

Clarification Note

Project Dragon

February 2024

Introduction

1. This Clarification Note has been prepared by Turley on behalf of LanzaTech UK Ltd (the Applicant). It provides clarifications in response to the key consultee responses received from Neath Port Talbot Council (NPTC) on a full planning application for the erection of a Sustainable Aviation Fuel (SAF) Production Facility at Crown Wharf, Port Talbot (ref. P2023/0858).
2. The information included in this Note provides clarification on the comments received, focused on noise, air quality, Natural Resources Wales (NRW) comments and biodiversity. It follows discussions held with NRW and NPTC on 9, 11 and 19 January 2024 respectively.
3. The response includes other information regarding biodiversity and green infrastructure to provide clarity to the Case Officer and Biodiversity Officer against updated Planning Policy Wales requirements. No additional or further assessment work has been required to adequately address the points raised and there has been no change to the conclusions set out in the Environmental Statement supporting the application. This GIS repurposes existing information provided throughout the planning submission to respond. The approach to the GIS was discussed and agreed with NPT on 29 January 2024.

Consultee Responses

4. The responses received from NPTC and other third-party consultees are listed in **Table 1** below. Most responses raise no objections and/or identify proposed conditions to support a positive determination for the planning application.

Table 1: Summary of Consultee Responses (green represents no objection and yellow represents comments that have been received and are addressed in this note).

Consultee	Type	Date
Mid and West Wales Fire and Rescue	No objection.	20 Nov 2023
Country Parks Officer	No objection. The Officer has no objections to the removal of the B and C category trees.	23 Nov 2023
Drainage	No objection. Conditions requested, relating to foul water, surface water and ground water seepage. SAB approval required.	7 Dec 2023
Highways	No objection. Conditions requested, relating to a Construction Method Statement (CMS), EV charging, signage, Travel Plan and visibility splays.	11 Dec 2023

South Wales Police	No objection. Standard observations made in relation to perimeter security, CCTV, lighting, landscaping, window and door security.	12 Dec 2023
Network Rail	No objection. Noted that any works will need to be undertaken following engagement with Asset Protection to determine the interface with Network Rail assets within a minimum of 3 months' notice before works start. LanzaTech has further reviewed with Network Rail Asset Protection who have confirmed no interest or involvement is required. This sits outside of relevant boundaries.	18 Dec 2023
Swansea Council	No objection or further comment.	18 Dec 2023
LVIA	No objection. NPT is comfortable with the submitted LVIA assessment and ES chapter. NPT will take the conclusions of the assessment and ES Chapter into account in determining the application.	4 Jan 2024
Contaminated Land	No objection. The Officer agreed with the Ground Investigation Report recommendations for additional works. Standard conditions are requested, relating to Desktop Assessment, Remediation Strategy, Verification Report and unexpected land contamination.	16 Jan 2024
Glamorgan-Gwent Archaeological Trust (GGAT)	No objection. Condition for written scheme of investigation requested.	18 Jan 2024
Air Quality	There are several queries set out in the comments which can be addressed by providing clarifications. The key points raised relate to shipping movements and construction and operational traffic modelling. These were discussed with Ricardo (on behalf of NPT) in December 2023. See Table 2 for the Applicant's response and clarifications.	19 Dec 2023
Noise	The comments state that the documents are robust and include the level of detail and assessment depth expected at this stage, overall. Notwithstanding this, a few comments on staff vehicles, quiet areas, tonal penalty and open windows were raised to seek clarification. See Table 2 for the Applicant's response and clarifications.	21 Dec 2023
Natural Resources Wales (NRW)	Lighting, flood risk and contamination are deemed acceptable, subject to conditions. There are several considerations set out in the comments. These primarily relate to marine (specifically the Water Framework Directive (WFD) assessment), air quality, noise and Oxtongue Broomrape. Meetings were held with NRW on 9 January and 11 January, where AQ, noise and marine/WFD matters were discussed and agreed with counterparts. This included clarity on what is required for planning, and what can and will be addressed separately through the permit and other associated consents in due course. A separate	21 Dec 2023

	response has been prepared and shared with NRW and NPT, based on this discussion. This is summarised in Table 2.	
Ecology	The primary comments relate to Planning Policy Wales, coastal habitats, invertebrate assemblage, lighting and Oxtongue Broomrape. These issues were addressed collaboratively and informally agreed with NPT on 19 January to ensure that appropriate solutions can be provided. A comprehensive clarification is set out in Table 2.	19 Dec 2023

Clarifications

5. Clarifications are provided in response to noise, air quality, NRW comments and ecology in **Table 2** below. A separate note has been shared with NRW in response to their comments.
6. These clarifications are informed by positive discussions with NRW and NPTC throughout late December 2023 and January 2024. They respond directly to the information required to determine this planning application. There is collective agreement on the distinction between planning and the separate requirements of associated consents and licences to be secured for the project. These are clearly set out in Section 5 of the Planning Statement and have been discussed with all parties.
7. The responses overleaf are accompanied by technical details set out in the appendices.

Table 2: Clarifications in Response to Consultee Comments

Consultee	Response/Clarification
Noise	NPT's comments state that the documents are robust and include the level of detail and assessment depth expected at this stage, on the whole. These main comments relate to staff vehicles, quiet areas, tonal penalty and open windows. Clarifications to these comments are set out comprehensively in Appendix 1 to close out these matters. The comments provided by NRW were discussed with NRW on 9 January. These included methodological clarifications such as sensitivity classification, soundscape, vibration and source data. A comprehensive note has been prepared by Hunter Acoustics and is provided at Appendix 1. It is considered that this note suitably responds to all queries raised by NPTC and NRW and has no impact on the assessment work or conclusions drawn on noise. There are no outstanding noise matters which preclude granting planning permission for this development.
Air Quality	There are a number of queries set out in the comments from NPT which can be addressed by providing clarifications. These have been addressed in a comprehensive response at Appendix 2. The key points raised relate to shipping movements and construction and operational traffic modelling. These were discussed with Ricardo (on behalf of NPT) in late December 2023 and proposed solutions/clarifications have been progressed and set out in the appendices. NRW's comments were discussed with NRW on 9 January to ensure full clarifications could be provided. A comprehensive note has been prepared by Kairus and is provided at Appendix 2. It is considered this suitably responds to all queries raised by NPTC and NRW and has no impact on the assessment work or conclusions drawn on air quality. There are no outstanding air quality considerations which preclude the granting of planning permission for the facility.
NRW	The comments received from NRW and requiring our clarification relate to marine (specifically the Water Framework Directive assessment), air quality, noise, and Oxtongue Broomrape. Meetings were held on 9 January and 11 January, where AQ, noise and marine/WFD matters were discussed with counterparts, clarified, and agreed. This included clarity on what is required for planning, and what can and will be addressed separately through the permit and other associated consents in due course. A comprehensive response has been prepared and shared with NRW, based on this discussion. This has been submitted to NPTC in parallel to this Note.

