Permitting Decisions- Bespoke Permit

We have decided to grant the permit for LON3 Data Centre operated by Iron Mountain (UK) Data Centre Limited.

The permit number is EPR/TP3120LE.

The permit was granted on 07/01/2026.

The application is for the operation of 17 emergency standby electricity generators at a data centre located in Slough, Berkshire at national grid reference SU 95817 81065. The data centre will under normal operating conditions be powered by grid supplied electricity. The initial cover for loss of external power is provided by on-site battery arrays.

Operation of the combustion plant will be regulated as a Section 1.1 Part A (1) (a) activity under the Environmental Permitting (England and Wales) Regulations (EPR) 2016 for the burning of any fuel in an appliance with a rated thermal input of 50 or more megawatts (MW). The aggregated net rated thermal input of the generators is 113.31 MWth

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document provides a record of the decision-making process. It:

- summarises the decision making process in the decision considerations section to show how the main relevant factors have been taken into account
- highlights key issues in the determination
- shows how we have considered the consultation responses

Unless the decision document specifies otherwise, we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit.

Key issues of the Decision

In reaching our decision to grant the permit we took into consideration the following matters:

1. The Installation

The installation is subject to the Environmental Permitting Regulations (EPR) as it carries out an activity listed in Part 1 of Schedule 1 to the EPR:

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

The data centre facility is located at 111 Buckingham Avenue, Slough, Berkshire, identified by the national grid reference SU 95817 81065.

The development comprises one main building which will be used as a data centre (LON3) and a 3-storey gantry adjacent to the main building that will house the Emergency Standby Generators (ESGs). The data centre will be powered using electricity from the national grid under normal operational conditions.

The permit authorises the operation of the ESGs serving the data centre in the event of failure in the electrical grid supply. The 17 ESGs, including 1 Rolls Royce 12V1600G10F generator (1.15 MWth; Gantry Level 0) and 16 Rolls Royce 20V4000G94LF generators (7.01 MWth; Gantry Level 2), with a combined thermal input of approximately 113.31 MWth, will be capable of providing a N+1 level of resilience. These ESGs are designed for limited operation, for maintenance, testing, and emergencies, the permit does not allow the export of electricity to the National Grid.

The ESGs will be fuelled using gas oil or Hydrogenated Vegetable Oil (HVO). Fuel will be stored in integrally bunded belly tanks at the sub-base of each ESG. The total fuel storage capacity of the site is 714,000 litres.

2. Best Available Techniques (BAT)

Choice of Technology and Fuel

The Applicant considered a range of technologies and fuels as part of the design and specification phase. At this time the latest generation of gas oil powered generators are optimally viable for operators based on availability, reliability, capital and operating costs. Alternatives, including natural gas engines, battery storage, hydrogen fuel cells, solar panels and wind turbines were considered but are not operationally viable for this installation.

We accept that gas oil powered generators are presently a commonly used technology for standby generators in data centres. We are satisfied that the applicant has provided sufficient justification to show that their proposal is BAT.

We have specified the fuel to burned in the engines to consist of gas oil or equivalent substitute to be agreed in writing with the Environment Agency with a sulphur concentration of 0.001% w/w. We are in the process of developing our position on the use gas oil substitute fuels, therefore we have required that if any of these fuels are proposed, written agreement is sought by the operator from the Environment Agency's regulatory officer.

The Applicant has informed us of their intention to use HVO as a substitute for gas oil. We consider this to be acceptable. HVO is increasingly used across the data centre sector as a lower-carbon alternative to conventional fossil fuels. It is subject to the same fuel quality specifications as gas oil, including limits on sulphur content. We are satisfied that using HVO will not result in emissions that exceed those associated with gas oil and that no further assessment is required.

Engine Specification

Environment Agency guidance specifies the BAT emissions specifications for new diesel-fired reciprocating engines as 2g TA-Luft or US EPA Tier II (or equivalent standard) with NO_x emission levels in the range of 2000 mg/m^3 at 5% oxygen and reference conditions.

