gwerth mewn gwahaniaeth
delivering on distinction

Transport and Works Act 1992

Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006

Morlais Demonstration Zone Order

Planning Statement

Isle of Anglesey (Ynys Môn)

Applicant: Menter Môn Limited
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GLOSSARY OF ABBREVIATIONS

Abbreviation	Definition
AONB	Area of Outstanding Natural Beauty
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
HDD	Horizontal Directional Drilling
HRA	Habitats Regulations Assessment
IoACC	Isle of Anglesey County Council
JLDP	Joint Local Development Plan
MPS	Marine Policy Statement
MDZ	Morlais Demonstration Zone
NDF	National Development Framework
NPS	National Policy Statement
NRW	National Resources Wales
PPW	Planning Policy Wales
SAC	Special Area of Conservation
SPA	Special Protection Area
SPG	Supplementary Planning Guidance
SSSI	Site of Special Scientific Interest
TAN	Technical Advices Note
TWA	Transport and Works Act 1992
TWAO	Transport and Works Act Order
WADZ	West Anglesey Demonstration Zone
WBFGA	Well-being of Future Generations Act (2015)
WNMP	Welsh National Marine Plan

1. INTRODUCTION

1.1. OVERVIEW

1. This Planning Statement has been prepared by WSP on behalf of Menter Môn Morlais Limited Morlais Limited ('the applicant') and accompanies an application for a Transport and Works Act Order (TWAO) for the Project and the associated application for deemed planning in respect of the onshore works ('the site') comprising the Project. These applications are required to construct and operate 240MW of tidal generating capacity within the Morlais Demonstration Zone (MDZ), an area to the west of Holyhead/Holy Island on the Isle of Anglesey, North Wales. The MDZ has been identified by the Crown Estate (previously known as the West Anglesey Demonstration Zone (WADZ)) as being a suitable location for the installation of marine energy devices. The leasing rights for this area of 35 km2, were awarded to Menter Môn Cyf to develop the Morlais Project.

2. The Morlais project comprises the installation and commercial demonstration of multiple arrays of tidal energy devices. It would include communal supporting infrastructure for tidal technology developers via up to nine export cable tails, an onshore landfall substation at Ty Mawr, and an onshore electrical cable route which, via a switchgear building at Parc Cybi, Holyhead, will export electricity generated to the existing electricity network through a connection substation at the Orthios Eco Park, Penrhos (Holyhead).

3. The footprint of the project also includes a design envelope for tidal devices for which the deployment is allowed under the TWAO, and the key parameters of which have been established by reference to a range tidal devices types which are considered to be the most realistic for deployment'.

4. The onshore works ('the Proposed Development') are the subject of the deemed planning permission and comprise of the onshore landfall substation, onshore electrical cable route, switchgear building and grid connection substation.

5. Development of the Proposed Development will support those objectives within the Anglesey and Gwynedd Joint Local Development Plan (2017) (JLDP), aimed at promoting the development of renewable or low carbon energy technologies. The Proposed Development will allow the commercial scale demonstration of tidal technologies, and in doing so enable both the development of these technologies and generation of renewable electricity. In doing so it will support the objectives of the JLDP.

6. The Proposed Development will also meet the well-being goals set out in the Well-being of Future Generations Act (2015) (WBFGA), not least in terms of Goal 1, A Prosperous Wales, in creating "an innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work." (Well-Being of Future Generations Act, Welsh Government, 2015).

7. The Proposed Development aims to secure a broad consent envelope, which will encompass a range of tidal device types and technologies with the potential to be installed and operated as part of the Proposed Development. The final details of all equipment to be installed, including tidal devices, will be confirmed following consent and prior to deployment. The proposed onshore works, to which the deemed planning application relates to includes landfall grid connection, switchgear building and grid connection substation – infrastructure required to transfer the electricity generated into the national transmission network.

1.2. PURPOSE AND STRUCTURE OF THIS STATEMENT

8. This Planning Statement has been prepared to support the application for the TWAO and direction as to deemed planning permission for the onshore aspects of the project provided for in the Order (the Planning Direction). The purpose of the Statement is to set out the planning context applicable to the project and identify those policy considerations that will be material to the decision-making process.

