



Environmental Permit Application

Non-Technical Summary

Iron Mountain (UK) Data Centre Limited

724-729 Dundee Road, Slough, SL1 4JU

Prepared by:

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SLR Project No.: 410.066935.00001

30 June 2026

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	Click to enter a date.			
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Basis of Report

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1.0 INTRODUCTION

SLR Consulting Limited (SLR) has been instructed by Iron Mountain (UK) Data Centre Limited (IM) to prepare a bespoke Environmental Permit (EP) application for the Iron Mountain Data Centre LON-1 (the Site), located at 724-729 Dundee Road, Slough, SL1 4JU.

Electricity for operation of the data centre is provided from connections to the local electricity transmission network; however, given the nature of data centres and their requirement to have an available energy supply at all times, the data centre incorporates 11 diesel-fired standby generators (SBGs).

There is currently no plan to increase the number of SBGs at the data centre.

The SBGs provide power to the data centre in the event of an emergency situation such as a brown- or black-out of the local electricity transmission network where there are fluctuations or loss of the electrical power provided by the network. On occurrence of such an event, there is the potential for a delay between fault detection and initial operation of the SBGs; on-site battery arrays provide a temporary uninterruptible power supply in order to cover such delays and the potential for a loss/reduction in the power supply to on-site equipment.

The SBGs, in accordance with manufacturer requirements, are subject to planned maintenance and testing. There are no agreements in place for the elective generation of electricity for commercial export to the electricity grid.

The total rated thermal input (under standby power operating conditions) of the 11 SBGs will be 70.265 MWth based on an efficiency of 35% as set out in the Environment Agency's guidance. This is made up of the following:

- 6 x MTU DS3100 (HV) generators (existing SBGs, installed before 20th December 2018), each with a thermal rated input of 5.43 MWth;
- 3 x Caterpillar 3516E (new SBGs, installed May 2019), each with a rated thermal input of 7.857 MWth; and
- 2 x MTU DS3100 (LV) generators (new SBGs, installed March 2021), each with a thermal rated input of 7.057 MWth.

Fuel consumption suggests that in fact this may be on the high side and efficiencies closer to 38% might be achieved for the caterpillar engines and of up to 42% for the MTUs.

The SBGs are fuelled with diesel and so for the purpose of this EP application, the air emissions risk assessment has been based on the use of diesel fuel.

The SBGs are considered to be an 'installation' as defined in Paragraph 1, Part 1, Schedule 1 of the Environmental Permitting (England and Wales) Regulations (EPR) 2016 (as amended) as "a stationary technical unit (STU) where one or more activities are carried on." The 'activities' on site are defined in Chapter 1, Schedule 1 of the EPR, under Section 1.1. (Combustion Activities). Fuel storage for the SBGs and surface water drainage are considered to be directly associated activities (DAAs) of the 'combustion' STU for the data centre.

This document is submitted on behalf of the operator to support the EP application for the data centre (as per the requirements of Section 2(1), Part 1, Schedule 5 of the EPR).

This non-technical summary (NTS) provides a summary of what is being applied for, along with a summary of the activities that will be undertaken at the data centre, and an explanation of key technical standards and control measures that are implemented at the site.



2.0 ENVIRONMENTAL PERMIT APPLICATION

2.1 Regulated Activities

The data centre will comprise in total a thermal input of 70.285MWth, based on a worst case efficiency of 35%, as set out in the Environment Agency's guidance. Testing of the SBGs (either routinely or following maintenance) will be undertaken at up to 100% load, although in an emergency situation it is likely a maximum of 9 of the 11 engines would operate.

This EP application (including the associated modelling studies and risk assessments) has been prepared on the basis of 11 SBGs:

- 6 x MTU DS3100 (HV) generators (existing SBGs, installed before 20th December 2018), each with a thermal rated input of 5.43MWth);
- 3 x Caterpillar 3516E (new SBGs, installed May 2019), each with a rated thermal input of 7.857MWth; and
- 2 x MTU DS3100 (LV) generators (new SBGs, installed March 2021), each with a thermal rated input of 7.057MWth.