	There are no amendments to the ES as a result of the clarifications. The WFD (Appendix 12.4) has, however, been updated in response to NRW comments in relation to linkages to water process discharge. These do not affect any conclusions of the assessment and no further work is required for planning purposes. This update to the WFD does not amend the assessment, mitigation or conclusions of the submitted ES or its suitability for determination purposes.
Ecology	The primary comments from NPT relate to Planning Policy Wales (PPW), coastal habitats, invertebrate assemblage, lighting and Oxtongue Broomrape. These comments have been addressed collaboratively with NPT to ensure that all parties have clarity on the mitigation proposals for the facility, which will ensure that the assessment outcomes already reported upon are secured. Options were discussed and informally agreed with NPT on 19 January. These are summarised below and detailed further in the Green Infrastructure Statement provided at Appendix 3 as part of the site-wide biodiversity considerations: • Coastal Grassland: Areas of coastal grassland will be established on site to compensate for the loss of small areas of habitat. This effect is fully compensated on-site in areas already identified for biodiversity/landscaping use. These are shown in the Green Infrastructure Statement. • Invertebrate Assemblage: There are localised opportunities for on-site compensation. A diversity of features for invertebrates will be provided, such as the establishment of coastal and pioneer grassland habitat. This is also being addressed through the provision of features beneficial for invertebrates in the modular biodiversity walls. Residual effects are offset by off-site habitat enhancements of ancient woodland, scrub habitat, neutral grassland and saltmarsh. • Lighting and Invertebrates: The design of the lighting scheme has been derived to be the lowest possible for operational and safety requirements. This is set out in the accompanying Lighting Assessment and Strategy prepared by AECOM. Modular biodiversity walls in the Production Development Zone (PDZ) will have value for invertebrates, particularly in areas facing away from lighting. Some light spill will be unavoidable given the safety/operational nature of the proposed development. A pragmatic solution which recognises the balance of requirements for this type of development is acknowledged by NPT. • Oxtongue Broomrape: Appropriate conservation has been agreed with NPT. This comprises a dual approach to conservation. This includes re-locating the Oxtongue Broomrape in TCA1 to a protected area in the northern-most portion of TCA1 (shown in the Green Infrastructure Statement), as well as exploratory inclusion of Oxtongue Broomrape in the modular biodiversity walls in the PDZ.

The above intends to respond directly to the comments provided by NPT's ecologist and will be able to delivered pursuant to appropriately worded conditions and planning obligations.

Separately, we have also included a Planning Statement Addendum, which is the Green Infrastructure Statement (GIS) at **Appendix 3**. This is a policy response document has been prepared separately to respond to the updated Chapter 6 of Planning Policy Wales and demonstrate the proportionate step-wise approach undertaken. Further detail on Oxtongue Broomrape and the conservation strategy is set out here.

Environmental Impact Assessment

8. There are no intended amendments to the ES beyond the submission of the updated WFD (as Appendix 12.4). As the ES assessment is not fundamentally informed by the context of the WFD, the revised document does not amend the assessment, mitigation or conclusions of the submitted ES or its suitability for determination purposes.

Final List of Documentation

9. To assist NPTC, **Appendix 4** includes a list of all final documentation to be approved as part of this planning application, taking account of the clarifications above.
10. The plans and drawings to be approved are unchanged. These are listed in **Appendix 5** for completeness and including revisions/version numbers.

Summary and Conclusions

11. **Table 2** and the accompanying appendices demonstrate that comprehensive clarifications have been provided to all of NPT's comments:
 - The air quality and noise responses provide clarity on the approach to methodology and do not result in any impacts on existing assessment work or conclusions.
 - The proposed approach to biodiversity minimisation, conservation, mitigation and compensation presents a proportionate approach as part of the proposed development and reflects the conclusions of the ES. This has been discussed collaboratively with NPTC since early pre-application discussions and recognises the practical balance with industrial development of this nature in this important location. Full details will be subject to condition/S106 agreement.
 - NRW's comments have been discussed and agreed directly. A separate clarification note has been provided to NRW.
12. We consider that the comments received from NPTC and NRW have been suitably addressed in this Note and accompanying appendices. There are no outstanding matters that would preclude the grant of planning permission. Appropriate planning conditions which take account of consultee feedback and which are relevant, reasonable, and necessary will be discussed promptly and collaboratively. We look forward to engaging on this in due course.

Contact

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January 2024

LANT3006

**Appendix 1: Full clarification and response to noise comments,
prepared by Hunter Acoustics.**

Ffion Middleton

Turley
18 Windsor Place
Cardiff
CF10 3BY

05/02/2024

Our Ref: 6387/L6_Rev7

Dear Ffion,

Re: Project Dragon, Port Talbot – Response to Red Twin and NRW Noise Comments

The below provides our response to comments received in the Red Twin email dated 21/12/2023 and NRW comments dated 21/12/2023, along with discussions in meeting with NRW held on 09/01/2024.

Whilst the majority of the note concurs with our proposed assessment methodology, we would set out the following clarifications:

1. NPT CBC / Red Twin Comments

Construction Noise Assessment

Staff Vehicles

- 1) The 153 staff vehicles are to be located at the northern end of TCA1, which is approximately 55 m from the NSR on Lower West End. Has the model incorporated both arriving and departing the site, and if so, what times are these modelled as occurring?

The modelling was based on a worst case 1hr period and incorporated the 153 movements in that period. These were assessed against daytime and Saturday limits determined in line with BS 5228 methodology.

- 2) I note that no single event noise assessment has been undertaken for the staff vehicle car park to assess for car doors / boots slamming. It would be advantageous for such an assessment to be made in light of the proximity of this area to the NSRs

See point 3 below.

- 3) I would suggest a separate staff vehicle car park assessment that includes the above, assessed as a 'change in noise level' against IOA / IEMA guidance, would be beneficial.

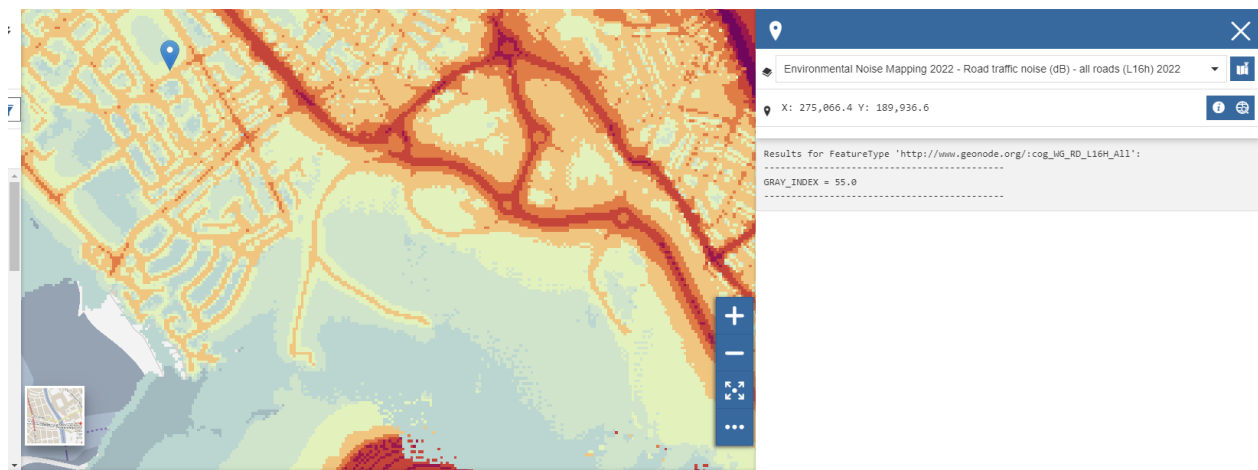
The construction noise assessment which includes contractor parking noise has been carried out in line with BS 5228 which focuses on L_{Aeq} levels. This is the correct assessment methodology for assessing construction noise activities and in our opinion, a separate car park assessment for a temporary construction phase car park is not required.