9. The Proposed Development has been the subject of Environmental Impact Assessment (EIA), the outcome of which has been reported in a project Environmental Statement (ES) that accompanies the TWAO application and application for deemed planning permission. The Proposed Development has also been subject to a Shadow Habitats Regulations Assessment (HRA) Screening to determine its potential effects on European designated sites. The need for the scheme, the site selection process, and alternative designs and technologies considered during the design development process are explained fully in Volume 1 of the ES and only presented in summary form within this Statement, where applicable. The outcomes of the EIA and HRA have informed the content of this Statement, specifically in relation to assisting the assessment of compliance between the Proposed Development and the planning framework.

10. This Planning Statement is structured as follows:

- **Section 2** sets out the context for the Proposed Development, including the summary of need for the development;
- **Section 3** provides an overview of both the application for the TWAO and Planning Direction and Marine Licence, including the legislation and processes which drive them;
- **Section 4** describes the Application Site and surrounding context and sets out a detailed description of the Proposed Development;
- **Section 5** provides an overview of the relevant policy documents;
- **Section 6** presents a detailed assessment of the compliance between the project and planning policies relating to subject specific issues at the national, regional and local level; and
- **Section 7** provides a summary and overall conclusion on how the application accords with relevant planning policy.

2. CONTEXT FOR THE PROJECT

2.1. LOCATION

11. The onshore aspect of the Proposed Development will be located inland of the bay on the western coast of Holy Island, known as Abraham's Bosom, where the Project will make landfall. The Landfall Substation is within land currently farmed by Ty-Mawr farm, in the area of Holy Island known as Penrhos Feilw. From the Landfall Substation location, most of the onshore cable route follows the minor road network towards the A55 and North Wales Coast Line, which it will pass underneath. The proposed switchgear building is located within Parc Cybi, whilst the grid connection substation is located within Orthios, both on the eastern side of Holy Island.

2.2. SITE SELECTION

12. Tidal stream resource is geographically constrained being localised around headlands and through straits between land masses.

13. A site selection process for suitable locations for wave and tidal energy demonstration zones was undertaken by the Crown Estate, and began in 2013 with the identification of 11 wave and tidal energy demonstration zones. Following a process of Strategic Environmental Assessment, the MDZ was identified as being a suitable location for the installation of tidal devices in the short to medium term, having a good tidal current resource (a current speed of greater than 1.5 m/s), over a relatively uniform water depth to seabed (with a water depth of over 5m) and a relatively low wave regime.

14. The Crown Estate undertook consultation with marine user groups during the process of identifying the demonstration zone and a competitive leasing process was then undertaken to identify suitable locally based organisations to manage and sub-let the sea bed within each of the zones. In July 2014 the Crown Estate announced that Menter Môn Cyf had been awarded the right to manage what was then known as the WADZ, and to sub-let use of the seabed to other bodies who could take forward the development of tidal technology in the UK.

15. After an assessment of the distribution of tidal stream resource within the MDZ, in 2015, Menter Môn Morlais Limited applied to the Crown Estate for the movement of the MDZ further to the north, to better capture the main areas of significant tidal stream flow to the west of Anglesey. Menter Môn Morlais Limited consulted stakeholders on the proposed move and the Crown Estate approved the change in 2016.

Alternatives

16. Several alternatives to the Morlais project and the Proposed Development were considered as part of the decision-making process by the Applicant, as documented in Chapter 3 of the ES. The early strategic project consideration of alternatives, which fed into the site selection process, are outlined in **Table 2-1** overleaf:

