



Surrender Site Condition Report

Hemel Hempstead HH1 (Centro) Data Centre

NTT Global Data Centers EMEA UK Limited

Centro Datacentre,
3 Boundary Way,
Hemel Hempstead
HP2 7SU

Prepared by:

SLR Consulting Limited

5th Floor, 35 Dale Street, Manchester, M1 2HF

SLR Project No.: 410.065477.00001

14 November 2025

Revision: Final

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
Draft	15 April 2025	Jonathan O'Donnell	Sean O'Brien	Sharon Abram
Final	14 November 2025	Sean O'Brien	Sharon Abram	Sharon Abram

Basis of Report

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with NTT Global Data Centers EMEA UK Limited (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.



Table of Contents

1.0	Introduction	1
1.1	Centro Data Centre	1
2.0	Surrender Test.....	3
2.1	Pre-application Advice.....	3
3.0	Site Details.....	4
4.0	Condition of the Land at Permit Issue	5
5.0	Permitted Activities.....	8
6.0	Changes to the Activity.....	9
7.0	Measures Taken to Protect Land.....	10
7.1	Site Details	10
7.2	Generator Belly Tanks.....	10
7.3	Bulk Storage Tank.....	10
7.4	Diesel Oil Delivery	11
7.5	Site Surfacing.....	11
7.6	Waste Storage	11
7.7	Fluorinated Gases	11
7.8	Drainage	11
7.9	Environment Management System (EMS).....	12
7.10	Preventative Maintenance Programme.....	12
7.11	Incident Reporting / Incident Log	13
7.12	Daily Checks	13
7.13	Spill Management.....	13
7.14	Training	13
7.15	Checklist of Supporting Information.....	13
8.0	Pollution Incidents That May Have Had an Impact on Land, and their Remediation.....	14
8.1	Spills and Leaks	14
8.2	Environment Agency Compliance Assessment Reports (CAR)	14
8.3	Checklist of Supporting Information.....	14
9.0	Soil Gas and Water Quality Monitoring (Where Undertaken)	15
9.1	Checklist of Supporting Information.....	15
10.0	Decommissioning and Removal of Pollution Risk.....	16
10.1	Decommissioning.....	16
10.2	Environmental Controls	16
10.3	Bulk Fuel Tank Decommissioning	16
10.4	Generator Decommissioning	17



10.5	Degassing of Refrigerant Based Systems	17
10.6	Training	17
10.7	Summary.....	17
10.8	Checklist of Supporting Information	18
11.0	Reference Data and Remediation (Where Relevant).....	19
11.1	Checklist of Supporting Information	19
12.0	Statement of Site Condition.....	20

Tables in Text

Table 1-1: Centro Data Centre Combustion Plant Rated Thermal Input.....	1
Table 1-2: Centro Data Centre Diesel fuel Storage Tanks	2
Table C.1: Photograph Reference Log.....	C-1

Appendices

Appendix A	Application Site Condition Report
Appendix B	EA Pre-Application Advice
Appendix C	Pre and Post Centro Data Centre Decommissioning Photographs
C.1	Photographic Record
C.1.1	Pre-Decommissioning Photographs
C.1.2	Post-Decommissioning Photographs
Appendix D	CAR Forms
Appendix E	Decommissioning and Demolition Scope of Works
Appendix F	Decommissioning RAMS
Appendix G	Waste Transfer Documentation



1.0 Introduction

SLR Consulting Limited (SLR) has been instructed by NTT Global Data Centers EMEA UK Limited (NTT) to support with the partial surrender of the environmental permit (EP) (EP reference BP3800PZ). The EP includes four data centres (HH1, HH2, HH3 and HH4) located in close proximity to one another in Hemel Hempstead; this partial surrender is required to remove from the EP the HH1 (Centro) data centre, located at 3 Boundary Way, Hemel Hempstead HP2 7SU.

In accordance with the Environmental Permitting (England and Wales) Regulations 2016 (as amended), the data centre sites are considered to be an ‘installation’ and regulated as:

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

The EP permitted activities at the Centro data centre include:

- 4 MTU X1000 diesel-fired generators, each with a thermal input of 2.49 MWth, and collectively equating to 9.96 MWth;
- The associated diesel storage; and
- Surface water discharge.

This Surrender Site Condition Report (SSCR) is provided in support of the application to partially surrender the EP.

In addition to this report, the EP surrender application submission includes the following:

- Forms Part A, Part E2 and Part F1;
- Non-Technical Summary;
- Technical Note; and
- Support Drawings.

