

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

PDCG (Group Services) Limited

Data Centre Staples Corner
JVC Business Park
Staples Corner
London
NW2 7BA

Variation application number

EPR/QP3706LH/V002

Permit number

EPR/QP3706LH

Data Centre Staples Corner

Permit number EPR/QP3706LH

Introductory note

This introductory note does not form a part of the notice

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. All the conditions of the permit have been varied and are subject to the right of appeal.

The variation authorises the installation and operation of an additional 40 gas oil or equivalent fuelled generators (Medium Combustion Plant (MCP)) with associated fuel storage.

Combustion plant on site:

- Existing Site 1 (LON1B1): 16x gas oil or equivalent fuelled generators each with thermal input of 7.31 MWth (16 generators with total thermal input of 116.96 MWth) (New MCP) – already permitted.
- Variation Site 2 (LON1B2): 40x gas oil or equivalent fuelled generators each with thermal input of 7.31 MWth (40 generators with total thermal input of 292.4 MWth) (New MCP) – variation to existing permit.

The variation will lead to:

- Total number of gas oil or equivalent fuelled generators (New MCP) on site = 56.
- Total thermal rated input of site = 56x 7.31 MWth generators (56 generators with a total input of 409.36 MWth).
- Increase in the permitted boundary.

Gas oil or equivalent fuel for the generators is stored in bunded day (belly) tanks located under each generator and each new generator also has access to the bulk fuel storage supply.

The total capacity of gas oil or equivalent fuel that can be stored at the site is:

- Existing Site 1 (LON1B1) = 691,200 litres – already permitted.
- Variation Site 2 (LON1B2) = 1,193,500 litres – variation to existing permit.

The variation will lead to:

- Total gas oil or equivalent fuel storage at site = 1,884,700 litres.

The main features of the permit are as follows:

The permit authorises the operation of standby electricity generating plant at a data centre located within the London Borough of Brent at national grid reference TQ 22296 87216.

The contingency standby power solution comprises 56x 7.31 MWth (new MCP) gas oil or equivalent fuelled generators with an aggregated thermal input of 409.36 MWth.

The default generator specification as a minimum for new plant to minimise the impacts of emissions to air (NOx) is 2g TA-Luft or US EPA Tier 2 (or equivalent standard) or an equivalent NOx emission concentration of 2000 mg/m³. The operator has confirmed that all generators in use at the data centre are compliant with the US EPA Tier 2 standard.

The generators can operate on either gas oil or an agreed equivalent substitute.

The data centre generators will only operate under a limited scheduled programme of routine testing and maintenance or in an emergency site power outage scenario. Electrical power is normally provided to the data centre from the National Grid. However, in the event of a failure in this electrical supply, the operator will utilise the generators to maintain an electrical power supply to the site. The generators will be used solely for the purpose for generating power for the facility. No electricity will be exported from the Installation.

Each generator on site 1 (LON1B1) has its own double skinned day (belly) tank (1,200 litres) and its own dedicated bulk fuel storage tank (42,000 litres). Each generator on site 2 (LON1B2) has its own double skinned day (belly) tank (1,200 litres). Site 2 (LON1B2) also has 20 bulk fuel storage tanks (ranging from 31,500 litres to 61,000 litres) across the site which represent 1 storage tank per 2 generators. However, these tanks act together as a larger balancing tank and are not dedicated to the pair of tanks which they serve. The tanks are positioned at ground level below each engine and have leak detection. The total fuel storage capacity is 1,884,700 litres.

The Installation falls under the following Environmental Permitting Regulations (EPR) Schedule 1 listed activity description:

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

On site 1 (LON1B1) exhaust gases from each pair of generators will be discharged through a common plenum at 8 emission points A1 a/b to A8 a/b. On site 2 (LON1B2) exhaust gases from each generator will be discharged through their own individual stacks at 40 emission points A9 to A48.

There will be no process effluent discharge from the Installation. Uncontaminated surface water run-off from the roof and hard-standing will drain via oil-water separators to the surface water drainage system at emission points W1 and W2.

The Installation is within the 2 km screening distance of the Brent Reservoir Site of Special Scientific Interest (SSSI) and a number of wildlife sites, however no significant environmental impact from the Installation is expected there.

There will be an Environmental Management System (EMS) in place based on the ISO 14001 standard.

The schedules specify the changes made to the permit.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application EPR/QP3706LH/A001	22/03/22	Duly made Application to operate 16 standby liquid fuelled generators in the event of National Grid failure and for testing and maintenance activities
Request for information sent 06/04/22	07/04/22	Response received: Engine operation and fuel storage
Request for information sent 07/04/22	19/04/22	Response received: Site condition report
Information received	19/04/22	Fuel type and storage
Request for information sent 31/05/22 and 07/06/22	23/06/22	Response received: use of the higher daily NOx critical level
Information received	01/08/22	Site plan
Request for information sent 26/07/22	02/08/22	Response received: fuel storage, refuelling arrangements
	17/08/22	Fuel delivery operating procedure
Request for information sent 17/08/22	01/09/22	Fuel storage and amended fuel delivery procedure
Permit determined EPR/QP3706LH	05/09/22	Permit issued to PDCG (Group Services) Limited
Application EPR/QP3706LH/V002 (variation and consolidation)	Duly made 22/08/24	Application to vary the permit to increase combustion plant on data centre site and update the permit to modern conditions.
Further Information received, responses to Request for Further Information dated 25/10/24	29/10/24	Further information received on Air Quality Assessment.
	20/11/24	Further information received on updated site plans and risk assessments regarding fuel storage, containment and drainage.
Further Information received, responses to Request for Further Information dated 13/01/25	27/01/25	Further information received on updated site plans, Air Quality Assessment and drainage system.
Further Information received, responses to Schedule 5 dated 30/01/25	13/02/25	Further information received on Air Quality Assessment, fuel storage, containment and drainage.
Variation determined and consolidation issued EPR/QP3706LH	20/05/25	Varied and consolidated permit issued in modern format.

