

Last Energy UK

EIA Scoping Report

Prosiect Egni Glan Llynfi

Llynfi Clean Energy Project



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1. Introduction

1.1. Overview

Last Energy UK Ltd (the “**Applicant**” or “**Last Energy UK**”) intends to make an application to the Welsh Ministers for a Development of National Significance (“**DNS**”) for a Micro Nuclear Power Plant Project (the ‘Proposed Development’) on the former Llynfi Power Station site in Bridgend, Wales (DNS CAS-03613-S7Y6S4 Prosiect Egni Glan Llynfi).

The Proposed Development is composed of four PWR-20 nuclear power plants that will generate low-carbon electricity and heat, enough to power the equivalent of 244,000 Welsh households per year. Energy from the project will be delivered to nearby industrial and commercial consumers through a private wire network, heat pipe infrastructure, and exported to the grid (see Chapter 2: Description of the Proposed Development).

Last Energy’s PWR-20 includes a micro pressurized water reactor (“**PWR**”) and its balance of plant extension, with nameplate capacity of 20 MW electric. The Nuclear Island includes the reactor, primary coolant loop, and ancillary condensation tanks. The Balance of Plant is a standard Steam Rankine Cycle power plant which converts energy from the Nuclear Island into electricity.

The Proposed Development is a Development of National Significance under Section 62D of the Planning (Wales) Act 2015. As the generating station is in Wales and has a generating capacity of over 10 megawatts it is defined as Development of National Significance under Section 4 of The Developments of National Significance (Specified Criteria and Prescribed Secondary Consents) (Wales) Regulations 2016.

This Scoping Report outlines the Environmental Statement to be submitted to Welsh Ministers under Schedule 1 of Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017.

1.2. Requirement for EIA

Environmental Impact Assessment (“**EIA**”) is a process required by Welsh Law which brings together information about the likely significant effects of a development. It provides decision-makers and the public with the environmental information needed to make sustainable decisions when determining applications for certain developments. The legal basis for EIA is the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) (“**the EIA Regulations**”) and subsequent amendments. Concerning DNS Developments, EIA is required for certain developments. The stages of the DNS EIA process include:

- Notification of EIA development;
- Scoping Report
- Preparation of an Environmental Statement (“**ES**”).

Some DNS Developments require EIA compulsorily (the EIA Regulations define these under Schedule 1), others only require EIA if they are likely to have significant effects on the environment by virtue of their nature, size or location (the EIA Regulations define these in Schedule 2).,

In this instance, the Proposed Development falls within Schedule 1 paragraph 2 of Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017, which refers to thermal and nuclear power stations and other reactors.

As such, an Environmental Statement will be prepared in respect of the Proposed Development in support of the DNS application.

1.3. Purpose of this Scoping Report

This report identifies the potential likely significant effects of the Proposed Development that need to be considered in depth as part of the Environmental Statement, effects to be scoped out from detailed assessment, and the proposed scope of the assessment in relation to these effects.

Table 1.1 - Infrastructure Planning (EIA) Regulations and Developments of National Significance Procedural Guidance Requirements for Scoping

REQUIREMENT	LOCATION WITHIN THIS REPORT
A plan sufficient to identify the land	Chapter 2
• A brief description of the nature and purpose of the development, including its location and technical capacity • A description of the physical characteristics of the whole development • A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected	Chapter 2; Chapter 8; Chapter 10
A description of the aspects of the environment likely to be significantly affected by the development	Chapter 8
A description of any likely significant effects, to the extent of the information available on those effects, of the proposed development on the environment resulting from the expected residues and emissions and the production of waste, where relevant, and the use of natural resources, in particular soil, land, water and biodiversity	Chapter 8; Chapter 6; Chapter 7; Chapter 10; Chapter 11; Chapter 12
A statement that the request is made in relation to a development of national significance for the purposes of section 62D of the 1990 Act	Chapter 1

Such other information or representations as the person making the request may wish to provide or make including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.	Chapter 11; Chapter 12
An outline of the main alternatives considered and the reasons for selecting a preferred option	Chapter 2
Results of desktop and baseline studies where available	Chapter 5, Chapter 6, Chapter 7, Chapter 8, Chapter 9, Chapter 10, Chapter 11, Chapter 12
A record of consultation undertaken with relevant bodies (including any public engagement) to date	Chapter 4
Referenced plans presented at an appropriate scale to convey clearly the information and all known aspects associated with the proposal	Chapter 2
Guidance and best practice to be relied upon, and whether this has been agreed with the relevant bodies together with copies of correspondence to support these agreements	Chapter 5, Chapter 6, Chapter 7, Chapter 8, Chapter 10, Chapter 11, Chapter 12
Methods used or proposed to be used to assess impacts and the significance criteria framework used	Chapter 4
Well-being of Future Generations (Wales) Act 2015 – effects and incorporation into the scheme	Chapter 13

This Scoping Report has been prepared to satisfy this element of the EIA Regulations and is in line with guidance from Planning and Environment Decisions Wales (“**PEDW**”). Further details are provided in Chapter 4: Scope of the Assessment.

1.4. Applicant and Project Team

The Applicant for this project is Last Energy UK, a subsidiary of Last Energy Inc. (together with Last Energy UK, “**Last Energy**”). Last Energy UK has engaged Logika to review this EIA Scoping Report for the Proposed Development.

Last Energy is a global developer of micro nuclear power plant projects, with a group headquarters in Washington, D.C., United States. Last Energy provides sustainable and reliable baseload power solutions to industrial customers and wholesale markets by leveraging its 20 MWe modular nuclear power plant product. Last Energy was founded in 2017 and has built a 1.6 GW development pipeline across the United Kingdom and the European Union. The Last Energy UK leadership team brings vast experience across energy and infrastructure development in the

United Kingdom from multiple different generating technologies. Last Energy's mission is to eliminate the need for communities to decide between energy abundance and sustainability.

1.5. Competence

Regulation 14(4) of the EIA Regulations requires that an Environmental Statement (“**ES**”) is prepared or reviewed by *‘persons who in the opinion of the relevant planning authority or the Welsh Ministers, as appropriate, have sufficient expertise to ensure the completeness and quality of the statement’* and that the ES is accompanied by a statement outlining the relevant expertise or qualifications of such experts. This information will be provided in the ES, and confirmation is also provided below on how appropriate expertise has been taken account in the Scoping Report.

This Scoping Report has been reviewed by environmental consultants who are members of the Institute of Environmental Management and Assessment’s (“**IEMA**”) EIA Quality Mark scheme. The Quality Mark requires its members to provide evidence of their EIA activities and adhere to certain commitments set out by IEMA. IEMA carry out an independent audit of those commitments each year by reviewing the ES’s produced by Quality Mark members.

1.6. Structure of the Scoping Report

The report is structured as follows:

- Chapter 2 outlines information on the Proposed Development, including its need, the alternatives under consideration as well as a detailed description of the Site and proposals;
- Chapter 3 outlines planning policies that have informed the scope of the assessment and other consents that may be required for the Proposed Development;
- Chapter 4 summarises the general approach to the EIA; and
- Chapters 5 to 15 outline the proposed scope of the assessment for each of the technical topics.

A glossary of abbreviations used in this report is provided in Appendix B.

Figures not embedded within the text are included as separate appendices to each respective technical chapter.

2. Description of the Proposed Development

2.1. Need for the Proposed Development

The power plant would be located in the Aberkenfig Ward of Bridgend County District Council. The site formerly housed the Llynfi Power Station, a 120 MWe coal power plant decommissioned in 1977. By 2011, all remaining onsite structures associated with the former coal plant were demolished or removed. Since, the site has remained largely vacant, until 2021 when a majority of the site was cleared to store construction and industrial equipment from the expansion of the neighbouring WEPA Bridgend Pulp Mill, until 2022.

Overarching National Policy Statement for Energy (EN-1)¹ identifies that there is a clear and pressing need to change the UK's approach to energy generation and reduce reliance on fossil fuels. By diversifying the energy sector, the UK will be able to reduce greenhouse gas emissions, improve energy security and diversify its range and type of power stations. Failure to decarbonise and diversify the energy sector will mean the UK could become locked into a system of high carbon fossil fuels and consequently fail to reach its target to reduce net greenhouse gas emissions to zero by 2050².

