Permitting Decisions- Bespoke Permit

We have decided to grant the permit for KAO Data Harlow Campus operated by Harlow Operations Limited.

The permit number is EPR/WE4588AB/V002.

The permit was granted on 03/06/2026.

The application is for the addition of standby diesel generators to the existing data centre campus. The proposed changes are as follows:

- Add two additional generators to the existing KLON1 data centre, each with a rated thermal input of 4.61 MW. KLON1 would now have seven generators.
- Add four additional generators to the existing KLON2 data centre, each with a rated thermal input of 4.61 MW. KLON2 would now have seven generators.
- Add a new data centre, KLON3, to the campus. KLON3 would comprise 11 generators each with a rated thermal input of 8.01 MW.

The combined thermal input of the facility would increase from approximately 36 MW to 152 MW. The generators provide an emergency back-up electricity supply to allow the data centres to continue operating during a loss of electrical power from the grid or an internal power supply failure.

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

Testing regime

The standby generators will be routinely tested for readiness according to the following schedule:

• **Monthly routine readiness test**: 1 hour per generator (individually) running at approximately 30% of the full load capacity, to occur on weekdays between 9am and 5pm. Will occur for 11 months of the year. Once a year this test will be replaced by the annual service test.

• **Annual service test**: Once per year, 2 hours per generator running at approximately 30% of the full load capacity, to occur on weekdays between 9am and 5pm.

• **Black Building Test**: Once per year, 30 minutes, running all generators within one of the three data centres simultaneously at approximately 30% of the full load capacity.

In addition to these routine testing scenarios, a scenario in which all 25 generators are continuously operating simultaneously for 72-hours was assessed to simulate an emergency event where the primary power supply is interrupted.

With the high level of mains electrical system redundancy, it is anticipated that the mains generators are unlikely to operate for extended time periods.

Air quality assessment

Dispersion modelling was undertaken using Lakes Environmental AERMOD View. Impacts at sensitive receptors were quantified for three separate event scenarios: routine readiness testing, black building tests and the emergency scenario, with the results compared with the relevant environmental standard (ES).

The Air Quality Assessment has been carried out assuming gas oil (ultra-low sulphur) as the fuel supply of choice. The operator is using hydrogenated vegetable oil (HVO). The potential benefits to combustion emissions from using this fuel compared with gas oil have NOT been included in the Air Quality Assessments carried out to date. The Air Quality Assessments carried out to date assume the use of gas oil.

The operating envelope and fuel choice requirements are captured by permit tables S1.1, S1.2 and S2.1. Also refer to Choice of Fuel section in this document.

The consultant assessed the potential long-term and short-term impacts of nitrogen oxides (NO_X), particulate matter (PM), volatile organic compounds (VOCs) and sulphur dioxide (SO_2) at sensitive human and ecological receptors.

Human health receptors

Routine readiness testing (human health)

It should be noted that while the monthly routine readiness testing will be conducted while the generators are running at approximately 30% load capacity, modelling used emission rates from operating the generators at 100% load capacity to be conservative. Similarly for the Black building test, the generators were modelled at 50% load capacity (rather than 30% likely running load capacity). The results for the routine readiness testing scenario that resulted in the greatest modelled concentrations was presented and is discussed below.

Based on the modelling results and the existing baseline conditions, the results show that the predicted pollutant concentrations for the routine readiness testing scenario were below the relevant short-term ESs at all receptor locations and are not considered to be significant.

Black Building Test (human health)

Similarly, the predicted pollutant concentrations for the annual Black Building Test were below the relevant short-term ESs at all receptor locations. As such, impacts are not considered to be significant.

Emergency Power Outage Event (human health)

Predicted pollutant concentrations for the Emergency Power Outage Event, representing a 72-hour grid outage, were below the relevant short-term ESs at all human receptor locations, with the exception of the 1-hour mean ES for nitrogen dioxide (NO_2). However, statistical analysis indicates that exceedances are highly unlikely to occur, therefore impacts are not deemed to be significant.

Permit improvement condition IC1 requires the operator to submit an Air Quality Management Plan (AQMP) to manage the risk to local receptors during grid outage events.

There were no predicted exceedances of any long-term ESs.

Ecological receptors

European sites

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

Special Area of Conservation (SAC)

Epping Forest (within 9342m)

Special Protection Area (SPA)

Lee Valley (within 7836m)

Ramsar

Lee Valley (within 7836m)

Non-statutory sites

We identified the following non-statutory sites within the 2 km screening distance of the facility:

Local Wildlife Sites (LWS)

16 sites identified with details available on our public register.