Quiet Areas

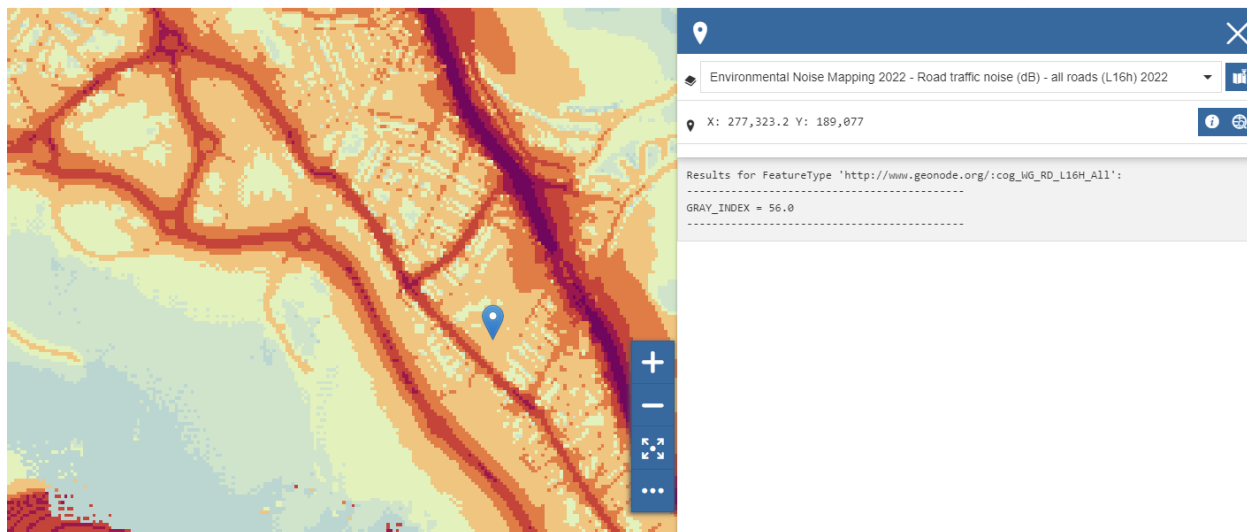
- 4) Ambient noise levels in both quiet areas seem quite high – higher than most of the other areas surveyed. I note the survey period was 2 x 15 minutes at both locations. Were there any noisy activities taking place nearby these two areas during the survey period that aren't typical occurrences? Would longer survey period yield different results and therefore affect the outcome described in para 7.2.12 of the operational noise assessment and table 6.1 of the construction noise assessment?

We would advise the following:

Ambient L_{Aeq} levels at Position 8 (Vivian Park) were measured at 55-56dB. There were no noisy activities in the area at the time of measurement and road traffic noise controlled the levels. Using the Welsh Government Noise Map to check levels indicates daytime 55dB $L_{Aeq,16hr}$ from road traffic noise – see below:



Ambient L_{Aeq} levels at Position 9 (Talbot Memorial Park) were 56-59dB. There were no noisy activities in the area at the time of measurement and road traffic noise controlled the levels. Using the Welsh Government Noise Map to check levels indicates daytime 56dB $L_{Aeq,16hr}$ from road traffic noise – see below:



The above therefore show good agreement with measured survey levels and a longer survey duration is unlikely to make a difference.

Operational Noise Assessment

Tonal Penalty

- 5) Was the penalty for tonality from the ship in Plymouth a subjective assessment (p24)? Was audio recorded and if so, can an objective tonal assessment be made?

Audio was recorded during this survey and software used to objectively analyse the tonal component resulting in penalties of 4dB. This was also in line with subjective impressions at receptors in Plymouth of tonal component being clearly audible at those distances.

Queries

- 6) Is the excess over background column correct in Table 7.3? It is noted, however, that the correct figures would be more advantageous than those shown.

There is a typo in the Rating Level column of this table and all figures are 1dB lower, however the resultant Excess over Background column is correct. The outcome of the assessment is not therefore affected.

- 7) Table 6.2 and 7.7 don't appear to correspond for the Predicted LAeq SSR7 in normal operating conditions (43 or 42 dB?). If 43 is correct then this would raise the excess over background to +4.

There is a typo in Table 6.2 and the correct predicted L_{Aeq} level for SSR7, Scenario 1 at 4.5m height is 42dB. The outcome of the assessment is not therefore affected.

Open windows

The range given in BS8233 for the reduction through an open window is 10-15 dB (section 7.3). A 10 dB reduction built in to the calculations is considered a more conservative approach as it represents a worst case. With such a performance, the level of exceedance becomes 5 dB greater

than that reported. It is noted, however, that with the exception of the emergency flare and ship offloading scenarios, the internal noise levels, whilst not achieving desirable levels at all receivers, are expected to achieve reasonable levels. The flare and off-loading events are not expected to achieve reasonable levels with a worst case scenario performance of 10 dB window reduction (36 dB LAeq). I'm of the opinion, however, that due to the infrequent occurrences of these events, such an outcome is acceptable and the outcome conclusion stated in 7.3 is supported. **Noted.**

Base Line Noise Survey

No further comments. **Noted.**

2. NRW Comments

Sensitivity classification of receptors

We are not wholly in agreement with the sensitivity classification i.e. residential medium and quiet areas as high. This may be true of daytime sound impacting on these receptors however, this will change during the night as quiet areas are absent of visitors who now reside in their homes.

As detailed within the noise chapter, sensitivity categorisation for receptors has been based on professional judgement. The categorisations and magnitude of change ratings have been set so as the effect level aligns with outcomes of BS 4142:2014+A1:2019 (i.e. a major impact is considered to align with background +10dB significant adverse impact under BS 4142). If receptor sensitivity classification changes, then magnitude of change ratings would be adjusted to maintain alignment with BS 4142 outcomes and therefore would have no bearing on the outcome of the assessment.

Operational vibration risk

The applicant has outlined that no sources of vibration will be present both in the operational and construction phase. We point out that by considering vibration early in the risk assessment process can avoid costly mitigation retrospectively.

There are not indicated to be any significant sources of vibration on the site likely to cause risk of vibration off-site (mainly pumps and compressors as opposed to any plant generating large impacts). Given the distance to receptors, an assessment of operational vibration is not therefore considered necessary for this site. Construction vibration has also been scoped out – as detailed in the EIA scoping review.

This was discussed in meeting with NRW on 09/01/2024 and there were no further comments.

Soundscape

We acknowledge the applicant's reference to WG's draft TAN11 document however, we also recognise that both Planning Policy Wales and TAN11 are planning guidance. Our noise guidance specific for permit application, states that - Adding a further industrial source, even if its sound level is below a defined guidance level, may become a tipping point for an inappropriate soundscape or make it much harder to fix an existing problem. Conversely, we point out that in another place, due to an already dull soundscape and low emotional expectations, an additional industrial sound source may not be a burden, as its level may be well masked by other sounds (for example traffic). Therefore, we may require further assessment to establish the applicants position for the environmental permit application.

We maintain our position that the draft TAN11 issued by Welsh Government (not current policy) states the following: "Whilst a soundscape design approach is supported in this TAN, it should only be required by planning authorities instead of, or in addition to, a conventional noise control or acoustic design where it is considered necessary to create an appropriate soundscape and is likely to result in better placemaking in accord with PPW and section 4.3.3 of this TAN." The supporting document 1 of the draft TAN11 entitled "Soundscape Design", provides further guidance, in the form of Table 1, which suggests that for a scheme with 'Low Potential for better placemaking through soundscape design' and that has a medium to high noise risk, one should "Achieve good acoustic quality through good acoustic design."

Given the nature and location of this development, an industrial processing site in a heavily industrialised port area, a conventional noise control assessment demonstrating good acoustic design has been provided.

Soundscape in practice is still an emerging area and recent IOA conferences have highlighted the need for more research in this area to move it out of academia and into real world practice. There are currently no IOA training programmes on the implementation of soundscape assessment in real world applications. Ultimately, a heavily industrialised port area is the correct location for this type of development and minimising noise impact by means of conventional noise control and good acoustic design is the way forward we would suggest.

The above was discussed in the meeting with NRW on 09/01/2024.