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit number

EPR/QP3706LH

Issued to

PDCG (Group Services) Limited ("the operator")

whose registered office is

5 Fleet Place

London

EC4M 7RD

company registration number **11377238**

to operate a regulated facility at

Data Centre Staples Corner

JVC Business Park

Staples Corner

London

NW2 7BA

to the extent set out in the schedules.

The notice shall take effect from 20/05/2025

Name	Date
Eleanor Blackeby	20/05/2025

Authorised on behalf of the Environment Agency

Schedule 1

All conditions have been varied by the consolidated permit as a result of the application made by the operator.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/QP3706LH

This is the consolidated permit referred to in the variation and consolidation notice for application
EPR/QP3706LH/V002

authorising,

PDCG (Group Services) Limited (“the operator”),

whose registered office is

5 Fleet Place

London

EC4M 7RD

company registration number **11377238**

to operate an installation at

Data Centre Staples Corner

JVC Business Park

Staples Corner

London

NW2 7BA

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Eleanor Blackeby	20/05/2025

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.2 Energy efficiency

- 1.2.1 The operator shall:
- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
 - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
 - (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

- 1.3.1 The operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
 - (b) maintain records of raw materials and water used in the activities;
 - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
 - (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
 - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
 - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.
- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 For the following activities referenced in schedule 1, table S1.1, AR1, the activities shall not operate for more than 500 hours in emergency use per annum.
- 2.3.4 For the following activities referenced in schedule 1, table S1.1, AR1:
- (a) the operator must keep periods of start-up and shut down of the combustion plant as short as possible.
 - (b) there shall be no persistent emission of ‘dark smoke’ as defined in section 3(1) of the Clean Air Act 1993.
- 2.3.5 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.6 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
 - (b) the composition of the waste;
 - (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.

The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Improvement programme

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.

- 2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

2.5 Pre-operational conditions

- 2.5.1 The activities shall not be brought into operation until the measures specified in schedule 1 table S1.4 have been completed.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1 and S3.2.
- 3.1.2 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.2 Emissions of substances not controlled by emission limits

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits; and
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour; and
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.4 Noise and vibration

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration; and
 - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Monitoring

- 3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
- (a) point source emissions specified in tables S3.1 and S3.2.
- 3.5.2 The first monitoring measurements shall be carried out within four months of the issue date of the permit or the date when the MCP is first put into operation, whichever is later.
- 3.5.3 Monitoring of MCP shall not take place during periods of start up or shut down.
- 3.5.4 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.5 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1 and S3.2 unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

- 4.1.1 All records required to be made by this permit shall:
- (a) be legible;
 - (b) be made as soon as reasonably practicable;
 - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
 - (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.
- 4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

- 4.1.3 The operator shall maintain a record of the type and quantity of fuel used and the total annual operating hours for each MCP.

4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:
- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data; and
 - (b) the performance parameters set out in schedule 4 table S4.2 using the forms specified in table S4.3 of that schedule.
 - (c) where condition 2.3.3 applies, the hours of operation in any year.
- 4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
 - (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.3; and
 - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

