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**I3 Solutions Group Limited**

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# Environmental Permit Application: Site Condition Report

LON3, 111 Buckingham Avenue, Slough,  
Berkshire, SL1 4PF

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## Contents

1.	Introduction	2
2.	Site Details	3
3.	Condition of the Land at Permit Issue	4
3.1	Geology	4
3.2	Hydrogeology	5
3.2.1	Aquifer designations	5
3.2.2	Licensed Groundwater Abstractions	5
3.2.3	Groundwater Sensitivity	5
3.3	Surface Water	6
3.3.1	Nearest Identified Surface Watercourse	6
3.3.2	Licensed Surface Water Abstractions	6
3.3.3	Ecological Designated Sites	6
3.4	Pollution Incidents	6
3.4.1	Contaminated Land Register Entries	6
3.4.2	Prosecutions or Enforcements	6
3.5	Historical Land Uses	7
3.5.1	On Site	7
3.5.2	Waste management Facilities	11
3.6	Evidence of Historical Contamination	12
3.6.1	Previous Use of the Site	13
3.7	Baseline Soil and Groundwater Data	14
4.	Permitted Activities	15
•	Appendix 1 – Site Layout Plan, Figure 1	15

## 1. Introduction

Ramboll UK Limited (“Ramboll”) was commissioned by I3 Solutions group Limited (“I3 Solutions” or the “Client”) to provide environmental permitting support in relation to the proposed installation and operation of emergency generators at a planned data centre site. The data centre is to be located at 111 Buckingham Avenue, Slough, Berkshire, Berkshire, SL1 4PF (the “site”). The data centre and associated generators will be operated by Iron Mountain Data Centres (“Iron Mountain”).

This site condition report is intended to satisfy the Environment Agency’s (EA) request for such a report as part of the application for an Environmental Permit and has been developed following the guidance and template provided in the EA’s Guidance for Applicants (H5) – Site Condition Report document<sup>1</sup>, including the application of the tabular format contained within the template.

### **Reliance and General Limitations**

The conclusions presented in this report represent Ramboll UK Limited’s best professional judgment based upon the information available and conditions existing as of the date of the review. In performing its assignment, Ramboll UK Limited must rely upon publicly available information, information provided by the client and information provided by third-parties. Accordingly, the conclusions in this report are valid only to the extent that the information provided to Ramboll Limited was accurate and complete. This review is not intended as legal advice, nor is it an exhaustive review of site conditions or facility compliance. Ramboll UK Limited makes no representations or warranties, express or implied, about the condition of the site.

Ramboll UK Limited’s scope of work for this assignment did not include collecting samples of any environmental media. As such, this review cannot rule out the existence of latent conditions.

<sup>1</sup> Environmental Permitting: H5 Site Condition Report, Environment Agency, Published 13 May 2013

## 2. Site Details

<b>Site Details</b>	
<b>Name of applicant</b>	I3 Solutions Group Limited
<b>Activity Address</b>	111 Buckingham Avenue, Slough, Berkshire, SL1 4PF, UK
<b>National Grid Reference</b>	495840, 181050
<b>Document reference and dates for Site Condition Report at permit application and surrender</b>	Site Condition Report at Permit Application: 1620016489 LON3 Site Condition Report, prepared by Ramboll UK Limited, August 2024

### 3. Condition of the Land at Permit Issue

The table below provides a description of the site’s environmental setting from a review of publicly available information and a previous third-party geo-environmental assessment report<sup>2</sup>.