Ship pumps and permitted installation boundary

No further comments. Additional review will be undertaken during the environmental permit application. **Noted.**

Source data

For the environmental permit application, for sources which are not yet operational, the applicant can use sound power data from the manufacturer (preferably octave band) or it can be measured using appropriate standards at similar plants. If the applicant's intention is to use sound power data from the manufacturer, it will need to establish how the data was obtained and what standard was followed.

No octave band spectra have been provided or measured at this stage. Octave band spectra have however been provided for the flare, cooling tower, cooling water pumps, CW dosing package and HP boiler package.

The project engineering team have provided sound pressure level estimates for the remaining plant as manufacturer selections have yet to be confirmed for all plant. Our assessment has therefore used spectra shapes from the Predictor database for representative plant and limits have been set in the report at this stage.

This approach was agreed acceptable in the meeting with NRW held on 09/01/2024.

Regards,

A handwritten signature in black ink, appearing to read 'M. Townsend'.

Meirion Townsend

BSc(Hons) MIOA | Director

Hunter Acoustics

Appendix 2: Full clarification and response to air quality comments, prepared by Kairus.

**Response to Comments on Air Quality ES Chapter Received December 2023
from NPT and NRW. Prepared by Kairus Ltd.**

- 1. AQ3 – It is recommended that the applicant provide a detailed modelling of the impact due to the additional shipping emissions including the cumulative effects with other sources.**

This was discussed with Ricardo in late December 2023 and has been carefully reviewed by the consultant team. The commentary below sets out why detailed modelling of shipping emissions is not considered to be required.

The vessel used would be compliant with IMO Tier II exhaust emission regulations set out in Annex VI Marpol 73/1.

Human Receptors - The assessment has been based on a 110 two-way shipping movements as a worst-case. However, through continued engagement by the client with relevant third-party operators, it has been confirmed that based on the size of the ship that would be used for the import of Ethanol and export of fuel there would be approximately 80 two-way shipping movements per annum. This equates to less than 2 ship movements per week.

These vessels would enter the port via the River Afan, travel through the lock into the inner port and to the new dock area that will be located on the northern side of the Site.

The approximately 4000 vessels discussed as the existing/base shipping movements relates to vessels visiting the port within the inner port area accessed via the Afan River and the outer tidal harbour which includes the vessel docking area to the west of the Steelworks. The outer tidal harbour that handles the large capesize vessels of up to 170,000 dwt, while the inner docks accommodate the smaller heavy-lift, project and general cargo vessels of up to 8,000 dwt.

The majority of vessels visiting the port are associated with Tata Steel and therefore would use the tidal harbour docking area. Recent data obtained from Associated British Ports (ABP), the operators of Port Talbot, show that over the last three years there has been an average of 294 vessels entering the inner dock per year (5-6 vessels per week). These

vessels generally produce lower emissions than the larger vessels which dock at the tidal harbour.

The NPTCBC review and assessment of air quality has not identified the port as a significant source of emissions influencing air quality within the Port Talbot area. The AQMA has been declared due to emissions associated with the Steelworks, not relating to traffic emissions or shipping emissions. Local monitoring has shown that existing air quality in Port Talbot is comfortably meeting the relevant air quality objectives (NO₂ and PM₁₀ concentrations are less than 70% of the limit value and SO₂ monitoring has shown no recorded exceedances of the relevant short-term limit values during 2022).

The number of vessels visiting the inner dock area equate to 7.4% of the 4,000 vessels per annum screening criteria and the vessels using the inner dock are the smaller cargo vessels which would generate less emissions. The number accessing the Margam Wharf area would only make up a small proportion of the vessels accessing the inner docks. The addition of 80 vessel movements per annum (less than 2 per week) is not considered to be a significant source of emissions and based on professional judgement would not result in a significant impact on local air quality.

Ecological receptors – The concern relating to ecological receptors is that of in-combination effects from all possible sources.

The wider air quality assessment, as set out in the ES, has shown that the impact of emissions associated with the proposed development from both on-site and traffic emissions will be well below 1% of the relevant CL/CLO on identified locally, nationally and internationally designated sites (SINCS, ancient woodland, SACS, SSSI and SPA) and furthermore, the in-combination effects associated with point source and traffic emissions be less than 1% of the CL/CLO.

As detailed above local monitoring has shown that pollution concentrations in the area are meeting the relevant UK air quality limit values and Port Talbot has not been identified as a significant source of emissions as part of the Councils air quality review and assessment process.

There are less than 6 vessels traveling into the inner dock per week. The addition of 80 vessel movements per annum would increase this to no more than 7 vessels movements per week. The level of emissions associated with an additional 80 vessel movements per annum are not considered significant in terms of local air quality. The total number of vessel

movements within the dock would remain at less than 8% of the LAQM.TG (22) 5,000 screening criteria.

Cumulatively the risk of significant effects from shipping vessels in-combination with other sources is not considered to be significant based on an additional 1-2 vessel movements per week taking into account the current low number of vessels using the port, the low pollution concentrations measured in the Port Talbot area, the impact of other sources having been assessed at less than 1% of the relevant CL and CLO.

Based on the above, detailed modelling of shipping emissions is not considered to be necessary for the purposes of this planning application.

2. Recommendation AQ5 – the applicant should revise the detailed modelling for both construction and operational traffic for human and ecological receptors

Human receptors – given the trip generation during construction and particularly during operation (which is well below the screening criteria) and the current baseline concentrations recorded at local monitoring points such that a change in assessment approach would be excessive and modelling the entire study area is unlikely to identify any significant effects.

The assessment of construction and operational traffic impacts has been carried out in accordance with best practice:

- The predicted trip generation has been screened against the IAQM screening criteria to determine those roads where there is a risk of significant effects. To ensure a robust assessment the lower screening criteria of a change in LGV of more than 100 per day and HGV of more than 25 per day has been used within and adjacent to the Port Talbot AQMA even though the AQMA is declared due to industrial emissions not traffic emissions.
- The presence of sensitive receptors has been identified in close proximity to those roads identified as being affected by construction or operational traffic (i.e. where the screening criteria is exceeded). This process considered the guidance set out within the NO₂ Concentrations and Distance from Roads document produced by Air Quality Consultants (AQC)¹ which acknowledges *‘that beyond 50m from the road, concentrations approach background levels’* and the Design Manual For Roads and

¹ AQC (2008) NO₂ Concentrations and Distance from Roads, Ref J504, p.10, paragraph 3.10

Bridges (DMRB) guidance² which determines an 'affected' road' as 'all roads that trigger the traffic screening criteria and adjoining roads within 200m'.

- Based on the above guidance and the above approach Harbour Way south of the Site was identified as exceeding the IAQM screening criteria during construction and as having sensitive receptors within 50 m of the roadside. This road was included within the modelling assessment. However, there are no other major roads located within 200 m of the identified receptors and therefore no other roads were included within the modelling.
- Based on the above guidance and the above approach Margham Road north of Harbour Way was identified as construction HGV just exceeding the IAQM screening criteria, however based on further review and professional judgement it was concluded that as receptors would be over 50m from the roadside and baseline NO₂ concentrations are <75% of the UK limit values, any short-term change in emissions as a result of construction traffic would not result in any breach of the limit values and would be a negligible impact. Furthermore, no other road within 200 m would result in an exceedance of the IAQM screening criteria. Further assessment was therefore correctly screened out based on relevant guidance.
- At no other locations were the IAQM screening criteria exceeded in a location where there were sensitive human receptors within 200 m of the roadside. All other roads were therefore excluded from further assessment

Also of note:

- Construction traffic generation is based on worst-case movements, so in reality averaged over a year the construction trips would be lower than assessed within the ES.
- The construction phase would occur over a 2.5 year period so emissions associated with construction traffic would be short-term.
- The AQMA has been declared for PM₁₀ relating to emissions from the Steel works, and is not declared for emissions relating to traffic emissions.
- Baseline concentrations of PM and NO₂ are well below the relevant UK limit values

Ecological Receptors – the screening of trips has used a very cautious approach to screening construction and operational trips to determine where a risk of significant effects may occur following discussions with Ricardo as part of the consultation process.