4.3 Notifications

- 4.3.1 In the event:
- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
 - (i) inform the Environment Agency,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
 - (b) of a breach of any permit condition the operator must immediately—
 - (i) inform the Environment Agency, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
 - (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:
- Where the operator is a registered company:
- (a) any change in the operator's trading name, registered name or registered office address; and
 - (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.
- Where the operator is a corporate body other than a registered company:
- (a) any change in the operator's name or address; and
 - (b) any steps taken with a view to the dissolution of the operator.
- In any other case:
- (a) the death of any of the named operators (where the operator consists of more than one named individual);
 - (b) any change in the operator's name(s) or address(es); and
 - (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.
- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
- (a) the Environment Agency shall be notified at least 14 days before making the change; and
 - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.
- 4.3.7 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:
- (a) a decision by the Secretary of State not to re-certify the agreement;
 - (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
 - (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR1	Section 1.1 Part A(1) (a): Burning any fuel in an appliance with a rated thermal input of 50 megawatts or more.	Operation of 56 x 7.31 MWth (new MCP) emergency standby generators with an aggregated thermal input of 409.36 MWth. The generators will burn either gas oil or an agreed equivalent substitute solely for the purpose of providing electricity to the data centre in the event of a failure of supply from the National Grid and during testing and maintenance.	From receipt of raw materials to combustion of fuel in emergency standby generators, generation of electricity, to exhaust of products of combustion to the atmosphere and despatch of waste. Electricity produced at the Installation cannot be exported to the National Grid. Generators shall not be operated for elective power generation, such as Balancing Services, Demand Side Response operations including Frequency Control Demand Management (FCDM) or Triad Avoidance. The emergency operational hours of the Installation shall not exceed the specifications set out in condition 2.3.3 of this permit.
	Directly Associated Activity		
AR2	Directly associated activity	Storage of raw materials, including above ground storage of gas oil or an agreed equivalent substitute.	From receipt of raw materials to dispatch for use including all associated pipework, handling and transfer to and from storage tanks.
AR3	Directly associated activity	Surface water drainage	From the input to the site drainage system until discharge off-site via oil/water interceptors.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application EPR/QP3706LH/A001	Response to section 3a – technical standards, Part B3 of the application form Supporting information Noise impact assessment including attenuation measures for the engines and generators	22/03/2022
Application EPR/QP3706LH/A001	Air Quality Assessment report (June 2021) - Table 3.3 Operational hours and loads (maintenance and testing) Table 3.4 Emission parameters This document has been superseded by the Generators maintenance testing schedule detailed in application documents for EPR/QP3706LH/V002.	22/03/2022
Application EPR/QP3706LH/A001	Engine operation and fuel storage	07/04/2022
Application EPR/QP3706LH/A001	Fuel type and storage	19/04/2022
Application EPR/QP3706LH/A001	Fuel delivery operating procedure	01/09/2022
Application EPR/QP3706LH/V002	Application Forms C2, C2.5 and C3 and all referenced supporting information.	Duly Made 22/08/2024
Application EPR/BP3800PZ/V002 Generators maintenance testing schedule	Generators maintenance testing schedule detailed in application documents:	Duly Made 22/08/2024
	Priestley Way, Brent (Site 2), Brent Cross, London, PDCG (Group Services) Ltd - Air Quality Air Emissions Risk Assessment (LON1B2V3A-E1-HL-ZZ-XX-RPT-Y-80000 Revision P04) dated 22/08/2024.	29/10/24
	Supplemented by: EPR/QP3706LH/V002 - Additional Air Quality Information (Revision: 01) dated 29/10/2024. EPR/QP3706LH/V002 - Additional Air Quality Information - Response to Schedule 5 Notice (Revision: 01) dated 13/02/2025. Along with the following operational restrictions on generator testing: <ul style="list-style-type: none"> • Testing of site 1 and site 2 shall not be carried out in the same 24-hour period. • Testing at site 1 shall involve each generator being tested individually. • For six-monthly testing, no more than 8 hours of operation shall be carried out in any 24-hour period. • For monthly testing, no more than 8 hours of operation shall be carried out in any 24-hour period for site 1. 	13/02/25

Table S1.2 Operating techniques		
Description	Parts	Date Received
	<ul style="list-style-type: none"> For monthly testing, no more than 2.5 hours of operation shall be carried out in any 24-hour period for site 2. <p>Along with the following operational loads during an emergency:</p> <ul style="list-style-type: none"> Site 1 generators operate at no more than 75% load. Site 2 generators operate at no more than 90% load. 	
Application EPR/BP3800PZ/V002	Fuel storage, containment and drainage.	20/11/24
		27/01/25
		13/02/25

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	<p>Monitoring Plan</p> <p>The operator shall submit a monitoring plan for approval by the Environment Agency detailing their proposal for the implementation of the flue gas monitoring requirements specified in table S3.1 of this permit.</p> <p>The monitoring plan shall be in accordance with web guide 'Monitoring stack emissions: low risk MCPs and specified generators', published 16 February 2021 (formerly known as TGN M5).</p> <p>The plan shall include, but not necessarily be limited to the following considerations:</p> <ul style="list-style-type: none"> When the generators are not fitted with sampling ports, a proposal to install them within the shortest practical timeline; and Details of any relevant safety, cost and operational constraints affecting the monitoring regime, in support of any proposed deviation from the testing regime specified in table S3.1 of this permit. 	Complete

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC2	<p>Air Quality Management Plan</p> <p>The operator shall submit an Air Quality Management Plan for approval by the Environment Agency and in conjunction with the Local Authority. The plan shall outline response measures to be taken in the event of a grid failure.</p> <p>The plan shall include, but not necessarily be limited to the following considerations:</p> <ul style="list-style-type: none"> • The response shall be tailored to reflect the predicted potential impact indicated by the air dispersion modelling at individual receptors; • Preventative and reactive actions to be implemented to limit the duration of an outage event to less than 50 hours as far as possible; • Specific timescales for response measures; • How local conditions during a grid failure might influence the response required, for example meteorological conditions or time of day; • Contingency for how the response will be carried out in the event scenario i.e. loss of power; and • Timescales for continued review of the management plan. 	Complete
IC3	<p>Monitoring plan - flue gas monitoring requirements</p> <p>The operator shall submit an updated monitoring plan (including monitoring of emissions from engines associated with variation EPR/QP3706LH/V002) for approval by the Environment Agency detailing their proposal for the implementation of the flue gas monitoring requirements specified in table S3.1, in line with web guide 'Monitoring stack emissions: low risk MCPs and specified generators' Published 20 March 2024 (formerly known as TGN M5).</p> <p>The plan shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> • When the generators are not fitted with sampling ports, a proposal to install them within the shortest practical timeline; • Details of any relevant safety, cost and operational constraints affecting the monitoring regime, in support of any proposed deviation from the testing regime specified in permit table S3.1. 	Within 3 months from the date of issue of the permit EPR/QP3706LH

