

15 August 2025

Dear

Request for information - ATISN 24902

Thank you for your refined request for information which I received on 17 July.

Your Request

You asked for the following information:

1. A list of meetings between Last Energy and Welsh Government including dates and who was in attendance (job titles fine!)
2. Emails and letters exchanged with Last Energy and Welsh Government relating to the proposal to build four small modular reactors in Maesteg between July 2024 and now.

Our Response

I can confirm that the Welsh Government holds information captured by your request. Please see a list of meetings along with emails exchanged appended at Annex A. Please note that any personal information such as names, etc, have been redacted under Section 40 of the Freedom of Information Act, personal information. Full reasoning for applying this exemption is appended at Annex B at the bottom of this letter.

Next steps

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or Email: Freedomofinformation@gov.wales

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely

Annex A

Online meetings:

24/09/24 – WG Head of Nuclear and WG Nuclear Business Manager, Last Energy

15/05/25 - WG Nuclear Business Manager, Last Energy

19/06/25 - WG Nuclear Business Manager, Last Energy

Site meeting:

7 February 2025 at Llynfi site, Bridgend

Present – WG Nuclear Business Manager, Last Energy (ONR (officials x2)

Email exchange number 1:

From: (WG official name and email address redacted under Section 40)

Sent: Monday, September 23, 2024 10:23:36 AM

To: (Last Energy name and email address redacted)

Cc: (WG official name and email address redacted under Section 40)

Subject: Re: Last Energy Comms plan

Thanks (name redacted)

(WG official name redacted) and (WG official name redacted) would very much appreciate an update to discuss how that call went.

Would tomorrow be convenient?

(WG official name redacted)

From: Last Energy (Name and email address redacted)

Sent: Monday, September 23, 2024 10:23:36 AM

To: (WG official name and email address redacted under Section 40)

Cc: (Last Energy names and email addresses redacted); (WG official name and email address redacted under Section 40)

Subject: Re: Last Energy Comms plan

(WG official name redacted)

Yes the first few events took place on the dates indicated.

The meeting with Huw Irranca-Davies was a call between one of our communications team (Name redacted under Section 40, personal information) and the deputy First Minister.

I believe that (Name redacted) would like to update you on that call as we are moving towards a start on the Llynfi project.

Best regards

(Last Energy name redacted)

On Mon, 23 Sept 2024 at 10:17, (WG official name and email address redacted under Section 40) wrote:

Thanks (Name redacted)

Can we take it that the first few opening events have taken place as planned and indicated?

Particularly the meeting with Huw Irranca-Davies?

(WG official name redacted)

From: (Last Energy name and email address redacted)

Sent: Monday, September 23, 2024 10:02:11 AM

To: (Last Energy name and email address redacted)

Cc: (WG official name and email address redacted under Section 40)

Subject: Re: Last Energy Comms plan

(WG official name redacted)

Good morning.

I thought it might be useful to send through the latest iteration of our Consultation Strategy.

On the issue of the supply chain days on 5th & 6th November in Cardiff and Swansea with Industry Wales/Welsh Nuclear Forum, these have no dependency on the Llynfi project - we have a range of projects across England & Wales for which we would like to start this workstream.

Also, our key dates are attached to help your discussion with Michael.

Best regards

(Name redacted)

On Mon, 23 Sept 2024 at 08:03, (Last Energy name and email address redacted) wrote:

(WG official name redacted),

Thank you for your comments. Do you have an opportunity to discuss on the phone today?

Our Comms team informally spoke to Huw Irranca-Davies yesterday at the Labour conference and this gave us some insight into his views. It would be good to share this with you also.

We are keen to take account of all comment and views as we plan the appropriate way forward.

Best

Name redacted

CEO, UK

[Last Energy](#)

On Mon, 23 Sep 2024 at 07:46, (WG official name and email address redacted under Section 40) wrote:

Hi (CEO Name redacted)

We are still reviewing the comms plan, but can suggest there may be issues with the included planning assumptions – we are confirming and will advise in coming days.

The plan is watermarked as draft, but I am aware of separate communications with Industry Wales on the proposed supplier day around 5th / 6th November? Does this event date direct the comms plan? Or other way around?

We are preparing to brief Cabinet Secretaries and Ministers, but do need some clarity of timings where possible; are you yet able to confirm a planned timeline?

(WG official name redacted)

From: CEO Last Energy>

Sent: Tuesday, September 17, 2024 2:32 PM

To: (WG official name and email address redacted under Section 40)

Cc: (Last Energy name and email address redacted); (WG official name and email address redacted under Section 40)

Subject: Re: Last Energy Comms plan

(WG official name redacted),

Please find attached our draft consultation strategy.

I have sent in WORD format to make it easier for you to comment and track changes.

Very grateful for comments and we hope we can meet with Ministers in due course - we have not made any fresh approaches yet since the leadership change.

Best regards

CEO

CEO, UK

[Last Energy](#)

On Mon, Sep 2, 2024 at 4:59 PM <(WG official name and email address redacted under Section 40)> wrote:

Hi (CEO Name redacted)

Hope you are well and enjoyed your last visit to Swansea.