The screening has concluded that at any location where there are ecological receptors within close proximity to the road network (i.e. within 200m in accordance with the DMRB guidance) effected by any change in trips (i.e. a very cautious screening threshold of a

² Highways England, Transport Scotland, Welsh Government, Design Manual For Roads and Bridges, LA 105 Air Quality

change in trips of more than 1 vehicle has been applied) then detailed modelling should be carried out.

The only road that falls within 200 m of an ecological receptor and is affected by operational traffic impacts is the M4 where the Eglwys Reservoir SSSI and the Kenfig SSSI fall within 200 m of the roadside.

Following consultation with the project ecologist it was concluded that Eglwys Reservoir does not include any qualifying features sensitive to emissions, therefore this site was excluded from the assessment.

Impacts associated with operational traffic were assessed using detailed modelling to predict impacts on the Kenfig SSSI.

There are no other main roads within 200 m of the Kenfig SSSI therefore, based on the LA 105 guidance, no other roads were included within the modelling.

The assessment of operational traffic on this site also takes account of emissions associated with the identified on-site point-source emissions and included traffic on the network from both the existing baseline and other committed developments and is therefore considered to be cumulative.

The assessment included within the ES is therefore considered to be robust in terms of assessing operational traffic impacts on ecological receptors.

An assessment of effects associated with construction is not considered necessary as the construction phase will be short-term and effects on ecological receptors is based on long-term (annual) exposure.

3. Recommendation AQ1 – it is recommended that an assessment of operational fugitive emissions is provided by the applicant including any mitigation measures that will be applied to ensure that these are minimised

A screening assessment of potential fugitive emissions has been carried out based on information provided by LanzaTech which has confirmed that appropriate best practice measures will be used to prevent/minimise fugitive emissions and therefore these won't be significant (Paragraphs 11.14 to 11.16 of the ES). Further clarification has been provided

from LanzaTech which confirmed the following as example measures that will be employed to prevent fugitive emissions:

- In line with NRW requirements, the design has considered all ‘best available techniques’ (BAT) listed in relevant BAT reference documents. “Best available techniques” (BAT) means the available techniques which are the best for preventing or minimising emissions and impact on the environment. “Techniques” include both the technology used and the way the installation is designed, built, maintained, operated and decommissioned. Examples incorporated in the DRAGON ATJ facility include but are not limited to:
 - Installation of low-NOx burners in the HP Boiler;
 - Provision of flare gas recovery to ensure flaring is only used for safety or non-routine operational conditions
 - Specification of emergency diesel generators as emissions optimised meeting 2g TA Luft or equivalent standard
- Any solids, like catalysts, that are handled in the open will be handled by trained personnel using special procedures and equipment to mitigate dust production.

Furthermore, the nearest residential receptors to the Site are over 400m from the Site boundary (Lower West End) and the nearest short-term receptors (Bro’s Café and MyBox Self Storage) are over 250 m from the Site. This provides sufficient separation distances for dispersion of emissions to ensure that any potential fugitive emissions would not result in significant effects at the nearest properties/receptors.

4. Recommendation AQ2 – it is recommended that an odour risk assessment is provided by the applicant including any mitigation measures that will be applied to ensure that these are minimised

As detailed in the ES chapter, an odour appraisal has been undertaken which confirms that odour will not be an issue at the Site. However, further clarification has been provided by LanzaTech as follows:

- No catalysts handled in the open are treated with materials prone towards producing odours.
- The feedstock is undenatured fuel grade ethanol, which does not have significant odour causing contaminants such as gasoline or other odour causing material.
- There are no chemical additives to the process that contain odours or odour causing materials.

Based on the information set out in the odour appraisal and the details provided above, it is confirmed that there would be no significant odour sources within the Site and therefore no further odour risk assessment is considered necessary.

5. Recommendation AQ4 – Applicant to take into consideration stringent PM_{2.5} target of 10 ug/m³

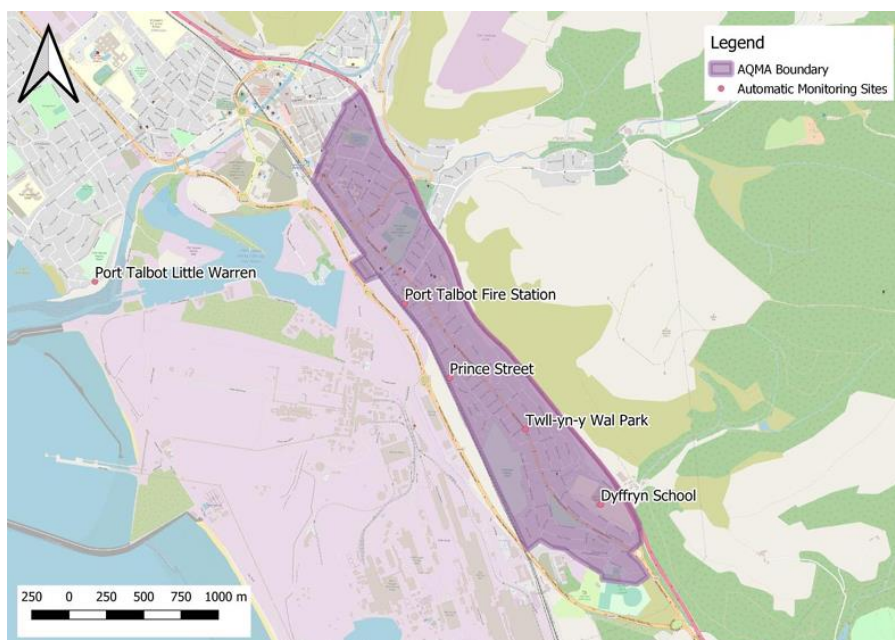
The PC from the onsite long-term emissions are predicted to be less than 0.1 µg/m³. When assessed against a PM_{2.5} target of 10 ug/m³ the PC is less than 1% of the target value and predicted concentrations at all receptor locations where the long-term limit values apply would remain at background concentrations as indicated in Table 11.7.3, Appendix 11.7. Impacts on PM_{2.5} would therefore be negligible when assessed against the current UK limit values for PM_{2.5} and the EIP target values.

6. The applicant should undertake a model verification exercise which would be representative for the study area

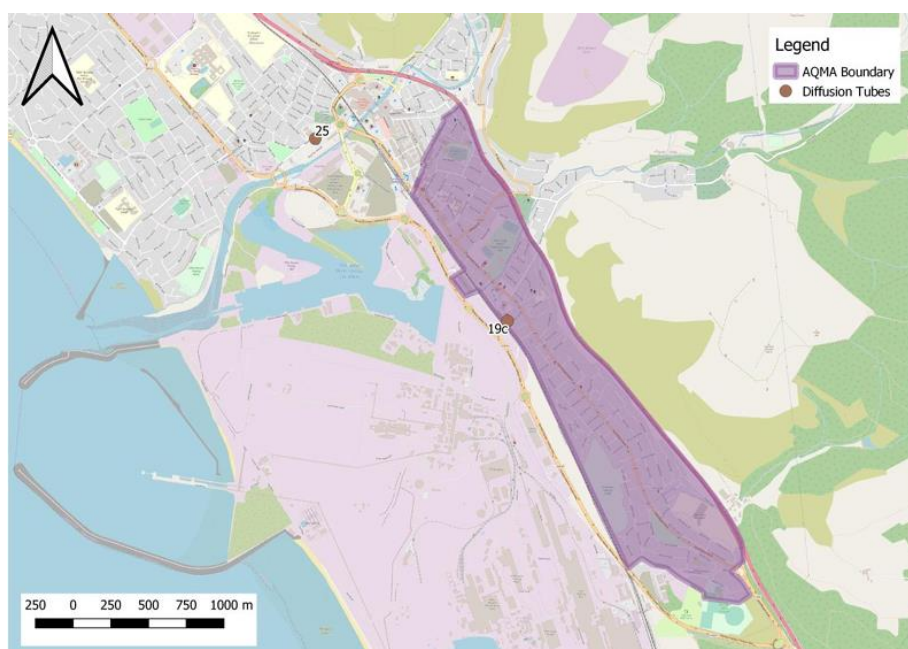
A review of local monitoring was carried out as part of the assessment process. There are no automatic or roadside monitoring sites located within Port Talbot or the study area.