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC4	<p>Air Quality Management Plan (AQMP)</p> <p>The operator shall produce an updated AQMP (including emissions from engines associated with variation EPR/QP3706LH/V002) in conjunction with the Local Authority outlining response measures to be taken in the event of a grid failure. This should include but not be limited to the following considerations:</p> <ul style="list-style-type: none"> • The response should be tailored to reflect the predicted potential impact indicated by the air dispersion modelling at individual receptors; • Preventative and reactive actions to be implemented to limit the duration of an outage event to less than 50 hours as far as possible; • Specific timescales for response measures; • How local conditions during a grid failure might influence the response required, for example meteorological conditions or time of day; • Contingency for how the response will be carried out in the event scenario i.e. loss of power; • Timescales for continued review of the management plan; and • Addition of indicative air quality monitoring stations around the site to inform on air quality during extended periods of standby generator running including prolonged grid outages. <p>The agreed Air Quality Management Plan shall be submitted to the Environment Agency for approval.</p>	Within 6 months from the date of issue of the permit EPR/QP3706LH

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC5	<p>Short-term nitrogen oxides and dust concentrations - monitoring plan</p> <p>The operator shall submit a written report to the Environment Agency for assessment and written approval detailing proposals for a monitoring programme to verify the predicted short-term nitrogen oxides (NOx) and dust concentrations at the boundary of the site or off-site locations of sensitive receptors.</p> <p>The proposal shall detail the monitoring methods and equipment that will be used, having consideration for, but not necessarily be limited to:</p> <ul style="list-style-type: none"> Representative monitoring of ambient air quality during operations, at the downwind boundary of the site, or off site locations during all the testing scenarios using reference equivalent (or greater) monitoring methods as set out in EA Technical Guidance Note M8 or subsequent revisions of that document, or using alternative techniques agreed in advance with the Environment Agency to an equal or greater standard. <p>(The plant should not be operated solely to enable the monitoring to take place. Monitoring should be done when other activities (such as testing) require the plant to be operated);</p> <ul style="list-style-type: none"> A demonstration that appropriate monitoring location(s) have been selected at the boundary of the site, or off site locations, taking into account the modelled predictions and the weather conditions prevalent at the time of the monitoring; and Details of certification of monitoring equipment and accreditation of personnel undertaking monitoring, where appropriate. <p>The operator shall undertake the monitoring in accordance with the plan agreed with the Environment Agency</p>	<p>Submit the written report within 6 months from the date of issue of the permit EPR/QP3706LH or as agreed in writing with the Environment Agency.</p> <p>Monitoring to be undertaken within 4 months from written approval of the monitoring plan</p>

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC6	<p>Short-term nitrogen oxides and dust concentrations - monitoring report</p> <p>A written report shall be submitted to the Environment Agency for assessment and written approval detailing the results and conclusions of the emissions monitoring and assessment undertaken in accordance with the monitoring proposals agreed by the Environment Agency under IC5.</p> <p>The report shall include:</p> <ul style="list-style-type: none"> • a demonstration that appropriate monitoring location(s) were selected at the boundary of the site, or off site locations, taking into account the agreed monitoring proposal under IC5, the weather conditions prevalent at the time of the monitoring and any additional sensitive receptors identified; • a comparison of modelled data against monitored concentrations of nitrogen dioxide and dust; and • proposals for any ongoing monitoring or further assessment. <p>Once approved in writing, the output of the monitoring exercise shall be used to inform / revise the AQMP and implement emission reduction measures, if necessary. Revisions to the AQMP and/or emission reduction measures shall be delivered in accordance with the timescales agreed in writing with the Environment Agency.</p>	<p>Submit the written report within 4 months of undertaking monitoring agreed under IC5</p> <p>As agreed in writing with the Environment Agency</p>

Table S1.4 Pre-operational measures	
Reference	Pre-operational measures
PO1	<p>Commissioning</p> <p>At least one month before operation the operator shall submit an updated commissioning plan for the engines associated with variation EPR/QP3706LH/V002 to the Environment Agency for approval. The plan shall provide timescales for the commissioning of the generators and shall demonstrate that the commissioning of the generators is covered within the site's permitted regular testing regime, thereby minimising durations and impacts.</p> <p>When the commissioning is not covered within the site's permitted regular testing regime, the operator shall submit an environmental risk assessment for approval by the Environment Agency, demonstrating that the environmental risks during the commissioning are minimised and remain not significant. The commissioning of the engines shall not begin prior to receiving written approval to the plan and associated environmental risk assessment by the Environment Agency.</p> <p>The plan shall be implemented in accordance with the Environment Agency's written approval.</p>

Table S1.4 Pre-operational measures	
Reference	Pre-operational measures
PO2	<p>Containment</p> <p>At least one month before operation the operator shall undertake a review of all liquid storage, bunds and secondary containment at the site and submit a written report to the Environment Agency for assessment and written approval.</p> <p>The review shall be carried out by a qualified structural engineer and compare all liquid storage, bunds and secondary containment against the standards set out in CIRIA guidance: Containment systems for the prevention of pollution (C736).</p>

