

From: [Rahul Patel](#)  
 To: [SM-Defra-RESP-notifications \(DEFRA\)](#)  
 Cc: [Jenkins-Jones, Hayley](#)  
 Subject: RE: EPR/LP3303PR/V004 We Need More Information About Your Application CRM:0887036  
 Date: 05 August 2024 10:12:10  
 Attachments: [image001.png](#)  
[image002.png](#)  
[Rahul Patel shared the folder NDM Response with you.mso](#)

Good morning Hayley,

Hope you had a good weekend. We have worked through the request for information and, on behalf of Equinix, have summarised responses in the table below. The referenced documents are saved in the ShareFile here [\[NDM Response\]](#). Have sent you a separate invite to this folder just now on email (see attached), so hopefully you can access the documents.

Regarding the air quality questions, these may warrant some additional discussion so please let us know if you need these talking through – our air quality team is happy to join a meeting if needed. Otherwise, we trust the information that we’re providing is sufficient for the application to now be duly made/validated.

**Responses to RFI Questions**

EA Questions	ERM Response
<b>1) Form A, Qu 6a Your main (registered office) address:</b>	
The address given in Form A, question 6a does not match the registered address of the company on Companies House. The address on the application form has to match your registered address on Companies House. Please amend and re-submit the form.	This has been updated. Updated form in folder "Q1 - Form A" of the SharePoint link folder.
<b>2) Form C2, Qu 1c Site details:</b>	
The site name and address given in Form C2, question 1c does not match the site name and address on the existing permit. Please review these details, amend if necessary and re-submit the form.	This has been updated. Updated form in folder "Q2 - Form C2" of the SharePoint link folder.
<b>3) Form C2, Question 5a Provide a plan or plans for the site:</b>	
The emission point site plan is insufficient. Fig 3.2 and Fig 4.1 Emission point plans do not include the emission point to sewer (S1). Please add the emission point to sewer to Fig 3.2 and Fig 4.1 and re-submit.	These figures have been amended. Updated figures in folder "Q3 - Site Plans" of the SharePoint link folder.
<a href="#">For further information on preparing your site infrastructure plan please see our guidance under Develop a management system: environmental permits (Develop a management system: environmental permits – GOV.UK (www.gov.uk))</a> .	
<b>4) Form C2, Question 5b Do any of the variations you plan to make need extra land to be included in the permit? Please provide a site report for the extra land:</b>	
Appendix A of your Site Condition Report is missing. Please submit Appendix A.	This has now been provided. See document saved in folder "Q4 - Appendix A - Previous Desk Studies and SI" of the SharePoint link folder.
<b>5) Form C2, Question 6 Environmental risk assessment (Air Quality Assessment):</b>	
The following aspects required by our guidance were not provided in the Air Quality Assessment:	
We have been unable to replicate your stack velocities, which seem very high looking at the stack diameters and actual volumetric flow rates. Please can you verify that these values are correct. If they are correct, please can you provide your calculations so we can check these directly.	Emission velocity for Cummins generators were incorrectly labelled in the report. This value should have been <b>25.453 m/s</b> .  The rest of the values are correct. We have attached the model inputs used see "AQ inputs" tab on the worksheet saved in the folder "Q5 - Air Quality Assessment" of the SharePoint link folder. Calculations can be supplied if required.
Actual oxygen and moisture percentage assumptions.	Actual oxygen and moisture percentage assumptions are not included. Values for generators were used at 5% O <sub>2</sub> .  Happy to discuss this point further with yourself or AQMAU.
Normalised volumetric flow values (at the same reference conditions you have used in your report).	These are not available.  Happy to discuss this point further with yourself or AQMAU.
<a href="#">Please re-submit an Air Quality Assessment following the Air emissions risk assessment for your environmental permit guidance (Air emissions risk assessment for your environmental permit – GOV.UK (www.gov.uk) with the above aspects included.</a>	ERM is not resubmitting the fully amended AQ assessment as the clarifications above hopefully sufficiently explain our responses.  Happy to discuss any of the points further if required.
<b>6) Form C2.5:</b>	
As you are applying to add new medium combustion plant (MCP) to your existing installation permit, the information listed in Annex 1 of the Medium Combustion Plant Directive (MCPD) is required. Please complete and submit application Form Part C2.5 and the accompanying Combustion Plant List Spreadsheet.	This form has now been completed and is saved in folder "Q6 - Form C2.5 and Combustion Plant List" of the SharePoint link folder.  Regarding question 2b:  <i>Is your permit variation application to add a new MCP(s) and there will now be a total aggregated thermal input of 20MW thermal or more?</i>  Whilst the plant aggregates to >20MWth input, they are not required to meet the requirements of the Energy Efficiency Directive, this is because the plant will operate for less than 1,500 hours per year. This is aligned to the EA's online guidance <a href="#">Medium combustion plant: apply for an environmental permit - GOV.UK (www.gov.uk)</a>
As the application is for a limited operating hours MCP the declaration box must be signed in the Combustion Plant List Spreadsheet. The signatory must be a relevant person equivalent to those who are able to sign the Form F1 declaration.	Bruce Owen-Crompton's signature has been added to the list as confirmation that the site operates limited operating hours MCP.