Furthermore, Prime Minister Keir Starmer's announcement on 6th February 2025 showcases the UK's determination to facilitate planning regulation specifically for Small Modular Nuclear Reactors in the UK.³

Further information on the policies relevant to the Proposed Development is provided in Chapter 3 of the Scoping Report.

2.1.1. Local Plan Current Site Status

The site is currently classed as countryside within Local Development Plan (LDP) policy DNP1 (Development in the Countryside), adopted in March 2024. As such:

All development outside defined settlement boundaries must ensure that the integrity of the countryside is conserved and enhanced. There is a presumption against development in the countryside, except, for, of note to the Proposed Development, amongst others:

- The expansion of an existing business (subject to other relevant policies in the plan);
- Land reclamation purposes;
- Transportation and/or utilities infrastructure to enable implementation of LDP allocations;
- Renewable energy projects;

Countryside development must be of a sustainable form with prudent management of natural resources and respect for the cultural heritage of the area. Where development is acceptable in principle in the countryside it must, in the first instance and where possible, utilise existing buildings and previously developed land. Where such an opportunity to re-use a rural building does exist, development must be in accord with DNP2.

While there is a presumption against development in the Countryside, the Proposed Development would utilise previously developed land (Llynfi Power Station) and supports land reclamation purposes (removing invasive species and remediating any formerly contaminated land).

2.2. Main Alternatives Considered

The EIA Regulations require that the ES contains a description of ‘reasonable alternatives’ considered as part of the design process. This may include alternative designs which are relevant to the objectives of the Proposed Development and its specific characteristics. The ES must report the main reasons for selecting the chosen option, including a comparison of the environmental effects. The ES will include content to:

- Identify, describe, and evaluate the likely significant effects on the environment of implementing the Proposed Development, and reasonable alternatives considering the objectives and the geographical scope of the Proposed Development.
- Summarise the reasons for choosing the Proposed Development, in the light of the other reasonable alternatives dealt with.
- Outline the reasons for selecting the alternatives dealt with, including a description of how the assessment was undertaken including any difficulties encountered in compiling the required information.
- The alternative assessment will focus on layouts, sizing, technologies, and design parameters considered within the Site Boundary.

Whilst there is no statutory requirement to include an assessment of alternatives in support of a request for a Scoping Opinion, PEDW recommends that a Scoping Report includes an outline of the reasonable alternatives considered and the reasons for selecting the preferred option.

At this stage, general consideration is being given to the following alternatives within the Site Boundary:

- Internal site layout;
- Access arrangements;
- Location of the temporary construction activity;
- Grid Connection, and
- “Do-Nothing” Alternative

Additional information on these aspects of the development is provided below and in section 2.3. The ES will fulfil the requirements of the EIA Regulations and include a description of the alternatives considered, and the main reasons why the preferred option has been selected including a comparison of environmental effects.

2.2.1. Water vs. Air Cooling

Several technologies exist to cool a reactor. Most conventional technologies centre on either open-air or water cooling. While a more electrically efficient form of plant cooling compared to air cooling, water cooling the PWR-20 would require increased plant infrastructure and site footprint, increased construction on site, greater sensitivity to local climate and weather, and significantly elevated water consumption. Water cooling can also increase the potential of accidental transfer of radionuclides as discharged water is released into a lake, river, or ocean.

The PWR-20 instead was designed to utilize closed-loop open-air cooling, sacrificing electrical efficiency to reduce the need for water intake on-site, and therefore environmental impacts and risks. Thanks to its closed-loop open-air cooling design, the PWR-20 does not require a connection to a water main. A once-a-month refilling by truck of the PWR-20's water storage tank is sufficient to operate the reactor safely.

2.2.2. Concrete vs. Structural Steel Piling

An important design element of the PWR-20 are structural below-ground support piles upon which the power plant will rest (Figure 2.1). This technology reduces on-site construction work and use of materials for foundation laying versus concrete, and provides a seismically secure structure for the PWR-20. Compared to concrete foundations, steel piles reduce overall Project environmental impacts and emissions.

2.2.3. "Do Nothing" Alternative

If Last Energy UK were not to develop the site, the former Llynfi Power Station brownfield site would remain unremediated. Invasive Japanese Knotweed and Himalayan Balsam onsite might also not be controlled over the next 50 years, which may lead to deleterious biodiversity impacts. Failure to implement the Project will likely result in local industry relying on the combustion of emissions from natural gas consumption, or land-use and potential environmental loss from at-scale renewable generation to meet required energy generation needs. The recently approved Y Bryn Wind Farm project in Port Talbot is estimated to generate 317,883 megawatt hours (MWh) of electricity a year and involve 2,320 hectares of land⁴. By comparison, Last Energy's Project is expected to generate more than 660,000 MWh of electricity a year on less than 6 hectares. National reliance on fossil fuels may also not be reduced. Due to grid constraints, local climate, and land availability, realistic and cost-effective alternative solutions to decarbonize the Project power generation needs may not exist in a "Do nothing" alternative, resulting in the variant being holistically worse off for the environment at both a local and national scale.

⁴ Y Bryn Wind Farm Design and Access Statement. Natural Power. May 31, 2023.

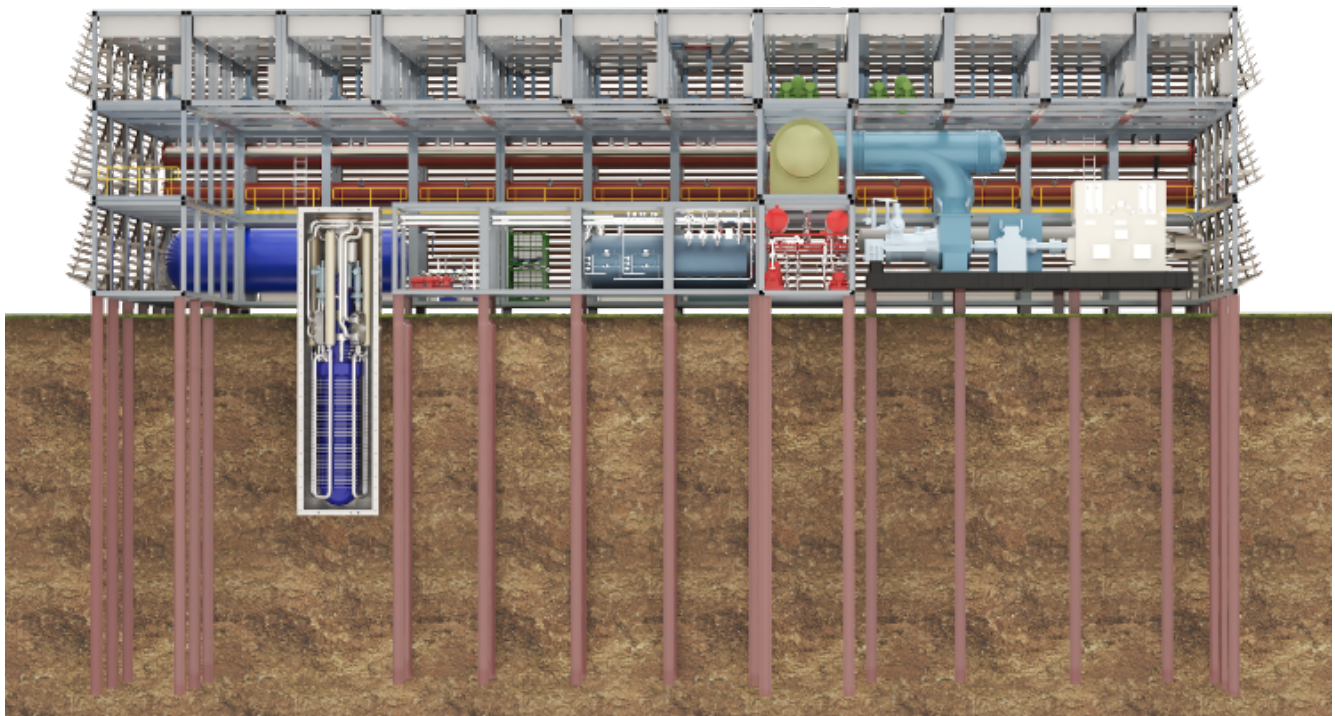


Figure 2.1 - Illustrative PWR-20 Structure Piling (Last Energy, 2024)

2.3. Characteristics of the Proposed Development

2.3.1. Site and Surroundings

The Main Development Site is located on the site of the former Llynfi power station within Cwm Llynfi; a valley orientated north to south between Maesteg to Junction 36 of the M4. In this respect, Bridgend lies some 7.5 kilometres to the south and Maesteg lies around 4.7 kilometres to the north⁴. More specifically, the proposed application site lies to the east of the A4063 and a single railway line (both running between Bridgend and Maesteg, where the latter terminates) and east of the Bridgend paper mill. The proposed application site is flanked on its north-eastern boundaries by the Afon Llynfi (River Llynfi). The site is located within a predominately rural environment, except for a large tissue paper mill operated by WEPA UK Ltd (i.e. the Bridgend Mill), located immediately to the west of the site. The Development Site is shown in Figure 2.2.