The generators proposed for the installation are emissions optimised and meet the above US EPA Tier II specification at 75% load which is the intended typical operational load, we are satisfied this is in line with Environment Agency guidance.

Fuel Storage

At the sub-base of each ESG there will be an integrally bunded 42m^3 belly tank, containing gas oil/HVO for the operation of the specific generator. The belly tanks will be equipped with leak detection and integral bunding having a capacity of 110% of the tank volume. Individual fuel polishing systems will be installed within each generator enclosure. The belly tanks shall have an access hatch to allow for inspection, a tank vent and a fill point connection to allow for the delivery of fuel to each tank from the fuel transfer tanks. The belly tanks will be automatically refuelled from the delivery road tankers, providing 48-hours fuel storage capacity and a redundancy of N+1. The total fuel storage capacity of the site is 714,000 litres.

Operational areas of the site will be covered in good quality hardstanding. Dedicated drainage interceptors to be installed acting as a tertiary containment to prevent spill fuel entering surface waters. All fuel fill lines will have class I proprietary leak detection systems and double walls. The Applicant has confirmed that the fuel storage and distribution system will be compliant with the Oil storage regulations for businesses.

3. Testing and Maintenance

Operation of the generators will occur via testing and maintenance and in the event of an outage of power at the facility. The black start testing where all 16 main generators are tested simultaneously is not expected to be required every year. As such, it is expected that there will be 20 hours of testing per year per individual main power stream generator and admin generator. Including black start testing this could increase to 22 hours per year for main power stream generators. Testing schedule is as follows:

Generator	Frequency	Number	Load	Annual hours	Total
Individual generator testing (only one test at a time)					
Main Power Stream (4000kVA)	0.5 hours every 2 weeks	16	45%	13	208
Admin (500kVA)		1	45%	13	13
Main Power Stream (4000kVA)	1 hour every 3 months	16	45%	4	64
Admin (500kVA)		1	45%	4	4
Main Power Stream (4000kVA)	1.5 hours every 6 months	16	100%	3	48
Admin (500kVA)		1	100%	3	3
Simultaneous generator testing					
Main Power Stream (4000kVA)	2 hours per year simultaneously (black start test)	12	99%	2	24
Main Power Stream (4000kVA)		2	51%	2	4
Main Power Stream (4000kVA)		2	25%	2	4

Operation During an Emergency Event

The power supply into the Installation is constantly monitored. Should the power supply be interrupted the sites Uninterruptable Power Supply (UPS) will ensure continuity of supply. The generators are automatically triggered to start once the power supply has been interrupted, providing power quickly following the failure of the National Grid supply, at which point the UPS would revert to standby. Once started, the generators will remain operational until the mains restoration detection equipment determines that the supply from the National Grid is stable. The return to the National Grid supply is an automated process, with the National Grid and generator supplies being interlocked to ensure that parallel running

cannot be achieved. The generators will not synchronise with the mains supply at any time.

The application states that National Grid National Electrical Transmission System Performance Report 2022/23 states that the overall reliability of supply over the period 2022-23 was: 99.999981%. Therefore, it is considered very unlikely that the generators would run for extended periods during a blackout event.

The Applicant has conservatively assessed the impact on air quality based on all 17 generators operating at 100% load for up to 72 hours to cover an emergency power outage scenario. This is in line with Environment Agency guidance.

4. Air quality assessment

The primary pollutants of concern to air quality from the combustion processes at the installation are nitrogen dioxide (NO_2), carbon monoxide (CO), particulates (PM_{10}) and sulphur dioxide (SO_2) resulting from the combustion process on site. We don't consider SO_2 emissions to be a risk from the operation of the installation as we have included a condition in the permit restricting the fuel to ultra-low sulphur gas oil, resulting in negligible emissions of sulphur.