Combustion activities that require an environmental permit are defined in Part 2, Schedule 1 of the EP Regulations:

- Section 1.1 Part A(1)(a) burning any fuel in an appliance with a rated thermal input of 50 or more megawatts.

The EP Regulations clarify that:

“...where two or more appliances with an aggregated rated thermal input of 50 or more megawatts are operated on the same site by the same operator, those appliances must be treated as a single appliance with a rated thermal input of 50 or more megawatts.”

The SBG provision includes for a level of redundancy to the SBG system such that, even in a worst-case blackout scenario, only the required number of SBGs would start up to deliver the required electricity IT load for the data centre; the number of operational SBGs at the time of a blackout would be dependent on the extent of the blackout. However, it is noted that, without specific physical controls preventing operation of an SBG, that the thermal input of all SBGs is required for determining the capacity of the site. Therefore, the capacity of the data centre in total will be 70.285MWth as a worst case, based on:

- 32.28MWth (6 x MTU DS3100 generators at 5.43MWth each);
- 23.571MWth (3 x Caterpillar 3516E generators at 7.857MWth each); and
- 14.114MWth (2 x MTU DS3100 generators at 7.057MWth each).

2.1.1 Directly Associated Activities (DAA)

Schedule 1, Part 1 Regulation 2(1) of the EP Regulations provides that a DAA is an operation that, in relation to any other activity:

- Has a technical connection with the activity;
- Is carried out on the same site as the activity; and
- Could have an effect on pollution.

The storage of fuel oil at the data centre associated with the proposed 11 SBGs and surface water drain drainage are considered to be DAAs of the 'combustion' Stationary Technical Unit (STU) for that data centre.



2.2 Application Contents

The EP variation application comprises the following elements:

- Application forms (Parts A, B2, B2.5, B3 and F1);
- MCP spreadsheet;
- Non-Technical summary;
- Environmental Risk Assessment;
- Air Emissions Risk Assessment;
- Best Available Techniques and Operating Techniques;
- Noise Risk Assessment;
- Site Condition Report; and
- Supporting Drawings.

2.3 Operating Techniques

The proposed SBGs and associated fuel storage are designed and operated in accordance with the relevant sections of the following guidance:

- Develop a management system: environmental permits guidance, April 2023;
- Risk assessments for your environmental permit guidance, December 2025;
- Emergency backup diesel engines on installations: best available techniques (BAT), 23 August 2023;
- Best Available Techniques: environmental permits, July 2025;
- Data Centre FAQ, Draft Version 21.0 to TechUK for Discussion 15/11/22; and
- Specified generator: comply with permit conditions, December 2022.

2.3.1 Management Systems

The data storage services at the data centre site are managed in accordance with the following standards, or suitable equivalent standards:

- ISO/IEC 27001:2013 that specifies the requirements for establishing, implementing, maintaining and continually improving an information security management system.
- ISO9001:2015 that specifies the requirements for establishing, implementing, monitoring, managing and improving quality throughout the organisation.

In addition, an environmental management system is in place. The EMS places particular importance on:

- Reducing risks to the environment to a level that is as low as reasonably practicable using best available techniques;
- Integrating EMS responsibilities within line management;
- A commitment to personnel environmental awareness and competence;
- The ongoing monitoring and review of environmental performance; and
- A commitment to working to achieve continuous improvement in environmental performance.



A summary of the proposed EMS is detailed in the site's Best Available Techniques and Operating Techniques (BATOT) document (SLR reference: 410.066934.00001 BATOT) submitted with the EP application.

2.4 Environmental Risk Assessment

The Environmental Risk Assessment (ERA) (SLR Reference: 416.066934.00001_ERA) has been prepared in support of the EP application in accordance with the Environment Agency (EA) *Risk assessments for your environmental permit*. The ERA is a simple assessment of the risks to the environment and human health from point source emissions to air, accidents, noise, fugitive emissions and global warming potential that may be associated with the permitted activities at the site. The aim of the assessment is to identify any significant risks and demonstrate that the risk of pollution or harm will be acceptable by taking the appropriate measures to manage these risks.