Condition of the Land at Permit Issue	
<p><b>Environmental setting including:</b></p> <ul style="list-style-type: none"> <li>• geology</li> <li>• hydrogeology</li> <li>• surface waters</li> </ul>	<p><b>3.1 Geology</b></p> <p>Geological information for the site was obtained from publicly available electronic mapping (Sheet 55, Beaconsfield) from the British Geological Society (BGS) website<sup>3</sup> and from information contained in the third party geo-environmental assessment report by Delta-Simons Limited<sup>2</sup>. This information is summarised below.</p> <p>The site is underlain by Superficial Deposits of the Langley Silt Member (clay and silt) which are underlain by Taplow Gravel Member. Beneath the superficial deposits is the Lambeth Group (clay, silt, and sand), further underlain by the White Chalk Subgroup (chalk with flint) to depth. The White Chalk Subgroup comprises the Seaford and Newhaven Formations, Lewes Nodular Chalk Formation and New Pit Chalk Formation.</p> <p>The thickness of the underlying Langley Silt Member within the surrounding area is approximately 10m thick. Groundwater within the Langley Silt Member is likely to be discontinuous given the unproductive nature of this bedrock geology.</p> <p>A ground investigation in relation to the neighbouring site which was undertaken by Delta-Simons Limited found the nearby ground conditions to have comprised the following:</p> <ul style="list-style-type: none"> <li>• Made Ground, composed of sandy flint, brick and concrete gravel, in addition to the presence of brick and concrete cobbles to 2.0m below ground level (bgl).</li> <li>• Langley Silt member clays (firm to stiff) up to 5.0m bgl.</li> <li>• Sand and gravels (loose to dense in composition) associated with the Taplow Gravel member Sand between 6.8m and 8.9m bgl.</li> <li>• Lambeth Group clays (stiff laminated) between 11.7m and 12.9m bgl.</li> <li>• Seaford and Newhaven Formation chalk (structureless) comprising gravelly silt to the final depth of the boreholes (maximum depth of 22.0m bgl).</li> </ul>

<sup>2</sup> Delta-Simons Limited. Geo-Environmental Assessment 111 & 113/4 Buckingham Avenue, Slough. Dated December 2022.

<sup>3</sup> British Geological Survey (BGS). Maps. Available at: <https://www.bgs.ac.uk/discovering-geology/maps-and-resources/maps/>. Accessed 01/02/2024.

## 3.2 Hydrogeology

Information regarding the hydrogeology across the site has been obtained from a review of publicly available online information and from information contained within or appended to the geo-environmental assessment report by Delta-Simons Limited.

### 3.2.1 Aquifer designations

The Environment Agency (EA)<sup>4</sup> Aquifer Designation for the Langley Silt Member underlying the site is Unproductive Strata. The Taplow Gravel Member is classified as a Principal Aquifer. The site is further underlain by a Secondary A Aquifer associated with the Lambeth Group and a Principal Aquifer associated with the Upper Chalk Formation.

The site is located within an EA designated groundwater Source Protection Zone 3 (SPZ 3) (total catchment)<sup>4</sup>. The site lies approximately 230m north of a SPZ 2 (outer zone) and approximately 1.37km south-east of a SPZ 1 (inner zone).

The EA currently classifies the underlying groundwater body at the site ('Twyford Tertiaries Water Body') as being of 'good' chemical quality and 'good' quantitative status under the Water Framework Directive classification scheme 2019<sup>5</sup>.

### 3.2.2 Licensed Groundwater Abstractions

According to a third-party environmental database (Envirocheck)<sup>6</sup>, appended to the geo-environmental assessment report by Delta-Simons Limited, there are five licenced groundwater abstractions within a 2km radius of the site, the closest of which is approximately 170m to the north-east. This abstraction is for 'Industrial; Commercial And Public Services: Laundry Use' and is licenced to Aeroserve Euro Limited.

There are twelve recorded groundwater abstractions for potable or private use recorded within 2km of the site. The nearest is a private water supply located approximately 1.12km north-west, licenced to Slough Energy Supplies Ltd for general use.

### 3.2.3 Groundwater Sensitivity

The site is considered to be situated in an area of moderate sensitivity with respect to groundwater resources due to the underlying Unproductive Strata, Secondary A Aquifer and Principal Aquifers. The site is located within a groundwater Source Protection Zone 3. The lower permeability Langley Silt Member will provide some protection to the underlying Taplow Gravel Member and Lambeth Group.

<sup>4</sup> Magic Map. Defra. Available at: <https://magic.defra.gov.uk/magicmap.aspx>. Accessed 01/03/2024.

<sup>5</sup> Catchment Data Explorer. Available at: <https://environment.data.gov.uk/catchment-planning/>. Accessed 01/03/2024.