The Applicant's assessment of the impact of air quality is set out in document Iron Mountain LON-3 Data Centre Air Quality Assessment (AQA), revision 2, dated 28th May 2024.

The assessment comprises:

- Dispersion modelling of emissions to air from the operation of the ESGs at LON-3 data centre.
- Dispersion modelling of emissions to air from the operation of the ESGs at LON-3 in combination with the ESGs at LON-2 data centre (EPR/PP3309MK/A001).
- A study of the impact of emissions on nearby sensitive conservation sites.

As a worst-case scenario, emissions from annual testing of ESGs assumed 636 maximum annual operating hours for a single generator for the main generator and 57 hours for the admin generator. Once commissioned the total annual testing hours for the generators will reduce to 352 for main generator and 20 hours for admin per year.

The air dispersion modelling carried out by the applicant used the Atmospheric Dispersion Modelling System (ADMS 6) version 6.0.0.1 which we consider an appropriate air quality modelling tool for regulatory purposes. The model used five years of meteorological data observed at Heathrow Airport meteorological station, which is located approximately 10 km southeast of the facility, between 2018 and 2022. We consider this station to be reasonably representative of the meteorological conditions at the site.

Airflow around buildings is often complex and may create zones of strong turbulence and downward mixing on the lee side, an effect known as building downwash. To represent this effect, the AQA includes 15 building structures in the model (Table D.3 of the AQA). We agree that this building configuration is reasonably representative, but we tested sensitivity to an alternative modelling software to assess ADMS's building approximations. The use of an alternative modelling software did not change conclusions.

Emission concentrations and emission rates for the proposed generators are derived from manufacturer's data specifications, provided in Appendix B of the AQA. We were able to replicate these emission rates.

Modelling scenarios

For dispersion modelling purposes, the AQA assumed that the LON-3 and LON-2 data centres will only test one generator at any given time between 8am and 6pm, which is likely to represent a typical working day. The generators at each data centre have been split into two groups to simplify the modelling, called the 'North' and 'South' group. Each generator in the 'North' and 'South' groups is assumed to cause similar contributions at receptors, so only one generator in each group has been modelled. All generators are modelled operating at full load, although in reality the Applicant expects the generators to be tested at loads between 25–99% (Table 2.3 of the Operational Report). The two-hour black start test has not been separately modelled because its short-term PCs will be the same as for the emergency scenario. The scenarios modelled for the AQA are as follows:

- A LON-3 north generator tested in isolation.
- A LON-3 south generator tested in isolation.
- A LON-3 north generator tested at the same time as a LON-2 north generator.
- A LON-3 south generator tested at the same time as a LON-2 south generator.
- The LON-3 admin generator tested at the same time as a LON-2 south generator.
- Emergency – all generators from LON-3 alone, and from LON-2 and LON-3 together, operated for 72 hours.

Air Quality Impacts (human health)

Testing:

The Applicant's AQA results indicate the following at human health receptors, for LON-3 alone and in combination with LON-2:

- The 99.79th percentile 1-hour NO_2 Environmental Standard (ES) is not predicted to be exceeded when generators are tested individually.

- 100th percentile 1-hour NO_2 Process Contributions (PCs) are not predicted to exceed the Acute Exposure Guideline Levels (AEGL-1).
- 1-hour NO PCs are predicted to be insignificant for operation of LON-3 alone. 1- hour NO PCs are 'not insignificant' in-combination, but they are not predicted to exceed the ES.

Emergency:

The Applicant's AQA results indicate the following:

- 1-hour 99.79th percentile NO_2 PCs are predicted to exceed the 1-hour NO_2 ES. For LON-3 in isolation, a 72-hour emergency outage scenario is predicted to have a 5% chance of exceeding the 1-hour NO_2 ES. For LON-2 and LON-3 in-combination, the Applicant predicts that that there would be a 5% chance of exceeding the 1-hour NO_2 ES if there were over 65 hours of emergency operation. However, the regions where the chance of an exceedance of the ES is greater than 5% seem to be within the site boundary (Figure 7-1 of the AQA).
- 100th percentile 1-hour NO_2 PCs are not predicted to exceed the AEGL-1 values.
- 1-hour NO PCs are not predicted to exceed the ES.
- The Applicant does not predict exceedances of any long-term ES when considering the total annual emissions.