Kind regards,

Rahul



**Rahul Patel**  
 Managing Consultant

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My work days are Monday to Friday (09h00 to 17h30)

From: SM-Defra-RESP-notifications (DEFRA) <[RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk)>  
 Sent: Friday, July 26, 2024 9:16 AM  
 To: Rahul Patel <[Rahul.Patel@erm.com](mailto:Rahul.Patel@erm.com)>  
 Cc: Jenkins-Jones, Hayley <[Hayley.Jenkins-Jones@environment-agency.gov.uk](mailto:Hayley.Jenkins-Jones@environment-agency.gov.uk)>  
 Subject: EPR/LP3303PR/V004 We Need More Information About Your Application CRM:0887036

EXTERNAL MESSAGE



Dear Rahul,

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

**Application reference: EPR/LP3303PR/V004**

**Operator: EQUINIX (UK) LIMITED**

**Facility: Equinix Slough Campus Data Centre, Buckingham Avenue, Slough, SL1 4AX**

Thank you for your application received on 05/07/2024. The following is to confirm our conversation on 26/07/2024.

I need to ask you for some missing information before I can do any more work on your application. Please complete/ and or provide us with more information to the following questions:

**1) Form A, Qu 6a Your main (registered office) address:**

The address given in Form A, question 6a does not match the registered address of the company on Companies House. The address on the application form has to match your registered address on Companies House. Please amend and re-submit the form.

**2) Form C2, Qu 1c Site details:**

The site name and address given in Form C2, question 1c does not match the site name and address on the existing permit. Please review these details, amend if necessary and re-submit the form.

**3) Form C2, Question 5a Provide a plan or plans for the site:**

The emission point site plan is insufficient. Fig 3.2 and Fig 4.1 Emission point plans do not include the emission point to sewer (S1). Please add the emission point to sewer to Fig 3.2 and Fig 4.1 and re-submit.

For further information on preparing your site infrastructure plan please see our guidance under Develop a management system: environmental permits ([Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](#)).

**4) Form C2, Question 5b Do any of the variations you plan to make need extra land to be included in the permit? Please provide a site report for the extra land:** Appendix A of your Site Condition Report is missing. Please submit Appendix A.

**5) Form C2, Question 6 Environmental risk assessment (Air Quality Assessment):**

The following aspects required by our guidance were not provided in the Air Quality Assessment:

- We have been unable to replicate your stack velocities, which seem very high looking at the stack diameters and actual volumetric flow rates. Please can you verify that these values are correct. If they are correct, please can you provide your calculations so we can check these directly.
- Actual oxygen and moisture percentage assumptions.
- Normalised volumetric flow values (at the same reference conditions you have used in your report).

Please re-submit an Air Quality Assessment following the Air emissions risk assessment for your environmental permit guidance ([Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](#)) with the above aspects included.

**6) Form C2.5:**

As you are applying to add new medium combustion plant (MCP) to your existing installation permit, the information listed in Annex 1 of the Medium Combustion Plant Directive (MCPD) is required. Please complete and submit application Form Part C2.5 and the accompanying Combustion Plant List Spreadsheet.

As the application is for a limited operating hours MCP the declaration box must be signed in the Combustion Plant List Spreadsheet. The signatory must be a relevant person equivalent to those who are able to sign the Form F1 declaration.

Please see application guidance of Form C2.5 for further information [Application for an environmental permit: part C2.5 vary to add MCP or SG or change an existing MCP or SG permit - GOV.UK \(www.gov.uk\)](#)

Please reply directly to this email with your information and copy in [hayley.jenkins-jones@environment-agency.gov.uk](mailto:hayley.jenkins-jones@environment-agency.gov.uk)

Please send the information within 10 working days of this letter (deadline 09/08/2024). If we do not receive the information within 10 working days, we will return your application.

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.

We'll let you know by letter whether your application can be duly made. If it can't be duly made, we'll return your application to you.

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. The 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-permits-and-abstraction-licences-tables-of-charges>

If you have any questions please phone me on 07391 409418 or email me at [hayley.jenkins-jones@environment-agency.gov.uk](mailto:hayley.jenkins-jones@environment-agency.gov.uk)

Yours sincerely,  
Hayley Jenkins-Jones

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