Figure 2.2 - Development Site Location (Google Earth, 2024)

Existing infrastructure at the Project site includes the adjacent 66kV Llynfi Substation, managed by National Grid, and a National Rail line directly south of the site. The large tissue paper mill, the former coal power plant site, and the existing substation provide an industrial brownfield setting to the Proposed Development. The Project site has national transport connectivity via two access roads onto the site. The site can be accessed via a private road from the A4063 between Bridgend and Maesteg with a road bridge passing over a railway line, or a private road through the Bridgend Mill passing over a railway line.

The Site is located on mostly hardstanding, broken surface with vegetation ranging from invasive species, such as Japanese Knotweed and Himalayan Balsam, to semi-mature broad-leaved trees near the Llynfi River and Ancient Woodland in proximity to the Site. The Site's soil is composed of made ground, including silty clay, sand, and gravel, overlaying alluvial and glacial deposits, with historical presence of hydrocarbons. The site's bedrock deposits are classified as a secondary aquifer and are not within a Source Protection Zone (SPZ), with no nearby groundwater abstractions. Adjacent to the Llynfi River, a UK Biodiversity Action Plan habitat, the site is characterized by a high groundwater table and riverine flooding risk. Nearest residential areas are located anywhere from 200-500 metres to the north, south, and east of the Site. The site is within a landscape of industrial and built historical value, and a landscape of habitat value. While there are nearby historic features to the Site, principally Ty Isaf, a listed building, no listed buildings or monuments are present within the site and no known archaeological interests.

2.3.2. Description of the Project

The Proposed Development is located on the site of the former Llynfi Coal-Fired Power Plant. The Project site is as shown in Figure 2.3: Indicative Project Site Boundary covers an area of approximately 5.5 hectares. The finished above ground development will occupy approximately 3 hectares.

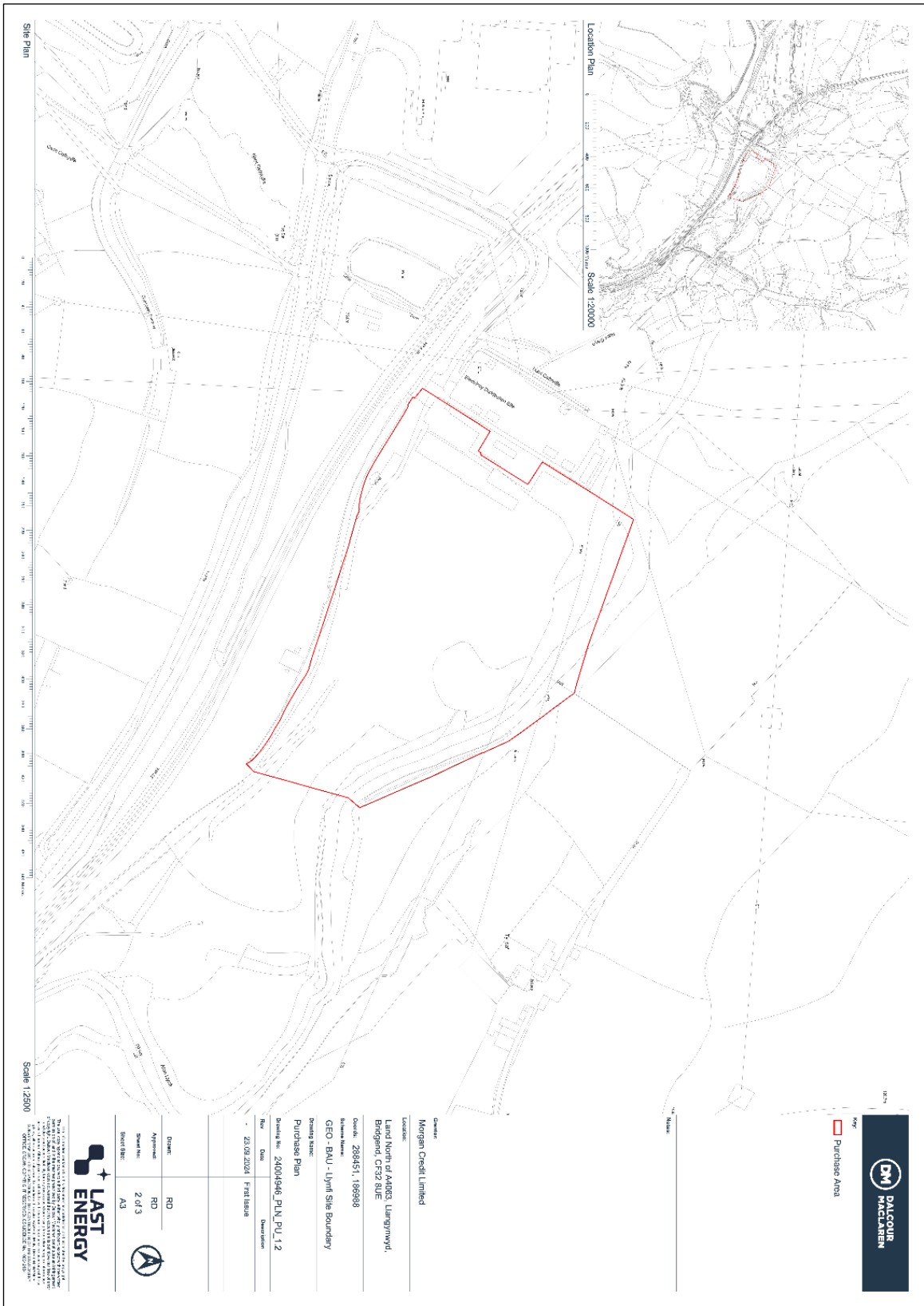


Figure 2.3 Project Site Boundary (Dalcour Maclaren, 2024)