The EP installation boundary and proposed surrender boundary is presented in Drawing 01 in Section 2 of the partial surrender application.

1.1 Centro Data Centre

The Centro data centre comprises four containerised diesel-fired generators, and one above ground bulk diesel storage tank.

Table 1-1 below presents the generating capacity of generators at the Centro data centre combustion plant.

Table 1-1: Centro Data Centre Combustion Plant Rated Thermal Input

Centro Generator Reference	Generator Model	Electrical Rating (stand by) (MWe)	Thermal Rated Input (MWth)
Gen 1	MTU X1000	0.88	2.49
Gen 2	MTU X1000	0.88	2.49
Gen 3	MTU X1000	0.88	2.49
Gen 4	MTU X1000	0.88	2.49



Diesel fuel is stored in banded belly tanks. These tanks are integral to the generator container units and are located beneath the base of each generator. The diesel belly tank capacities are summaries in Table 1-2 below:

Table 1-2: Centro Data Centre Diesel fuel Storage Tanks

Centro Generator Reference	Generator Model	Diesel Belly Tank Capacity (litres)
Gen 1	MTU X1000	840
Gen 2	MTU X1000	840
Gen 3	MTU X1000	840
Gen 4	MTU X1000	840
Total		3,366

Diesel fuel is also stored in an above ground bulk storage tank adjacent to the generators. The tank is provided with secondary containment (110% capacity). The tank serves the belly tanks of the four generators; the capacity of the bulk diesel storage tank is 75,000 litres. The fuel delivery pipework from the bulk tanks to the generator belly tanks is above ground level.



2.0 Surrender Test

The legal test for surrender is – ‘that the necessary measures have been taken –

- a) To avoid a pollution risk resulting from the operation of the regulated facility; and
- b) To return the site of the regulated facility to a satisfactory state, having regard to the state of the site before the facility was put into operation’.

The objective of this partial surrender application is to demonstrate that these two surrender tests have been satisfied in relation to the Centro data centre.

This SSCR has been drafted in accordance with, and to satisfy the requirements of, relevant Environment Agency (EA) guidance, notably:

- H5 Site Condition Report – guidance and templates; and
- Regulatory Guidance Note 9: Surrender.

A SCR was produced at the application stage which described the condition of the land and groundwater at the start of the EP and was to be updated throughout the lifetime of the EP.

This partial surrender SCR presents the measures taken to protect the land and groundwater during the permitted lifetime of HH1 and ensure that the condition of the land and groundwater is in a ‘satisfactory state’; it also provides details related to the decommissioning of the permitted elements of the site, including the removal of generators, removal of fuel and the associated above ground bulk storage tank, and removal of refrigerants (F-gases) from refrigerant systems.

2.1 Pre-application Advice

Basic pre-application advice was sought from the Environment Agency (EA) in relation to an application for partial surrender of the EP, a response to which was provided by the EA on 18th June 2024. This response is presented in Appendix B.

SLR proposed a low risk approach to the partial surrender (i.e. no requirement for an intrusive investigation to obtain soil and groundwater samples to confirm the contamination status of the site). This was deemed appropriate by the EA; the EA did however request that proof be provided with the application that the local EA site officer (Howard Tee) has agreed to a low risk partial surrender application. This was provided by Howard Tee on the 28th May 2024 by email, and is evidenced in Appendix B.

Based on this advice, NTT is seeking a low risk surrender for the Centro data centre.

The remainder of this SSCR provides information in support of the partial EP surrender.



3.0 Site Details

The following is an excerpt from the original application Site Condition Report (SCR)¹, summarising the site details of the Centro data centre only. The full application SCR is included in Appendix A.

CENTRO SITE DETAILS	
Name of the applicant	NTT Global Data Centers EMEA UK Limited
Activity address	Centro Datacentre 3 Centro Boundary Way Hemel Hempstead HP2 7SU
National reference grid	TL 08132 08443
Document reference and dates for Site Condition Report at permit application and surrender	Permit Application Site Condition Report (April 2023) – 410.05391.00011/SCR Partial Permit Surrender Site Condition Report (March 2025) – 410.065477.00001/SSCR
Document references for site plans (including location and boundaries)	410.065477.00001 Drawing 01 Environmental Permit Boundary

¹ Site Condition Report (410.05391.00011 NTT HH4 Phase 2) SLR April 2023.