The ERA has assessed the potential risks based on the balance between the probabilities of exposure and the magnitude of the consequences of those exposures. Overall, with measures in place to manage potential risks, no significant environmental risks have been identified at the site where the measures set out in the application are followed.

2.5 Air Emissions Risk Assessment

A detailed air quality risk assessment (SLR Ref. 416.066934.00001_AERA) has been undertaken to investigate the potential for emissions from the SBGs to impact on air quality by comparison to UK Air Quality Standards and EA regulatory benchmarks (e.g. Environmental Assessment Levels) in line with the prevailing guidance. Emissions from the site will vary dependent upon the operational scenario of the engines (e.g. full emergency load, testing).

The SBGs will each operate for less than 500 hours per annum and will therefore not be subject to emissions limit values (ELV) for the substances listed in Annex V of Directive 2010/75/EU on industrial emissions (Industrial Emissions Directive, IED).

Overall, the air emissions risk assessment predicts for:

- Operation of the SBGs for all normal maintenance and testing, that significant impacts are unlikely on the identified sensitive receptors where the number of engines tested is limited to one at a time with an hour's break between tests and testing is carried out during the day (between 8am and 8pm);
- Operation of a black building test may have an impact at some receptors. However this situation is unlikely. Whilst the operator would like the ability to carry out such tests they are not usually undertaken.

2.6 Site Condition Report

A Site Condition Report (SCR) (SLR Ref: 416.066934.00001_SCR) has been prepared in support of the EP application. Sections 1-3 have been completed; these sections comprise the following aspects:

- site details;
- condition of the land at permit issue;
- geology;
- hydrology;
- hydrogeology;



- pollution history;
- evidence of historic contamination; and
- permitted activities.

Sections 4 to 7 will be maintained during the lifetime of the EP, and Sections 8 to 10 will be completed and submitted in support of an application to surrender the EP.

2.7 Key Technical Standards

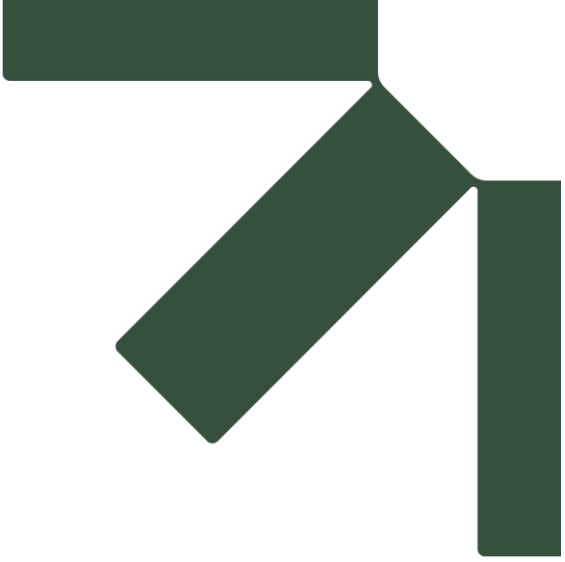
The data centre has been designed to provide maximum reliability of the electrical power supply to the systems on site that are critical for continuous operation of the site as a data centre. The operational techniques that are in place to manage the activities at the data centre can be summarised as follows:

- Other than for planned maintenance and testing, the SBGs are operated for emergency back-up purposes which will only commence in the event that electricity is not available from the local transmission network (e.g. brown- or black-out) or if there is an internal failure of power supply.
- The planned maintenance and testing regime for the SBGs are scheduled so that the impact on air quality as a result of the fuel combustion emissions is minimised.
- The scheduled maintenance and testing regime for each SBG is notably below the 50-hours per year. The SBGs are not operated on an 'elective' basis.
- With regard to engine selection, as the SBGs are required to provide emergency/standby power for the data centre, diesel engines have been determined as BAT.
- The existing SBGs have dedicated stacks to aid the dispersion of the engine flue gases; these stacks are/will be vertical. The stack release heights are currently either 5.2m or 8.1 above ground level.
- The SBGs are housed within propriety steel container units. Fuel for the SBGs is either stored in belly tanks or day tanks supplied from five bulk tanks. The belly tanks are integrally bunded (110% capacity) to minimise the risk of loss of fuel in the event of leakage from the tank. The day tanks are contained to minimise the risk of loss of fuel in the event of leakage from the tanks. The bulk tanks are located in steel or concrete bunds.
- The SBGs belly tanks are fitted with a tank level gauge and high and low level alarms. The existing SBGs day tanks all have level gauges.
- Bulk fuel deliveries will be fully supervised by the operator. Fuel deliveries will be managed in accordance with a fuel delivery procedure.
- A preventative maintenance system, which defines the required checks for storage tanks and associated infrastructure, is in place. PPM is managed and completed by the facilities management personnel and if required, by competent third parties appointed by the operator. The facility is manned 24 hours a day.
- Uncontaminated surface water runoff from the service yard where the SBG container units and the fuel loading area are located will drain via the on-site surface water drainage system. Currently this is fitted with cut off valves, which will be closed in the event of an incident to contain any contaminated water on site. The provision of oil interceptors within the drainage system is to be assessed and implemented if possible. Where it is not feasible to retrofit interceptors, oil detection connected to an automatic shut off system for the cut off valves will be installed, in line with the Environment Agency's recommendations for the site.



- Procedures will be developed and included within the site's EMS for the management of surface water runoff and for the management and maintenance of the interceptors or other pollution control measures, relevant staff will be suitably trained in these procedures.
- Fluorinated gases (F-gases) will be used at the data centre in the cooled water chillers and air conditioning units. Units containing refrigerants are subject to regular maintenance and leak testing undertaken by an operator approved external specialist contractor. The operator maintains an F-gas register for the data centre and leak detection and maintenance records are also maintained.
- Significant fugitive emissions, odours and noise are not considered likely with respect to operation of the SBGs at the data centre.
- A Noise Assessment completed for the proposed data centre concluded that there is no significant noise impact on the near-by noise-sensitive receptors.
- The management of energy is an integral part of the EMS. The site is accredited to ISO 50,001.
- Operation of the SBGs does not produce significant amounts of waste. Waste oil is generated as a result of generator maintenance. Generator maintenance is undertaken by an appointed third-party specialist who is responsible for the off-site disposal of this waste.
- In accordance with the EMS, procedures are in place for the regular inspection and maintenance of storage areas and associated infrastructure. Any accidents or incidents and the action taken to rectify these, are recorded.





Appendix A Enhanced Pre- Application Advice

Environmental Permit Application

Non-Technical Summary

Iron Mountain (UK) Data Centre Limited

SLR Project No.: 410.066935.00001

30 June 2026

IRON MOUNTAIN (UK) DATA CENTRE
LIMITED

Date: 22/01/2026

Dear Maria Francis,

Pre application advice – Enhanced service

Pre-application reference EPR/LP3020MX/P001

Waste and installations

Site: LON1 Data Centre in Slough, located at 724 729 Dundee Road, Slough, SL1 4JU

Thank you for your pre application enquiry on 01/12/2025.

I am pleased to provide you with your pre-application advice. This advice is based on the information provided on your pre application advice form and conversations/emails recorded on the following dates:

- Emails on 23/12/2025 (basic pre-application advice provided) and 07/01/2026 (habitats screening report provided)
- Telephone conversation on 21/01/2026 (Environment Agency – Kirsty White, Guy Elliot; Iron Mountain – Adam Gilio, Paul Edwards, Craig Allen; SLR – Alison Cook, Paul Wright)

We note that the installation has been operating for five years without the necessary environmental permit, with the two new combustion units taking the thermal input of the facility over the 50 MWth threshold for the combustion listed activity.