The Victoria Gardens roadside monitor is located adjacent to Eastland Road at the junction with Cimla Road, 8.5 km to the north of the Application Site and 10.7 km of the area assessed within the roads modelling assessment. The Site is also located at a traffic light controlled 4-way junction. This site is not therefore considered representative of conditions being assessed within the modelling assessment and is a considerable distance from Port Talbot.

The Council operated automatic sites located in Port Talbot are all classed as industrial sites, with only one being located at a roadside location – Site TW1 0 Twll-yn-y Wal Park (but also classed by the Council as an industrial site) – Please see map below. This site only monitors PM₁₀ so can not be used to undertake model verification for NO₂.



NO₂ is monitored at two other locations in Port Talbot using diffusion tubes. However, as is shown in the map below, neither is at a roadside location.



The above review shows that there is no suitable monitoring data in Port Talbot that can be used to undertake model verification, the use of an arbitrary adjustment factor was therefore used. However, this factor was not derived from a single modelling assessment it was obtained by taking the average of a number of adjustment factors obtained from a number of different road modelling assessments undertaken in similar urban environments.

- 7. Recommendation AQ13 – applicant should clarify where ELVs have been taken from**

The assessment has been based on emissions data provided by LanzaTech.

- 8. Addressed, no further clarification**

- 9. Addressed, no further clarification**

- 10. Recommendation AQ18 – the applicant should undertake a dust risk assessment using the IAQM guidance**

It is confirmed that there are no receptors within 250 m of the demolition activities. The nearest receptors are on Lower West End which are 400 m to the north-east of the demolition area.

- 11. AQ20 Applicant should clarify that ONLY (and no other point source emissions) the emissions sources that have been modelled during the long-term scenario SC1 and the short-term scenarios would operate in those normal, start-up and emergency scenarios**

This is confirmed based on information provided by LanzaTech

- 12. Recommendation AQ7 – The applicant should clarify speeds used in the assessment and that speeds have been slowed down at junctions**

The modelling has used speeds of 48 kph to ensure a robust assessment. No junctions have been modelled so no additional traffic speeds have been used.

- 13. Recommendation AQ8 – the applicant should clarify the method surface roughness value used in the roads model**

A surface roughness of 0.5 m was used but it should also be noted that terrain data was also included within the model

- 14. No further clarification required**

- 15. Recommendation AQ10 – the applicant should provide further information on the surface roughness value used in the point source dispersion model**

A surface roughness of 0.5 m was used but it should also be noted that terrain data was also included within the model.

16. Recommendation AQ11 – The applicant should provide further commentary on the meteorological data capture and how limitations were addressed

The met data used for Mumbles Met site had the following data capture:

2020: 0% missing wind and temperature, 0% cloud data – 100% cloud data was replaced with cloud data from Cardiff Met Site (this data set only had 0.2% missing cloud data)

2021: 1.2% missing wind and temperature, 0% cloud data – missing cloud data replaced with cloud data from Cardiff (this data set only had missing cloud data of 1.6%)

2022: 0.7% missing wind data, 0.1% missing temperature data and 100% missing cloud data - cloud data replaced with data from Cardiff (0.3% of cloud data was missing from the Cardiff data set)

The met data sets where missing 100% cloud cover, however this was replaced by data from the Cardiff met site which is the nearest site to Mumbles. Data capture from Cardiff was more than 98% and therefore considered suitable for use and reduced the limitations of the data.

A sensitivity test using Cardiff data (as detailed in Appendix 11.3 of the ES) has shown that use of data from this location results in very little change in predicted impacts and therefore use of this data to replace missing cloud data would not result in a significant limitation in the data set.

Missing wind and temperature from Mumbles is less than 2% and therefore the data set is considered to be acceptable for use and limitations to the data are minimal and would not significantly effect the outcome of the modelling.

17. Recommendation AQ12 – A sensitivity study should have been undertaken to confirm whether the significance of the impact of the facility would not be worse with the incorporation of the 8m platform

This has been addressed and is set out in Appendix 11.3 of the ES

18. Recommendation AQ16 – Applicant to provide justification for flare parameters

Flaring flow rates are based on operating procedures for normal start-up and shutdown (A3-2 and A3-4) and the methodology defined in API 521 Pressure-relieving and Depressuring Systems for emergency scenarios (A3-1 and A3-3). Composition of flared gas is based on emission factors in EEMS Atmospheric Emissions Calculations.

19. Recommendation AQ17 – Applicant to provide justification for boiler temperature

The project has specified a high efficiency (>90%) boiler. This includes maximising recovery of heat from combustion flue gases to an acid dew point corrosion limit. The specified stack temperature (130 degC) is a conservatively low minimum with normal operation likely at ~150 degC.

NRW Comments 21 December 2023

1. Footnote 2 of Table 11.3 – NRW has queried why impacts were not considered in relation to the 24 hr NO_x limit

The 24-hr NO_x limit was not presented within the ES chapter because guidance states that this limit value only applies where there are high concentrations of SO₂ and Ozone, which is not generally the current situation in the UK.

As detailed in the IAQM guidance which quotes comments from the 2000 WHO guidelines, *‘experimental evidence existing that the CLE decreases from around 200 µg/m³ to 75 µg/m³ when in-combination with O₂ or SO₂ at or above their critical levels. In the knowledge that short-term episodes of elevated NO_x concentrations are generally combined with elevated concentrations of O₃ or SO₂ 75 µg/m³ is proposed for the 24 hour’*. However, the IAQM guidance goes on to state that *‘Ozone and SO₂ are typically low in the UK compared to many other countries. If a regulator does require the use of the short-term NO_x critical level, given the low UK SO₂ concentrations IAQM consider it is most appropriate to use 200 µg/m³ as the short-term critical load’*.

The short-term NO_x outputs from the modelling undertaken as part of the ES have been used to considered in relation to the limit of 75 µg/m³. However based on the above quote set out within the IAQM guidance, a limit of 200 µg/m³ is considered more appropriate to use. Therefore consideration against the lower limit value represents a cautious assessment of potential effects.

The data from Scenario 3 (the flare operating under emergency conditions) has been used to undertake a sensitivity test of short-term NO_x emissions given that this operating scenario resulted in the highest emissions from the Site. The sensitivity test shows that at all the ecology receptors considered in the ES, the PC is less than 10% of the 75 µg/m³ 24 hr limit value. The additional sensitivity test shows that the outcomes set out within the ES remain appropriate and are not required to be updated or amended.

2. Please confirm that all receptor sites with public exposure were considered –

During further consultation with NRW both the Bros Café and Box-self-storage were identified as receptors closer to the site than those assessed within the ES chapter.

Neither of these were identified as receptors with the ES screening assessment. However, due to the nature of these receptors, they would be considered in respect of short-term exposure. The contour plots presented in Figures 11.8 to 11.30 show that the predicted PC for all pollutants for annual mean and short-term emissions are negligible at these receptors.