4.0 Condition of the Land at Permit Issue

The following is an excerpt from the original application SCR¹, summarising the site setting for the Centro data centre only. The full application SCR is included in Appendix A.

Condition of the land at permit issue	
<p>Environmental setting including:</p> <ul style="list-style-type: none"> • geology • hydrogeology • surface waters 	<p>Geology</p> <p>British Geological Survey² (BGS) data indicates the site is underlain by a bedrock of Lambeth Group Clay, Silt and Sand, formed in the Palaeogene Period approximately 48-59 million years ago. There are no recorded superficial deposits.</p> <p>Hydrogeology</p> <p>A search of the Multi Agency Geographical Information for the Countryside (MAGIC)³ revealed that the bedrock beneath the site is classified as a Secondary A Aquifer which is defined as “permeable strata capable of supporting water at a local rather than a strategic scale and in some cases forming an important source of base flow to rivers”.</p> <p>Hydrology</p> <p>MAGIC map revealed that the nearest surface water to the site is a pond approximately 300m to the east of the site.</p> <p>The Flood Map for Planning⁴ identifies the site as lying within a Flood Zone 1, defined by the website as having a less than 1 in 1,000 annual probability of river or sea flooding.</p>
<p>Pollution history including:</p> <ul style="list-style-type: none"> • pollution incidents that may have affected land • historical land-uses and associated contaminants • any visual/olfactory evidence of 	<p><u>Summary of historical and pollution data from SLR: Phase 1 Land Quality Assessment Report, Ref. 413.05391.00002.003, January 2020</u></p> <p>Site Land Use</p> <p>The site was identified as being open land until the 1990s, with the exception of an above ground tank farm which encroached onto the southern boundary in the 1960s. In the 1990s the tank farm was no longer present, however, a large square building had been constructed in the centre of the site.</p> <p>Surrounding Land Use</p> <p>The surrounding land was recorded as being mostly open fields until the 1960s when significant development of the industrial estate had occurred, including an engineering works and textile works with</p>

² British Geological Survey, available at www.bgs.ac.uk, accessed March 2025

³ Multi Agency Geographical Information for the Countryside Map, available at www.magic.gov.uk, accessed March 2025

⁴ Flood Map for Planning, available at <https://flood-map-for-planning.service.gov.uk/>, accessed March 2025.



<p>existing contamination</p> <ul style="list-style-type: none"> evidence of damage to pollution prevention measures 	<p>associated electricity substations and tanks, and a tank farm adjacent to Centro.</p> <p>Further development of industrial buildings occurred in the 1970s, and in the 1980s an oil storage depot had been constructed 300m east of Centro. In the 1990s there had been significant redevelopment of the industrial estate, with the majority of the industrial units having been replaced with industrial buildings; a large building had been constructed directly east of Centro, with the tank farm directly south having been removed. There have been no significant changes since this date.</p> <p>Pollution History</p> <p>The Phase 1 report identifies the following events and consents within a 500m radius of the site:</p> <ul style="list-style-type: none"> five records of potentially historical contaminative land uses relating to unspecified commercial/industrial, unspecified tanks and unspecified depot. Two records of unspecified tanks on site. 3 x Part A (1) and IPPC authorised activities within 250m of the site, the closest being A&M Tungsten Powders Ltd for inorganic chemicals and gases c.120m north. There are no Part 2 (A) and Part B activities within 250m of the site. Two records of Planning Hazardous Substance Contents and Enforcements relating to Shell UK Oil for storage and loading of hydrocarbons c.245m east. 1 x waste transfer station and workshop located c.250m south. No recorded pollution incidents within 250m of Centro. 1 x permitted groundwater abstraction relating to Hemel Telehouse Borehole A, C. 350m to the east. 1 x permitted discharge consent within 500m – site drainage from Hatfield Business Park c.220m to the west.
<p>Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)</p>	<p>See Appendix A: SLR Phase 2 Site Condition Report, ref. 410.05391.00011</p>
<p>Baseline soil and groundwater reference data</p>	<p>Baseline soil and groundwater reference data was not available at the time of submission of the EP application.</p> <p>An Improvement Condition (IC) to conduct intrusive investigations and obtain baseline soil and groundwater conditions was included in the EP. This was later addressed by the EA Local Officer in CAR BP3800PZ/0455783 (Appendix D) with the agreement that a desk study and updated Site Condition Report would satisfy this IC.</p>



Supporting information	Appendix A: SLR Phase 2 Site Condition Report, ref. 410.05391.00011 Appendix D – CAR Forms
-------------------------------	---



5.0 Permitted Activities

The following is an excerpt from the original application SCR¹, summarising the permitted activities for the Centro data centre only. The full application SCR is included in Appendix A.