<sup>6</sup> Envirocheck Report. Landmark Information Group. Dated 02/11/2022.

### 3.3 Surface Water

#### 3.3.1 Nearest Identified Surface Watercourse

According to the Envirocheck<sup>6</sup> information the nearest surface water feature is a pond located approximately 390m south-east.

The nearest surface water course is Salthill Stream located approximately 940m east of the site. The EA currently classifies the 'Salthill Stream Water Body' as being of 'moderate' ecological quality and it failed its chemical quality assessment under the Water Framework Directive Classification Scheme (2019 dataset). According to 2022 data, the ecological quality was classified as 'moderate' and the chemical classification item 'does not require assessment'.

#### 3.3.2 Licensed Surface Water Abstractions

According to the third-party environmental database (Envirocheck)<sup>6</sup>, there are no licensed surface water abstractions within 2km of the site.

#### 3.3.3 Ecological Designated Sites

A Local Nature Reserve, Haymill Valley, is located approximately 1.53 km north-west of the site. There are no other statutory designated sites identified within 2km of the site (sites of special scientific interest, special protection areas, special areas of conservation or Ramsar sites).

### 3.4 Pollution Incidents

The third-party environmental database (Envirocheck)<sup>6</sup> holds no records of pollution incidents on site.

A total of 18 pollution incidents to controlled waters have been recorded within 1km of the site. The nearest of these was located approximately 140m east of the site, relating to unknown chemicals. The receiving water was not recorded. The incident occurred in March 1994 and, was classified by the EA as a Category 3 - Minor Incident.

There has been one substantiated pollution incident recorded within 1km of the site, as detailed below:

- A pollution incident involving crude sewage occurred approximately 960m east of the site in August 2015. The event was considered to be a Significant Incident – Category 2 to water and No Impact – Category 4 to air and land.
- This incident pre-dates the development of the site for use as a datacentre and is located off-site. It is considered unlikely to have resulted in long-term impacts within the installation boundary.

#### 3.4.1 Contaminated Land Register Entries

None recorded within 2km of the site.

#### 3.4.2 Prosecutions or Enforcements

There are two records of prosecutions relating to controlled waters within 2km of the site:



- The closest is located approximately 480m west for 'causing pollution (namely cyanide) to enter the Chalvey Ditch, a tributary of the River Thames'. The incident occurred in September 1998 and a hearing took place in May 1999 which resulted in a 'guilty' verdict and an associated fine of £7,000.
- A second prosecution, approximately 620m south-west, was recorded in relation to 'polluting the Chalvey Ditch with a large quantity of detergent, resulting in a large fish kill'. A hearing took place in November 1997 and resulted in a guilty verdict and a fine of £6,000.

There are records of two, Enforcements and Prohibition Notices within 1km of the site, these are located approximately 550m north-west and appear to relate to the same issue:

- An enforcement was given in August 1997 and ordered that 'any further use of caustic soda tank' to be stopped 'until any damage caused by the spillage of hydrochloric acid is identified and remedied'.
- An enforcement was given in August 1997 to 'stop any further use of Hydrochloric Acid Tanks until the source of the leak is established and corrected'.