Table 2-1 Consideration of Alternatives

Topic	Consideration of alternatives	Final selection for the Project
Project size	The initial concept had a capacity of less than 100MW. However, the availability of tidal resource across the MDZ, updates in technology and increased interest from tidal device developers for deployment in the MDZ led to an increase in the proposed installed capacity, initially up to 180MW and now to 240MW.	The final capacity for the Proposed Development to be applied for consent is 240MW.
Landfall area	A long list of 15 landfall areas with a variety of construction techniques were reviewed for suitability to the variable Holy Island coastline.	Landfall sites were shortlisted based on several considerations including, but not limited to: nature conservation designations; existing infrastructure; feasibility of construction; seabed suitability for cable laying; and length of export cables.
	A short list of four landfall locations within the Abrahams Bosom area of west Holy Island were selected for further investigation. Due to the cliff and foreshore geology, a range of construction techniques were reviewed.	Key receptors included noise and visual disturbance to residential properties adjacent to the landfall site, and minimising disturbance to both ecological designations, foreshore and cliff line within the Area of Outstanding Natural Beauty (AONB) and Heritage Coast. Options for split pipe cable laying within trenches, and Horizonal Directional Drilling (HDD) were identified.
Landfall substation	A long list of 13 landfall substation locations were considered. Landfall substation locations were shortlisted based on several considerations, including nature conservation designations; existing infrastructure; and potential visual impacts. Key considerations were the feasibility of landfall construction using the preferred trenching and HDD methods, and the distance of the Landfall Substation from the landfall. A shortlist of four options, within Abrahams Bosom were selected for further investigation.	A final site was chosen based on further consideration of nature conservation designations and landowner discussions. Further consideration of potential visual impacts results in the position of the Landfall Substation within a recessive location in the landscape and uses the landform to help integrate the substation into the landscape.
Grid connection point	The closest four options to the project site were considered. Those were refined to the three closest, with two on Holy Island to minimise disturbance during cable trenching works; one at Parc Cybi employment site and one at the existing Anglesey Aluminium and Orthios site.	The preferred locations for connection to the existing electricity network are the switchgear building at Parc Cybi and the Grid Connection Substation at Orthios. This is due to the proximity to an existing substation for minimising visual impacts, technical considerations and the use of land within a brownfield site, to minimise disturbance to onshore ecology and residents.
Onshore cable route	Given the rural nature of the Proposed Development, the location of the AONB, public perception and consultation with Isle of Anglesey County Council, it was decided that overhead cables would not be appropriate. Only options for traditional trenching methods of cable installation between the Landfall Substation and Grid Connection Substation were reviewed.	The final onshore cable route is selected to minimise disturbance to the natural environment on Holy Island. Therefore, the onshore cable route will be of up to 8.1km total route length, dependent on final route design, with the cables trenched into the local road network so much as is practicable given constraints in road width and services already within the road.

2.3. THE APPLICANT

17. Development of the MDZ is being led by Menter Môn Morlais Limited. Menter Môn Morlais Limited is a not for profit, third sector social enterprise, delivering socioeconomic development projects across North Wales in various sectors. Menter Môn Morlais Limited has been allocated funding from European Union (EU) Structural Funds prioritised for marine energy in Wales and their motivation for the Proposed Development is to position itself as a community agency at the centre of renewable innovation, and to establish Anglesey as a marine energy hub, thereby securing maximum added value for the local economy and community.

18. The applicant owns a leasehold interest in the area where the technologies will be deployed offshore and has an associated right to lay cables from this area to landfall. It is proposed to grant leases of parts of the offshore area to operators of marine energy technology to enable them to install and demonstrate tidal devices and associated collector's hubs on a commercial basis offshore.

2.4. THE NEED

19. The need for the development of a renewable, low carbon energy infrastructure (including tidal energy generation) is clearly set out in European, National and Local policy documents, summarised in Section 5 of this Statement. The key drivers for need are:

- Tackling Climate Change; and
- Secure & Renewable Energy Supply.

TACKLING CLIMATE CHANGE

20. The climate is changing because of emissions of greenhouse gases resulting from human activity, it is a global issue which needs addressing. The Climate Change Committee, an independent statutory body established under the Climate Change Act 2008, who advises the UK Government and Devolved Administrations, reports "*the bulk of emissions derive from our demand for energy. The largest contributor is carbon dioxide (C02), emitted when fossil fuels are burnt to meet those demands*" (www.theccc.org.uk/tackling-climate-change/).

21. Generating and harnessing energy from low carbon, renewable and sustainable sources, such as tidal energy, is one of the solutions available to substantially reduce carbon emissions, whilst also addressing the challenges of meeting energy demand as part of a balanced energy portfolio.

