

Permitting Decisions- Bespoke Permit

We have decided to issue the variation for Romford North Data Centre operated by Green Mountain DC UK Limited.

The permit number is EPR/FP3630EU.

Application number is EPR/FP3630EU/V002

Variation issued – 19/02/2026

The application is for the operation of 8 additional standby electricity generating plant at the data centre. The permit has also been reviewed to ensure compliance with the Medium Combustion Plant Directive (MCPD).

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

1. The Installation

The variation authorises the operation of 8 new standby gas oil or Hydrogenated Vegetable Oil (HVO) fuelled generators (Phase VI) serving a data centre. The

generators will provide electrical power to the data centre in the event of failure in the electrical grid supply along with the existing 9 standby generators (Phase III, IV and V).

The permit does not allow the export of electricity to the National Grid.

2. 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. Operating scenarios are as follows:

Testing and maintenance

The planned operation of the installation is:

Phase	Routine Generator Tests (Per Generator)				
	Weekly Testing Duration (minutes)	Bi- Weekly Testing Duration (minutes)	Monthly Testing Duration (minutes)	Quarterly Testing Duration (minutes)	Annual Testing Duration (minutes)
Phase III (EP 11-12)	10	-	20	20	120
Phase IV (EP 21-22)	-	10	-	120 ^(a)	120
Phase V (EP 31-35)	-	10	120^(b)	-	120
Proposed Generators (PG 1-8)	-	10	120^(c)	-	120

In this testing scenario, all generators are tested separately unless indicated in bold. The phases highlighted in **bold** are tested concurrently.

- (a) Generators run separately for 120 minutes, alternating plant per quarter
- (b) Monthly testing supersedes the bi-weekly test if they fall on the same week
- (c) 7 out of 8 generators tested concurrently

Operation During an Emergency Event

The generators would also run in the event of a loss of power supply, i.e. temporary grid blackout; the generators will be utilised to maintain the required power supply. The generators are designed to automatically activate and provide the required power to the data centre pending restoration of mains power, at which time they shall automatically ramp down and switch back to utility supply.

Under normal circumstances, electricity to the site will be provided by UK Power Distribution. The electrical infrastructure is such that there are two supply routes or 'feeds', A and B. Each feed can support the full site load, meaning that if one feed was to fail, electrical provision to the installation would not be compromised. A site wide failure is considered extremely rare as it would require a catastrophic regional failure on the grid, or at the supplying power station, and would likely impact not only the site but the surrounding London area. As a result, the grid connection is considered to be highly reliable as demonstrated in the grid reliability letter provided with the application (calculated as 99.999612% for period 2021/22). 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 site load (assumed to be 75%) for 72 hours with all but one generator from each phase operating cumulatively. This is in line with Environment Agency guidance.

3. Air Quality Assessment

The Applicant's assessment of the impact of air quality is set out in:

- *Air Quality Dispersion Modelling Assessment at LON1-East. April. 2025' – assessment of emergency scenario (note that this version of the AQ assessment has modelled 'testing and maintenance' scenario, however the 'testing and maintenance' schedule was subsequently updated).*
- *Air Quality Dispersion Modelling Assessment at LON1-East. Oct. 2025' – assessment of 'testing and maintenance' scenario.*

The assessments comprised:

- Dispersion modelling of emissions to air from the operation of the installation.
- A study of the impact of emissions on nearby sensitive conservation sites.

The air dispersion modelling carried out by the applicant used the ADMS 6.0 software which we consider an appropriate air quality modelling tool for regulatory purposes. The model used 5 years meteorological data (2015-2019) from the London City Airport meteorological station and included the potential effects of buildings in the modelling domain on the dispersion of the emitted pollutants. The assessment carried out by the Applicant also included a sensitivity analysis of the modelling set up and a statistical interpretation of short-term exceedances of air quality standards. The statistical analysis was based on the hypergeometric probability distribution and followed the methodology set out in our web guidance on dispersion modelling assessment for generators. The 2 operating scenarios detailed above were modelled.