Schedule 2 – Raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
Gas oil or equivalent substitute to be agreed in writing with the Environment Agency.	Sulphur content 0.001% w/w max

Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency Note 2	Monitoring standard or method
<u>Site 1 (LON1B1)</u> A1 a & A1 b ^{Note 1} A2 a & A2 b ^{Note 1} A3 a & A3 b ^{Note 1} A4 a & A4 b ^{Note 1} A5 a & A5 b ^{Note 1} A6 a & A6 b ^{Note 1} A7 a & A7 b ^{Note 1} A8 a & A8 b ^{Note 1}	Gas oil or equivalent fuelled generator exhausts 56 x 7.31 MWth (New MCP)	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	No limit set	In line with web guide 'Monitoring stack emissions: low risk MCPs and specified generators' Published 20 March 2024 (formerly known as TGN M5)	Every 1,500 hours of operation or once every five years (whichever comes first). Note 3	In line with web guide 'Monitoring stack emissions: low risk MCPs and specified generators' Published 20 March 2024 (formerly known as TGN M5)
		Carbon monoxide	No limit set	In line with web guide 'Monitoring stack emissions: low risk MCPs and specified generators' Published 20 March 2024 (formerly known as TGN M5)	Every 1,500 hours of operation or once every five years (whichever comes first). Note 3	In line with web guide 'Monitoring stack emissions: low risk MCPs and specified generators' Published 20 March 2024 (formerly known as TGN M5)
		Sulphur dioxide	No limit set	--	--	--
		Particulate	No limit set	--	--	--
<u>Site 2 (LON1B2)</u> A9 to A48						
Vents associated with bulk storage fuel tanks	Vents from fuel storage tanks for engines: A1 a/b to A8 a/b and for engines: A9 to A48 (1x bulk tank per pair of engines)	No parameters set	No limit set	--	--	--
Note 1: Exhaust gases from each pair of engines (a & b) is discharged through a common plenum at eight emission points A1 to A8. Emission points on site plan in Schedule 7 of this permit. Note 2: In accordance with condition 3.5.2 of this permit. Note 3: Unless otherwise agreed in writing with the Environment Agency as a result of approval of improvement condition IC3.						

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W1	Uncontaminated site surface water via oil-water separator	Oil and grease	None visible	Spot sample	Weekly	-
W2	Uncontaminated site surface water via oil-water separator	Oil and grease	None visible	Spot sample	Weekly	-

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Point source emissions to air Parameters as required by condition 3.5.1.	A1 a/b to A8 a/b and A9 to A48 (New MCPs)	Every 1,500 hours of operation once or every five years (whichever comes first).	Within four months of the issue date of the permit or the date when the engine is first put into operation, whichever is later. <small>Note 1</small>
Note 1: Unless otherwise agreed in writing with the Environment Agency as a result of approval of improvement condition IC3.			

Table S4.2 Performance parameters		
Parameter	Frequency of assessment	Units
Gas oil (or equivalent substitute agreed in writing with the Environment Agency) usage	Annually	Tonnes
Generator operation for testing and maintenance	Report to be submitted annually	Total hours for the site (hours) Total hours per generator (hours) Total number of runs per generator (quantity and dates) Number of minutes per run (minutes)
Generator operation during emergency scenario	Within 24 hours if operation commences	Date and time of National Grid failure Number of generators operating immediately after the failure Number of generators operating two hours after failure Anticipated duration of the mains supply failure (hours)
Generator operation during emergency scenario	Annually	Total number of runs (quantity) Duration of runs (hours)

Table S4.3 Reporting forms		
Parameter	Reporting form	Date of form
Air	Emissions to Air Reporting Form or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Other performance indicators	Form performance 1 or other form as agreed in writing by the Environment Agency	As agreed with the Environment Agency
Generator operation during emergency scenario	Form 'emergency scenario' or other form as agreed in writing by the Environment Agency	As agreed with the Environment Agency

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the breach of permit conditions not related to limits	
To be notified within 24 hours of detection	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

(d) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

“Accident” means an accident that may result in pollution.

“Application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“Authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“Emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission limit.

“Emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“Gas oil” includes diesel and is defined in Article 3(19) of the MCPD.

“Groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“Medium Combustion Plant” or “MCP” means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW.

“Medium Combustion Plant Directive” or “MCPD” means Directive 2015/2193/EU of the European Parliament and of the Council on the limitation of emissions of certain pollutants into the air from medium combustion plants, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“Net rated thermal input” means the rate at which fuel can be burned at the maximum continuous rating of the appliance multiplied by the net calorific value of the fuel and expressed as megawatts thermal.

“New MCP” means an MCP first put into operation on or after 20/12/2018.

“Operating hours” means the time, expressed in hours, during which a combustion plant is operating and discharging emissions into the air, excluding start-up and shut-down periods.

“Shut-down” is any period where the plant is being returned to a non-operational state.