We have spoken today with Industry Wales and Wales Nuclear Forum regarding the proposed supplier events later this year.

Are you yet in a position to share your proposed communications plan with us? We would like to fully brief Welsh Ministers, and given the potential announcement could be as soon as early October, we are conscious that we do not yet have sufficient detail.

What we would hope for is a document that gives confidence to the Ministers that you have a well-considered and prepared plan; for 4 units in Bridgend in the first instance, but might also include the other units at another South Wales site to be confirmed.

Separately, have you made any of your own approaches to engage with any of the Welsh Ministers? – that could be helpful for us to know.

Kind regards,
(WG official name redacted)

Email exchange number 2:

From: (WG official name and email address redacted under Section 40)

Sent: Tuesday, January 7, 2025 16:18 PM

To: (Last Energy names and email addresses redacted)

Cc: (WG official name and email address redacted under Section 40)

Subject: RE: FW: Public consultation

Good afternoon (Last Energy Name redacted)

Happy new year to you and yours.

Thank you again for the update which I used in allaying fears expressed by one resident of Coytrehen; specifically the leaflet drop.

I am content to respond to them reiterating that we have had confirmation from yourselves, but I think I would like to try one more attempt to placate them with additional information. From the ward info you kindly sent me, I have extracted the salient details.

Can you confirm the following is correct so that I can include in my correspondence:

“Last Energy confirmed to me that they delivered the following, to those three wards they had determined closest to their planned development:

- Llangynwyd – 1247 leaflets (1234 to residential + 13 to businesses)
- Aberkenfig – 969 leaflets (943 to residential + 26 to businesses)
- Garw Valley – 3553 leaflets (3471 to residential + 82 to businesses)”

Many thanks,

(WG official name redacted)

From: (Last Energy name and email address redacted)

Sent: 04 December 2024 11:32

To: (Last Energy CEO)

Cc: (WG official name and email address redacted under Section 40)

Subject: Re: FW: Public consultation

(WG official name redacted)

Apologies for the delay in replying; I was caught up in another couple of issues unrelated to Llynfi.

The first thing to note is that, despite their advertising, the first two events primarily serve as tests for our materials and logistics. These events will provide valuable insights for future events, enabling us to optimise their effectiveness. We conducted a small leaflet drop for the first two events to gauge the response; the total number of leaflets dropped corresponds to the closest three wards to the plant. We are considering newsletters and other event and venue communication methods. These will include Bettws Life Centre, Bridgend College Pencoed Campus, Maesteg Town Hall, Coytrahen Community Hub, Bryncethin Community Centre, and Westward Community Centre. We are actively engaged in a conversation with local councillors to find venues that would be best for the community and also in real social value initiatives.

In terms of timing, the plan is as follows:

2025	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
Non-statutory Town Hall																							
Non Statutory Town Hall																							
Statutory Town Hall																							
Statutory Town Hall																							
Statutory Town Hall																							

Following our two supplier days we have commenced the public engagement - all of which will be on our website. The two we have announced so far are [here](#):

We are running online adverts in the local press and we delivered paper bills through doors in the local area for our all day drop-in on Nov 27th in Bettws and our upcoming public talk next week at Bridgend college. In Bettws things went well, a good first run where there was lots of interest to learn more. I am giving the presentation in Bridgend on the 12th and I'm sure we will have some good Q&A afterwards.

Our next set of engagements will be in Q1 and these will also be on the website as well as advertised again online and with paper bills.

(Redacted as not captured by request)
Best

(Name redacted)

CEO, UK

On Tue, Dec 3, 2024 at 9:53 AM (WG official name and email address redacted under Section 40) wrote:

Good morning (Name redacted)

Hope you are well. I've not heard back from (Name redacted) as yet, but am hoping you can give us more information on the planned public consultation sessions – dates and location would be fine.

(Redacted as not captured by request)
Kind regards,

(WG official name redacted)

From: (WG official name and email address redacted under Section 40)

Sent: 02 December 2024 11:29

To: (Last Energy name and email address redacted)

Subject: Public consultation

Good morning (Name redacted)

I trust you are well.

I did see your update last week on the first public event at Bettws Life Centre, and would be grateful if you might be able to forward a list of the planned public events.

We are expecting to prepare briefings for Cabinet Secretaries and Ministers, and the planned programme would be a useful inclusion.

Apologies if the programme might have already been communicated.

(WG official name redacted)

Email exchange number 3:

From: (WG official name and email address redacted under Section 40)

Sent: Tuesday, January 7, 2025 16:18 PM

To: (Last Energy name and email address redacted)

Subject: RE: Site Visit 7th February

Hi (Name redacted)

Personally I don't have a problem, but I will need get some advice to provide final confirmation.

If you could possibly let me get back to you either tomorrow or Monday at latest?

(WG official name redacted)

From: (Last Energy name and email address redacted)

Sent: 30 January 2025 08:48

To: (WG official name and email address redacted under Section 40)

Cc: (Last Energy name and email address redacted)

Subject: Site Visit 7th February

(WG official name redacted),
Good morning

Just a quick one relating to the above: I have been asked a) whether you would be okay with us taking photos during the Llynfi site visit and b) whether you would be happy with us doing a news story on our website about the visit afterwards (and using the photos).