22. The Well-Being of Future Generations (Wales) Act 2015 (WBFGA) (Welsh Government) sets goals for improving well-being. Tackling and adapting to climate change is integral to the wellbeing goals, which recognise that the case for action on climate change is clear and fundamental to future prosperity and the future resilience of communities. Through its well-being objectives, the Act sets a clear agenda for sustainable development. The Proposed Development would help deliver Goal 1 of the WBFGA by contributing to "*an innovative, productive and low carbon society which recognises the limits of the global environment and*

therefore uses resources efficiently and proportionately", and several of the national indicators including investment in new renewable energy infrastructure, creation of employment, and social return on investment of Welsh partnerships.

23. The Environment (Wales) Act 2016 (Welsh Government) is the basis for Wales' approach to tackling and responding to climate change. It requires the UK to reduce greenhouse gas emissions by 57% relative to 1990 levels by 2030, and by 80% by 2050. Some of the main aims of the Act are to:

- Establishing a long-term, legally binding framework to cut carbon emissions;
- Set a 5-yearly carbon budget and the development of a climate change adaptation plan;
- Improve carbon management in the UK, helping the transition towards a low-carbon economy; and
- Demonstrate UK leadership internationally, signalling commitment to taking an appropriate share of responsibility for reducing global emissions in the context of developing international negotiations.

24. Section 39 of The Environment (Wales) Act 2016 (Welsh Government) requires Welsh Ministers to prepare and publish a report for each budgetary period setting out their policies and proposals for meeting the carbon budget for that period. In March 2019, the Welsh Government published 'Prosperity for All: A Low Carbon Wales' plan, which sets out the Welsh Government's first carbon budget (2016 – 2019) and the 2020 interim target, and its pathway to cut emissions and increase efficiency in a way that maximises wider benefits for Wales, ensuring a fairer and healthier society. It aims to reach targets to deliver clean growth, protect the environment and ensure a healthier society for future generations (Welsh Government, 2019).

SECURE & RENEWABLE ENERGY SUPPLY

25. Indigenous energy production within the UK has fallen year on year since 1999 and, in 2004, the UK became a net energy importer, with net imports accounting for 46% of energy used in 2014 (UK Energy Statistics, Department of Energy & Climate Change, 2015). The reliance on importing energy is an unsustainable energy model as it places the UK at both financial and demand risk through increased global competition for resources combined with increased national growth.

26. As demand increases and without adopting measures to address the risk from importing energy, the UK will become more and more reliant upon imported energy sources, with greater exposure to global energy price fluctuations. The Project will provide additional source of energy into the national grid which will increase the resilience and security of supply.

27. In 2009 the UK Government released the Low Carbon Transition Plan (Department of Energy and Climate Change, now the Department for Business, Energy and Industrial Strategy) which outlined how the UK will cut greenhouse gas emissions compared to 1990 levels, by 34% by 2020. The Plan identified that a reduction in reliance on fossil fuels will achieve a greater security of energy supply.

28. Increasing renewable energy and resource efficiency is one of the Welsh Government's three national priorities for managing natural resources. The Welsh Government set out its vision for a low carbon transition, as well as identifying ambitious renewable energy targets in 'Energy Wales' in 2017 which targeted: the generation of 70% of Wales' electricity consumption from renewables by 2030; 1 GW of renewable electricity capacity in Wales to be locally owned by 2030; and renewable energy projects to have at least an element of local ownership from 2020.

29. For the power sector in Wales to contribute to meeting the decarbonisation targets, there is the need to concentrate on reducing emissions from fossil sources whilst also increasing the quantum of low carbon, renewable energy being generated.

30. Tidal energy is a clean, renewable and highly predictable source of energy. The European Union (EU) has identified tidal energy, and more widely ocean energy (tidal and wave combined), as having the potential to contribute significantly to climate change reduction, socio-economic and energy security objectives (Blue Energy – action needed to deliver on the potential of ocean energy in European seas and oceans by 2020 and beyond, European Commission, 2014). In 2014, the European Commission presented its action plan, 2030 Energy Strategy, for achieving the potential for 'blue energy' by 2020 and beyond, aimed at facilitating the further development of the renewable ocean energy sector in Europe.

