

Leigh Paterson
HDR Consulting
204 West George Street, Glasgow,
G2 2PQ

Our reference: EPR/FP3630EU
Date: 21/09/2023

Dear Leigh Paterson

Pre application advice – Enhanced service

Site: LON1East (Formerly Romford North Data Centre)

Operator: Green Mountain UK Ltd (Formerly ISDC Developments (No2) Limited)

Thank you for your pre application enquiry on 23/05/2023 and for taking the time to attend a meeting with myself and colleagues on 16/08/2023.

Below is a record of the discussions from that meeting:

Meeting attendees:

Gary Hutchings (GH) – Green Mountain UK Ltd

John Dwyer (JD) – Green Mountain UK Ltd

Leigh Paterson (LP) – HDR Consulting

Neil Hadden (NH) – HDR Consulting

Emma May (EM), Howard Tee (HT), Alun Roberts-Jones (AR-J), Emily Pople (EP), Kirsty White (KW) – Environment Agency.

An overview was provided of the current site generator capacity and the proposed increase in generators. MTU generators (emissions optimised to 2g-TA Luft) have already been ordered due to lengthy lead times. Delivery of the generators is expected in March 2024. It is anticipated that these will be operational by August 2024 for a testing period, with normal operational scenario to commence October 2024.

On this basis the following questions were posed by the operator:

Could a permit be in place by the anticipated operating date and if not, what would the potential implications be?

Any scenario whereby generators are already on site and operational before a permit application has been processed are currently assessed by the Area Officer on a site-by-site basis. This scenario wouldn't necessarily automatically result in an enforcement notice to cease operation. We would encourage an application to be made as early as

customer service line 03706 506 506

floodline 03459 88 11 88

incident hotline 0800 80 70 60

Page 1 of 4

LIT 55347 7/4/2021

possible to allow it to have reached at least the Duly Making stage which would allow for site specific information to be assessed to seek a way forward if the above scenario were to occur.

With respect to the length of time to process an application once received, we have implemented a new triage system whereby any application will now receive an initial assessment upon receipt to identify if everything required has been submitted. At this stage AQMAU will also do a preliminary check on any air quality component to identify any omissions in the assessment early on. There will still be the usual wait on the queue for the application to be allocated to a Permitting Officer, but once it has been allocated the process of Duly Making and determination should be swifter because of the triage process.

At the time of the meeting, applications received on to the permitting work queue were taking about 5.5 months to be allocated to a permitting officer. This is an indicator only and may change by the time of submitting any variation application for this site.

Preliminary air quality modelling results undertaken by the operator suggest no exceedances of the short or long-term national air quality objective for nitrogen dioxide under a normal operational scenario. Potential exceedances have been identified under a 72hr power outage scenario. Given the history of only 1 power outage since operation began in 2014 (lasting for 3 hours and 15 mins) would the results of this power outage modelling scenario result in the need for additional emissions reduction measures to be installed / applied on the new generators?

Modelling results can only be assessed in full at the time of submission of an application for a permit variation, and until that point it is not possible to specify whether emissions reduction measures would be required or not. The air quality impact assessment for a variation, must consider the impact of the installation as a whole, and not just the process contribution from the new proposed generators.

Generators with emissions optimised to 2g-TA Luft or US EPA tier 2 or equivalent is the current requirement in terms of BAT. The choice of generators ordered for the site meets this requirement. Beyond this BAT requirement we are concerned less about the 72-hour timespan with regards to the power outage modelling scenario and more about the peak oxides of nitrogen (NOx) emissions, hence our requirement for modelling results to be assessed against US EPA AEGL-1 levels or equivalent. We also require consideration of, and assessment against, the Environmental Assessment Level (EAL) for nitrogen monoxide when assessing peak NOx emissions.

It is important for applicants to consider the impacts of the generator commissioning period during the assessment of potential emissions. In practice this can be the most significant emission event. Consideration should be given to a carefully planned test regime scenario to account for this.

Applicants should also be aware that many Local Authorities within London are now insisting on Selective Catalytic Reduction (SCR) being applied to new emissions sources. Clarification should be sought from the appropriate Local Authority (LA) about whether this is applicable for the site. However, even if this is not a requirement of the LA, it is

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incident hotline 0800 80 70 60

Page 2 of 4

recommended that some level of consideration is given to the potential 'readiness' of the new proposed generators to have SCR fitted at a later date should this become a requirement, for example due to further expansion of the site or should additional new receptors ever be introduced nearby.

Can clarification be provided of latest version of Environmental Standards, and Data Centre Guidance? Are there any upcoming changes in guidance / standards that may affect this application?

The current Environmental Standards for air emissions can be found at:

[Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit)

A recent revision of EALs exercise is due to conclude shortly, none of those that have changed would affect this application. Furthermore, once an application has been submitted and is 'in flight', it would only be subject to the standards/guidance relevant at the time of submission.

The most recent version of the Data Centre FAQ Headline Approach document that you should use to guide your application submission is: Version 21.0, a copy of which will be provided to accompany this response.

What happens next?

If you submit an environmental permit application then please quote this pre-application reference number: EPR/FP3630EU/V002.

If the advice above details using the [online digital application form](#), your application can be submitted using this method. If not, please send your completed application documents via email to:

psc@environment-agency.gov.uk

Or by post to:

Environment Agency, Permitting Support Centre, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF

Disclaimer

The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to duly making and then full technical checks during determination, and additional information may be required based on your detailed submission and site specific requirements and the advice given is to address the specific pre-application request.

This advice covers installations only.

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Page 3 of 4

Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.

This pre-application request is now closed.

Further enquiries resulting from this response must be logged as a new request using the online form:

<https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form>

If you have any questions please find my contact details below.

Yours sincerely

Emma May

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Page 4 of 4

LIT 55347 7/4/2021