“Start-up” is any period, where the plant has been non-operational, until fuel has been fed to the plant to initiate steady-state conditions.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels other than gas engines or gas turbines, 6% dry for solid fuels; and/or
- in relation to emissions from gas engines or gas turbines, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 15% dry for liquid and gaseous fuels; and/or

- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

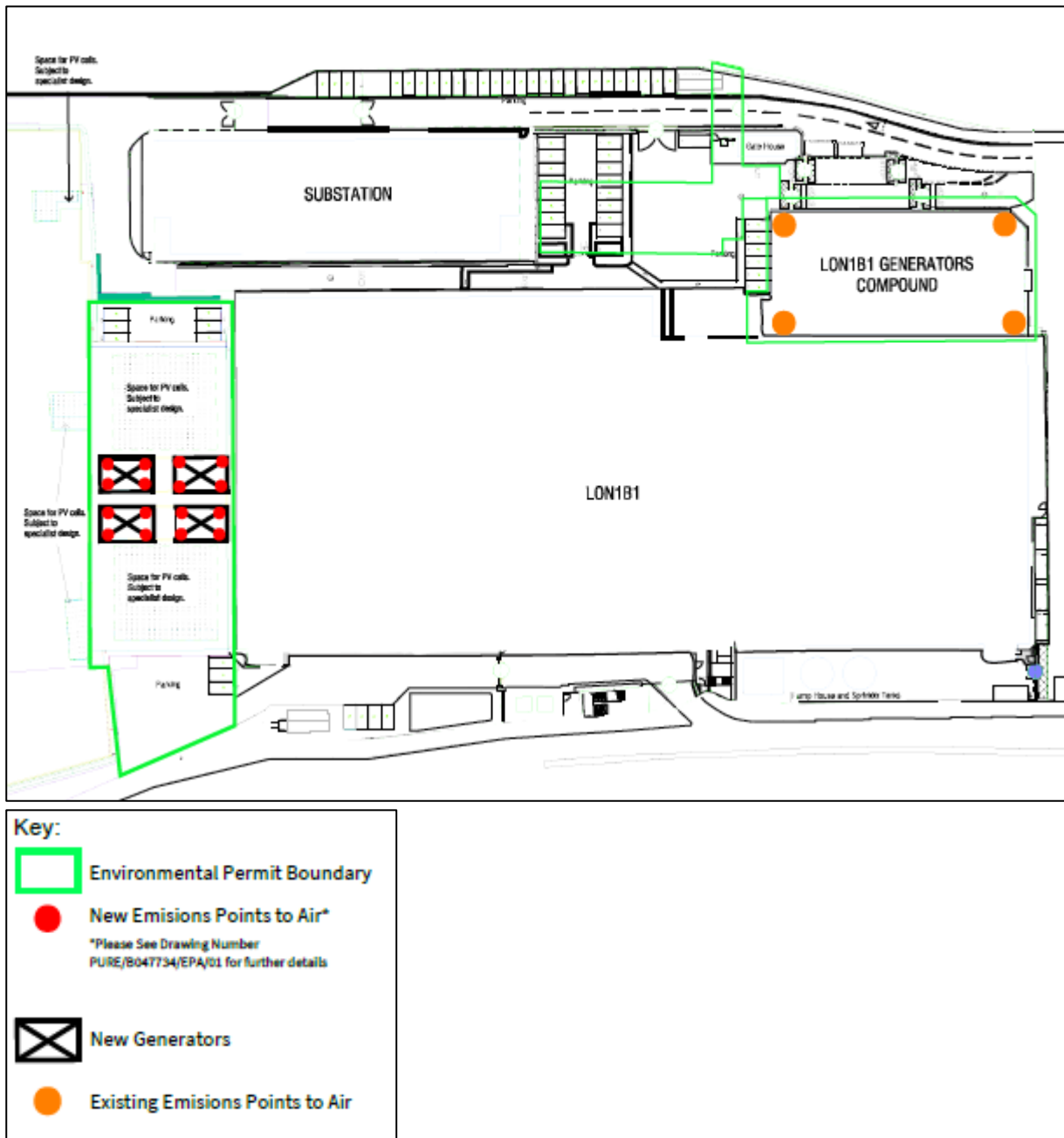
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

“Year” means calendar year ending 31 December.