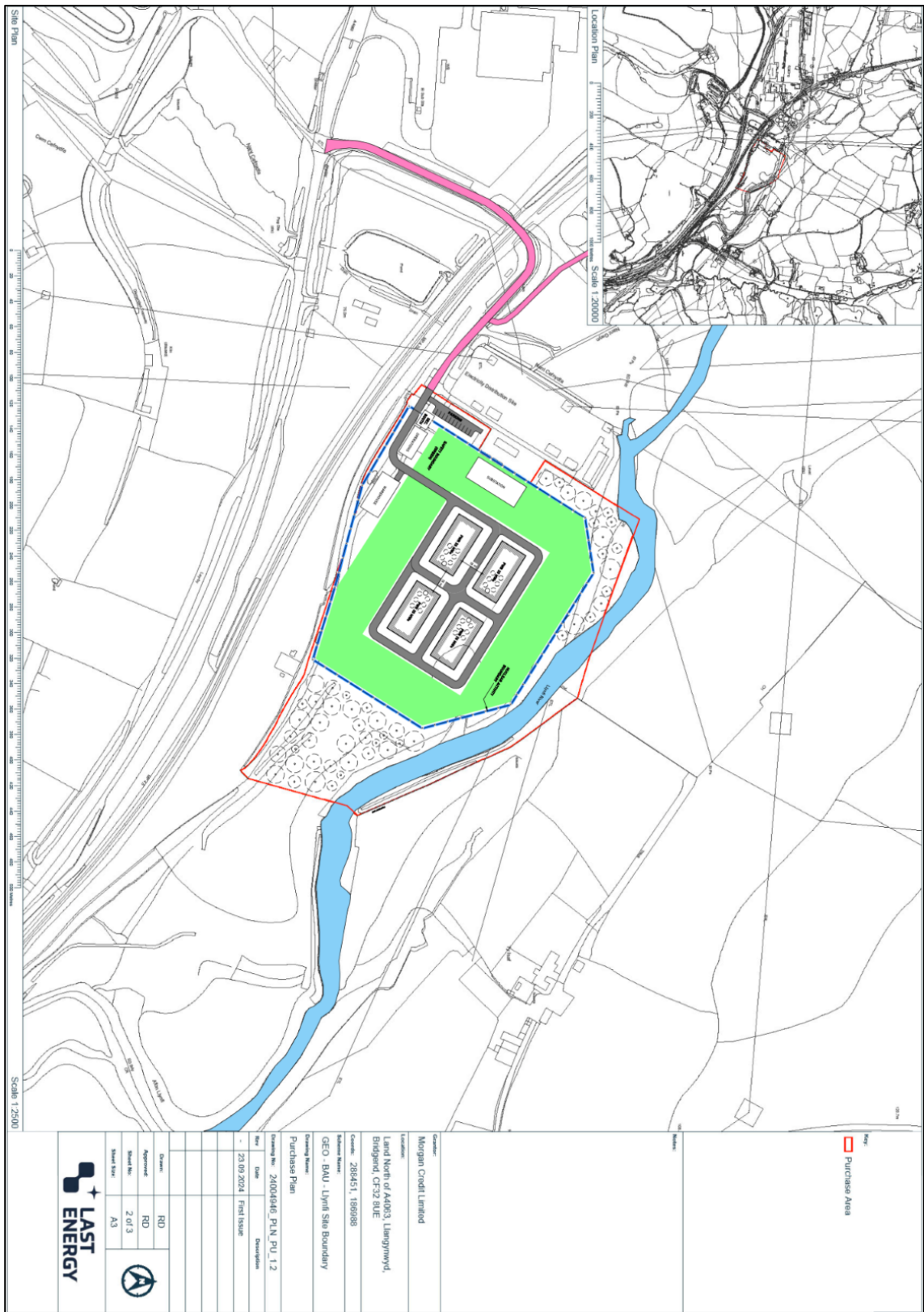


Figure 2.4 Preliminary Site Master Plan (Last Energy, 2024)



Figure 2.5 Illustrative Project Site Rendering (Last Energy, 2024)

A preliminary overview of the site development, subject to change during the development process, is captured in Figure 2.4, Preliminary Site Master Plan.

The Proposed Development would include several elements within the Red Line Boundary (the ‘Site’), including:

- Four PWR-20 units (80 MWe in total);
- Grid Connection and a substation; (to be assessed in ES)
- Administrative Facility and Storage Warehouse;
- Parking, gatehouses, and security fencing;
- Access Improvements; and
- Electric Private Wire and Heat Pipe Infrastructure (to be assessed in ES)

The height of the main plant building would reach a maximum building height of no more than 15 metres. The exterior cladding, components within, and the final floor space of the main plant building will be confirmed during the iterative design and procurement process. A low-profile administrative building, parking, and an adjacent warehouse are expected to be constructed on-site, as well as security fencing, gatehouses, and site lighting requirements for safety purposes to be further defined as part of the design process, and factored into relevant assessments, including visual landscape and biodiversity impacts. To access the site for development, potential site enhancements may be pursued to widen existing access roads to the site (see Chapter 5, Traffic Impacts).

2.3.3. Grid Connection

Last Energy has accepted a grid distribution connection offer for the Project from National Grid Electricity Distribution, via the neighbouring Llynfi Substation, and may also pursue a direct transmission application. The substation is adjacent to Last Energy's development site, facilitating the creation of a 66kV single circuit tee-off connection, involving the addition of a circuit breaker at the existing National Grid substation, the installation of a transformer and a square concrete pad housing a transformer, and necessary access roads (Figure 2.6). As the grid connection involves an existing adjacent substation to the development site, potential impacts of the Project's Grid Connection are unlikely to be significant, but will be assessed in the ES.

2.3.4. Electric Private Wire

The project may include the infrastructure necessary to install and maintain an overhead or buried private wire to the facilities of private industrial consumers. Private wires will originate from a PWR-20 unit and terminate at private industrial user's facilities. As private wires can be buried or follow existing above-ground cables, they are not expected to have significant impacts, but may be assessed in the ES.

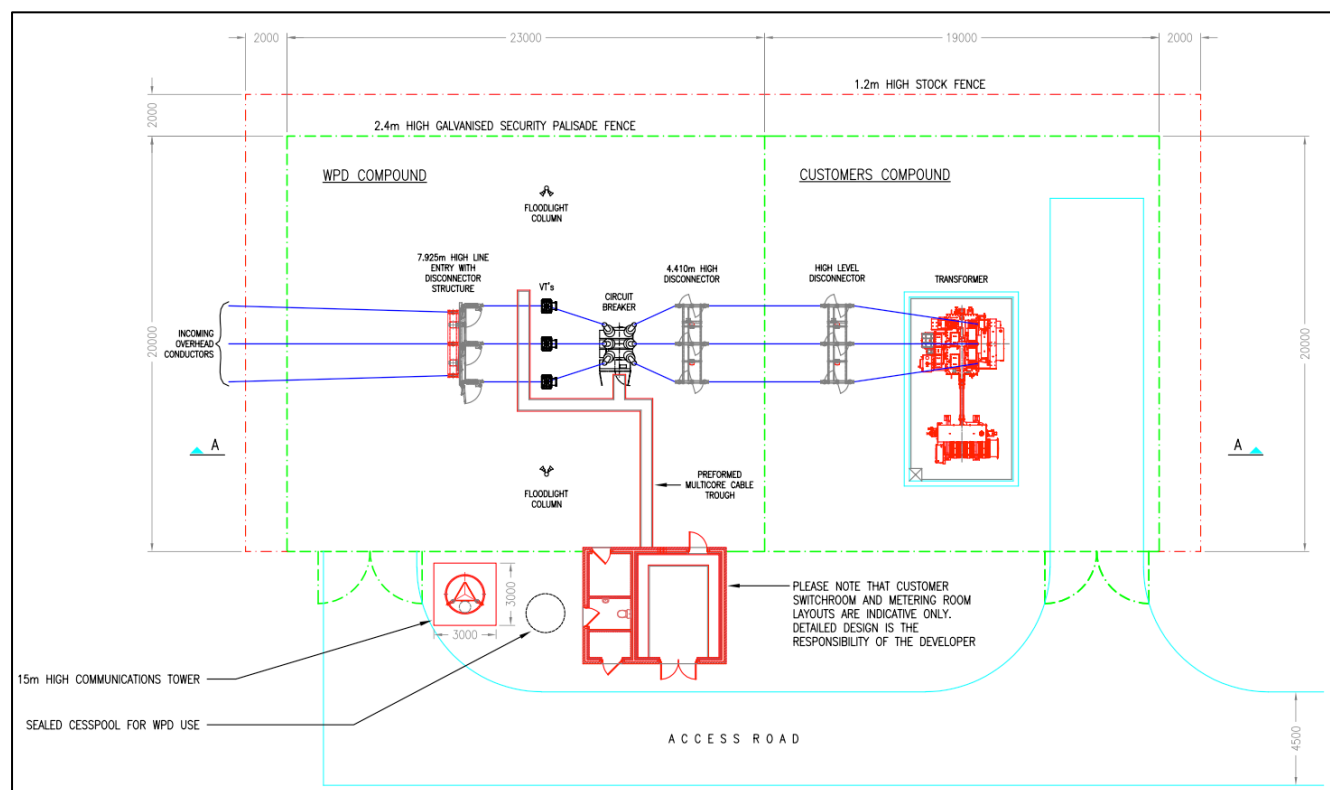


Figure 2.6 Potential On-Site Grid Connection Infrastructure (National Grid, 2024)

2.3.5. Heat Pipe Infrastructure

The project may include the infrastructure necessary to install and maintain piping that will circulate hot water from a PWR-20 unit up to a nearby industrial consumer, where infrastructure will process hot water into usable steam to decarbonize industrial processes. Buried equipment along the proposed path may include but is not limited to; piping, support structures, condensate traps, metering equipment, and a steam generator. Any ancillary Heat Pipe Infrastructure is not expected to have significant impacts but may be further assessed in the ES.