31. UK Government's Clean Growth Strategy (Department for Business, Energy and Industrial Strategy, 2017) indicates that "*more nascent technologies, such as wave, tidal stream and tidal range, also have a role in the long-term decarbonisation of the UK*". Wales is well placed to take advantage of these technologies having the required tidal resource at West Anglesey, Holyhead Deep and South Pembrokeshire.

2.5. BENEFITS

32. In addition to the benefits associated with addressing the above identified need, there are a number of additional benefits to Wales and the local community arising from the Proposed Development. These are summarised below.

NEW ENERGY INFRASTRUCTURE

33. The Proposed Development will have an installed capacity of up to 240 MW – enough to provide electricity to the equivalent of over 188,000 homes. For context, there are around 30,600 households on the Isle of Anglesey; 52,500 in Gwynedd and 51,200 in Conwy.

34. The Proposed Development will support those objectives within the JLDP, aimed at promoting the development of renewable or low carbon energy technologies. Menter Môn are committed to delivering the Morlais project in a way that supports the local supply chain and provides employment opportunities for those living in Anglesey, North Wales and Wales, as set out in Chapter 25 of the ES.

35. As noted on page 28 of the Prosperity for All: A Low Carbon Wales under the sub-heading of 'Innovation', "*it is understood that the development and introduction of new technologies and*

solutions can take time to commercialise so multiple interventions may be required to meet targets. We need to encourage technology to be deployed in Wales and ensure that Wales benefits from progress made elsewhere". In line with this statement, the Proposed Development comprises a demonstration area for the commercialisation of new renewable energy technology in Wales.

ECONOMIC GROWTH

36. The energy industry plays a central role in the UK economy and in delivering key commitments within the UK's Low Carbon Transition Plan to help make the UK a centre of green industry by supporting the development and use of clean technologies.

37. In 2013 the energy sector contributed 2.8% of Gross Domestic Product (GDP) and directly employed over 162,000 people. In addition, the number of people employed through low carbon and environmental goods and services in the UK was 937,923, with a value of £128.1 billion in 2012 (Low Carbon Environmental Goods and Services, Department for Business Innovation & Skills, 2013). It is estimated that employment levels could rise to more than a million people by 2020 if the UK is able to maximise the opportunity presented by being a world leader in low carbon technologies.

38. In Wales, Prosperity for All: A Low Carbon Wales (Welsh Government, 2019) notes that the low-carbon economy is currently estimated to consist of 9,000 businesses, employing 13,000 people and generating over £2.4 billion turnover in 2016.

39. As tidal energy generation is an emerging industry, the technologies deployed as part of the Proposed Development are expected to have been thoroughly tested elsewhere but primarily as single devices. The Proposed Development will provide an opportunity for the technologies to be demonstrated in arrays for potential future use on a large scale commercial basis.

40. As noted in chapter 25 of the ES, it is anticipated that Anglesey could expect to benefit directly from local spend as a consequence of the Project to the value of between £3.2m and £41.4m annually for the life of the Project. The benefits to the North Wales region are expected to be between £2m and £25m annually for the life of the Project, with the rest of Wales seeing potential benefits of £14.5m to £33m annually for the life of the Project.

LOCAL COMMUNITY BENEFITS

41. Menter Môn Morlais Limited aims to benefit local communities, the economy and environment through renewable local carbon electricity generation. The key objectives and benefits of the scheme are included within the Statement of Aims and within the Socio-Economic assessment contained in the ES submitted with the TWAO application.

42. Menter Môn Morlais Limited will endeavour to encourage all contractors to utilise the local workforce and supply chain and develop a supply chain portal that will advertise opportunities for local contractors. It is estimated that the local spend of the Proposed Development may add somewhere between 0.4 % and 4 % to the annual economic activity of the Island.

43. It is estimated that the Proposed Development would generate up to 467 jobs per year during initial construction. A further total of up to 456 jobs per year could arise from Operations & Maintenance activity. Of these it is estimated that approximately 137 – 228 could be in Anglesey, 91 in North Wales and 46 across the rest of Wales.