### 3.5 Historical Land Uses

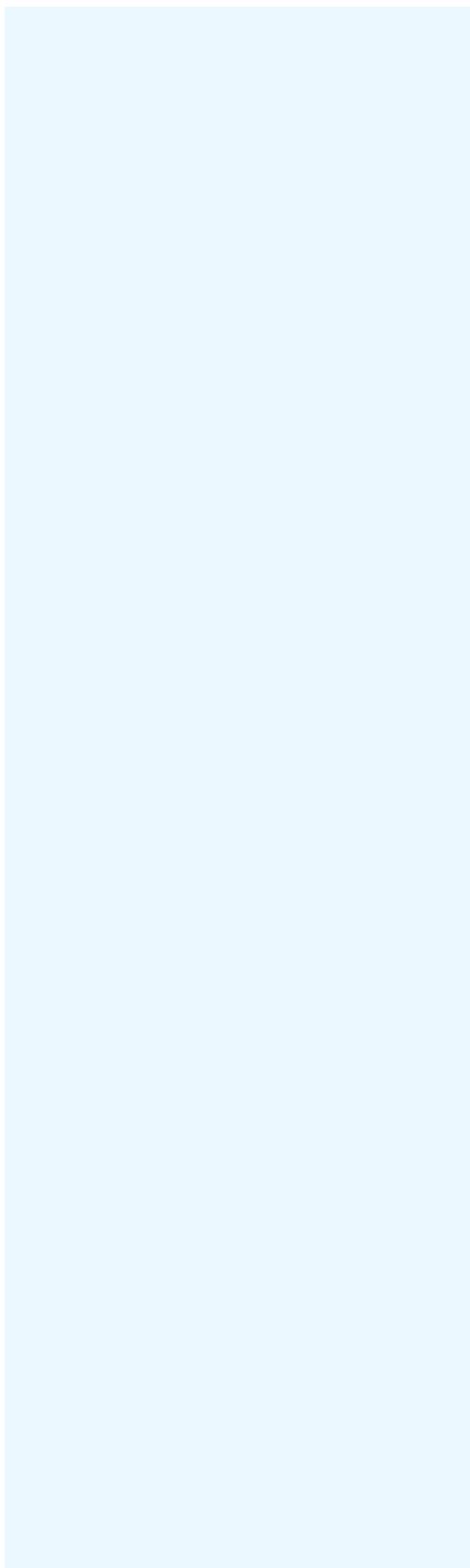
#### 3.5.1 On Site and Surrounding Area

Historical ordnance survey maps, appended to the geo-environmental assessment report by Delta-Simons Limited which were obtained from a third-party environmental database (Envirocheck) have been used to provide a summary of the historical land use on-site and in the surrounding area. This information is shown in the table below.

Date	On-site	Surrounding Area
1876	Undeveloped	The immediate surrounds were largely depicted as vacant land (possibly in agricultural use) with exception to The Great Western Railway which was noted approximately 100m to the south.
1924	By 1924, a railway track intersected the northern portion, extending off-site to the east and west.	An engine house was depicted approximately 15m east of the site and a Trading Estate Station was labelled to the south of the site associated with the Railway. Two railway tracks were shown on mapping approximately 10m north of the site. Slough Trading Estate,

		including a motor works, and cable and rubber works was shown in mapping from approximately 200m north-west.
1932	A Box Works was depicted occupying the northern part of the site. Further structures, likely associated with the Box works were noted in the central and southern portions of the site.	The engine house was no longer depicted and industrial style buildings were present on-site and in the immediate surrounds to the north, east and west. A box works was depicted in the north of the site, extending off-site. A veneered panel works was depicted adjacent to the west of the site, beyond which was a milling works, upholstery works and gramophone record works. A tank was noted approximately 90m west and engineering works were depicted from approximately 40m north and 90m south. Further industrial properties including a chemical works were noted from approximately 100m north-east, a printing works was shown situated approximately 200m west and additional works were depicted approximately 90m south.
1955	Part of a Woodworks and Nail Processing Works were shown to have occupied the northern portion of the site. Further structures, possibly associated with the works, were noted in the central and southern portions of the site.	By 1955, the immediate surrounds were heavily industrialised. The Trading Estate Station was labelled as 'disused'. An engineering research works (with outbuildings) was depicted adjacent to the west of the site followed by warehousing and a furniture works. The tank to the west was no longer shown. Additional works were shown from approximately 10m east including a foundry, chemical works, printing works and flexible hose works. The engineering works (alloy castings) to the north of the site had expanded to the east and west (with two associated