2.3.6. Technology Summary

The PWR-20 is a micro modular nuclear power plant design owned and developed by Last Energy Inc., a nuclear developer with headquarters in Washington, D.C., United States. The PWR-20 is a multi-loop PWR with an operational design life of forty-two years and a nominal power output of 20 MWe / 80 MWt. The PWR-20 balance of plant is a standard Steam Rankine cycle whereby heat exchangers generate steam in the secondary loop that is used to power the turbine and generate electricity. Both the Nuclear Island and Balance of Plant are entirely modular, allowing for factory fabrication and minimal onsite construction.

The PWR-20 is a PWR, a tank-type reactor with light water as the coolant and moderator that utilizes low-enriched uranium fuel (<4.95% U-235). It heats water to 300-330°C while maintaining high pressure (~15 MPa) to prevent boiling. Steam for the turbines is produced in a steam generator through a multi-loop system: the primary loop, which contains sub-loops, circulates high-pressure water through the reactor core, the intermediate loop separates and transfers heat between the primary and secondary loops, and the secondary loop produces steam for the turbine. This steam is first converted into wet steam, then superheated into dry steam to prevent turbine blade corrosion. After passing through the turbine, the low-pressure steam is condensed in a condenser cooled by a tertiary circuit, which rejects heat to the atmosphere via air-cooled heat exchangers. The PWR-20 operates for 42 years across seven six-year fuel cycles. At the end of a fuel cycle, control rods are inserted into the reactor core, to render it subcritical (stopping the fission chain reaction). For each new fuel cycle, a new Nuclear Island module is installed on-site.

The PWR-20 is designed with flexible siting capabilities to address the clean, baseload energy needs of industrial customers, heavy power users, and district heating networks. The features that enable flexible siting include:

- No requirement to be situated near water due to air cooling of the tertiary loop;
- Small plant footprint due to modular construction and subterranean nuclear island;
- Small plant boundary due to reduced amount of radioactive material onsite;
- No bedrock requirement due to use of friction piling.

The PWR-20 is composed of the subterranean Nuclear Island and its balance of plant extension which converts the energy from the Nuclear Island into electricity. These facilities are independent civil structures, each installed on structural supports prepared before delivery of the modules to the site.

2.3.7. Construction

Construction laydown will be within the indicative Project site boundary. Construction techniques for piling and excavation will be defined in the ES, alongside how construction materials and components of the PWR-20 will be delivered to the Project site. Any noise abatement methods that will be employed will also be defined. Due to modular construction methods, on-site construction is less invasive and takes a much shorter time than comparable projects.

2.3.8. Operation

For the purposes of defining the Scope of the EIA, it is assumed that the Project will operate 24 hours/day, 7 days/week, 365 days/year for up to 42 years. However, this will be subject to planned outages. The facility is estimated to operate continuously for 6 years, with a planned 3-month outage for refuelling.

2.3.9. Decommissioning

Upon the termination of the Project's operational lifespan, all PWR-20 plants on site will be deactivated and the balance of plant systems, which should contain no radioactive materials, will be disassembled and removed from the site. Within about a decade, or as soon as environmental and technical considerations permit, the nuclear island modules will be decommissioned. This will involve defueling the modules, followed by the dismantling, segregating, processing, and transporting of the Nuclear Island components, along with associated movements of abnormal load vehicles, traffic, waste, and materials recovered for reuse, recycling, and/or disposal. Temporary structures will be erected onsite to facilitate these activities, which will be carried out in accordance with appropriate environmental management plans and industry best practices. These activities are not expected to result in any abnormal environmental conditions. Unless otherwise indicated in the environmental topic chapters in this Scoping Report, the environmental effects associated with the decommissioning phase would be of a similar magnitude as those reported for the construction phase.

Upon completion of decommissioning works, the disposal of nuclear waste from the plant is governed by a comprehensive regulatory framework designed to protect human health and the environment. This will include Environmental Permitting, the use of Best Available Techniques (BAT), a Waste Management Plan (WMP) and Site-Wide Environmental Safety Case (SWESC). The WMP and SWESC will demonstrate how radioactive waste will be managed throughout the facility's lifecycle, from operation to decommissioning. All of this would be in compliance with the Nuclear Installations Act 1965: Operating a nuclear facility requires a site license issued by the Office for Nuclear Regulation (ONR). This license ensures that safety and security standards are met, including those related to radioactive waste management. Adherence to National Policies and Strategies: Our waste management practices will align with national policies. By following these regulations and guidelines, Last Energy will ensure that the disposal of nuclear waste from the plant is conducted safely, responsibly, and in compliance with UK law. Once decommissioning and all waste disposal operations have been completed, the Site will be returned to its original remediated brownfield condition, benefitting from biodiversity net-gain impacts.

Prior to commissioning, a Decommissioning Fund will be established, funded throughout the Project's operational lifespan, and deployed in undertaking the above decommissioning actions. The fund is expected to be larger than conservative cost estimates for complete decommissioning.

3. Planning Policy

This section sets out the overarching planning policies for the Proposed Development. The Project will be progressed taking account of policies at the national, regional, and local level.

3.1. National Planning Policy

3.1.1. National Policy Statements

The National Policy Statements relevant to the Proposed Development include:

- Overarching National Policy Statement for Energy (EN-1);
- National Policy Statement for Electricity Networks Infrastructure (EN-5)⁵; and
- National Policy Statement for Nuclear Power Generation (EN-6)⁶.

EN-1 and EN-5 were produced by the Department for Energy Security and Net Zero (DESNZ) and came into force in January 2024. EN-6 was produced by the former Department of Energy and Climate Change (DECC), now DESNZ, and designated in July 2011.

3.1.2. National Planning Policy Framework

Edition 12 of Planning Policy Wales (“PPW”)

- Paragraph 3.55 states that the development of previously developed (brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development.
- Paragraph 5.7.7 states that the planning system should “maximise renewable and low carbon energy generation.”
- Paragraph 5.9.1 sets out that local authorities should facilitate all forms of renewable and low carbon energy development.

⁵ Department for Energy Security and Net Zero *National Policy Statement for electricity networks infrastructure (EN-5)* 2024. Available online at: <https://www.gov.uk/government/collections/national-policy-statements-for-energy-infrastructure> [Accessed 20 February 2024]

⁶ Department for Energy Security and Net Zero *National Policy Statement for nuclear power generation (EN-6)* 2011. Available online at: <https://www.gov.uk/government/publications/national-policy-statement-for-nuclear-power-generation-en-6> [Accessed 20 February 2024]

Future Wales: The National Plan 2040.

- Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure sets out that the Welsh Government strongly supports the principle of developing low carbon energy from all technologies and at all scales to meet our future energy needs.

3.2. Local Planning Policy

The Main Development Site for the facility is located within the Aberkenfig Ward of Bridgend County. Local development plans may be a relevant consideration for nationally significant infrastructure projects, although like the National Policy Planning Framework (NPPF), they are not the primary policy.

The Proposed Development Site has been subject to several energy-related planning applications:

- Full planning permission was granted in October 2009 for the development of a Biomass Power Station with a generating capacity of 10MWe. It is understood that the consent was implemented but the plant not built out.
- A subsequent application was approved in May 2015 to construct a Biomass Power Station with a generating capacity of up to 25 MWe. Based on Bridgend County Borough Council's ("BCBC") planning register, there is no indication that any conditions have been discharged and the consent has been implemented.
- An application was subsequently submitted for the temporary delivery and permanent storage of up to 15,000 tonnes of wood chip to fuel the power station. The application was refused by BCBC on 11th February 2016 as the storage was open storage in the countryside and constituted inappropriate development.
- The most recent application relates to a request for a Scoping Direction in 2021 for an Energy Recovery Facility with a generating capacity of between 25 to 28 MWe and associated ancillary infrastructure. Due to the indicative size and scale of the facility (being greater than 10MWe), the scheme would qualify as a Development of National Significance to be determined by Welsh Ministers. On this basis, the Scoping Direction request was made under Regulation 30 of the Town and Country Planning (Environment Impact Assessment) (Wales) Regulations 2017 to the Planning Inspectorate and then was in turn shared with BCBC as a consultee to that process.

The current adopted development plans relevant to this area include:

- DNP1: Development in the Countryside, adopted in March 2024.
- List of relevant local laws (Local Development Framework, Local Plans, Core Strategy, Transport Schemes)
- Policy SP13 of BCBC's 2024 LDP, setting out Bridgend County's support for renewable and low carbon development proposals where there are no unacceptable impacts and/or impacts are minimised.