Each generator has its own exhaust stack. Phase III, IV and V generators are 14.2m high; and Phase VI generators are 13.97m high.

Generator operating parameters and emission concentrations are based on the generator manufacturer's performance and emission data.

Each of the 8 new generators is fitted with Selective Catalytic Reduction (SCR) NO_x abatement. It has been estimated by the Applicant that it will take 10 minutes for the SCR to warm-up before becoming effective. Once the SCR is effective, it is proposed that the NO_x emissions from the generators will be reduced by 95%. The use of SCR will therefore only be applicable to the annual testing scenario and the emergency scenario.

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. The output from the model has then been used to inform further assessment of health impacts and impact on habitats and conservation sites.

Our review of the Applicant's assessment leads us to agree with the Applicant's conclusions.

The Applicant's modelling predictions are summarised in the following sections.

Air Quality Impacts (human health)

Predicted impacts for the Testing and Maintenance

The predicted pollutant concentrations for all Phases were below the relevant long-term and short-term environmental standards (ES) at all receptor locations and are not considered to be significant.

Predicted impacts for Emergency Power Outage

The Operator's maximum 1-hour mean NO₂ predicted environmental contribution (PEC) exceeds the ES at 3 receptor locations. With a maximum PEC of 145% of the ES. The hypergeometric distribution analysis indicates that the probability of exceedance is >5% at 10 receptor of the 31 relevant receptor locations. However, there are no predicted of exceedances of the Acute Exposure Guidelines Levels (AEGL-1) for NO₂ at any of the relevant sensitive receptor locations. AEGL 1 represents the least severe health effects which are transient and reversible upon cessation of exposure. The Operator has highlighted that the modelling for Scenario 2 is based on all but one generator from each Phase operating cumulatively, however in reality only the generators required to meet the electrical load will operate during an emergency outage.

As the risk of the emergency power outage scenario occurring is very unlikely (1 in every 10 years) based on electrical grid reliability for the area and inbuilt design resilience we are satisfied that there is no significant risk of harm to human.

Air Quality Impacts (Habitats)

We identified the following European sites within the 10 km screening distance of the facility:

- Epping Forest Special Area of Conservation (SAC).

The following non-statutory local wildlife and conservation sites are located within 2 Km of the installation:

Local Wildlife Sites (LWS):

- River Rom at King George's Playing Fields
- River Rom in North-West Havering
- Raphael Park
- Rise Park Stream
- Marks Hedge and Hainault Road Allotments
- White's Farm
- Wellgate Community Farm
- Railsides West of Romford
- Furze House Farm
- Bob's Lane and Ash Lane
- Westland's Rough
- Romford Golf Course

We have assessed the impact from the proposed Installation on the Habitat sites that are within the relevant screening distance. As required under the Habitats Regulations we have completed a Habitats Regulation Assessment (HRA). This is a two-stage process. The Stage 1 HRA is where it is identified whether process contribution (PC) will have a likely significant effect on the integrity of the habitat site. For any habitat site where we are unable to conclude that there will be no likely significant effect on the integrity of the site a detailed 'appropriate assessment' of the impacts is carried out under the Stage 2 HRA to determine if the impacts will have an adverse effect on the habitat site.

The Applicant's assessment shows that for all scenarios the process contributions of NO_x, NH₃ nitrogen deposition and acid deposition at the Epping Forest Special Area of Conservation (SAC) when compared to the relevant critical levels and loads are likely to be insignificant. We have therefore concluded no likely significant on the integrity of the habitat site. We have completed a stage 1 HRA detailing our assessment and this was sent to Natural England for information only.