Permitted activities	
Permitted activities	Environmental Permitting (England and Wales) Regulations 2016 (as amended): Combustion Activities, Schedule 1 Section 1.1 Part A(1)(a)
Non-permitted activities undertaken	All areas other than the diesel fired generators and the associated diesel storage.
Document references for: <ul style="list-style-type: none"> • plan showing activity layout; and • environmental risk assessment 	<p>Centro</p> <p>Section 2: Drawing 002B - Site Layout Drawing – 410.05391.00011</p> <p>Environmental Risk Assessment – 410.05391.00011/ERA</p> <p><i>Note: Environmental Risk Assessment referenced above was submitted with the original EP application, this has not been included with this EP partial surrender application.</i></p>



6.0 Changes to the Activity

The following is an excerpt from the original application SCR¹ summarising the permitted activities for the Centro data centre only. The full application SCR is included in Appendix A.

Have there been any changes to the activity boundary?	There have been no changes to the installation boundary since the original EP application.
Have there been any changes to the permitted activities?	There have been no changes to the permitted activities since issue of the EP.
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	No additional potentially dangerous substances have been utilised within the permitted installation boundary through the lifetime of the EP.
Checklist of supporting information	Section 2: Drawing 410.065477.00001.013.001 Site Location Plan



7.0 Measures Taken to Protect Land

Use records that you collected during the life of the permit to summarise whether pollution prevention measures worked. If you can't, you need to collect land and/or groundwater data to assess whether the land has deteriorated.

7.1 Site Details

The Centro data centre comprises impermeable hardstanding throughout the site. The generators and associated diesel belly tanks are containerised. The bulk diesel tank was located on concrete hardstanding. Only authorised personnel were granted access to the generator container units and the bulk diesel fuel tank.

In addition, only authorised vehicles were granted access to the data centre for the purpose of refuelling the bulk diesel storage tank. The bulk tank was situated towards the eastern boundary of the site (Section 2, Drawing 002B).

7.2 Generator Belly Tanks

The four generators at the Centro data centre were housed within propriety steel container units located in the external yard areas of the site. Beneath the floor of the container units for each of the four generators was a belly tank, which was integral to the generator container units, and automatically supplied diesel to the generator.

The belly tanks were bunded (110% capacity) and were filled directly from the bulk storage diesel tank.

The diesel belly tanks had the following protection measures:

- Tank level gauge;
- High and low level alarms connected to the Building Management System (BMS);
- A pressure delivery over-fill prevention valve to prevent over pressurisation of diesel supplied from the belly tanks; and
- Pipework comprised of corrosion resistant material to minimise the risk of corrosion.

7.3 Bulk Storage Tank

Diesel fuel at Centro was stored in an above ground diesel storage tank (Section 2, Drawing 002B), which served the belly tanks for the four generators. The bulk tank had the following protection measures:

- Integrated secondary containment (110% containment capacity);
- Fill point was located in a lockable cabinet provided with a drip tray designed to capture any minor spillages of oil from the fill point during delivery which was integral to the bulk tank unit;
- Level gauge connected to the BMS;
- High and low level alarms connected to the BMS;
- The delivery pipework from the bulk storage tank to the generators was above ground level with a pipe-in-pipe arrangement to minimise the risk of leaks. Leak detection is provided on the delivery pipework which was connected to the site's BMS; and
- Pipework was painted or comprised of corrosion resistant material to minimise the risk of corrosion.



7.4 Diesel Oil Delivery

Bulk deliveries of diesel were from NTT approved suppliers. The delivery of diesel was undertaken in accordance with procedure *HS12-P02 Diesel oil delivery procedure*.

This procedure required an NTT engineer (CFM Engineer) to escort the fuel tanker to the relevant delivery tank, to unlock and open the tank fill point, to test the tank's high-level alarm was working, and only then was the fuel delivery driver allowed to connect the tanker delivery hose and deliver the fuel.

Following delivery of the fuel, the tanker driver was then required to ensure that the delivery hose is 'blown down' to remove any residual diesel in the hose and thus avoid fuel spillage on disconnection. The fuel supplier was required to ensure that a fuel spill kit was available on the fuel delivery vehicle.

During the permitted lifetime, there were no significant leaks or spills in relation to the delivery of diesel fuel.

