2 7BA – Phase II Environmental Site Investigation (Dated March 2017); and,
3. Ramboll – Harpview Business Park, Staples Corner – Additional Environmental Investigation (Stage 1 and Stage 2) (ref L1700000548_1, dated February 2018).

Table 3 – Baseline Surface Water Chemical Composition

Parameter	
pH	7.2 to 8.1
Dissolved Oxygen	20 to 87 %
Electrical Conductivity	388 to 900 µS/cm
Redox Potential	32 to 97mV
Ammoniacal Nitrogen	0.37 to 5.4
Ammonium (NH ₄)	0.47 to 6.9
Calcium	61 to 120
Iron	0.02 to 0.14
Magnesium	3.1 to 23
Potassium	5.4 to 12
Sodium	21 to 120

All units in mg/l unless otherwise stated.

Source: Ramboll – Harpview Business Park, Staples Corner, London NW2 7BA – Drainage Survey and Sampling (ref LUK14-24569_1, dated July 2017).

Table 4 – Baseline Shallow Groundwater Chemical Composition

Heavy Metals	
Aluminium	<10 to 6,800
Arsenic	<10 to 26.5
Barium	25 to 1,338
Boron	17 to 1,370
Cadmium	<0.5
Total Chromium	<10 to 3,200
Copper	<10 to 27
Iron	<10 to 16,510
Lead	<10 to 22

Magnesium	<10 to 886,000
Mercury	<0.2 to 6
Nickel	<10 to 34
Selenium	<2 to 14
Vanadium	<10 to 115
Zinc	<10 to 93
pH	4 to 12.75 pH
Alkalinity	100 to 2,672,000 mg/l
Electrical Conductivity	810 to 7,400 µS/cm
Dissolved Oxygen	2 to 76% saturation
Biochemical Oxygen Demand	<1 to 39 mg/l
Chemical Oxygen Demand	11 to 304 mg/l
Ammonia	1.7 to 4 mg/l
Calcium	67 to 950 mg/l
Chloride	32 to 1,325 mg/l
Cyanide	<0.05 to 0.88 mg/l
Sulphate as SO ₄	<10 to 1,500 mg/l
Sulphide	0.74 mg/l
Ammoniacal Nitrogen	610 to 49,260 mg/l
Floating Free Product	Non detected
Acenaphthene	0.05 to 11.5
Acenaphthylene	<0.02 to 11
Anthracene	<0.02 to 3
Benzo(a)anthracene	<0.02
Benzo(a)pyrene	<0.02 to 0.07
Benzo(b)fluoranthene	<0.02
Benzo(g,h,i)perylene	<0.02
Chrysene	<0.02
Fluoranthene	<0.02 to 6
Fluorene	0.06 to 15.7
Indeno(1,2,3-cd)pyrene	<0.02
Naphthalene	0.94 to 45.1
Phenanthrene	0.03 to 22.5
Pyrene	0.11 to 4.3
Aliphatic EC 5-6	<10 to 16
Aliphatic EC >6-8	<10
Aliphatic EC >8-10	<10
Aliphatic EC >10-12	<10
Aliphatic EC >12-16	<10
Aliphatic EC >16-35	<10 to 3,120
Aliphatic EC >35-44	<10

Aromatic EC >5-7	<10
Aromatic EC >7-8	<10
Aromatic EC >8-10	<10
Aromatic EC >10-12	<10
Aromatic EC >12-16	<10
Aromatic EC >16-21	<10
Aromatic EC >21-35	<10
Total Aliphatic	<10 to 230
Total Aromatic	<10 to 272
Benzene	<10
Toluene	<10
Ethyl benzene	<10
mp-xylene	<10
o-xylene	<10
MTBE	<10
Total Phenol	<0.1 to 25
SVOCs	<DL
VOCs	<DL

All units in ug/l unless otherwise stated. <DL refers to less than laboratory detection limits. Sources:

1. Buro Happold – Phase 2 Interpretative Geotechnical and Contamination Assessment Report (ref 7236, dated May 2003;
2. Ramboll – Harpview Business Park, Priestley Way, Staples Corner, London NW2 7BA – Phase II Environmental Site Investigation (Dated March 2017);
3. Ramboll – Harpview Business Park, Staples Corner – Additional Environmental Investigation (Stage 1 and Stage 2) (ref L1700000548_1, dated February 2018);
4. Ramboll - JVC Business Park, Staples Corner – Groundwater Monitoring, Round 3 of 3, December 2018 (ref R1700000548, dated January 2019);
5. Ramboll – JVC Business Park, Staples Corner – Detailed Groundwater Quantitative Risk Assessment (ref 1700000548_1, dated March 2019);
6. Ramboll - Harpview Business Park, Staples Corner – Groundwater Monitoring, Round 2 of 3, July 2018 (ref R1700000548_2, dated September 2019); and,
7. Ramboll – JVC Business Park, Staples Corner, Annual Groundwater Monitoring 2019 (referenced 1620008335, dated January 2020).

3.0 Permitted activities

Permitted activities

The site currently operates under permit EPR/QP3706LH which authorises the operation of 16 standby electric generating plant in the event of a National Grid failure and for testing purposes.