4. Scope of the Assessment

4.1. Introduction

The EIA Regulations (The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017) require consideration of the likely direct and indirect significant effects on the following factors (including their interactions):

- Population and human health;
- Biodiversity;
- Land, soil, water, air and climate; and
- Material assets, cultural heritage and the landscape.

4.2. Topics in EIA Scope

Table 4.1 lists the environmental factors outlined in Paragraph 5 of Schedule 4 of the EIA Regulations as requiring consideration and highlights where these have been considered in this Scoping Report.

Table 4.1 EIA Regulation Considerations

EIA TOPIC	RELEVANT SECTION IN THIS EIA SCOPING REPORT
Population	Traffic and transport (Chapter 5), air quality (Chapter 7), noise and vibration (Chapter 6), landscape and visual (Chapter 8)
Human Health	Traffic and transport (Chapter 5), air quality (Chapter 7), noise and vibration (Chapter 6), geology, hydrogeology and contaminated land (Chapter 12) and hydrology (Chapter 11)
Biodiversity	Biodiversity (Chapter 10)
Land	Geology, hydrogeology and contaminated land (Chapter 12)
Soil	Geology, hydrogeology and contaminated land (Chapter 12)
Water	Hydrology (Chapter 11)
Air	Air Quality (Chapter 7)
Climate	Landscape and visual (Chapter 8), Biodiversity (Chapter 10), climate change (Chapter 13), Hydrology (Chapter 11)
Material Assets	Historic environment (Chapter 9), geology, hydrogeology and contaminated land (Chapter 12)
Cultural Heritage	Historic environment (Chapter 9), Landscape and visual (Chapter 8)
Landscape	Landscape and visual (Chapter 8)

4.3. Topics Not Included in EIA Scope

As set out in National Planning Scheme (“NPS”) EN1, the ES should be focused, documenting only the assessment of likely significant environmental effects. Therefore, those effects which are not likely to result in significant impacts should not be included and should be scoped out of the EIA. Table 4.3 sets out those topics that have been

determined not to be significant and therefore are suggested to not be included in the EIA, together with the rationale for doing so.

Table 4.3 - Topics suggested to be partially or fully scoped-out

EIA TOPIC	RATIONALE FOR SCOPING OUT
Climate Change	The Project is expected to have very low lifecycle emissions and significantly offset emissions. Resilience to climate risk will be addressed in the ES. Therefore, Climate Change impacts are suggested to be scoped out of the EIA.
Air Quality	As the PWR-20 generates no significant emissions into the air during routine operation, Air Quality impacts are suggested to be scoped-out of the EIA. Emission impacts of backup generators or engines will inform the ES.
Traffic and Transport	The Project is not expected to generate significant traffic impacts. Therefore, traffic impacts are suggested to be scoped-out. An Abnormal Indivisible Loads Plan and assessment of further in-depth temporary changes in traffic flows and consideration of appropriate and practical mitigation measures to offset any temporary traffic impacts will be assessed in the ES.
Landscape & Visual Assessment	Due to the Project's low physical profile and limited receptors, it is expected to have negligible landscape and visual impacts. Landscape and Visual amenity impacts are suggested to be scoped-out of the EIA.
Historic Environment	No known archaeological interests are expected to be affected by the Project. As a coal power plant was built on the Project Site, there is also reduced potential for new archaeological interests. Historic Environment impacts are suggested to be scoped-out of the EIA.
Noise and Vibration	As the Proposed Project is expected to cause negligible noise impacts to the nearest residential receptors, Noise and Vibration impacts are suggested to be scoped-out.
Major Accidents and Disasters	Major Accidents and Disasters will be addressed in depth by the Office for Nuclear Regulation ("ONR") under External Hazards, therefore, to focus the ES, a Major Accidents and Disasters section is scoped-out of the EIA.
Heat and Radiation, Radiological Effects	Heat and Radiation are both partially included under Radiological Effects (Chapter 14) and will be assessed in depth by the Office for Nuclear Regulation. To focus the ES, the Heat and Radiation, and Radiological Effects are scoped-out of the EIA.
Materials and Waste	Minimal materials and non-radiological waste are expected from the Project. Any radiological waste will be assessed by the ONR. An outline Construction Environmental Management Plan ("CEMP") will inform the ES. Therefore, Materials and Waste are suggested to be scoped-out of the EIA.
Socio Economic Impact	The economic effects of the Proposed Project are expected to be beneficial but due to the scale of the Project are unlikely to be very significant in the long-term. Therefore, Socio Economic Impact is suggested to be scoped-out of the EIA.

Forestry	Addressed in Biodiversity (Chapter 10). Expected trees deforested by the Project and reforested through biodiversity net gain fall short of National Resource Wales (“NRW”) thresholds in which an EIA is to be sought.
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4.4. Assessment of the Effects

Methods of prediction to be applied within the EIA will be either quantitative or qualitative or, in certain instances, both. Quantitative methods predict measurable changes because of the Proposed Development and rely on accurately measuring baseline conditions of the Site to make accurate predictions. Qualitative assessment techniques will rely on professional judgment and are exercised within a structured framework to ensure consistency of conclusions drawn. For the following EIA Scoping Report:

- Impact refers to the degree of change and will be defined based on an absolute impact of significance, or no impact
- Effects will also be described as either permanent, and short-term or temporary.

4.5. Approach to Cumulative Effects Assessment

The ES will include an assessment of cumulative effects in line with the EIA Regulations and the Planning Inspectorate Advice Note 17: Cumulative Effects Assessment in absence of guidance for Wales. It will consider two types of cumulative effects:

- In-combination effects: The combined effect of the Proposed Development together with other reasonably foreseeable developments on a common receptor.
- Effects Interactions: The combined effects on a particular receptor which may collectively cause a more significant effect than individually. A theoretical example is the culmination of disturbance from dust, noise, vibration, artificial light, human presence, and visual intrusion on sensitive fauna (e.g. certain bat species) adjacent to a construction site.

Development proposals that should be included in the cumulative assessment will be shared with PEDW in conjunction with key stakeholders through the EIA Scoping Opinion and subsequent stakeholder consultation as necessary. Potential cumulative effects will be addressed in each chapter.

4.6. Consultation

The Applicant will conduct formal community consultation in accordance with 'The Developments of National Significance (Procedure) (Wales) Order 2016', including public exhibitions and circulars. The results will be compiled into a Pre-Application Consultation (“PAC”) Report, outlining the consultation process, compliance with the legislation, and any changes to the Proposed Development.

Consultation throughout the EIA process is valuable for creating a comprehensive Environmental Statement. Feedback from statutory and non-statutory consultees will support EIA focus on key environmental issues and help direct further investigation. Ongoing consultation will also enable the incorporation of mitigation measures to reduce adverse effects and enhance environmental benefits, influencing the design process through continuous feedback. As part of the EIA process, consultation has been undertaken with a range of statutory and non- statutory consultees, including, at the submission of this scoping report, three local town halls.

The following Chapters identify the environmental topics scoped into the EIA, the likely effects identified, and the methodology proposed to undertake the topic assessments. In some instances, the scope of the assessment is based on environmental information already collected (including desk study data, site walkovers and previously conducted survey work) which is being used to inform the emerging design of the Project.

5. Traffic and Transport

5.1. Summary

At this stage, the Project is expected to not generate significant traffic impacts during construction, decommissioning, and operation.

- An Abnormal Indivisible Loads Plan and any related mitigation will inform the EIA.

5.2. Baseline Data and Conditions

The principal data sources used to inform the EIA Scoping Report include the following:

- Biomass Power Plant Llynfi Transport Assessment (JMP, 2010)
- Active Travel Network Maps, (NRW, 2024)
- Crashmap, to provide a summary of personal injury accidents on the road network;
- Department of Transport Road Traffic Statistics (2023)
- Biomass Power Plant Llynfi Transport Assessment (JMP, 2010)

National and local policies relevant to the Proposed Development are listed in Table 5.1 (Appendix A).

The Development Site is located on the site of the former Llynfi Power Station within Cwm Llynfi; a valley orientated north to south between Maesteg to Junction 36 of the M4 (Figure 5.1). JMP's 2010 Transport Assessment of the Development Site and current OS mapping was consulted to identify road links to be included in the study area.