Schedule 7 – Site plans

Installation

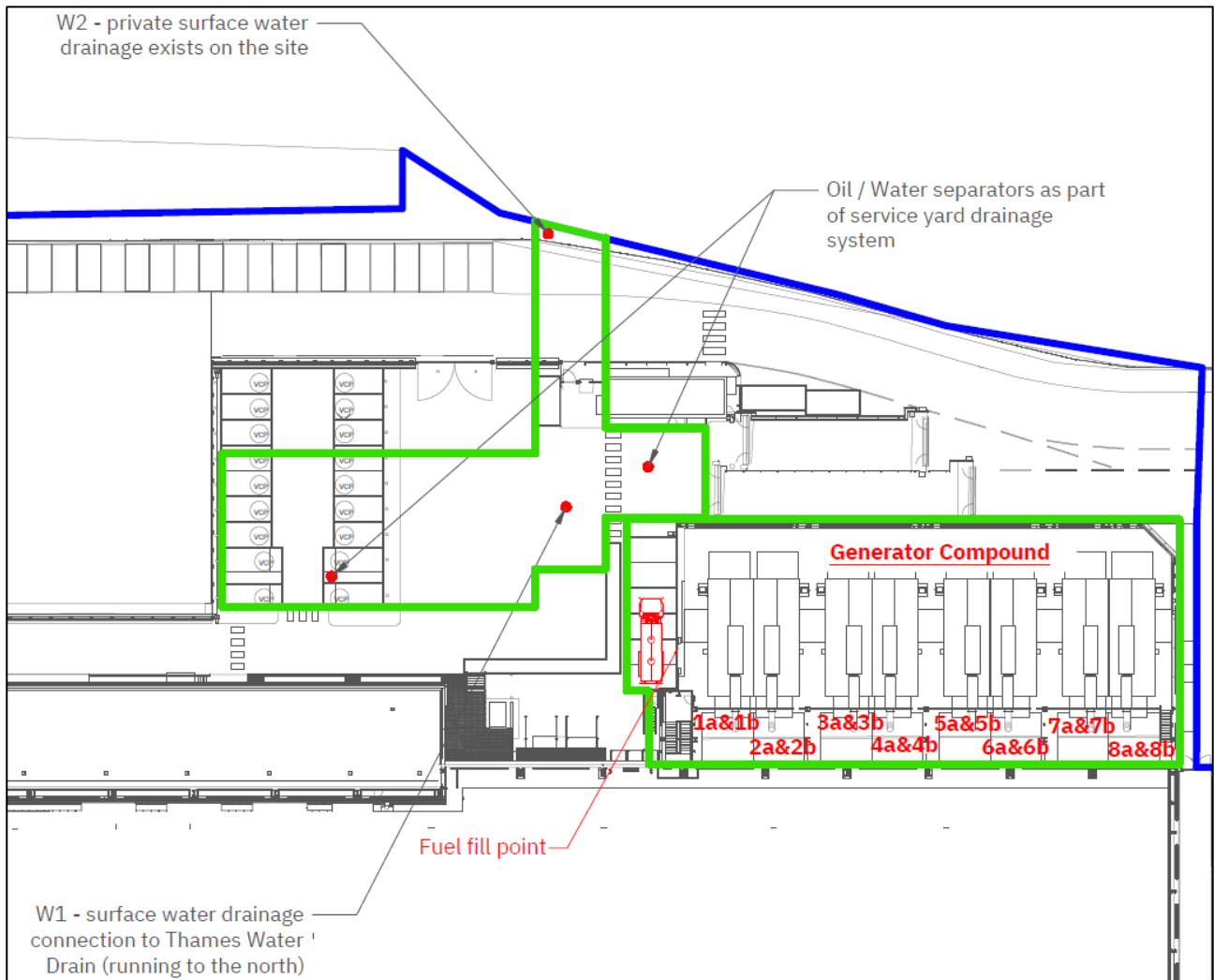
LON1B1 and LON1B2



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Site 1 (LON1B1)

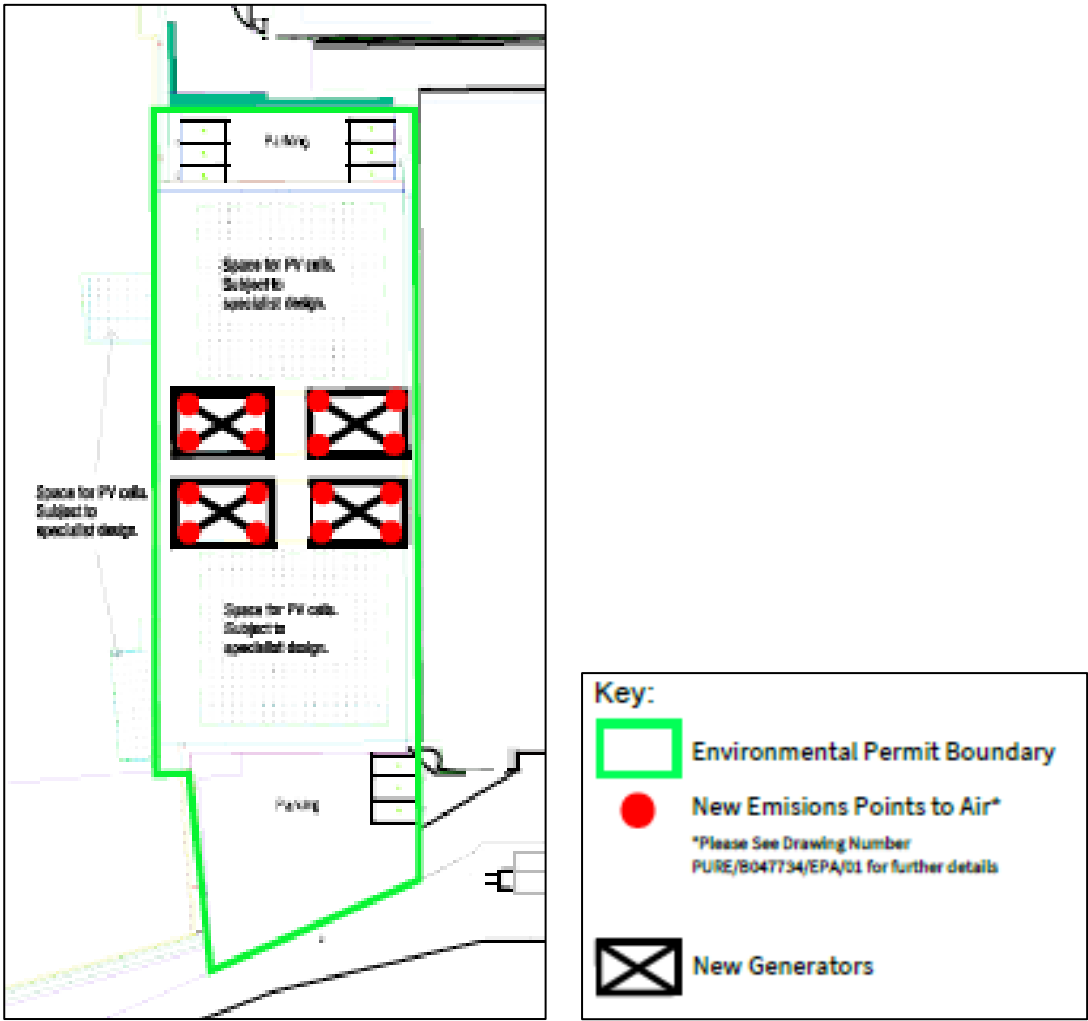
Installation boundary (green) and emission points to air and water