		tanks), five tanks were noted from approximately 160m north-east and a petroleum storage depot with tanks was noted from approximately 200m north-west. Further engineering works were shown from approximately 100m south-west and 200m west in place of the printing works. A gasket works was shown from 200m north-west and further engineering works were depicted from 150m north.
1974	The Woodworks and Nail Processing Works were no longer labelled, and the structures in the central site area were no longer shown.	The railway depot to the south of the site had been dismantled and the warehousing and furniture works to the west had been replaced by a fabric printing works and television cabinet factory and the five tanks to the north-east were no longer shown. The works from 10m east had largely been replaced by a flexible tube factory and the railway tracks from 10m north were no longer depicted. Several engineering works associated with slough trading estate were depicted from approximately 170m south.
1986	A depot was depicted in the south/south-west of the site, extending off-site to the south and east. The depot replaced the structures which were previously shown to have occupied this area of the site with exception to one remaining building in the south-west. Part of an industrial style building (in the area previously occupied by the Woodworks and Nail Processing	The immediate surrounds were shown as industrialised as part of the wider Slough Trading Estate. A car park and industrial style unit were depicted in place of the dismantled railway depot.



	Works), was shown to have occupied the northern portion of the site.	
1993	The depot in the south was no longer labelled however, the building remained in situ. The remaining structure in the south-west was no longer shown and the industrial style building in the north of the site appeared to have been reconfigured.	Three tanks were shown adjacent to the west of the site.
1999	Aerial photography dated 1999 depicts a car park in the central site area, likely associated with the buildings in the north and south of the site.	The building adjacent to the west of the site had been demolished and an additional structure had been constructed from 60m west.
2003	No significant changes.	No changes.
2005	No significant changes.	Buildings from approximately 10m east of the site had been demolished.
2008	Google earth imagery shows the south-east of the site was used for the storage of unknown materials/equipment, associated with the industrial style building in the south of the site.	A structure (possibly in use as a data centre) was shown in place of the demolished building to the east of the site.
2021	No significant changes.	A data centre which was located approximately 60m west of the site was demolished.
2022	No significant changes.	LON-2 was depicted approximately 60m west in place of the older data centre which had been demolished.

### 3.5.2 Waste management Facilities

There are three records of former landfill sites recorded in the Envirocheck Database within a 2km radius of the site. These are located:

- Approximately 510m south. The first and last input dates are not given. Deposited waste included inert, industrial and commercial wastes.
- Approximately 600m north-west. Deposited waste included inert waste.
- Approximately 620m south-west. The first and last input dates are not given. Deposited waste included inert, industrial and commercial wastes.
- Approximately 670m south. The first and last input dates are not given. Deposited waste included inert waste.

There are no records of current landfill sites recorded in the Envirocheck Database within a 2km radius of the site.

There are records of four Licensed Waste Management Facilities within 1km of the site, these are located:

- Approximately 460m north, Operator: Fibre Fuel Ltd, Physical Treatment Facility, License Issued: March 1996; Surrendered: December 2003.
- Approximately 600m south-east, Operator: Slough Recycling Ltd, household, commercial and industrial transfer station and treatment, License Issued: October 2009; Revoked: April 2016.
- Approximately 690m south-east, Operator: Benton Plant Ltd, mixed metal recycling site, License Issued: March 1998, modified in August 2013.
- Approximately 710m north-west, Operator: Fibre Fuel Ltd, Physical Treatment Facility, License Issued: September 2001.

There are three Registered Waste Treatment or Disposal Sites recorded in the Envirocheck Database within a 1km radius of the site. These are located:

- Approximately 460m north, Licence Holder: Fibre Fuel Ltd. The site has an annual input rate of  $\geq 25,000$  tonnes and  $< 70,000$  tonnes. Authorised waste at the site includes adhesive labels, desilverised photographic film, laminate packaging, manufacturers reject nappies/hygiene products, paper pulp, paper/cardboard and plastics/plastic packaging Wastes. (See waste management facilities, bullet point 1).
- Approximately 710m south-east, Licence Holder: Bruce Bishop & Sons Ltd

There are no records of Registered Waste transfer Sites within 1km of the site.

There are eleven Part A(1) Permit records within 2km of the site. The closest of which is licensed to Cyxtera Technology Uk Limited, located approximately 330m south-east of the site.

There are records of two Part A(2) Permits within 1km of the site. The closest is registered to Slough Power Station, located approximately 610m north-west for combustion. The second is registered to Duco International Ltd, located approximately 860m west for an unknown purpose associated with the mineral industry.