Assessment of other conservation sites

Conservation sites are protected in law by legislation. The Habitats Directive provides the highest level of protection for SACs and SPAs and domestic legislation provides a lower but important level of protection for SSSIs. Finally, the Environment Act provides more generalised protection for flora and fauna rather than for specifically named conservation designations. It is under the Environment Act that we assess other sites (such as local wildlife sites) which prevents us from permitting something that will result in significant pollution; and which offers levels of protection proportionate with other European and national legislation. However, it should not be assumed that because levels of protection are less stringent for these other sites that they are not of considerable importance. Local sites link and support EU and national nature conservation sites together and hence help to maintain the UK's biodiversity resilience.

For SACs SPAs, Ramsar and SSSIs we consider the PC and the background levels in making an assessment of impact. In assessing these other sites under the Environment Act we look at the impact from the Installation alone in order to determine whether it would cause significant pollution. This is a proportionate approach, in line with the levels of protection offered by the conservation legislation to protect these other sites (which are generally more numerous than Natura 2000 or SSSIs) whilst ensuring that we do not restrict development.

Critical levels and loads are set to protect the most vulnerable habitat types. Thresholds change in accordance with the levels of protection afforded by the legislation. Therefore, the thresholds for SAC SPA and SSSI features are more stringent than those for other nature conservation sites.

Therefore, we would generally conclude that the Installation is not causing significant pollution at these other sites if the PC is less than the relevant critical level or critical load, provided that the Operator is using BAT to control emissions.

The Operator's assessment shows that for testing and maintenance the PCs at the non-statutory local wildlife and conservation sites listed above will be below the relevant critical levels or loads. Our assessment and audit of the Operator's modelling did not agree with this, our checks showed that during testing and maintenance operations there was a risk of an exceedance of the daily mean NOx critical level (200µg/m³) at the River Rom at King George's Playing Fields LWS. For this reason, we have included operational restrictions in the permit that will ensure that NOx impacts at the LWS during testing and maintenance operations will remain below the daily mean NOx critical level. The restrictions included in table S1.1 of the permit are as follows:

- Testing of generators/DRUPS shall not be carried out for longer than 6 hours in any 24-hour period.
- No testing of any generators/DRUPS shall be carried out within the same 24-hour period as the monthly concurrent testing of the Phase V generators.

Also, the likelihood of a 72-hour emergency scenario is expected to be extremely low (Operator predicts 1 every 10 years), we are therefore satisfied that the Installation is unlikely to cause significant pollution at any conservation site. The Operator is required to prevent, minimise and control emissions using BAT, this is considered further in Section 5. See AQMAU 'Audit of Air Quality Assessment' report for further details of our assessment.

4. 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.

5. Best Available Techniques (BAT)

Technology and Fuel

The Applicant considered a range of technologies and fuels as part of the design and specification phase. The Applicant considers the latest generation of gas oil/HVO powered generators to be BAT for this site. Alternatives, including diesel rotary uninterruptible power supply engines (DRUPS), natural gas engines, LPG engines, gas turbines and hydrogen fuel cells were considered but were not considered operationally viable for this installation.

We accept that gas oil/HVO 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.

Engine Specification

Environment Agency guidance specifies the BAT emissions specifications for new gas oil 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/m³ at 5% oxygen and reference conditions.

The 8 new generators proposed for this installation and included in the Air Quality assessment are emissions optimised and achieve the Tier II USE EPA standard. The maximum design load is 75% per generator and at this load unabated NO_x emissions are 1,865mg/Nm³ (at 5% oxygen and standard temperature and pressure). Furthermore, so as to minimise the potential impact of NO_x emissions at nearby sensitive receptors, the generators will be fitted with Selective Catalytic Reduction (SCR) emissions abatement with a minimum NO_x emission reduction of 81%. We are satisfied that the applicant has provided sufficient justification to show that their proposal is BAT.

Fuel Storage

Each of 8 new engines has its own dedicated above ground carbon steel fuel belly tank (44,546 litre capacity) which are integrally bunded and built to BS799 Part 5 Type J 2010 specification. The tanks will have volume and leak detection alarms in place. Fuel tanks are vented back to the fuel filling points. Tanks are to be filled via local fill point cabinets installed on the front of the building. The cabinets will be locked when not in use. The Operator has confirmed that the fuel storage tanks, bunding and associated pipework for the 8 new generators are designed and built in accordance with the requirements in the Oil Storage Regulations (SI 2001/2954. The Control of Pollution (Oil Storage) (England) Regulations 2001). All tanks, bunding and pipework are regularly inspected for leaks and/or damage.