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Site 2 (LON1B2)

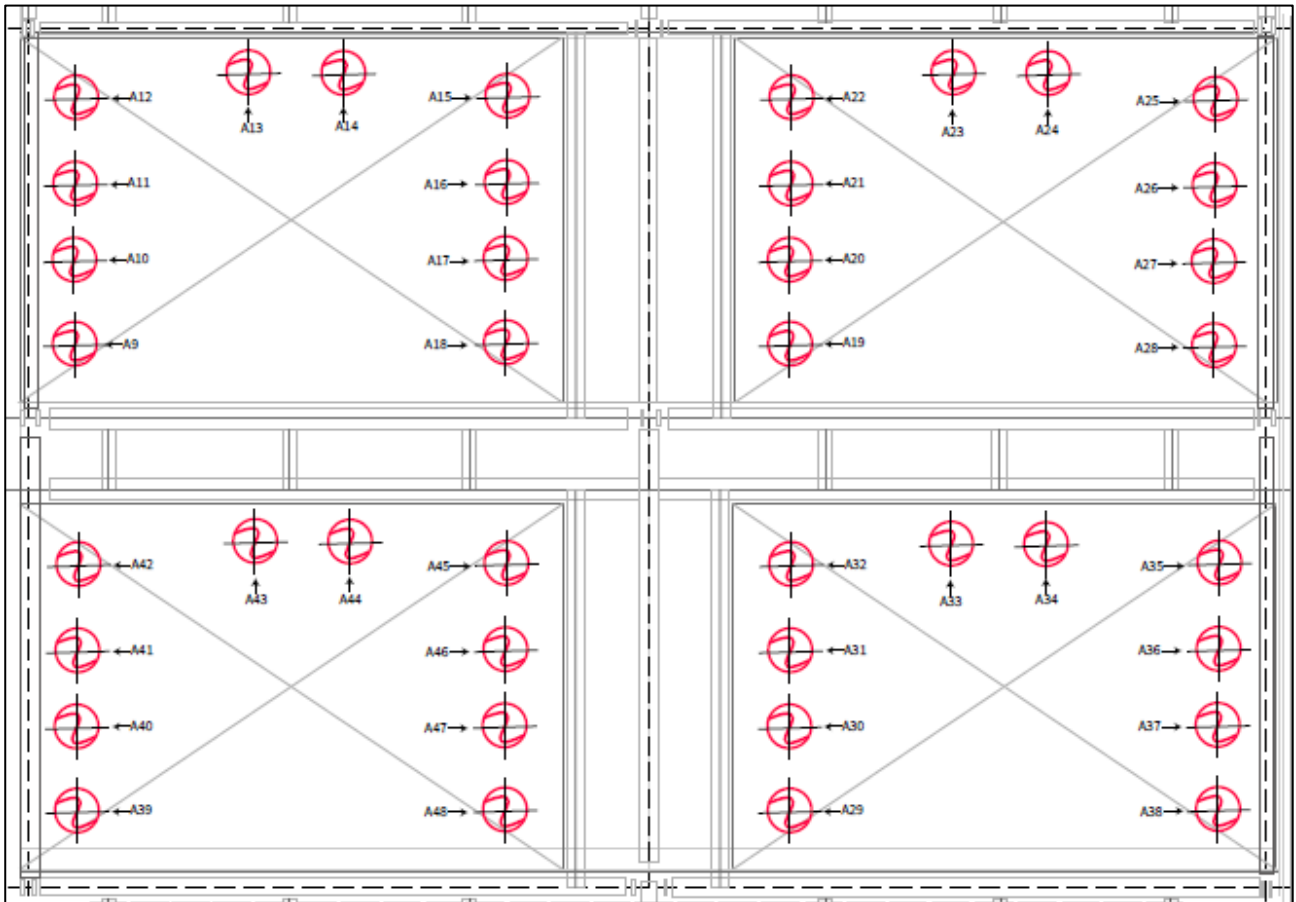
Installation boundary (green) and emission points to air



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Site 2 (LON1B2)

Emission points to air



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END OF PERMIT