What this enhanced pre application advice covers

As part of this service, we have provided you with the following information:

Documents attached:

- Supplementary pre-application advice on preparing a noise impact assessment
- Methodology for assessing the in-combination air quality impact of clusters, dated 17 June 2024

Habitats screening: already provided

Application charge required

The application will be classed as a new application and subject to a fee of £19,103 in accordance with Table 1.10, reference 1.10.1 of the EA Charging Scheme.

There will be an additional fee for a Habitats Assessment of £779.

1.19.7 - £1,246 (noise management plan) - there may be an additional charge if a noise and vibration management plan is required.

Forms required to be submitted

Parts A, B2, B2.5, B3, F1 and Medium Combustion Plant (MCP) spreadsheet.

customer service line **03706 506 506**

floodline **03459 88 11 88**

incident hotline **0800 80 70 60**

If sections are not applicable to your permit, please indicate this rather than leaving a section blank.

For limited operating hours MCP, the column “Will the medium combustion plant be operated as a limited operating hours plant?” of the Combustion Plant Spreadsheet must be completed for all plant.

Please find links to these forms below:

[New bespoke environmental permit: application forms \(England\) - GOV.UK](#)

Additional documents required

- **Non-Technical Summary**
- **Drawings**
- **Environmental Risk Assessment**
- **Air Emissions Risk Assessment**

following our guidance at [Air emissions risk assessment for your environmental permit - GOV.UK](#) and [Environmental permitting: air dispersion modelling reports - GOV.UK](#) and including the following:

Covering both the emergency (power outage) and testing / maintenance scenarios
Emergency power outage to be modelled at a worst-case scenario of loss of on-site power during an emergency event lasting 72 hours.

An assessment against the short-term nitrogen monoxide (NO) Environmental Assessment Level (EAL).

Acute exposure risk assessment, using the US EPA acute exposure guidelines levels (AEGLs).

For combined impacts, we advise consideration of report ‘Methodology for assessing the in-combination air quality impact of clusters, dated 17 June 2024’.

Habitats assessment.

Model input files.

- **Noise impact assessment**

You are required to submit a Noise Impact Assessment and Noise Management Plan to accompany this application, which should be undertaken in accordance with:

Our guidance at [Noise and vibration management: environmental permits - GOV.UK](#)

BS 4142:2014+A1:2019 – Method for Rating and Assessing Industrial and Commercial Sound

customer service line 03706 506 506

floodline 03459 88 11 88

incident hotline 0800 80 70 60

[Method implementation document \(MID\) for BS 4142 - GOV.UK](#)

You may also find it useful to refer to the attached "Supplementary pre-application advice on preparing a noise impact assessment".

- **Best Available Techniques (BAT)**

To include:

Consideration of Data Centre FAQ Headline Approach, DRAFT version 21.0 H.Tee 15/11/22, already provided.

Addressing BAT for Emergency backup diesel engines on installations: best available techniques (BAT) - GOV.UK,

Include copies of engine specification sheets - these will provide evidence of engine standards and proof of BAT.

Confirmation that new engines are specified to at least one of the two recognised main international standards 2g-TA Luft or US EPA tier 2 or equivalent (applicable to new MCP, i.e. generators put into operation after 20/12/2018) or detailed technical justification when deviation from these standards is proposed.

Engines are emissions optimised.

Consideration of abatement i.e. Selective Catalytic Reduction (SCR) and SCR ready (available space to retrofit) as set out in the advice already provided.

New generators are provided with vertical stacks with no impediments to dispersion such as caps or cowls (proposed improvement plan for legacy generators).

Testing < 50 hrs per annum per engine, minimised & staggered.

Clearly defined maintenance scenarios in terms of numbers of plant operating at any one time, duration and load of plant operation. Where our decision is to issue a permit, you will be required to operate within the risk envelope identified in the application, subject to our assessment of the air quality impacts.

Drainage infrastructure and pollution prevention measures to include details of primary (tank specification), secondary containment, surfacing, oil/water interceptor..., also refer to the guidance links in the pre-application advice already provided.