7.5 Site Surfacing

Site surfacing in the external areas where the generators and bulk diesel storage tanks were located comprised hardstanding with kerbing (tertiary containment) to retain surface water runoff and direct this to drain, which was then directed directly to the municipal sewer. No oily water was permitted to leave the site under normal operating conditions.

Operational areas, roads and external surfacing benefit from impermeable surfacing to prevent percolation of any spilt/leaked fuel or potentially contaminated runoff to soil and groundwater. There were no significant leaks or spills of diesel during the lifetime of the EP.

7.6 Waste Storage

The Centro datacentre inherently did not produce significant amounts of waste. Any minor spillages of diesel were to be cleaned up using proprietary spill kits, and the oil contaminated materials were to then be stored in suitable bunded containers in a waste storage area at Centro prior to offsite disposal by an NTT approved waste contractor.

Waste oil was generated as a result of generator maintenance. This maintenance was undertaken by a third-party specialist who is responsible for the off-site disposal of this waste. No waste oil was stored at the Centro datacentre.

7.7 Fluorinated Gases

Fluorinated gases (F gases) were used at the Centro data centre in the chiller and air conditioning units.

The refrigerant used in these units was R410a, a hydrofluorocarbon (HFC) with ozone depleting (ODP) and medium-high global warming potential (GWP).

These units were subject to regular maintenance and leak testing; these requirements were included in the site's preventative maintenance system. Maintenance and testing was undertaken by an NTT approved external specialist contractor.

Leak detection and maintenance records were maintained for the lifetime of the EP.

7.8 Drainage

There was no direct discharge from the Centro data centre to controlled waters.

The site had separate foul and surface water drainage systems. The surface water drainage system at Centro accepted surface water runoff from the plant areas, i.e. the areas where



the generator container units and above ground diesel storage tank were located, along with building roof areas, and other hard surface areas of the site.

All surface runoff from the plant areas drained to the onsite surface water drainage system prior to offsite discharge into the municipal sewer system. The location of the discharge point into the municipal sewer (SW1) is presented in Section A (Drawing 002B).

There is an alarmed oil interceptor and penstock valve in place at the Centro data centre, confirmed as part of Improvement Condition 3 (IC3) in Compliance Assessment Report (CAR) BP3800PZ-0435860).

7.9 Environment Management System (EMS)

NTT has an ISO 14001 certified EMS that includes the policies, management principles, organisational structure, responsibilities, standards/procedures, process controls and resources which are in place to manage environmental protection across all aspects of the business. The ISO14001 EMS included the Centro data centre.

The EMS places particular importance on:

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

NTT's main activities are identified and recorded in the Environmental Aspect and Impact Register (EMS04). Evaluation of these aspects and impacts and the associated implications are recorded in the Register. Environmental aspects are considered under the following conditions:

- Normal operation (i.e. standard operating procedures and conditions);
- Abnormal operation (i.e. standard operating procedures but non-standard conditions); and
- Emergency conditions.

7.10 Preventative Maintenance Programme

NTT has a Preventative Maintenance System (PPM) which is managed and completed by the facilities management personnel and appointed approved third-party specialists, as required. The PPM system is used to inform FM personnel of plant status and any system issues.

There was a central Control Room at the Centro datacentre, and the Control Room personnel were responsible for the following:

- Issue of all permits for plant modification and repair (the permit issuers also control and approve Risk Analysis and Method Statements (RAMS));
- Monitoring of all fuel deliveries;
- Monitoring tank levels, flow rates, tank level alarms and leak alarms; and
- Control and monitoring of all fuel transfers between bulk diesel tanks and day tanks.



7.11 Incident Reporting / Incident Log

During the active management of the site, any spills were to be reported to management and recorded in an incident log. A summary of the incident, the material involved and follow up action were to be recorded in the log.

No known incidents were recorded during the lifetime of the Permit.

7.12 Daily Checks

The PPM system included the requirement for daily checks of storage tanks and associated infrastructure.

The checks at Centro included the visual inspection of the above ground bulk tank during the plant check day and night shift walk round by the Facilities Management (FM) engineer; the results were recorded on the 'PIPE System Check'.

Generators and belly tanks were also inspected for leaks during these visual inspections.