We have reviewed the Applicant's modelling, including the choice of the model, the assumptions made and the background data used. Although exceedances of the 1-hour mean NO_2 environmental standard for the 72-hour emergency scenario cannot be ruled out, as this represents a national emergency event and is considered unlikely to occur, we consider that the Applicant's proposal is in line with Environment Agency's guidance and no further mitigation measures are required. Therefore, we agree with the Applicant's conclusions that emissions to air are insignificant or are unlikely to cause an exceedance of any environmental standards at human health receptors.

Air Quality Impacts (Habitats)

The Applicant has identified the following European sites within the 10 km screening distance of the facility:

- Burnham Beeches Special Area of Conservation (SAC).
- Windsor Forest and Great Park SAC.
- South West London Waterbodies Special Protection Area (SPA) & Ramsar.

There are no sites of special scientific interest (SSSIs) within the 2 km screening distance of the facility:

The Applicant has identified the following non-statutory local wildlife and conservation sites within 2 km screening distance of the installation:

- Haymill Valley Local Nature Reserve (LNR) & Local Wildlife Sites (LWS).
- Cocksherd Wood LNR &LWS.
- Railway Triangle LWS.

The Applicant assessed the impact from the proposed Installation on the Habitat sites that are within the relevant screening distances, and their modelling predictions are summarised below:

- The annual NOx, nutrient nitrogen, and acid deposition PCs are less than the insignificance criteria of 1% at all ecological sites, for LON-3 in isolation and in-combination.
- For testing of LON-3 in isolation and in-combination with LON-2, the daily mean NOx PCs are all insignificant.
- For the 72-hour emergency scenario, the daily mean NOx PCs are 'not insignificant' for LON-3, but the Predicted Environmental Concentrations (PECs) are not predicted to exceed the critical level. In-combination, the PC is above the insignificance criteria for local nature sites at the Railway Triangle LWS (PC of 103.9%). For the rest of the ecological receptors, the PCs and PECs are below the critical level. The Applicant claim that this concentration is unlikely to occur at the Railway Triangle LWS, because 72-hours of emergency operation is very unlikely.

We have evaluated the significance of the daily mean NOx PC at Railway Triangle LWS being above the 100% insignificance criteria when ESGs at LON-2 and LON-3 are running at the same time during an emergency event and we agree exceedances are unlikely, as this is based on a national emergency event.

The way in which the Applicant used dispersion models, its selection of input data, use of background data and the assumptions it made have been reviewed by the Environment Agency to establish the robustness of the Applicant's air impact assessment. Our review of the Applicant's assessment leads us to agree with the Applicant's conclusions that the operation of ESGs at LON-3 data centre is unlikely to make a significant contribution to or cause exceedances of critical loads or levels at ecological designations.

5. Emission limits

As the plant is limited to less than 500 hours of emergency operation by permit condition 2.3.6 and less than 50 hours for maintenance and testing in permit table S1.2, air emission limits have not been set.

6. Monitoring requirements

We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified. In particular:

We have specified monitoring of emissions of carbon monoxide (CO) from emission points A1 to A17, with a minimum frequency of once every 1,500 hours of operation or every five years (whichever comes first). This monitoring has been included in the permit in order to comply with the requirements of Medium Combustion Plant Directive (MCPD), which specifies the minimum requirements for monitoring of carbon monoxide emissions, regardless of the reduced operating hours of the plant.

We have also specified monitoring of emissions of nitrogen oxides (NO_x) from emission points A1 to A17, with the same frequency specified for the monitoring of carbon monoxide emissions. In setting out this requirement, we have applied our regulatory discretion, as we consider that this limited monitoring, to happen in concurrence with the carbon monoxide monitoring, is proportionate to the risk associated with the emissions of NO_x from the installation.