3. THE TWAO APPLICATION

3.1. LEGAL FRAMEWORK

44. The proposed legal framework for consenting the projects is through:

- The Transport and Works Act 1992 (as amended);
- Town and Country Planning Act 1990 (as amended);
- The Transport and Works (Description of Works Interfering with Navigation) Order 1992 (as amended);
- The Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006; and
- The Marine and Coastal Access Act 2009.

45. Section 3(1)(b) of the Transport and Works Act 1992 empowers the Secretary of State to make an order relating to, or to matters ancillary to, the carrying out of works which interfere with rights of navigation in waters within or adjacent to England and Wales up to the seaward limits of the territorial sea and are of a description prescribed by the Transport and Works (Description of Works Interfering with Navigation) Order 1992 ("the Description Order"). The Description Order identifies several works for the purpose of section 3(1)(b) including construction of an offshore installation and utilities structures.

46. The Proposed Development is not within a major shipping lane. However, the construction, and subsequent operation, of the Proposed Development will impact on the routes used by several cruise ships, ferries and small vessels such as fishing boats.

47. The impacts on rights of navigation will occur during construction, and subsequent operation, because of the different types of tidal energy converters to be installed as part of the Proposed Development. As such, a safety zone will need to be established for the life of the Proposed Development.

48. The Project falls within the works identified in the Description Order and therefore, an application for a Transport and Works Act Order (TWAO) has been submitted seeking consent for the carrying out of works, of a prescribed description, which interfere with rights of navigation in waters within and adjacent to England and Wales, up to the seaward limits of the territorial sea. Further details in respect of the prescribed (proposed) development are set out in section 4.3 of this Statement and in Chapter 4 of the ES.

3.2. DEEMED PLANNING PERMISSION

49. Deemed Planning Permission is sought from Welsh Ministers, through a direction under section 90(2A) of the Town and Country Planning Act 1990 for the onshore development authorised by the Order.

50. The application for deemed planning permission seeks consent for the development of the landfall substation at Abraham's Bosom, switchgear building at Parc Cybi and grid connection substation at Orthios. The application is accompanied by a Design and Access Statement and set of draft conditions, as per the Application Rules.

3.3. MARINE LICENCE

51. An application for a marine licence is being made in parallel to the application for the TWAO and Deemed Planning Permission, under Part 4 of the Marine and Coastal Access Act 2009, in respect of licensable marine activities associated with the Proposed Development. Those activities will include:

- The construction of the Proposed Development comprising the installation of the off-shore cables;
- Works to install the cable arrays;
- The Installation of individual devices for energy generation and their operation; and
- Any future works of maintenance to the extent that this may amount to the alteration, improvement or replacement of the installed works whether they are in or over the sea, or on or under the seabed, thus encompassing works to offshore infrastructure as well as the individual devices.

52. A licence is required to:

- deposit constituent components of the Proposed Development on or under the seabed from a vehicle, vessel, aircraft or marine structure;
- for the use of a vehicle, vessel, aircraft, marine structure or floating container to remove an object (such as a device) from the sea bed;
- to authorise the deposit of materials on the seabed because of the drilling techniques to be adopted in the construction.

3.4. SCOPE AND FLEXIBILITY

53. The TWAO seeks authorisation for the overall parameters of the Proposed Development and gives the defined undertaker the necessary powers to construct, operate, maintain and ultimately decommission it. It also allows for repowering, as defined in the Order. Controls over the way in which the Proposed Development is constructed, operated maintained and

decommissioned onshore are dealt with via conditions attached to the deemed planning permission as set out in the statement of draft conditions submitted with the application.

54. The arrangements for the deployment of different technologies within the offshore area need to be sufficiently flexible to change over time depending on the needs of the various operators, in respect of the area in which they are to operate (and in respect of which they will be granted leasehold interests), and the time during which the technologies operate.

55. Further details and explanation of the TWAO can be found within the explanatory memorandum which accompanies the draft order.