7.13 Spill Management

The site operated the following procedures to ensure that spillages were effectively managed:

- *HS12- P01 Spillage Procedure; and*
- *HS04-TT44 Spillage Response.*

7.14 Training

The Centro site was managed by a sufficient number of competent staff. In accordance with the EMS:

- All staff had clearly defined roles and responsibilities;
- Records were maintained of the knowledge and skills required for each post;
- Records were maintained of the training undertaken and relevant qualifications obtained by staff to meet the competence requirement of each post; and
- Operations were governed by standard operating procedures.

Each individual's knowledge and skills were assessed and matched against the needs of the job position. The training needs of all employees were regularly reviewed.

All contractors and sub-contractors were given appropriate training prior to commencement of any works or services at the Centro site.

7.15 Checklist of Supporting Information

- Appendix C: Pre and Post Decommissioning Photographs



8.0 Pollution Incidents That May Have Had an Impact on Land, and their Remediation

Summarise any pollution incidents that may have damaged the land. Describe how you investigated and remedied each one. If you can't, you need to collect land and /or groundwater reference data to assess whether the land has deteriorated while you've been there.

8.1 Spills and Leaks

There have been no spills or leaks at Centro recorded during the lifetime of the EP which could have resulted in damage to land.

8.2 Environment Agency Compliance Assessment Reports (CAR)

8.2.1 EPR CAR BP3800PZ/0435860, dated 9 September 2022

This CAR follows discussions at NTT Hemel Hempstead Data Center on the improvement condition (IC) deadlines and compliance issues at the sites. The CAR notes that an alarmed oil interceptor was provided at Centro.

No non-conformances were identified at Centro.

8.2.2 EPR CAR BP3800PZ/0455783, dated 28 March 2023

This CAR was a review of an annual report and IC submissions. A procedure for the maintenance, inspection and testing of drains and interceptors' procedure (Underground Services Maintenance – ESS), in response to Improvement Condition 4 (IC4), was presented by NTT to the EA; the EA confirmed that IC4 was complete and would to be fully checked at the next site inspection.

With regard to IC2 which required a review of tertiary containment at all four sites, a proposed review by the operator was accepted by the regulator.

IC6 (site investigation programme for baseline soil and groundwater data) was addressed in this CAR, with the proposal to review the site conditions at Centro via a desk study and update to the SCR, negating the need for intrusive work, under the condition that this systematic appraisal was provided within six months.

No non-conformances were identified at Centro.

8.2.3 EPR CAR BP3800PZ/0464440, dated 09 June 2023

This CAR raised an action to review the fuel filling points at HH1-HH4 due to a quantity of spilt diesel in the drip tray at HH2.

No non-conformances were identified at Centro.

8.3 Checklist of Supporting Information

Appendix D:

- EPR CAR BP3800PZ/0435860 (9 September 2022);
- EPR CAR BP3800PZ/0455783 (28 March 2023); and
- EPR CAR BP3800PZ/0464440 (9 June 2023)



9.0 Soil Gas and Water Quality Monitoring (Where Undertaken)

Provide details of any soil gas and/or water monitoring you did. Include a summary of the findings. Say whether it shows that the land deteriorated as a result of the permitted activities. If it did, outline how you investigated and remedied this.

Not applicable. There have been no spills or leaks of hydrocarbons at the Centro site during the lifetime of the EP. Based on the pollution prevention measures and the environmental management measures in place in relation to the permitted activities, ground gas and water quality monitoring was not considered necessary.

Land and/or groundwater data has not been collected. The information provided in sections 3, 4, 5 and 6 of this SSCR demonstrate that there is a low risk of soil/groundwater pollution, and that the risk of the deterioration of land quality is highly unlikely.

9.1 Checklist of Supporting Information

- Appendix A – Site Condition Report (410.05391.00011 NTT HH4 Phase 2) SLR Consulting Limited, April 2023.
- Appendix B – EA Pre-application advice response (18 June 2024) and Local Officer confirmation of Low Risk Surrender via an updated Site Condition Report.
- Appendix D – CAR BP3800PZ-0455783 (28 March 2023) detailing removal of EP IC6 for background ground and groundwater monitoring.



10.0 Decommissioning and Removal of Pollution Risk

Describe how the site was decommissioned. Demonstrate that all sources of pollution risk have been removed. Describe whether the decommissioning had any impact on the land. Outline how you investigated and remedied this.

10.1 Decommissioning

The Centro data centre was decommissioned during 2024 and completed in November 2024. The required scope of works is detailed in the *NTT Dilapidation Deconstruction – HH1 London Plan*, which is presented in Appendix E.