According to the Table S1.1 of the Environmental Permit, the current activities are undertaken:

Section 1.1 Part A(1) (a):

- Burning any fuel in an appliance with a rated thermal input of 50 megawatts or more

	• Operation of 16 x 7.31 MWth (new MCP) emergency standby generators with an aggregated thermal input of 117 MWth. • The generators will burn either gas oil or an agreed equivalent substitute solely for the purpose of providing electricity to the data centre in the event of a failure of supply from the National Grid and during testing and maintenance. PDCG are now seeking to vary the environmental permit to expand the existing site and construct a further 40 gas engines each rated at 7.54MWth (New MCP).
Non-permitted activities undertaken	Car parking, office space, and staff welfare facilities.
Document references for: • plan showing activity layout; and • environmental risk assessment.	PURE/B047734/GEN/01 – Permit Boundary Plan PURE/B047734/EPA/01 – Emission Points to Air GA PROPOSED SITE PLAN (EAST AND WEST)- PHASE 02 – Layout Plan. Environmental Risk Assessment - (Appendix C of the Environmental Permit Variation Application)

It is essential that you identify in your environmental risk assessment all the substances used and produced that could pollute the soil or groundwater if there were an accident, or if measures to protect land fail. These include substances that would be classified as ‘dangerous’ under the Control of Major Accident Hazards (COMAH) regulations and also raw materials, fuels, intermediates, products, wastes and effluents. If your submitted environmental risk assessment does not adequately address the risks to soil and groundwater we may need to request further information from you or even refuse your permit application.

4.0 Changes to Existing Activities	
• Have there been any changes to the activity boundary?	PDCG are now seeking to vary the environmental permit to expand the existing permitted site to encompass an area to the west and directly adjacent to building LON1B1 as shown on drawing GA PROPOSED SITE PLAN (EAST AND WEST)- PHASE 02 – Layout Plan. The permit boundary will be extended to the west of the site as shown on the drawing. However, the baseline site condition report for the Environmental Permit covered this operational area and as such there are no changes to the baseline contamination data as a result of this application.
• Have there been any changes to the permitted activities?	PDCG are now seeking to vary the environmental permit to construct a further 40 gas engines each rated at 7.54 MWth. These gas engines also benefit from individual fuel storage bunkers.

Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	No dangerous substances have been used or produced as a result of the permitted activities since the Application Site Condition Report.
Checklist of supporting information	- Non- Technical Summary - Environmental Risk Assessment - (Appendix C – September 2023) - Best Available Techniques and Operating Techniques - (Appendix B – September 2023) - Air Quality Assessment - (Appendix E – September 2023) - Site Condition Report - (Appendix D – September 2023) - Application Forms - (Appendix A – September 2023) - PURE/B047734/GEN/01 – Environmental Permit Boundary Plan - PURE/B047734/EPA/01 – Emission Points to Air - GA PROPOSED SITE PLAN (EAST AND WEST)- PHASE 02 – Layout Plan. - PURE/B047734/REC/01 – Environmental Receptor Plan

5.0 Measures taken to protect the land

Use records that you collected during the life of the permit to summarise whether pollution prevention measures worked. If you can't, you need to collect land and/or groundwater data to assess whether the land has deteriorated.

Checklist of supporting information	The site operates on hardstanding with separators to minimise the likelihood of any insoluble substances entering the surface water drainage system. Each engine has its own dedicated bulk fuel storage tank (capacity 71,211 litres). They are positioned underneath the engines at ground level, minimising pipe-runs and pumping distances to point of use. Each tank is double walled, affording integrated primary and secondary containment and minimisation of leakage associated with containment failure. Daily site walk overs will be undertaken to provide a visual inspection of multiple key locations, including visual inspection of fuel storage tanks, leaks, fill points and hardstanding, and vent points.
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6.0 Pollution incidents that may have had an impact on land, and their remediation

Summarise any pollution incidents that may have damaged the land. Describe how you investigated and remedied each one. If you can't, you need to collect land and /or groundwater reference data to assess whether the land has deteriorated while you've been there.

	No pollution incidents have occurred since the commencement of operations.
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7.0 Soil gas and water quality monitoring (where undertaken)

Provide details of any soil gas and/or water monitoring you did. Include a summary of the findings. Say whether it shows that the land deteriorated as a result of the permitted activities. If it did, outline how you investigated and remedied this.

Checklist of supporting information	To be populated on surrender of permit
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8.0 Decommissioning and removal of pollution risk

Describe how the site was decommissioned. Demonstrate that all sources of pollution risk have been removed. Describe whether the decommissioning had any impact on the land. Outline how you investigated and remedied this.

Checklist of supporting information	To be populated on surrender of permit
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9.0 Reference data and remediation (where relevant)

- Say whether you had to collect land and/or groundwater data. Or say that you didn't need to because the information from sections 3, 4, 5 and 6 of the Surrender Site Condition Report shows that the land has not deteriorated.

• If you did collect land and/or groundwater reference data, summarise what this entailed, and what your data found. Say whether the data shows that the condition of the land has deteriorated, or whether the land at the site is in a "satisfactory state". If it isn't, summarise what you did to remedy this. Confirm that the land is now in a "satisfactory state" at surrender.

Checklist of supporting information	To be populated on surrender of permit
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10.0 Statement of Condition

To be completed on surrender of permit; statement declaring that all permitted activities have ceased, that the decommissioning has been completed and that the land is returned to a pre-permit state will be completed on surrender of the permit.