The Applicant has stated that in the event of a fuel spillage within the generator rooms, the fuel will naturally fall to one side of the fully bunded and tanked pit into a linear gully, from which a temporary pump will be lowered into the gully and fuel pumped into an external tank for removal off site.

Fuel Delivery

We are satisfied that the necessary controls will be in place to minimise the risk of pollution. Refuelling is expected to only occur twice a year or less. Spill kits are situated in refuelling areas. An existing petrol interceptor is in situ as part of the below ground drainage system. Fuel filling points are positioned above a concrete slab. Temporary containment kerbs are used during refuelling. Refuelling is conducted by trained fuel tanker drivers and supervised by a trained member of the site engineering staff. The Operator has existing operating procedures in place and we are satisfied that they are appropriate.

Choice of Fuel

The applicant confirmed that the emergency generators will be operated on either gas oil or HVO. We have specified in the permit that gas oil/HVO can have a maximum sulphur content of 0.001% (w/w).

6. Emission Limits

Based on the operational requirements, we have not set any emission limits.

As there are no limits, permit condition 2.3.6 'The activities shall not operate for more than 500 hours per year' has been included to restrict the hours of operation. The operator will be required to record operating hours and the number of runs for each of the generators.

7. Monitoring Requirements

We have specified monitoring of emissions of carbon monoxide (CO) from emission points EP1 to EP17, 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 the 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 oxides of nitrogen (NOx) from emission points EP1 to EP17, 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 NOx from the installation.

Taking into account the limited hours of operation of the generators operating at the installation, and the fact that we are not setting emission limits for carbon monoxide and NOx, 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).

8. Emissions to Sewer

The existing permit did not have a point source emission to sewer listed in the permit. However, the variation application included details of a drainage connection to the surrounding industrial estates drainage network. The operator has stated that discharges are limited to surface water runoff. We have therefore included this discharge in the permit and restricted the discharge to uncontaminated surface water runoff.

9. Waste

The facility will not generate significant quantities of waste. Each main engine lubricating oil is changed at 500 run hours or 3 yearly intervals, whichever is shorter. Any waste oil generated during testing/maintenance will be removed

from site by an appointed third-party contractor and managed by a suitably regulated waste management contractor.

Based upon the information in the application, we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise pollution from waste.

10. 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 <50 hours per generator, linked to operating techniques table S1.2

11. Permit Conditions

Permit condition 2.3.6

The permit includes a maximum 500-hour operational limit for the emergency standby generators. The 500 hours includes testing and maintenance.

Table S1.1 (Activities)

Includes the following operational control:

- Electricity produced at the installation cannot be exported to the National Grid.

This control places a limit on the activity to exclude voluntary 'elective power generation' such as Balancing Services, Demand Side Response operations including Frequency Control Demand Management (FCDM) or Triad Avoidance. This is primarily to differentiate data centres from 'diesel (gas oil) arrays' that voluntarily operate within the balancing market, and importantly a clear way to demonstrate minimisation of emissions to air as 'emergency plant'.

As discussed above we have also included the following operational restrictions:

- Testing of generators/DRUPS shall not be carried out for longer than 6 hours in any 24-hour period.

- No testing of any generators/DRUPS shall be carried out within the same 24-hour period as the monthly concurrent testing of the Phase V generators.

Table S1.2 (Operating techniques)

The testing and maintenance scenarios are detailed in this document and controlled through permitted operating techniques in table S1.2 of the permit.

Table S1.3 (Improvement programme)

IC1 - Air Quality Management Plan (AQMP)

Whilst we are satisfied that the maintenance and testing regime is appropriate, given the local issues regarding air quality, including the designation of the AQMA, we have included an improvement condition in the permit. This requires the operator to produce an updated Air Quality Management Plan.