All other receptors selected represent worst-case locations of long-term exposure at high sensitivity receptors. There are no other sensitive receptors located within closer proximity to the Site than the receptors considered in the ES and the two identified above.

3. Section 11.27 – compared to other human receptors C1 and C2 are further away from the proposed site. When considering the onsite construction emissions and road traffic in combination, C1 and C2 may not represent the worst-case locations

C1 and C2 have been selected to assess effects from construction traffic emissions. A comprehensive screening assessment has been carried out to screen locations at risk of significant effects resulting from construction emissions using the IAQM screening criteria. This identified Harbour Way adjacent to C1 and C2 as exceeding the screening criteria, therefore modelling was carried out for this location. C1 and C2 were selected as being closest to Harbour Way and the 'Affected' Road. There are no other locations within 200 m of the 'affected' road where there are sensitive receptors. There are sensitive receptors closer to the Site however these have been screened out as not experiencing significant effects as a result of construction traffic and are located over 200 m from any on-site construction activities therefore cumulative/in-combination effects from construction traffic and on-site construction activities would be negligible.

4. Section 11.148 – it is expected that concentrations of these pollutants will remain at current levels into the near future. However, data shows that concentrations are currently meeting the relevant objective. Most 2023 data are now available, this statement may not be correct

2023 data is not yet publicly available, and the full years data set would not have been ratified by the LA at this stage. However, based on long-term trends in concentrations in the area it is very unlikely that any of the limit values are being exceeded as this would require a significant increase in local concentrations of more than 50% for the majority of pollutants.

Tweaked comment – *‘concentrations will remain below the objectives in the near future’*

Appendix 3: Green Infrastructure Statement

This Green Infrastructure Statement is a separate document given file size.

Appendix 4: Final list of planning application documents

Document	Author	Date/Reference
Standalone Planning Application Documents		
Covering Letter	Turley	16 Nov 2023
Application Form and Certificates	Turley	16 Nov 2023
Planning Statement (including Draft Planning Obligations)	Turley	16 Nov 2023
Design and Access Statement (DAS)	Inspire Architects	2143.01-IA-XX-XX-RP-A-0910 P11
Full suite of technical plans	Inspire Architects	Please see Appendix 8
Sustainability and Energy Statement	Turley Sustainability	Rev I
Transport Assessment (including Transport Implementation Strategy and access plans)	SCP	CT/220352/TA/04
Flood Consequence Assessment	JBA	Rev G
Outline Drainage Strategy	JBA	Rev F
Green Infrastructure and Landscape Strategy	EDP	edp7470_d010-O
Green Infrastructure Statement	Turley	January 2024
Ecological Impact Assessment (EcIA)	RPS	Rev 2
Arboricultural Baseline Note	EDP	edp7470_r002e
Archaeology and Heritage Assessment	EDP	edp7470_r003
PDZ Ground Investigation Report (Phase 1)	TEC Consulting	2111006.003.01D
Margam Wharf Ground Investigation Report (Phase 1)	TEC Consulting	2111006.006.02A
PDZ Desk Study	TEC Consulting	2111006.002.01G
Margam Wharf Desk Study	TEC Consulting	2111006.006.01C
Geotechnical Report	TEC Consulting	2111006.005.02
Geoenvironmental Report	TEC Consulting	2111006.005.01B
Detailed UXO Risk Assessment	Brimstone	Rev 2
Preliminary Waste Management Plan	Stopford	Issue A8
Economic and Social Value Statement	Turley Economics	Nov 2023
Lighting Assessment and Strategy	AECOM	Oct 2023
Fire Strategy Report	Part B	PJD-PTB-ZZ-XX-RP-FE-1001 – Issue 2
Odour Note	LanzaTech	Rev 1

Framework Construction Environmental Management Plan (FCEMP)	LanzaTech	08 Nov 2023
Pre-Application Consultation (PAC) Report	Turley Strategic Communications	Rev B
Environmental Statement		
Volume 1: Primary Report and Supporting Graphics		
ES Chapter 1 (Introduction)	Turley EIA	08 Nov 2023
ES Chapter 2 (Approach to EIA)	Turley EIA	08 Nov 2023
ES Chapter 3 (Site Context)	Turley EIA	08 Nov 2023
ES Chapter 4 (Development Specification)	Turley EIA	08 Nov 2023
ES Chapter 5 (Consideration of Alternatives)	Turley EIA	08 Nov 2023
ES Chapter 6 (Major Accidents and/or Disasters)	Turley EIA	08 Nov 2023
ES Chapter 7 (Terrestrial Ecology)	Turley EIA	08 Nov 2023
ES Chapter 8 (Landscape and Visual)	Turley EIA	08 Nov 2023
ES Chapter 9 (Socio-Economics and Human Health)	Turley EIA	08 Nov 2023
ES Chapter 10 (Climate Change)	Turley EIA	08 Nov 2023
ES Chapter 11 (Air Quality)	Turley EIA	08 Nov 2023
ES Chapter 12 (Noise and Vibration)	Turley EIA	08 Nov 2023
ES Chapter 13 (Marine Ecology)	Turley EIA	08 Nov 2023
ES Chapter 14 (Assessment of Cumulative Effects)	Turley EIA	08 Nov 2023
ES Chapter 15 (Summary of ES)	Turley EIA	08 Nov 2023
Volume 2: Technical Appendices		
Appendix 1.1 Statement of Technical Competence	Turley EIA	08 Nov 2023
Appendix 2.1 EIA Scoping Report	Turley EIA	08 Nov 2023
Appendix 2.2 Environmental Topics which are Not Significant	Turley EIA	08 Nov 2023
Appendix 2.3 Natural Resources Wales (NRW) Response	Turley EIA	08 Nov 2023
Appendix 2.4 Water Framework Directive Assessment (Rev E) (January 2024)	Turley EIA	Rev E (January 2024)
Appendix 6.1 HSE Design Philosophy	Technip	08 Nov 2023
Appendix 7.1 Preliminary Ecological Appraisal	RPS	08 Nov 2023
Appendix 7.2 Phase 2 Species Survey Report	RPS	08 Nov 2023

Appendix 7.3 BBS WBS Assessment Report	RPS	08 Nov 2023
Appendix 7.4 Invertebrate Assessment	RPS	08 Nov 2023
Appendix 7.5 Invertebrate Survey 2023	RPS	08 Nov 2023
Appendix 8.1 LVIA	Turley LVIA	08 Nov 2023
Appendix 8.1 LVIA Appendix 6 – Supporting Figures	Turley LVIA	08 Nov 2023
Appendix 8.2 Ocean CGI AVR Supporting Doc and Method Statement	Ocean CGI	08 Nov 2023
Appendix 9.1 Supply Chain Employment	Turley Economics	08 Nov 2023
Appendix 11.1 – 11.8 Air Quality Appendices	Kairus	08 Nov 2023
Appendix 12.1 Baseline Noise Survey	Hunter Acoustics	08 Nov 2023
Appendix 12.2 Operational Noise Impact Assessment	Hunter Acoustics	08 Nov 2023
Appendix 12.3 Construction Noise Impact Assessment	Hunter Acoustics	08 Nov 2023
Appendix 13.1 The Marine Ecology Study Area	Marine Space	08 Nov 2023
Appendix 13.2 UWN Modelling Report	Marine Space	08 Nov 2023
Appendix 14.1 Approved Projects ZOI	Turley EIA	08 Nov 2023
Volume 3: Environmental Management Plan		
Volume 4: Non-Technical Summary		