NTT appointed a specialist third party contractor to complete the decommissioning. The contractor (DataProjex) Method Statements for the decommissioning and removal of the generators and fuel system can be found in Appendix F.

Decommissioning included:

- Decommissioning of all mechanical and electrical equipment and services; and
- ‘Drain down’ of all redundant pipework and equipment, removing potentially hazardous liquids in a controlled manner. Waste liquids from the drain down were removed and transferred offsite to a suitably licensed waste contractor for disposal.

A licensed waste contractor undertook the following work relating to the permitted generators and fuel storage tanks, and removed any associated wastes offsite for disposal at a suitably licensed facility:

- Draining and removal of connecting redundant pipework between generator’s belly tanks and bulk tank;
- Draining of fuel and oil and removal of belly tanks for generators 1, 2, 3 and 4;
- Draining of fuel and removal of bulk diesel storage tank;
- F gas (HFC) used in the fire suppression system was removed by a suitably licensed specialist contractor (The method statements for the decommissioning of the air conditioning system are presented in Appendix F);

All debris arising from the decommissioning was segregated on site and removed from site as soon as practicable.

Photographs of datacentre before and after decommissioning are provided in Appendix C.

10.2 Environmental Controls

Environmental controls were implemented during the decommissioning works and are detailed in RAMS which is included within Appendix F.

The generation of waste was minimised, and the waste hierarchy was applied to manage waste, maximising waste reuse and minimising waste disposal.

10.3 Bulk Fuel Tank Decommissioning

The diesel bulk storage tank was drained of all fuel by specialist contractor (Adler & Allan) prior to removal.

The empty tank was then removed in its entirety by a specialist contractor (Holywell Haulage Ltd.). There was no unplanned release of diesel during the removal process.

The RAMS for the removal of the diesel fuel and fuel tank are included in Appendix F.



The waste transfer notes for the diesel and bulk diesel tank disposal are included in Appendix G.

Photos of the tank removal and condition of the concrete base after removal are included in Appendix C.

10.4 Generator Decommissioning

Norwest Projects Limited (Norwest Projects) were contracted to drain down the pipework between the generators and the bulk fuel tank, and also to transfer the fuel within the generator belly tanks to IBCs. RAMS for these procedures are included in Appendix F.

Norwest Projects ensured the following steps were implemented to minimise the risk of an unplanned release of diesel:

- ensure bulk fuel tank pipework was isolated at the valves on the belly tanks prior to works commencing; and
- install temporary bunding using sandbags where pipework is to be removed to ensure that any fuel leaks would be contained and not enter the surface water drainage system.

There was no unplanned release of diesel during generator decommissioning.

10.5 Degassing of Refrigerant Based Systems

Norwest Projects were also contracted to degas and strip out the Variable Refrigerant Flow (VRF) DX systems (external condensers). The Mechanical and Electrical RAMS are included in Appendix F.

Norwest Projects ensured the following steps were implemented to minimise the risk of an unplanned release of refrigerant:

- identify AC equipment to be taken out of service;
- electrically isolate equipment and remove supply cabling;
- install reclaim unit into AC systems at condenser locations;
- allow reclaim unit to extract refrigerant;
- confirm all refrigerant is removed from system and cut pipework to indoor and outdoor units ready for strip out works; and
- fill out F-gas site register to show the removal of refrigerant.

10.6 Training

A site induction was provided for the appointed decommissioning contractors; this included detail on specific tasks, and the required environmental management practices.

10.7 Summary

The decommissioning phase ensured that all potential sources of pollution relating to the permitted activities have been removed from site. There were no unplanned releases of potentially polluting substances during the decommissioning of the generators, bulk fuel tank and fuel pipelines. Additionally, the cooling systems were fully degassed, and all F gases were contained and removed from site.



10.8 Checklist of Supporting Information

- Appendix C – Pre and Post decommissioning photograph log.
- Appendix E – Decommissioning Scope of Works.
- Appendix F – Decommissioning RAMS
- Appendix G – Waste transfer notes.



11.0 Reference Data and Remediation (Where Relevant)

Say whether you had to collect land and/or groundwater data. Or say that you didn't need to because the information from sections 3, 4, 5 and 6 of the Surrender Site Condition Report shows that the land has not deteriorated.

If you did collect land and/or groundwater reference data, summarise what this entailed, and what your data found. Say whether the data shows that the condition of the land has deteriorated, or whether the land at the site is in a "satisfactory state". If it isn't, summarise what you did to remedy this. Confirm that the land is now in a "satisfactory state" at surrender.