We have asked the same question to the ONR.

I look forward to seeing you next week.

Best regards

(Name redacted)

UK Director, Development

Email exchange number 4:

From: (WG official name and email address redacted under Section 40)

Sent: Tuesday, February 11, 2025 07:10 AM

To: (Last Energy name and email address redacted)

Subject: RE: Modular Factory

Hi (Name redacted)

Was useful to visit the site and appreciate your time and effort in organising – and accompanying us in the cold wind.

Thank you for the attached indications – I will discuss with colleagues and respond asap.

I am clear that Last Energy are already engaging with ONR, but do you have any update on where Last Energy are in respect of planning application? Are you working with the local authority and/or are you intending to engage with PEDW?

More info here if not already aware.

[Planning and Environment Decisions Wales | GOV.WALES](#)

Kind regards,

(WG official name redacted)

From: (Last Energy name and email address redacted)

Sent: 09 February 2025 11:36

To: (WG official name and email address redacted under Section 40)

Subject: Modular Factory

(WG official name redacted)

It was good to see you again on Friday.

As discussed, please find our rough estimate on the factory requirements. I know our Board would like us to have a meeting with Welsh Ministers to ensure that, as a minimum, the plan would not be opposed by the Welsh Government.

Also, I am meeting with (Name redacted under Section 40, personal information) on Tuesday evening; I believe he is looking to make an alternative proposal.

Speak soon

Best regards

(Name redacted)

UK Director, Development

Annex B

ATISN 24902 - Application of exemptions

The Freedom of information Act provides a right for anyone to ask a public authority to make requested information available to the wider public. As the release of requested information is to the world, not just the requester, public authorities need to consider the effects of making the information freely available to everybody. Any personal interest the requester has for accessing the information cannot override those wider considerations.

We have decided to withhold the following information:

- The personal data contained in the information you have requested under Section 40 of the Freedom of Information Act 2000 (FOIA), personal data.

This Annex sets out the reasons for the engagement of Section 40 of the FOIA.

Engagement of S40(2) – Personal Data

The Welsh Government believes the personal data contained in the information being released with this request should be exempt from disclosure

Section 40(2) of the Freedom of Information Act 2000 (FOIA), together with the conditions in section 40(3)(a)(i) or 40(3)(b), provides an absolute exemption if disclosure of the personal data would breach any of the data protection principles.

‘Personal data’ is defined in sections 3(2) and (3) of the Data Protection Act 2018 (‘the DPA 2018’) and means any information relating to an identified or identifiable living individual. An identifiable living individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

We have concluded that, in this instance, some of the information contained within the information caught by your request contains third party personal data. Specifically, this relates to correspondence containing the names of Welsh Government officials, the names of third-party representatives, and their email addresses.

Under Section 40(2) of the FOIA, personal data is exempt from release if disclosure would breach one of the data protection principles set out in Article 5 of the UK GDPR. We consider the principle being most relevant in this instance as being the first. This states that personal data must be:

“processed lawfully, fairly and in a transparent manner in relation to the data subject”

The lawful basis that is most relevant in relation to a request for information under the FOIA is Article 6(1)(f) of the UK GDPR. This states:

“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child”.

In considering the application of Article 6(1)(f) in the context of a request for information under FOIA it is necessary to consider the following three-part test:

1. The Legitimate interest test: Whether a legitimate interest is being pursued in the request for information;
2. The Necessity test: Whether disclosure of the information/confirmation or denial that it is held is necessary to meet the legitimate interest in question;
3. The Balancing test: Whether the above interests override the interests, fundamental rights and freedoms of the data subject.

Our consideration of these tests is set out below:

1. Legitimate Interest Test

The Welsh Government recognises there is a legitimate interest in being able to identify the parties involved in any communication in order to follow the flow of that communication and to understand the views and positions expressed by each party. We do not believe, however, there is any legitimate reason why the personal data would need to be released in order to follow and understand those communications. The views expressed in the communications are those of the respective organisations rather than those of the individuals concerned. As such it is irrelevant as to who made those comments. The Welsh Government cannot identify any other legitimate interest in you or the public receiving the personal data captured by your request.

2. Is disclosure necessary?

The Welsh Government is of the view that it is not necessary to disclose the personal information caught by your request. It is straight forward, even when withholding the personal data, to follow the discussions and to identify the views expressed by each organisation. As such we do not believe it is necessary to disclose the personal data to allow the conversations to be followed.

3. The Balancing Test

As it has been concluded that there is no necessity to disclose the personal data of another individual, the fundamental rights and freedoms of the affected third party prevail in this instance and releasing the information cannot be justified under Article 6(1)(f).

Conclusion

To conclude, as release of the information would not be legitimate under Article 6(1)(f), and as no other condition of Article 6 is deemed to apply, release of the

information would not be lawful within the meaning of the first data protection principle. It has therefore been withheld under section 40 of the Freedom of Information Act. Section 40 is an absolute exemption and not subject to the public interest test.