Ancient Woodland

Markhall Wood

Barnsley/Brenthall Woods

Harlow Park

Routine readiness testing (ecological impacts)

The highest daily mean NO_X PC is 80.1 µg/m^3 at Markhall Wood LWS which exceeds the lower critical level of 75 µg/m^3. The consultant's analysis indicates that exceedances occur due to building downwash effects when KLON02 engines operate during north-westerly winds. The consultant suggests that this is infrequent, therefore, exceedances are unlikely. The consultant's daily mean NO_X PCs are insignificant at all other ecological sites.

Black Building Test (ecological impacts)

The predicted daily mean NOx PCs are insignificant.

Emergency Power Outage Event (ecological impacts)

For the emergency scenario, the daily mean NO_X PCs are predicted to exceed the critical level of 75 µg/m^3 at all ecological sites included in the assessment except for Lee Valley special protection area (SPA). The consultant has applied the lower daily mean NO_X critical level of 75 µg/$m^{3.}$ Our checks indicate that the higher daily mean NO_X critical level of 200 µg/m^3 is applicable at the ecological sites included in the assessment.

The annual NO_X, nutrient nitrogen and acid deposition PCs are all insignificant when combining the total annual operations.

Environment Agency audit/assessment

Based on our check modelling, we agree with the operator's overall conclusions that the impacts from the site are unlikely to be significant. Our audit focused on the impacts from NOx emissions.

Human health receptors

We do not predict any exceedances of the short- or long-term NO_2 environmental standard for any modelled scenario. For the emergency scenario, we find that the consultant's PCs would not exceed the ES if the 15% NO_X to NO_2 conversion is used.

(The consultant states that they have used conversion factors of 70% for long-term and 15% for short-term to calculate the percentage of NO_2 from NO_X emissions. We observe from their short-term modelling results that they have likely applied the standard short-term conversion factor of 35% from our guidance. The conversion factor of 15% is likely to be reasonably representative at receptors within the first few hundred meters (approximately 500 m) from the source, which is where maximum PCs are predicted.)

Ecological receptors

For the routine readiness and black building tests, results from our check modelling show daily mean NO_X PCs are insignificant when using the higher daily mean NO_X critical level of 200 $\mu g/m^3$. We note that the consultant's daily mean NO_X PCs for the routine readiness and black buildings tests would also be insignificant if assessed against the higher critical level instead of the lower critical level.

For the emergency scenario, our daily mean NO_X PCs are predicted to exceed the higher critical level should a prolonged power outage coincide with worst-case meteorology, however, we find that exceedances are unlikely, as this is based on a national emergency event.

Our annual NO_X and nutrient nitrogen and acid deposition PCs are all insignificant against the site-specific critical levels and critical loads.

Air quality management plan (AQMP)

When the permit is issued, we have specified that that the operator shall have a written AQMP to manage any issues for prolonged emergency running of the plant.

An AQMP will be provided in consultation with the Local Authority. This will outline the response measures to be taken in the event of a National Grid failure and the operation of the generators. This will include consideration of the

predicted potential impact indicated by the air dispersion modelling at individual receptors, timescales for response measures, considerations of local conditions relevant during a grid failure, contingency measures and how this plan will be reviewed.

The approved plan will be incorporated into table S1.2 of the permit.

Operating hours

The Medium Combustion Plant (MCP) will be operated on limited hours, with permit tables S1.1 and S1.2 securing the necessary requirements.

New MCPs operating less than 500 hours per year as a three-year rolling average are exempt from meeting Medium Combustion Plant Directive (MCPD) emission limits, refer to Emission limits section of this document.

Permit conditions

2.3.6

The permit includes a maximum 500 hour ‘emergency/standby operational limit’ for any or all the plant producing on-site power under the limits of the combustion activity; and thereby emission limit values (ELVs) to air are not required within the permit. Emergency hours’ operation includes those unplanned hours required to come off grid to make emergency repair of electrical infrastructure associated but occurring only within the data centre itself.

4.2.2

Reporting of standby engine maintenance run hours is required annually and any electrical outages (planned or grid failures regardless of duration) requires both immediate notification to the Environment Agency and annual reporting.

Table S1.1 (Activities)

Includes necessary additional operational controls.

Refer also to Noise section below.

Table S1.2 (Operating techniques)

Incorporates the testing and maintenance scenarios and relevant technical standards. It will also incorporate the approved AQMP.

Table S1.3 (Improvement programme)

Whilst we are satisfied that the maintenance and testing regime is appropriate, we have included improvement conditions in the permit:

Provision of an AQMP. Refer to Improvement Programme and AQMP sections of this document.

Provision of a monitoring plan. Refer to Monitoring section of this document.

Provision of assessment of performance of the SCR systems (for applicable generators)

Provision of an assessment to address the potential for fuel spills to enter the surface water drainage system within the KLON-01 area.

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.

Noise

The operator completed a noise impact assessment (NIA) which assessed the BS 41422 noise impacts due to the operation and testing of existing and proposed generators. The assessment identified that under Monthly Routine Readiness testing and once annual Black Build testing low or below adverse potential impacts are likely to occur.