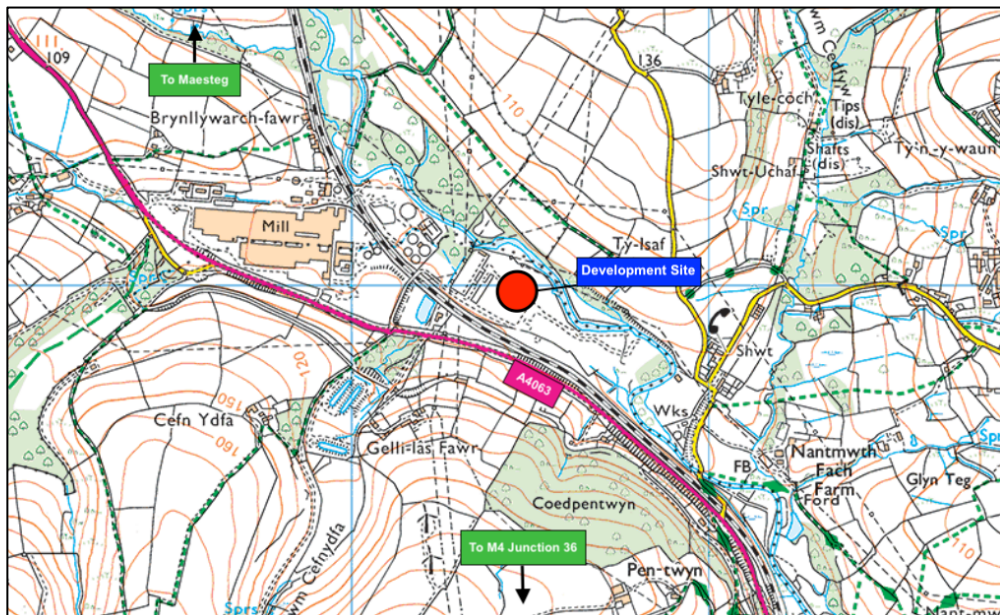


Figure 5.1 - Development Site Local Road Network (Last Energy, 2024)

5.2.1. A4063

The main road access to the Development Site is via the A4063. The A4063 is a major two-way 'A' road with a 30 mph (48 km) speed limit on most sections, including the neighbouring Bridgend Mill. Crashmap indicates there has been two 'fatal', two 'serious', and three 'slight' accidents on A4063 within 500m of the Development Site in the past five years.

According to the Department of Transport's Road Traffic Statistics (2023), traffic on the A4063 has increased approximately 17% since 2013, registering an average daily flow of over 11,500 daily vehicles in 2023.

5.2.2. Site Access

The Site will be accessed by:

- The Project's preferred entry point, an existing, wide private access road (with two accesses) from the A4063 through the Bridgend Mill, crossing a railroad (Figure 5.2, A)
- The Project's alternative entry point is an existing private access road from the A4063 crossing a bridge over a railroad (Figure 5.2, B)
- The Project is investigating the potential to utilisation of rail delivery. The site could also be accessed - potentially with the installation of a rail spur - via an existing railway adjacent to the Development Site (Figure 5.2, C)



Figure 5.2 - Development Site Access (Google Earth, 2024)

5.3. Estimated Impact

The PWR-20 is designed to minimize all on-site construction and its associated impacts, using standard construction and transport equipment to deliver and assemble a plant onsite within 6-months. Each of the approximately 30 equipment modules for one PWR-20 are designed to fit on highway-legal flatbed lorries, classifying as abnormal loads due to module weight and width exceedances (Figure 5.3). Construction and decommissioning of each PWR-20 onsite is expected to be carried out in staggered succession.

5.3.1. Construction

- Approximately 30 abnormal load vehicles over 4 months (one PWR-20)
- < 20 Heavy Goods Vehicles (“HGV”) onsite a day (one PWR-20)
- < 10 passenger vehicles onsite a day

5.3.2. Operation

- < 25 passenger vehicles onsite a day (four PWR-20s)
- Approximately 4 HGVs once a month to refuel water tanks
- Approximately 4 abnormal load vehicles every six years for plant refuelling (four PWR-20s)

5.3.3. Decommissioning (staggered)

- Approximately 30 abnormal load vehicles over the decommissioning period (one PWR-20)
- < 20 HGVs onsite a day (one PWR-20)
- < 10 passenger vehicles onsite a day



Figure 5.3 –Abnormal Load Vehicle and PWR-20 Module (Last Energy, 2024)

IEMA guidelines indicate that highway links subject to traffic flow increases of more than 30%, or 10% if affecting a sensitive area, need to be assessed.⁷ The 7.4 km stretch of the A4063 that encompasses the Proposed Development Site, from Junction A4065 to the Maiden St. Junction in Maesteg, registered 11,600 average daily vehicles in 2023. Using a simple formula (traffic flow = vehicle density/km x vehicle speed/km):

- Roughly 1,300 vehicles/hour can be estimated for peak traffic flow, with a vehicle density of approximately 27 cars a kilometre. Assuming vehicles driving at the speed limit, the estimated change to traffic flow by introducing 30 vehicles within an hour is approximately 3%. At a significantly lower average vehicle speed (from 48 km/h to 20 km/h), the estimated change to traffic flow is roughly 6%.
- Using a normalized daily average, or low hourly traffic flow of 500 vehicles/hour, introducing 30 vehicles at the speed limit within an hour increases flow by approximately 6%.

If the area of the A4063 involving the Proposed Project classifies as a sensitive area, and a conservative 30 non-abnormal load vehicles arrive within the same hour to the Development Site, an assessment would not be suggested by IEMA guidelines. The A4063 and associated access roads likely constitute sufficient coverage of routes surrounding the Development Site. Beyond these roads, any additional traffic from the Project is likely to be diluted by existing traffic on major routes to a point where traffic effects would be minimal.

While the Proposed Project's estimated operational road and traffic impacts are negligible, as construction will require several abnormal load vehicles to enter the site, temporary, potentially significant traffic impacts are likely to occur associated with abnormal load vehicles, which may require additional road signage and minor access enhancements to minimize local traffic impacts to the community.

5.4. Scoping and Future Assessment

As road and traffic impacts during operation are expected to be negligible, they are suggested to be scoped-out. However, the ES will consider further in-depth temporary changes in traffic flows and consideration of appropriate and practical mitigation measures to offset any temporary traffic impacts.

An Abnormal Indivisible Loads Plan conducted according to best practices is expected to inform the ES, in close consultation with Bridgend County and appropriate highway agencies. Relevant mitigations may also inform the ES, such as widening existing accesses or introducing new signage.

Cumulative assessment effects to consider in the ES may be any planned road and traffic impacts generated from a concurrent development of the neighbouring Bridgend Mill or the Llynfi Substation.

⁷ Institute of Environmental Management and Assessment. Guidelines: Environmental Assessment of Traffic and Movement. July 2023

6. Noise and Vibration

6.1. Summary

At this stage, the noise impacts on-site during construction, operation, and decommissioning are expected to cause no significant impacts to the nearest residential receptors.

- Vibration and noise effects during construction, operation, and decommissioning are suggested to be scoped-out of the EIA.
- Updated ambient noise studies for the closest residential receptors may inform the ES.

6.2. Baseline Data and Conditions

- Residential receptor ambient noise from Llynfi Biomass Power Station – Noise Assessment of Rail Deliveries report (Arm Acoustics, 2011).
- NoiseTools sound modelling to estimate noise impacts.

National and local policies relevant to the Proposed Development are listed in Table 6.1 (Appendix A).

The nearest residential receptors to the Development Site are Ty Isaf, located approximately 250 metres to the north-east of the Development Site, Gelli-las Fawr, approximately 400 metres to the south-west, and Greenfield Terrace, approximately 500 metres to the east of the Project site (Figure 6.2).