There are 19 active Part B Permits within 2km of the site. Permits within 250m of the site include:

- Approximately 90m north-west, Romney Packaging Convertors Ltd, printing of flexible packaging, Status: not given.
- Approximately 190m south, Autotech Slough Ltd, respraying of road vehicles, Status: Permitted.
- Approximately 240m north-west, Federal Mogul, Adhesive coating, Status: Permitted.
- Approximately 240m north-west, Federal Mogul, coating of metal and plastic, Status: Permitted.

### **3.6 Evidence of Historical Contamination**

Based on Ramboll's review of historical information sources provided in the geo-environmental assessment report by Delta-Simons Limited and in recognition of the site's past industrial uses (railway tracks, Box Works, Woodworks, Nail Processing Works and depot), it is considered likely that various chemicals, including fuels, oils, glues and solvents were historically used at the site. With the absence of additional information regarding the historical storage and use of chemicals at the site, Ramboll cannot rule out the potential that historical site uses have impacted the subsurface of the site (soils and groundwater).

A publicly available Unexploded Ordnance (UXO) Risk Map<sup>7</sup>, shows the site is located within a moderate risk area with regard to unexploded ordnance. Mapping records also indicate that, that two Luftwaffe targets were located in close proximity (within 600m) to the site during World War II (WWII). The geo-environmental assessment report by Delta-Simons Limited summarises relevant information from a 'Detailed Explosive Ordnance Risk Assessment' undertaken for the wider Slough Trading Estate in November 2021. The summarised information reports that most of the site with exception to an area in the south (moderate risk), is considered to be in a low-risk zone for UXO.

Historical mapping indicates that the site was initially developed by the mid-1920s (used for railway tracks)

<sup>7</sup> Zetica UXO Risk Map. Available at: <https://zeticauxo.com/guidance/risk-maps/>. Accessed 15/03/2024.

with building having been constructed on site by the early 1930s. This is before the general ban of asbestos from use in construction materials in the UK in 1999. An asbestos works, located approximately 200m north-east of the site, was noted in mapping dated 1932 until at least 1956. The geo-environmental assessment report by Delta-Simons Limited, confirms the presence of asbestos in site soils. Specifically, asbestos was recorded beneath concrete slabs in the south of the site.

#### 3.6.1 Previous Use of the Site

Based on historical mapping provided by Landmark Group, appended to the geo-environmental assessment report by Delta-Simons Limited, the previous on-site activities/uses included:

- possible agricultural use;
- railway tracks;
- a Box Works;
- a Woodworks;
- a Nail Processing Works; and
- a depot.

Possible ancillary activities in relation to the historical uses of the site are considered likely (not confirmed) to have included the storage of waste, fuel, oils and chemicals (i.e. production chemicals, cleaning chemicals and general maintenance chemicals/products). Possible chemical use as part of production and manufacturing activities may have also taken place in relation to historic industrial activity at the site.

The site has been occupied by industrial style units since at least 1932. Based on the available historical information contained in the geo-environmental assessment report by Delta-Simons Limited, on-site activities associated with its historic uses may have included some potentially contaminative processes (e.g. chemical storage and use, fuel storage, process wastewater, combustion activities and waste storage).

The geo-environmental assessment report by Delta-Simons Limited contains a review of previous reports (not seen by Ramboll). A summary of a Geo-Environmental Ground Investigation dated 1999, by WSP Environmental Limited ('WSP'), reported that staining and areas of an oily appearance were noted in the vicinity of the three tanks which were located to the west of the site historically (see section 3.5.1). Additionally, 12 underground tanks were recorded adjacent to Malton Avenue. The summary also made reference to a possible 'significant fuel spillage or leakage'. Concentrations of Total Petroleum Hydrocarbons (TPH) in groundwater in the vicinity of the 12 tanks were reportedly over twice Delta-Simons' generic assessment criteria. The geo-environmental assessment report by Delta-Simons Limited also summarises a further investigation undertaken by WSP in 2000, which reportedly involved the installation of three further groundwater monitoring wells in the vicinity of the site. TPH concentrations of up to 1,836

mg/l were identified and various hydrocarbons including kerosene, diesel (both degraded and newer), lubrication oil or grease and petrol were noted (please note, not all of these substances were listed as present in samples from all three monitoring wells).