Appendix 5: Drawing Issue Register for approval

2143.01 Project Dragon

Planning (Application)			Sheet No.																			
Document Reference	Size	Day	27	09	10	11	14	15	11	12	13	19	20	26	27	31	02	03	06			
		Month	7	8	8	8	8	8	10	10	10	10	10	10	10	10	10	11	11	11		
		Year	23	23	23	23	23	23	23	23	23	23	23	23	23	23	23	23	23			
2143.01-IA-ZZ-ST-DR-A-0100_Site Location Plan	A1		P11	P12											P13							
2143.01-IA-ZZ-ST-DR-A-0101_Site Location Plan - Ownership Boundaries	A1		P6	P7											P8							
2143.01-IA-ZZ-ST-DR-A-0200_Existing Site Key Plan	A1		P9	P10											P11							
2143.01-IA-ZZ-ST-DR-A-0201_Existing Site Plan (Area 1)	A1		P7	P8																		
2143.01-IA-ZZ-ST-DR-A-0202_Existing Site Plan (Area 2)	A1		P7	P8											P9							
2143.01-IA-ZZ-ST-DR-A-0203_Existing Site Plan (Area 3)	A1		P7	P8																		
2143.01-IA-ZZ-ST-DR-A-0204_Existing Site Plan (Area 4)	A1		P7	P8											P9							
2143.01-IA-ZZ-ST-DR-A-0210_Proposed Site Key Plan	A1		P8	P9					P10	P11	P12					P13			P14			
2143.01-IA-ZZ-ST-DR-A-0211_Proposed Site Plan (Area 1)	A1		P7	P8	P9	P10				P11		P12				P13						
2143.01-IA-ZZ-ST-DR-A-0212_Proposed Site Plan (Area 2)	A1		P7	P8	P9	P10				P11	P12	P13				P14			P15			
2143.01-IA-ZZ-ST-DR-A-0213_Proposed Site Plan (Area 3)	A1		P7	P8	P9	P10				P11		P12				P13						
2143.01-IA-ZZ-ST-DR-A-0214_Proposed Site Plan (Area 4)	A1		P8	P9	P10	P11				P12	P13	P14				P15						
2143.01-IA-ZZ-ST-DR-A-0215_Proposed PDZ Layout & Equipment List	A1		P8	P9		P10				P11	P12	P13	P14	P15	P16	P17			P18			
2143.01-IA-ZZ-ST-DR-A-0216_Proposed PDZ Layout - External Surface Finishes	A1		P5	P6		P7										P8			P9			
2143.01-IA-ZZ-ST-DR-A-0217_Proposed Site Plan - PDZ & Temp. Construction Areas	A1		P7	P8											P9				P10			
2143.01-IA-ZZ-ST-DR-A-0220_Proposed Site Key Plan - EIA Boundary Shown	A1		P7	P8						P9	P10	P11				P12			P13			
2143.01-IA-ZZ-ST-DR-A-0227_Site Location Plan - EIA Boundary Shown	A1		P7	P8											P9							
2143.01-IA-ZZ-ST-DR-A-0228_Existing Site Key Plan - EIA Boundary Shown	A1		P6	P7											P8							
2143.01-IA-ZZ-ST-DR-A-0240_Proposed Site Fencing Layout	A1		P2	P3		P4									P5				P6			
2143.01-IA-ZZ-ZZ-DR-A-0400_Existing Site Sections	A1		P7	P8												P9						
2143.01-IA-ZZ-ZZ-DR-A-0401_Proposed Site Sections - Sheet 1 of 2	A1		P7	P8												P9	P10		P11			
2143.01-IA-ZZ-ZZ-DR-A-0402_Proposed Site Sections - Sheet 2 of 2	A1		P6	P7		P8										P9	P10		P11			
2143.01-IA-ZZ-ZZ-DR-A-0500_Proposed Zone 1 Plant Elevations - Enclosed Ground Flare	A1		P2	P3		P4										P5	P6					
2143.01-IA-ZZ-ZZ-DR-A-0501_Proposed Zone 2 Plant Elevations - Collection Basin	A1		P2	P3	P4	P5										P6	P7					
2143.01-IA-ZZ-ZZ-DR-A-0502_Proposed Zone 3 Plant Elevations - Substation 3000	A1		P2	P3	P4	P5										P6	P7					
2143.01-IA-ZZ-ZZ-DR-A-0503_Proposed Zone 4 Plant Elevations - Tanker Loading	A1		P2	P3	P4	P5										P6						
2143.01-IA-ZZ-ZZ-DR-A-0505_Proposed Zone 5 Plant Elevations - Ethanol Tanks	A1		P3	P4		P5										P6						
2143.01-IA-ZZ-ZZ-DR-A-0506_Proposed Zone 6 Plant Elevations - Process Modules	A1		P2	P3	P4	P5										P6	P7		P8			
2143.01-IA-ZZ-ZZ-DR-A-0507_Proposed Zone 7 Plant Elevations - Sustainable Aviation Fuel Tanks	A1		P2	P3	P4	P5										P6						
2143.01-IA-ZZ-ZZ-DR-A-0508_Proposed Zone 8 Plant Elevations	A1		P2	P3	P4	P5										P6						
2143.01-IA-ZZ-ZZ-DR-A-0509_Proposed Zone 9 Plant Elevations - Hydrogen Generation	A1		P2	P3		P4										P5	P6					
2143.01-IA-ZZ-ZZ-DR-A-0510_Proposed Zone 10 Plant Elevations	A1		P3	P4		P5										P6	P7		P8			
2143.01-IA-ZZ-ZZ-DR-A-0511_Proposed Zone 11 Plant Elevations - Metering & Water Tanks	A1		P2	P3	P4	P5										P6						
2143.01-IA-ZZ-ZZ-DR-A-0512_Proposed Zone 12 Plant Elevations - Water Package & Tank	A1		P2	P3	P4	P5										P6						
2143.01-IA-ZZ-ZZ-DR-A-0513_Proposed Zone 13 Plant Elevations	A1		P2	P3	P4	P5										P6						
2143.01-IA-ZZ-ZZ-DR-A-0514_Proposed Zone 14 Plant Elevations - Substation 2000 & Liquid Nitrogen Storage	A1		P2	P3		P4										P5	P6					
2143.01-IA-01-ZZ-DR-A-0300_Proposed Process-Control Building Plans	A1		P5	P6												P7						
2143.01-IA-02-ZZ-DR-A-0300_Proposed Laboratory Plans and Elevations	A1		P6	P7												P8						
2143.01-IA-03-ZZ-DR-A-0300_Proposed Gatehouse 1 Plans and Elevations	A1		P5	P6		P7										P8						
2143.01-IA-04-ZZ-DR-A-0300_Proposed Gatehouse 2 Plans and Elevations	A1		P5	P6												P7						
2143.01-IA-05-ZZ-DR-A-0300_Proposed Workshop Plans and Elevations	A1		P6	P7		P8										P9						
2143.01-IA-06-ZZ-DR-A-0300_Proposed Warehouse Store Plans	A1		P6	P7												P8						
2143.01-IA-06-ZZ-DR-A-0301_Proposed Warehouse Store Elevations	A1															P1						
2143.01-IA-09-ZZ-DR-A-0300_Proposed Admin Building Plans and Elevations	A1		P6	P7												P8						
2143.01-IA-10-ZZ-DR-A-0300_Proposed Amenity Shelter 1 Plans and Elevations	A1		P1	P2												P3						
2143.01-IA-11-ZZ-DR-A-0300_Proposed Amenity Shelter 2 Plans and Elevations	A1		P1	P2												P3						
2143.01-IA-12-ZZ-DR-A-0300_Proposed Cycle Store Plans and Elevations	A1		P1	P2												P3						
2143.01-IA-XX-XX-RP-A-0910_Design and Access Statement	A3		P1	P2		P3		P4		P5		P6				P7			P8	P9		