Historical baseline monitoring recorded the following values at the identified nearest residential receptors (Table 6.1). As traffic on the adjacent A4063 has increased at least 17% since the noise monitoring report, it is likely these historical values remain representative conservative estimates of current levels.⁸

Table 6.1 - Ambient Noise Levels at Nearest Residential Receptors (Arm Acoustics, 2011)

RECEPTOR	TYPE	DAYTIME dB(A) L _{Aeq,T}	NIGHTTIME dB(A) L _{Aeq,T}
Gelli-las-Fawr (400 m)	Residential	48	45
Ty Isaf (250 m)	Residential	45	39

6.3. Estimated Impacts

- Estimated 2 dB(A) increase to ambient nighttime noise level during operation at Ty Isaf
- Up to estimated 15 dB(A) temporary increase in daytime ambient noise levels during construction

⁸ Department of Transport Road Traffic Statistics, A4063. 2023.
UK0100-PLN-RPT-0001

6.3.1. Construction

The PWR-20 uses standard construction techniques for industrial modular construction. The loudest source of construction noise effects is expected to be a pile driving hammer, estimated to generate up to 120 dB(A) at source (lower with commercially available vibratory pile hammers). A noise impact model based on this sound power level has shown that the construction noise level would be expected to fall below the lowest noise assessment criterion in BS 5228 (for Category A), i.e. a threshold of 65 dB(A) daytime for the closest residential receptor, Ty Isaf, at 250 metres from the construction site boundary (Figure 6.2).⁹ Construction vibration is generally imperceptible beyond approximately 100 metres, therefore potential effects of construction vibration are also expected to be negligible.



Figure 6.2 - Estimated Noise Impacts of Pile Driving Hammers on Residential Receptors (NoiseTools, 2024)

⁹ BS 5228. Code of practice for noise and vibration control on construction and open sites. BSI. 2014.

6.3.2. Operation

The loudest noise effect during operation is expected to be fin-fans at the top of the plant for cooling; 94.5 dB(A) at source. For the closest residential receptor, Ty Isaf, the noise model finds that the loudest operational equipment is estimated to cause a negligible impact, registering approximately a 2 db(A) increase compared to ambient noise during nighttime (Figure 6.1). According to BS 4142, this overall impact falls below the recommended threshold of 10 dB(A) change for significant impacts.¹⁰



Figure 6.1 - Estimated Noise Impacts of Fin-Fans on Residential Receptors (Noisetools, 2024)

¹⁰ BS 4142. Methods for rating and assessing industrial and commercial sound. BSI. 2019.

Table 6.2 - Estimated Operational and Construction Noise Impacts at Ty Isaf (250m) (Noisetools, 2024)

NOISE SOURCE	NOISE LEVEL AT SOURCE dB(A)	NOISE LEVEL AT TY ISAF dB(A) $L_{Aeq, T}$	AMBIENT AT TY ISAF dB(A) $L_{Aeq, T}$	SIGNIFICANT IMPACT THRESHOLDS dB(A)
Fin-Fans (loudest operational equipment)	94.5	41 (night and day)	39 (night) 45 (day)	+10 dB(A) daytime +5 dB(A) nighttime (BS 4142)
Pile Driving Hammers (loudest construction equipment)	120	60 (day)		65 (dB(A) BS 5228 Cat. A)

6.3.3. Decommissioning

Decommissioning noise impacts are not expected to generate any temporary noise impacts above the loudest construction noise impacts.

6.4. Scoping and Future Assessment

Significant vibration effects due to construction, operation, or decommissioning of the Facility are unlikely as piling will not take place adjacent to existing buildings and no significant sources of operational vibration from each PWR-20's operation are expected. Any assessment of vibration is suggested to be scoped out in the EIA.

Negligible noise impacts are expected from the Proposed Project. It is therefore suggested that noise impacts be scoped out of the EIA. Updated ambient and background noise data gathering, in line with IEMA, TAN 11, and BS 4142 guidance, focusing on the nearest receptors, may inform the ES.

Fan blade noise dampeners or acoustic louvers to dampen nighttime noise impacts from the plant's fin-fans are commercially available, alongside noise barriers, or dampened pile driving hammers to ensure noise impacts are kept below significant levels.

Cumulative assessment effects of expected negligible impact in the ES may concern noise impacts generated from any concurrent development of the Bridgend Mill or the Llynfi Substation.

7. Air Quality

7.1. Summary

The PWR-20 generates virtually no emissions affecting local air quality during routine operation. As such, air quality impacts from the Proposed Development are expected to be insignificant.

- Air quality impacts are suggested to be scoped-out of the EIA.
- A narrowed air quality section is suggested to inform the ES of expected emissions from emergency backup generators for each PWR-20 and any associated mitigation.

7.2. Baseline Data and Conditions

- Mapped estimates of background concentrations (UK-air¹¹); (DEFRA, 2023)
- Mapped estimates of background concentrations and deposition rates (“APIS”¹²); (UK Air Pollution Information System, 2023).
- Bridgend County Air Quality Management Area (“AQMA”) zones (DEFRA, 2023)

National and local policy relevant to the Proposed Development is outlined in Table 7.1 (Appendix A).

No AQMA zones involve the Proposed Project as the closest AQMA zone, the Park Street AQMA, is 7 kilometres south of the Proposed Project and no development-related road traffic is expected to pass through Park Street.

The area, according to APIS, is characterized by Nitrogen Oxide concentrations of 9.68 µg NO_x (as NO₂) m⁻³, and Sulfur Dioxide concentrations of 1.81 µg m⁻³, below critical levels.

7.3. Estimated Impacts

The main Project activities during construction, operation, and decommissioning that have the potential to give rise to air quality impacts would be limited to:

- Construction and decommissioning activities, generating dust emissions from earthworks and the movement of construction vehicles, including trackout onto surrounding roads.;
- Combustion emissions from fixed and mobile construction plant and vehicles; and
- Backup emergency engines or generators, expected to operate < 24 hours in a year.

¹¹ Defra. (2019). *Background mapping data for local authorities*. [online]. Available at: <https://uk-air.defra.gov.uk/data/laqm-background-home> [Accessed 20 February 2024]

¹² APIS. (2019). *Air Pollution Information Service*. [online]. Available at: <https://www.apis.ac.uk/> [Accessed 20 February 2024]

Construction works would be localised, short-term, intermittent and controllable through the application of best practices on-site. In line with Institute of Air Quality Management (“IAQM”) guidance, the development is not expected to change the flow of over 500 light-duty vehicles, 100 heavy goods vehicles, introduce a new junction, or change the flow of over 100 buses, indicative criteria for an Air Quality Assessment. Once operational, the only source of combustion emissions would be from occasional maintenance vehicles, and any impacts would be negligible. The contributions of combustion emissions (e.g., NO₂ and PM₁₀) from construction vehicles are likely to be low. Fixed and mobile equipment would be limited in size and number and would operate for short periods. Measures to manage air quality during construction or remediation, such as dust management, will be in line with IAQM guidance and assessed in relation to site contaminant investigation (see Chapter 12; Geology, Hydrogeology, and Land Contamination, informing the ES.¹³

Effects relating to the Proposed Project’s ancillary infrastructure are expected to be negligible and temporary, as the grid connection is in part already existing and/or requires minor construction. Each PWR-20 is expected to be equipped with 2 MWe generators to provide back-up power in the rare event of a mains power failure and the need to black start a PWR-20. The PWR-20 will have routine shutdowns once every 6 years when adding a new nuclear island. Power failures are expected to be extremely rare and, if so, occur for short durations. On this basis, it is expected that emergency generators will be used to provide back-up power on a very infrequent basis; each not expected to significantly exceed an estimated 24 hours per year. According to IAQM guidance, as standby generators may emit more than 5mg/sec, the ES will focus on the plant’s emergency backup generators.

Any air quality effects from the PWR-20 on workers and the local community are not expected to be significant. This assessment is based upon the professional experience of other similar developments, the amount of construction activity, emergency generators, construction equipment, and distance to residential receptors likely to be present on the Proposed Development Site. A site contaminant investigation will inform the EIA of any potential for contaminant-related air quality impacts from construction for onsite personnel or the local community (see Chapter 12; Geology, Hydrogeology and Land Contamination).

¹³ IAQM. Guidance on the assessment of dust from demolition and construction (Version 2.2). January 2024. <https://iaqm.co.uk/wp-content/uploads/2013/02/Construction-Dust-Guidance-Jan-2024.pdf>

7.4. Scoping and Future Assessment

Air quality impacts from the Proposed Project are suggested to be scoped out.

Air quality impacts from back-up generators are expected to inform the ES in line with IAQM guidance.

A site contaminant investigation may inform the EIA of any potential for abnormal air quality impacts from construction, with appropriate mitigation assessments where applicable.

Any cumulative effects are expected to have a negligible impact given the low expected air quality impacts of the Proposed Project and expected reduction in emissions from nearby industrial consumers to the project.