IC2 - Performance of SCR systems

This condition has been included to ensure that the proposed SCR systems are fit for purpose and as described in the application.

IC3 – Monitoring plan – flue gas monitoring requirements

This condition has been included requiring the operator to submit a monitoring plan detailing their proposal for the implementation of the flue gas monitoring requirements specified in table S3.1.

Table S1.4 (Pre-operational condition for future development)

PO1 – Commissioning

The Operator has not modelled the commissioning of the proposed new engines in the AQ assessment. It is therefore unclear whether the impact from commissioning has been covered by the existing AQ assessment. For this reason, the Operator is required to submit a report detailing the proposed commissioning and demonstrating the operations are covered within the site's permitted regular testing regime. If 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.

Table S4.2 (Performance parameters)

Reporting of testing and maintenance run hours is required annually. Operation during an emergency scenario requires both notification within 24 hours and annual reporting.

Annex 1 - 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.

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:

Health & Safety Executive (HSE)

London Borough of Havering Local Authority (planning and environmental health)

UK Health Security Agency (UKHSA) (formerly Public Health England (PHE))

The comments and our responses are summarised in the [Consultation Responses](#) section of this document.

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 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.

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. Refer to Air Quality Impacts (Habitats) section of this document.

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.

Operating Techniques

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

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 controls in the permit 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 on the use of liquid fuel.

Pre-operational Conditions

Based on the information in the application, we consider that we need to include a pre-operational condition requiring submission of a commissioning plan.

Improvement Programme

Based on the information in the application, we consider that we need to include an improvement programme. See key decisions for details of the conditions include.

Emission Limits

We have decided that emission limits are not required in the permit, refer to Monitoring Requirements section of this document.

Reporting

We have specified reporting in the permit to gather information on emissions to air from EP1 to EP17 and performance parameters.

Management System

We are not aware of any reason to consider that the operator will not have the management system to enable them 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.

Annex 2 - 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:

Responses received from:

1. **UK Health Security Agency (UKHSA)** (Environmental Public Health Scientist) – response received 21/08/2024

Brief summary of issues raised:

We would ask the regulator to consider asking the applicant to provide:

- clear plots of 1-hr NO₂ and PM₁₀ exposure at sensitive locations compared to appropriate statutory limits.
- Where there is a number of “permissible breaches” to demonstrate that a) the breaches do not risk statutory limits being exceeded and are as low as possible to reduce the impact on public health, and b) the cumulative impact of extra off-site emissions during these events have been appropriately factored in.
- The modelling methodology to factor in elevated emissions during generator start-up and the potential for fugitive emissions. We would also expect the assumed impact of abatement measures to be clearly justified.
- The site is within an AQMA and reducing public exposures to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards has potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants and address inequalities (in exposure) and encourage their consideration during site design, operational management, and regulation.

Summary of actions taken:

For comments 1 -3:

1. NO₂ and PM₁₀ contour plots – Because the Operator has assessed at relevant human health receptors and they do not predict exceedances during testing operations, we would not need to see contour plots for these pollutants in this audit.
2. We predicted no exceedance of the environmental standards or AEGLs, and by adding SCR to the proposed generators, the NO₂ emissions from the proposed generators are as low as possible to reduce the impact on

public health. Our modelling employed multiple conservative assumptions, and is deemed to be worst-case.

3. In our checks, we factored in elevated emissions during SCR warmup for the proposed generators. For all generators, the consultant has modelled at the emission concentrations from the relevant generator datasheets.

For comment 4 – No response required.

Responses received from:

London Borough of Havering – Environmental Health Dept – response received 14/10/2024

Brief summary of issues raised:

Concern that no consideration has been given to the Mayor of London's requirement for any development to be air quality neutral.

Summary of actions taken:

This is a matter for the relevant local authority and is outside the scope of this determination which is to assess the impact of emissions from the proposed activity.