Taking into account the limited hours of operation of the engines operating at the installation, and the fact that we are not setting emission limits for NOx and carbon monoxide, we consider this monitoring can be carried out in line with web guide ‘Monitoring stack emissions: low risk MCPs and specified generators’ Published 04 June 2024 (formerly known as TGN M5).

We have set an improvement condition (IC2) requesting the operator to submit a monitoring plan for approval by the Environment Agency detailing the operator’s proposal for the implementation of the flue gas monitoring requirements specified in the permit.

For new MCP, we have set a requirement for the first monitoring to happen within 4 months of the issue date of the permit or the date when each new medium combustion plant is first put into operation, whichever is later (permit condition 3.5.4) unless otherwise agreed under IC2.

7. Operational hours

We set operational hour limits for data centres at 500 hours as they are permitted for emergency use only. The limit on the emergency use of 500 hours is for the

installation as a whole i.e. as soon as one generator starts operating the hours count towards the 500 hours.

The operational hours on the site will be monitored and reported as follows:

Emergency operation limited to 500 hours for the installation via permit condition 2.3.6.

Maintenance and testing regime limited to <22 hours per stack, linked to operating techniques table S1.2.

8. Emissions to Sewer

Surface water runoff from the generator areas is routed across the site through a dedicated surface water drainage system to a flow attenuation system before being pumped into the municipal surface water drainage system through emission point W1. The surface water drainage system will consist of appropriate oil/water interceptors to ensure only uncontaminated water is discharged to the surface water sewer operated by Thames Water. The operation of the Installation will not result in any discharges of wastewater to surface water.

9. Noise and Vibration

The Application contained a noise impact assessment (NIA) which identified local noise-sensitive receptors, potential sources of noise at the proposed plant and noise attenuation measures. Measurements were taken of the prevailing ambient noise levels to produce a baseline noise survey and an assessment was carried out in accordance with BS4142:2014 to compare the predicted generator plant rating noise levels with the established background levels.

We have reviewed the Applicant's NIA and our review concluded that the noise impact from the installation is likely to be low and therefore we are satisfied that noise impact on nearby sensitive receptors will not be significant.

Note: Our audit only includes impacts from the generators. Chiller units are not part of the permitted activities and so not regulated by the Environment Agency.

Decision considerations

Confidential information

A claim for commercial or industrial confidentiality has not been made.

Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential.

The decision was taken in accordance with our guidance on confidentiality.

Consultation

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- Slough Environmental Protection Department
- Slough Planning
- UK Health Security Agency and director of public health
- Health and Safety Executive
- Thames Water

The comments and our responses are summarised in the consultation responses section.

Operator

We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.

The regulated facility

We considered the extent and nature of the facility at the site in accordance with RGN2 ‘Understanding the meaning of regulated facility’, Appendix 2 of RGN2 ‘Defining the scope of the installation’ and Appendix 1 of RGN 2 ‘Interpretation of Schedule 1’.

The operator has provided the grid reference for the emission points from the medium combustion plants.

The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.

The site

The operator has provided plans which we consider to be satisfactory.

These show the extent of the site of the facility including the discharge points.

The plan is included in the permit.

Site condition report

The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports.

Nature conservation, landscape, heritage and protected species and habitat designations

We have checked the location of the application to assess if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.

We have not consulted Natural England but we have sent them an HRA stage 1 for information.

The decision was taken in accordance with our guidance.

Environmental risk

We have reviewed the operator's assessment of the environmental risk from the facility.

The operator’s risk assessment is satisfactory.

General operating techniques

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.

The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.

