



Our Ref: EA/EPR/CP3042QG/A001 - 22-0598.01

04th April 2023

Hayley Jenkins-Jones
Senior Permitting Officer
Environment Agency

[via email]

Dear Hayley

Many thanks for your Request for Information letter dated 15th March 2023. We have made the following response to each section of your letter.

Letter Section	Response
<i>Form B2, Question 3d Management systems (all): Please tick box to confirm that you have read the guidance and that your management system will meet our requirements.</i>	This is now ticked and Form B2 resubmitted.
<p><i>Management System – We have determined that our completeness check could not be completed because the following were not provided in the Management System:</i></p> <ul style="list-style-type: none"> <i>a. Site Infrastructure Plan</i> <i>b. Site operations</i> <i>c. Site and equipment maintenance plan</i> <i>d. A changing climate</i> <i>e. Complaints procedure</i> <i>f. Make sure people understand what you do</i> <p>Please re-submit a Management System following the Develop a management system: environmental permits (https://www.gov.uk/guidance/develop-a-management-system-environmental-permits) with the above included.</p>	<p>“Site Infrastructure Plan_1” appended to this response.</p> <p>Document “Management Systems_1” attached to this response details points b-f, including the complaints procedure and For “Make sure people understand what you do”, interested parties are directed to the operator’s website at https://globaltechnicalrealty.com/locations/london-gb-one/</p>
<p>Form B2, Question 5a Provide a plan or plans for the site: The Site Infrastructure Plan is missing. Please provide a site plan with the following included:</p> <ul style="list-style-type: none"> a. Site boundary reasonably accurate and in acceptable format and clearly identified. b. Site layout. c. Emission points clearly shown. 	<p>“Site Infrastructure Plan_1” appended to this response.</p>



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<p>d. Identification of other geographic features (roads, rivers etc.).</p> <p>e. Scale indicator.</p> <p>f. OS NGR indicated.</p> <p>g. Site drainage plan – surface water and foul sewers identified.</p> <p>h. Direction of drainage identified.</p> <p>i. Site surfacing identified.</p> <p>j. Fuel storage areas, tanks and underground pipes identified.</p> <p>k. Fuel delivery areas identified.</p>	
<p><i>Form B2, Question 5c Provide a non-technical summary of your application: The non-technical summary is missing. Please provide a non-technical summary.</i></p>	<p>Non-technical summary attached to this response in document “Non-technical Summary_1”</p>
<p><i>Form F1, Question 1 Working out charges, Table 3 (Additional assessment charges (B)): Your application requires an assessment under the Habitats Regulations. The charge for this assessment is not included in your baseline application charge. You will therefore need to make an additional payment of £779 (Ref:1.19.2). Please update and re-submit Form F1 with the fee.</i></p>	<p>Form F1 resubmitted and fee paid via BACS</p>
<p><i>Form B3, Question 1 Table 1a Types of activities: Supplementary to the information supplied in Supporting Document Section 3, please fill in Table 1a with all the requested information.</i></p>	<p>Form B3 resubmitted with requested information which was submitted in supplementary information document.</p>
<p><i>Form B3, Question 2 Table 2 – Emissions (releases): Supplementary to the information supplied in Supporting Document Section 7, please fill in Table 2 with all the requested information.</i></p>	<p>Form B3 resubmitted with requested information which was submitted in supplementary information document.</p>
<p><i>Form B3, Question 3a, Table 3 Technical standards: Please complete the missing sections in Table 3. Form B3 Table 3 states BAT used is ‘Data Centre FAQ Headline Approach Version 11.0 H.Tee 11/5/20’. However, Supporting Document Section 8 states BAT used is ‘Data Centre FAQ Headline Approach, Draft Version 10.0 H. Tee 01/06/18 – Release To Industry’. Please confirm which BAT has been used in the application.</i></p>	<p>“Data Centre FAQ Headline Approach Version 11.0 H.Tee 11/5/20” is used for this application, therefore B3 Question 3a, Table 3 Technical standards is the correct version.</p>
<p><i>Air Quality Assessment – The following aspects required by our guidance were not provided in the Air Quality Assessment:</i></p> <p>a) <i>Air quality modelling files.</i></p>	<p>Air Quality Consultants Ltd report attached, modelling files included.</p>



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<p>b) List of sensitive human and ecological receptors affected by the site with grid references.</p> <p>c) Process contributions (PCs) and predicted environmental concentrations (PECs) at specific receptor locations.</p> <p>d) Assessment at ecological habitats.</p> <p>e) Assessment of 72 hour emergency scenario.</p> <p>f) Due to an SCR being used a risk assessment of ammonia emissions.</p> <p>g) Numbering of emission sources to be changed from 'Source001' etc to 'A1' etc for simplification. Please list these in a table format with their corresponding grid references.</p> <p>h) Data outputs must include a wind rose.</p> <p>i) Dimensions of all buildings included in the model, including National Grid references, height, width and rotation.</p> <p>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.</p>	
<p>Environmental Risk Assessment – An Environmental Risk Assessment which identifies all the sources of pollution on the site including fuel storage, containment, drainage and underground pipework with the potential pathways for pollution and the potential receptors for pollution e.g. surface water drains has not been submitted.</p> <p>Please submit an Environmental Risk Assessment using the format of 'Source – pathway – receptor' following the Risk assessments for your environmental permit (Risk assessments for your environmental permit - GOV.UK (www.gov.uk)). This must cover as a minimum fuel storage/containment and drainage including underground pipework.</p>	<p>Environmental Risk Assessment attached to this response as "Environmental Risk Assessment_1".</p>

We trust this information submission will address all of your question above and this application can move to determination as swiftly as possible given the long period of time since original submission. We have separately been in discussions with about commissioning while this application is being determined, as the data centre is largely complete.

Yours sincerely,
 Marcus Reynolds

Associate
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