

[Redacted]

**From:** Woodward, Marcus  
**Sent:** 04 October 2023 07:31  
**To:** Woodruff, Sarah  
**Subject:** FW: EPR/JP3647JU/A001 – Further Information Required CRM:0644005  
**Attachments:** Receptors v2 Table.asp.csv; Noise report v2.pdf; BAT Assessment v2.pdf

**Marcus Woodward** MSc BSc (Hons) MCIWEM  
Principal Permitting Team Leader – Installations  
National Permitting Service

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**From:** Spence, Neil [Redacted]  
**Sent:** Tuesday, October 3, 2023 5:53 PM  
**To:** Woodward, Marcus [Redacted]  
**Cc:** May, Emma [Redacted]  
**Subject:** FW: EPR/JP3647JU/A001 – Further Information Required CRM:0644005

Hi Marcus,

This RESP notification is due but I see Emma is off till 16<sup>th</sup> – are you able to assist in her absence?

Would appreciate comments on the need to model ALL noise impacts and a potential Noise management plan as of all the Datacentre applications I have worked on (12 and counting), this is the first time these have been requested

Regards,

**Neil Spence**  
Associate Director

**HDR**  
[Redacted]

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**From:** Spence, Neil [Redacted]  
**Sent:** Tuesday, October 3, 2023 5:44 PM  
**To:** SM-Defra-RESP-notifications (DEFRA) <[RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk)>  
**Cc:** May, Emma [Redacted]  
**Subject:** RE: EPR/JP3647JU/A001 – Further Information Required CRM:0644005

Hi Emma,

Please see responses below with supporting information attached.

Please let me know if any further queries,

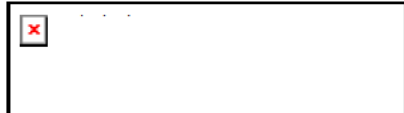
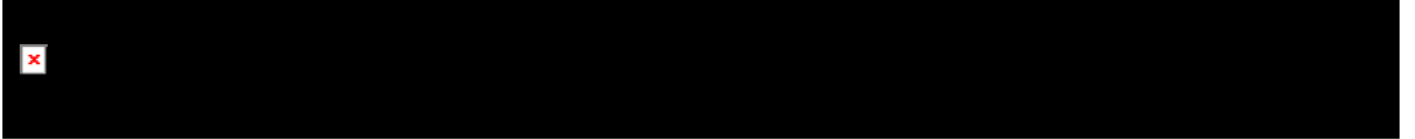
Regards,

**Neil Spence**  
Associate Director

**HDR**  
[Redacted]

From: SM-Defra-RESP-notifications (DEFRA) <[RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk)>  
Sent: 19 September 2023 12:36  
To: Spence, Neil [REDACTED]  
Cc: May, Emma [REDACTED]  
Subject: EPR/JP3647JU/A001 – Further Information Required CRM:0644005

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Dear Neil

**Environmental Permitting (England and Wales) Regulations 2016**

**Application reference: EPR/JP3647JU/A001**

**Operator: K D 2 LIMITED**

**Facility: KLON-06, Slough, SL1 4AN**

Thank you for your application received on 30/11/2022. The following is to confirm our conversation of 19/09/23.

I have completed the checks on your new bespoke permit application and will be Not Duly Making it for the reasons stated below:

- A summary of the applicant's Environmental Management System as requested in Question 3d of form Part B2 has not been provided. **Summary provided in BAT assessment, Section 9.** Please provide us with a standalone document and cover all points outlined in: [Develop a management system: environmental permits](#). Please also provide a copy of the applicants ISO 14001 certification. **Certificate attached and added as Appendix to updated BAT assessment.**
- A draft Air Quality Management Plan is cited within the Non-Technical Summary but was not received with the application. Please provide this. **This will be developed once the site is fully operational. We request this be included as an improvement condition in the permit**
- A full set of atmospheric dispersion modelling files has not been provided. Only the .APL files for one met year have been provided with the application. Please provide us with the atmospheric dispersion modelling files (.APL) for all scenarios assessed, for all met data years and the associated receptor file. **Please see attached**
- A Noise Impact Assessment (NIA) has been provided with the application however it has not been undertaken in accordance with our guidance. Please review our guidance (available at Noise and vibration management: environmental permits - GOV.UK ([www.gov.uk](http://www.gov.uk))) and re-submit a NIA that: **Updated noise assessment attached.**

- is undertaken in full accordance with our guidance
- includes a full BS 4142 assessment (as opposed to a comparison with data contained within “BS 8233:2014 – Guidance on Sound Insulation and Noise Reduction for Buildings”)
- considers all noise sources which form part of the permitted activity (including - but not necessarily limited to, the backup generators)
- considers other, non-permitted noise sources within the permitted boundary – (including - but not necessarily limited to - the ventilation and cooling system extraction)
- presents the following assessments: a) permitted activities only (the backup generators), b) non permitted activities only (for example the ventilation and cooling system extraction (fans)) and c) all activities within the permitted boundary (the relative contribution to the overall impact of the permitted and non-permitted activities should form part of the context of the BS 4142 assessment)
- - considers - in line with our guidance - that the background sound levels should be established while the site is not active (including both permitted and non-permitted activities).
  - contains detailed justification for any assumptions made
  - is submitted in the format of technical reports - taking into account all content of our guidance regarding recommended structure.
- No detail has been provided regarding the storage of Urea associated with the SCR abatement system for the backup generators. Please provide details of the likely quantities held on site, storage and containment details, and disposal details (if necessary). **Please refer to updated BAT assessment, Section 3.9 and section 7.3.**
- Only outline information regarding the proposed routine maintenance testing of the existing and new backup generators is provided. Please provide a more detailed description of the proposed routine maintenance approach including how testing will be minimised, staggered, and at what engine loading. **Please refer to updated BAT assessment, Section 4.2.**

I look forward to receiving your response within 10 working days of this email. If we do receive the requested information within 10 working days, we'll continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for. If it can't be duly made, we'll return your application to you.

If we do not receive the information within 10 working days we will return your application.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permitting-charging-scheme-2019>

In addition to the above information required, please note that should the application reach the Determination stage it is likely that you will be asked to provide a Noise Management Plan to accompany the Noise Impact Assessment. Please be aware that assessment of a Noise Management Plan incurs an additional fee of £1246. Information regarding the estimated quantity of waste engine lubrication oil is also likely to be required.

If you have any questions regarding this application, please do not hesitate to use my contact details below to discuss this further.

Kind Regards

Kind regards,

**Emma May Bsc MRes**

Senior Permitting Officer, Installations

**Environment Agency** | Kings Meadow House, Kings Meadow Road, Reading, RG1 8DQ



Mobile: [REDACTED]

Working days: Monday to Thursday 09:00 to 15:00

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