Operating techniques for emissions that screen out as insignificant

Emissions of nitrogen oxides (NOx), sulphur dioxide (SO_2), carbon monoxide (CO), particulate matter (with a diameter less than 10 microns (PM10) and 2.5 microns (PM2.5)) have been screened out as insignificant, and so we agree that the applicant's proposed techniques are Best Available Techniques (BAT) for the installation.

We consider that the emission limits are not needed for this installation and the installation permit reflect the BAT for the sector.

National Air Pollution Control Programme

We have considered the National Air Pollution Control Programme as required by the National Emissions Ceilings Regulations 2018. By setting emission limit values in line with technical guidance we are minimising emissions to air. This will aid the delivery of national air quality targets. We do not consider that we need to include any additional conditions in this permit.

Raw materials

We have specified limits and controls on the use of raw materials and fuels.

Pre-operational conditions

Based on the information in the application, we consider that we need to include pre-operational conditions.

The applicant must provide a written report to the Environment Agency local office before the plant goes into full operation.

Table S1.4 Pre-operational measures	
Reference	Pre-operational measure
PO1	**Commissioning** At least one month before operation the operator shall submit a commissioning plan to the Environment Agency for approval. The plan shall provide timescales for the commissioning of the diesel generators and shall demonstrate that the commissioning of the diesel generators is covered within the site's permitted regular testing regime, thereby minimising durations and impacts. 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. The plan shall be implemented in accordance with the Environment Agency's written approval.

Improvement programme

Based on the information on the application, we consider that we need to include an improvement programme.

We have included an improvement programme to ensure that the level of compliance is as high as possible.

Table S1.3 Improvement programme requirements		
Reference	**Requirement**	**Date**
IC1	**Air Quality Management Plan (AQMP)** The operator shall produce an AQMP in conjunction with the Local Authority outlining response measures to be taken in the event of a grid failure. This must include, but not be limited to, the following considerations: • 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	Within 6 months from the date of issue of the permit EPR/TP3120LE

	• 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. The agreed Air Quality Management Plan shall be submitted to the Environment Agency for approval.	
IC2	**Monitoring plan - flue gas monitoring requirements** 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, in line with web guide 'Monitoring stack emissions: low risk MCPs and specified generators' Published 04 June 2024 (formerly known as TGN M5). The plan shall include, but not necessarily be limited to: • 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/TP3120LE

Reporting

We have specified reporting in the permit to ensure the site is operated to the standards specified in the Operating Techniques including the reporting of emissions to air.

We have specified reporting to ensure the Operator notifies us of any operation of the stand-by generators in emergency mode in response to national grid power outage.

Management System

We are not aware of any reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.

The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.

Growth duty

We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.

Paragraph 1.3 of the guidance says:

“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”

We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.

We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

Consultation Responses

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public, and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section:

Response received from: UK Health Security Agency (UKHSA)– response received 31/01/2025.

Brief summary of issues raised:

i. We recommend that assessments, including the modelling of short-term (hourly) NO_2 emissions associated with the emergency operations of generators at LON-3 and LON-2 and LON-3 in combination, state the PECs at human health receptors and reference these against relevant health standards or guidelines.
ii. We understand that the Regulator will review the Applicant's dispersion modelling assessment to determine the significance of any potential pollutant impacts.
iii. Additional mitigation measures to ensure air quality standards are not exceeded such as boundary monitoring, and ensuring routine testing of the backup generators is only carried out in favourable weather conditions.
iv. The Environment Agency should ensure that Site mitigation and controls are satisfactory to minimise risk associated with fires.
v. The Environment Agency should ensure that complaints will be suitably considered.

Summary of actions taken:

i. Additional document with short term PECs at human health receptors was submitted on 19/12/2024 and assessed as part of the determination process.
ii. Applicant's dispersion modelling assessment was reviewed as part of the determination process.
iii. We have audited applicant's dispersion modelling assessment and are satisfied that the plant will operation in accordance with Environment Agency guidance.
iv. Accident Management Plan will be developed and will form part of the Environmental Management System.
v. Complaints procedure will form part of the Environmental Management System.