Land and/or groundwater data has not been collected. The information provided in sections 3, 4, 5 and 6 of this Surrender Site Condition Report demonstrate that there is a low risk and that the condition of the land has not deteriorated.

11.1 Checklist of Supporting Information

- Appendix A – Application Site Condition Report.
- Appendix B – EA Pre-application advice response and Local Officer confirmation of Low Risk Surrender via an updated Site Condition Report.
- Appendix D – CAR Form BP3800PZ-0455783 detailing removal of EP Improvement Condition 6 for background ground and groundwater monitoring. Action issued for a desk based Risk Appraisal of baseline conditions to inform an updated Site Condition Report and management plan.



12.0 Statement of Site Condition

Using the information from sections 3 to 7, give a statement about the condition of the land at the site. This should confirm that the permitted activities have stopped decommissioning is complete, and the pollution risk has been removed the land is in a satisfactory condition.

Based on the information presented in this SSCR, it is considered that:

- The permitted activities have now ceased;
- All potentially polluting materials have been safely and correctly removed from site;
- The site equipment has been decommissioned to remove any residual risk of pollution;
- The operational history for the site and the management systems in place, demonstrate that appropriate measures were employed during the lifetime of the permitted activities to prevent pollution risk to soil and groundwater; and
- There has been no significant loss of materials to soil or groundwater from the permitted activities during the permit lifetime.

On this basis, it is considered that there has been no potential for deterioration of either soil or groundwater condition underlying the site, and the land at the Centro site is considered to be in a satisfactory condition to allow the EP to be partially surrendered.





Appendix A Application Site Condition Report

Surrender Site Condition Report

Hemel Hempstead HH1 (Centro) Data Centre

NTT Global Data Centers EMEA UK Limited

SLR Project No.: 410.065477.00001

14 November 2025





Appendix B EA Pre-Application Advice

Surrender Site Condition Report


Hemel Hempstead HH1 (Centro) Data Centre

NTT Global Data Centers EMEA UK Limited

SLR Project No.: 410.065477.00001

14 November 2025





Appendix C Pre and Post Centro Data Centre Decommissioning Photographs

Surrender Site Condition Report

Hemel Hempstead HH1 (Centro) Data Centre

NTT Global Data Centers EMEA UK Limited

SLR Project No.: 410.065477.00001

14 November 2025



C.1 Photographic Record

Photographs of the Site have been provided by NTT of the partial permit surrender application area at the Centro Data Center. The photo references are presented in the table below and in the corresponding sections for pre and post decommissioning.

Table C.1: Photograph Reference Log

Photo Reference	Pre or Post Decommissioning	Detail
C.1	Pre	Generators 1 – 4
C.2	Pre	Bulk Diesel Fuel Storage Tank, Front View
C.3	Pre	Bulk Diesel Fuel Storage Tank, Rear View
C.4	Post	Bulk Diesel Tank Removal and Post Generator Removal
C.5	Post	Bulk Fuel Storage Tank platform after tank removal

All photos provided by NTT

C.1.1 Pre-Decommissioning Photographs

Photo C.1: Generators 1 – 4 in-situ



Photo C.2: Bulk Diesel Tank – front view



Photo C.3: Bulk Diesel Tank – rear view



C.1.2 Post-Decommissioning Photographs

Photo C.4: Bulk Diesel Tank Removal and Post Generator Removal



Photo C.5: Bulk Diesel Tank Concrete Base After Removal



Appendix D CAR Forms

Surrender Site Condition Report

Hemel Hempstead HH1 (Centro) Data Centre

NTT Global Data Centers EMEA UK Limited

SLR Project No.: 410.065477.00001

14 November 2025





Appendix E Decommissioning and Demolition Scope of Works

Surrender Site Condition Report

Hemel Hempstead HH1 (Centro) Data Centre

NTT Global Data Centers EMEA UK Limited

SLR Project No.: 410.065477.00001

14 November 2025



Appendix F Decommissioning RAMS

Surrender Site Condition Report

Hemel Hempstead HH1 (Centro) Data Centre

NTT Global Data Centers EMEA UK Limited

SLR Project No.: 410.065477.00001

14 November 2025



Appendix G Waste Transfer Documentation

Surrender Site Condition Report

Hemel Hempstead HH1 (Centro) Data Centre

NTT Global Data Centers EMEA UK Limited

SLR Project No.: 410.065477.00001

14 November 2025





Making Sustainability Happen