Furthermore, information relating to the monitoring wells contained in a Letter Report for the Environment Agency by WSP, dated 2000, was reviewed and summarised by Delta-Simons. Summarised information suggests the tanks, heavy metal contaminated soils and a drain line were extracted. These were noted as 'the primary contamination sources'. Additionally, TPH was reportedly measured at 4,502 mg/l in a further round of groundwater monitoring. Despite this, according to a Groundwater Monitoring Letter Report dated July 2002 by WSP (summarised by Delta-Simons), repeat testing results from new wells indicated a drop in TPH levels to a maximum recorded value of 28 mg/l.

### 3.7 Baseline Soil and Groundwater Data

Published EA guidance for datacentre operation states "The groundwater monitoring of fuel storage tanks and distribution pipework using GW [groundwater] boreholes is risk based for the site condition report (SCR) and IED 5 yearly monitoring. Should GW monitoring be required for underground tanks and/or the SCR, the boreholes should be positioned for whole site surveillance (for the SCR) rather than as a very local control immediately around the buried fuel oil tanks (i.e. not be just an addition to double skinned tanks already protected by leak detection and hence ignoring distribution pipework etc)."

and,

"10-yearly soil sampling under IED is normally not needed but still needs some justification."

The site meets the requirements of BAT for above ground fuel storage. All infrastructure associated with the transport and use of fuel is located above ground, in areas of hardstanding with secondary containment which meets BAT.

The following measures/features are also incorporated within the site's design to mitigate potential pollution risks from the installation:

- Service yard regrading and a central linear gully positioned at the edge of the gantry;
- A full retention interceptor on the drainage;
- Overspill provision in the case of a blockage on the interceptor;
- Water tight manholes and covers in the service yard and car park;
- Isolation valves on outflow pipelines;
- Provision for an automatic stop on the outfall pumping station, in addition to a manual emergency pollution override (EPO) point at the guardhouse;
- Bollards to mitigate damage to the gantry;
- The fuel transfer tanks will be fitted with secondary containment and have barrier protection; and
- The site will be surfaced with hardstanding.



	<ul style="list-style-type: none"> <li>• Spill kits will be present at the site/</li> <li>• Appropriate operations procedures to be put in place to ensure risks during fuel delivery and use are minimised and/ or adequately managed.</li> </ul> <p>It is therefore considered that monitoring wells are <u>not required</u> to be installed within the installation boundary.</p>
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## 4. Permitted Activities

<b>Details of Activities at the Installation</b>	
Permitted Activities	<p>EPR Schedule 1, Part 2, Chapter 1, Section 1.1 of the Environmental Permitting (England and Wales) Regulations 2016 (as amended) - the burning of any fuel in an appliance with a rated thermal input of 50 or more megawatts.</p> <p>The Installation will comprise the operation of 17 diesel/HVO fired generators for use as a back-up power supply for a datacentre. One generator will be located on the ground floor and the remaining 16 will be located on gantry level 2. The generators will be housed on a gantry adjacent to the main data centre building on the site. The Installation will include associated activities of handling (e.g. receipt), storage, and distribution of fuel, use of lubrication oils and engine coolants.</p>
Non-Permitted Activities Undertaken  Document References For: <ul style="list-style-type: none"> <li>• plan showing activity layout; and</li> <li>• environmental risk assessment.</li> </ul>	<p>Operation of the data centre.</p> <ul style="list-style-type: none"> <li>• Appendix 1 – Site Layout Plan, Figure 1</li> <li>• Appendix 1 – Site Layout plan, Figure 2</li> <li>• Appendix 1 – Site Drainage Plan, Figure 3</li> <li>• Appendix 2 – Environmental Risk Assessment</li> <li>• Appendix 3 – Ground Investigation Report</li> </ul>

Appendix 1  
[Appendix Title]

[Text]