Generator full load testing identified potential significant adverse impacts however, specific sound levels for the full load testing scenario have been calculated on the basis of sound levels being dictated by the load bank, which does not have a fixed location. The consultant's predictions are based on worst-case locations for this element, and lower impacts are more likely. The emphasis in the management of noise from the site is on prevention during 'normal' day to day data centre operations, and as such preventative maintenance, management, monitoring and inspection of all routine potential sources of noise.

We have reviewed the NIA and conclude that the noise level and frequency of the generator testing is unlikely to be high enough to cause noise pollution at sensitive receptors.

The above assumes that:

- All testing will be carried out during daytime hours (09:00-17:00).
- No complaints have been raised regarding noise from the testing of the existing generators.

We are not aware of any previous noise complaints relating to the site from the operation of the existing generators.

We have included the testing during daytime hours in table S1.2 of the permit.

Due to the identification of the potential for significant adverse impacts during the generator full load testing scenario, we requested that a Noise Management Plan (NMP) be produced. The NMP is included within Table S1.2 as an Operating Technique.

Best Available Technique (BAT)

We accept that oil fired diesel generators are presently a commonly used technology for standby generators in data centres.

The default generator specification as a minimum for new plant to minimise the impacts of emissions to air (NOx) is 2g TA-Luft (or equivalent standard) or an equivalent NOx emission concentration of 2000 mg/m^3. The generators on the site meet this standard. We agree with the operator that the engines are BAT for the proposed operation.

Fuel storage & delivery

Fuel is stored in individual double skinned tanks (integrally bunded to 110% capacity) below each individual generator that they serve. The generators are fed directly from belly tanks; there are no day tanks in use. Balancing lines (double skinned pipes) are present between tanks for the generators within KLON-01 only, which allow the tank fuel to be shared between tanks The tanks vary in size from 27,000 litres up to 47,939 litres, with a total combined capacity of 919,252 litres. They are fitted with high- and low-level alarms and overfill prevention valves to prevent over filling, with bund and leak detection alarms also present. Each tank has its own local fill point located on the tank itself at the roadside of the generator (i.e. there is no common fill point area remote to the tank), inside a cabinet that will be locked when not in use and located above a drip tray to capture minor spillages during refuelling.

The site is covered in hardstanding and for the areas of KLON-02 and KLON-03, surface water drains into oil interceptors prior to discharge from site and into the public surface water sewer system at emission point SW1. A recent Compliance Assessment Report (Report ID: WE4588AB/0586731, 04/11/2025) identified that the surface drainage at KLON-01 appeared to be at risk for delivery spills. An improvement condition has been added to the permit to review this, identify and install a suitable interceptor.

We are satisfied that these controls meet the necessary requirements and the likelihood of any release of fuel to the environment has been minimised.

Choice of fuel

A recent Compliance Assessment Report (Report ID: WE4588AB/0586731, 04/11/2025) identified that the generators are currently fuelled on HVO but are able to operate on gas oil also**.**

The air impact assessment was based on gas oil as the fuel, which represents a worst case.

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, this includes the use of HVO.

Emission limits

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

As the plant is limited to less than 500 hours of emergency operation by permit condition 3.5.5 and less than 50 hours for maintenance and testing in permit table S1.2, air emission limits are not applicable.

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 from emission points KLON-01 EP01 to EP07, KLON-02 EP01 to EP07 and KLON-03 EP01 to EP11, 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 (NOx) from emission points KLON-01 EP01 to EP07, KLON-02 EP01 to EP07 and KLON-03 EP01 to EP11, 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 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 20 January 2026 (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 3.5.5) unless otherwise agreed under Improvement Condition 2.

For existing MCP with net rated thermal input between 1MW-5MW monitoring applies from 01/01/2030, which is the relevant MCPD compliance date. We have set a requirement for the first monitoring to happen at any time, but no later than the relevant compliance date (permit condition 3.5.5) unless otherwise agreed under Improvement Condition 2.

We have also specified continuous process monitoring of levels of nitrogen oxides (NOx) from emission points KLON-02 EP03, to EP06 and KLON-03 EP01 to EP11 because these generators are fitted with SCR, hence we consider this monitoring necessary to ensure the effective operations of the abatement system, to prevent excessive ammonia slip and to dose the right amount of urea solution. Because this monitoring is not specified to assess compliance with emission limits, we are satisfied that it will not require certification to MCERTS standards.

Emissions to water

There will be emissions of uncontaminated site surface water via oil interceptors (from KLON-02 and KLON-03 only) at emission point SW1.

Also refer to Fuel storage and delivery section of this document.

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.

We consulted the following organisations:

The Director of Public Health

UK Health Security Agency (UKHSA)

Local Authority (Planning & Environmental Health)

Health & Safety Executive (HSE)

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

The application was publicised on the GOV.UK website.