- **Site Condition Report (SCR)**

In accordance with H5 (Environmental permitting: H5 Site condition report - GOV.UK) and where storing, using, producing or releasing hazardous substances – does the SCR:

Identify relevant hazardous substances (RHS).

Include a stage 1-3 assessment, and

Where this identifies a risk to soil/and or groundwater – establish baseline reference data.

- **Monitoring**

Standards, frequencies, information on sampling ports.

Additional information

We have already provided our basic pre-application advice documents which cover relevant information for your application. You should read these carefully and use the information to help prepare your application.

You must ensure you provide dates of birth for all appropriate people as per Appendix 1 in form Part A. Failure to do so will delay your application being put into our systems. Please note that these details will not be made available on the Public Register.

After you apply

The information that you need to submit with your application is explained in the application form and its guidance. The Environment Agency will check that you have submitted this information and the correct application charges. This is to ensure we have enough information to start to determine your permit application.

We will contact you if information is missing and can feasibly be provided within 10 working days. If we consider information cannot be provided within this time frame we will return your application with a list of what is missing.

We'll retain 20% of the correct application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,613. This is explained in the environmental permitting charges guidance.

We will not charge this if we return an application after having done very little work – for example, because it contained obvious errors or omissions.

Once we have duly made an application we will start to determine it.

Once an application is validated and duly made, it is ready to be allocated for determination. Determination is when we do our technical checks. We may need to ask you for further information or additional documents during determination and it is important you send anything requested as quickly as possible.

The time it takes us to allocate an application depends on a number of factors, including the complexity of the specific application and the availability of a member of our team with the right skills to assess it.

The amount of time taken to determine your application will vary. It will be impacted by factors such as:

- The quality of the application
- The complexity of the application
- Whether an application is of high public interest
- Whether the application includes novel technologies or techniques

customer service line 03706 506 506

floodline 03459 88 11 88

incident hotline 0800 80 70 60

- Whether the determination requires input from others, both internal and external to the Environment Agency
- Whether modelling and/or monitoring and assessment is required, for example Air Quality modelling and assessment or water discharge or groundwater activity specific substances assessment.

The Permitting Officer determining your application will be able to keep you updated with the progress of your application.

What happens next?

If you submit an environmental permit application then please quote this pre-application reference number: EPR/LP3020MX/P001

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

Please email applications where possible. If email is not possible you can submit by post to:

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

Scope of this advice

We have only provided the specific advice you requested based on the information provided. We cannot provide advice on all aspects of your application, so it is important you read all available online guidance and the application forms to ensure anything not covered within this advice is considered as part of your application.

However, based on the information you have provided, we have identified the following aspects you should pay particular attention to when preparing your application:

- Based on the location of the surface water release we have advised that an oil/water interceptor may be required so this will need to be addressed as part of the drainage infrastructure and pollution prevention measures.
- Based on the location of the facility (Slough cluster) for air quality impacts, we advised following the methodology in the report provided.

This is not an exhaustive list; it is important you consider the online guidance and application forms carefully to include everything you need within your application.

You may want to consider if you would benefit from additional pre-application advice on these aspects. If you require additional enhanced pre-application advice please complete our [online form](#).

It is important to remember:

- this is advice, we are not agreeing anything at this stage
- we have provided this advice based on the limited information we have about your proposals at this time
- we have only provided the advice you specifically requested
- we may need to request additional information when we have a full application

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.

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

Enhanced pre application cost

The pre-application advice will cost £2000 plus VAT. An invoice will be sent separately. This will include a link to pay online. You can also pay your application charges online but this is a different link so please ensure you are using the correct one when you apply.

This pre-application request is now closed

We consider this pre application request is now closed however if you have any questions regarding this letter please contact PreApplicationService@environment-agency.gov.uk.

If you require additional enhanced pre-application advice please complete our [online form](#).

Yours sincerely

Kirsty White

Senior Permitting Officer



Making Sustainability Happen