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 1 of RGN 2 ‘Interpretation of Schedule 1’, and Appendix 2 of RGN2 ‘Defining the scope of the installation’.

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 combined net rated thermal input of the plant is above 20 MW. Because the plant are spark ignition gas engines, they are not considered to be a section 1.1 Part B activity as spark ignition gas engines, based on the Environmental Permitting (EP) Regulations (England and Wales) 2016.

The combined net rated thermal input of the plant is greater than 50 MW. In accordance with the Environmental Permitting (EP) Regulations (England and Wales) 2016 the activity is a listed activity falling under:

Section 1.1 Part A1(a): Burning any fuel in an appliance with a rated thermal input of 50 or more megawatts.

The site

The operator has provided a 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 and baseline reporting under the Industrial Emissions Directive.

We noted that the operator decided not to fully assess contaminants associated with the previous use of the site, with only some background data having been collected. The previous land use is unlikely to represent a significant source of historic contamination, so we agree that collection of full baseline reference data is not necessary to support this application. However, the applicant was advised that in the absence of this establishment of baseline conditions it may be difficult for them to prove that they have not caused contamination should it be identified at the surrender stage. The applicant acknowledged acceptance of this potential risk.

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. Refer to the Air Quality Assessment section of this document.

We have not consulted Natural England; however, we sent the Stage 1 Habitats Regulations Assessment form for information only on 31 March 2026.

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 oxides of nitrogen 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 included in 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.

Noise management

We have reviewed the noise and vibration management plan in accordance with our guidance on noise assessment and control.

We consider that the noise and vibration management plan is satisfactory and we approve this plan.

We have approved the noise and vibration management plan as we consider it to be appropriate measures based on information available to us at the current time. The applicant should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.

The applicant should keep the plans under constant review and revise them annually or if necessary sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit'.

Refer to 'Noise' section above for further information.

Raw materials

We have specified limits and controls on the use of liquid fuel in table S2.1 of the permit.

Pre-operational conditions

Based on the information in the application, we consider that we do not need to include the standard pre-operational condition for a commissioning plan.

The site has a number of existing permitted emergency standby generators and several of the new generators are already commissioned. The new generators began commissioning in July 2025 with the Local Enforcement Officer issuing a Compliance Assessment Report (CAR) to provide temporary cover whilst this variation application was being determined.

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:

- an Air Quality Management Plan (AQMP) is produced, outlining response measures to be taken in the event of a grid failure,
- a monitoring plan is produced for the implementation of the flue gas monitoring requirements specified in the permit,
- an assessment of the performance of the SRC systems is undertaken,
- a proposal to install a suitable oil interceptor system for the area draining from KLON-01 prior to discharging off site.

Emission Limits

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

Monitoring

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.

These monitoring requirements are described in more detail in the ‘Monitoring requirements’ section above.

Reporting

We have specified reporting in the permit to gather information on emissions to air from emission points KLON-01 EP01 to EP07, KLON-02 EP01 to EP07 and KLON-03 EP01 to EP11 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 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.

Previous performance

We have assessed operator competence. There is no known reason to consider the applicant will not comply with the permit conditions.

We have checked our systems to ensure that all relevant convictions have been declared.

No relevant convictions were found. The operator satisfies the criteria in our guidance on operator competence.

Financial competence

There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.

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 HSA.

Brief summary of issues raised: The potential exceedance of the 1hr NO_2 Air Quality Standard under the emergency power outage scenario has been identified potentially requiring further justification and mitigation measures such as boundary monitoring, ensuring routine testing of the backup generators is only carried out in favourable weather conditions, and not undertaking annual testing of all data centres within the same 24-hour period. A lack of modelling assessment for ammonia emissions associated with the generators that have SCR emissions abatement.

Summary of actions taken: When undertaking an audit of the air emissions modelling assessment we undertook several sensitivity analyses, including adopting a 15% NO_x to NO_2 conversion which we considered to be reasonably representative at receptors within the first few hundred meters (approximately 500 m) from the source, which is where maximum PCs are predicted. When taking this approach, we did not predict any exceedances of the short- or long-term NO_2 Air Quality Standard for any modelled scenario. For the emergency scenario, we found that the consultant's PCs would not exceed the Environmental standard. When undertaking an audit of the air emissions modelling assessment, we also considered the lack of modelling of the potential emissions of ammonia (NH_3) slippage from the SCR systems. We concluded that given the small number of annual hours of operation we consider the potential contribution of NH_3 to impacts to be minimal. The applicant does not propose to undertake annual testing of all data centres within the same 24-hour period.

Testing would be staggered. An Air Quality Management Plan will be required to outline response measures to be taken in the event of a grid failure, including adoption of air quality monitoring stations around the site if appropriate.