4. THE SITE AND PROPOSED DEVELOPMENT

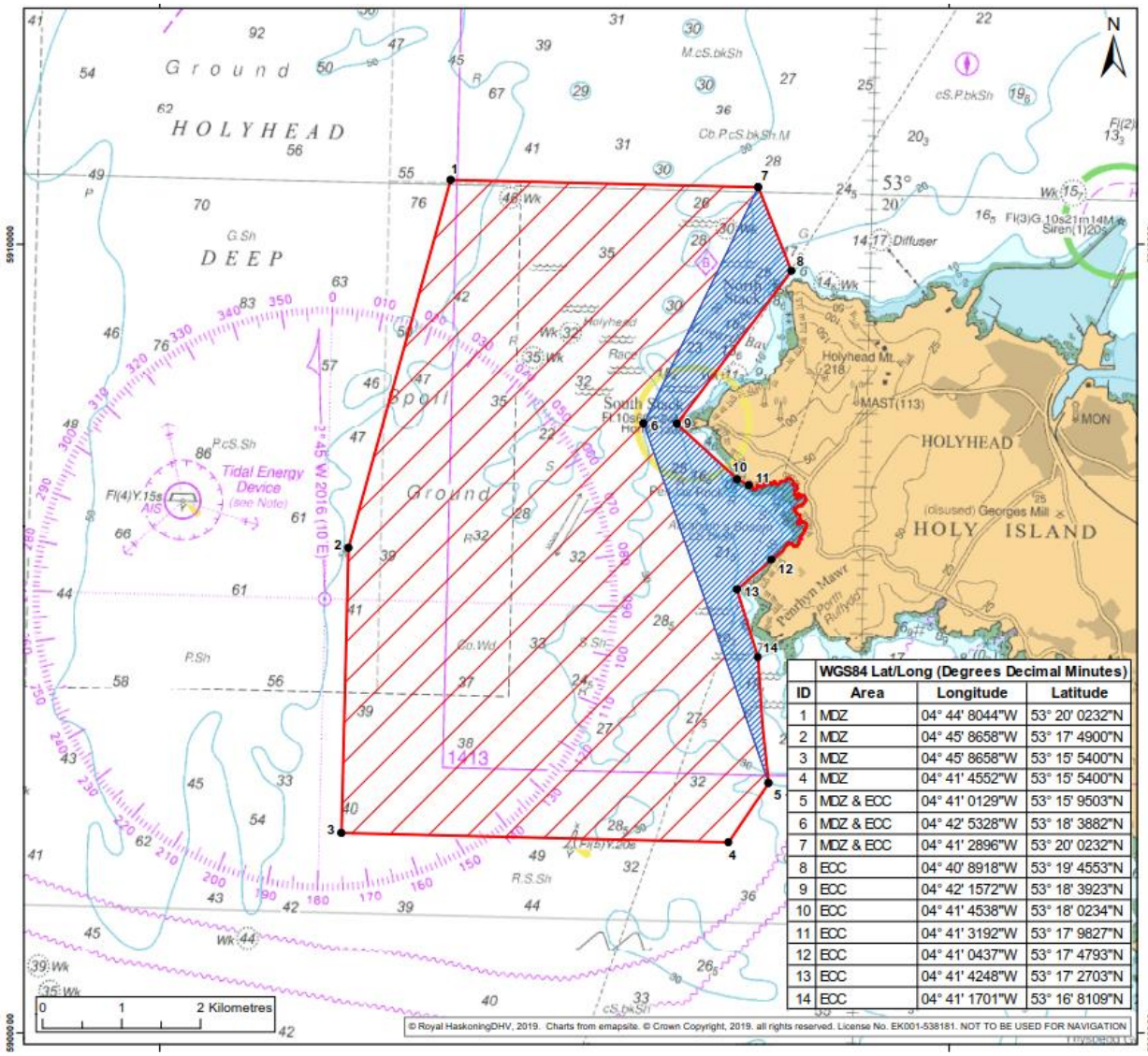
4.1. OVERVIEW

56. The Proposed Development comprises of an Offshore Development Area including the MDZ covering an area of 35km^2, combined with an Export Cable Corridor with an area of 4.75km^2; and associated onshore infrastructure contained within an Onshore Development Area of 1km^2.

OFFSHORE

57. The MDZ, shown hatched red in **Figure 4-1**, is located to the west of Holy Island, Anglesey. The Export Cable Corridor, shown hatched blue in **Figure 4-1**, connects the MDZ to the landfall location at Abraham's Bosom on the west coast of Holy Island.

Figure 4-1 Offshore Development Area



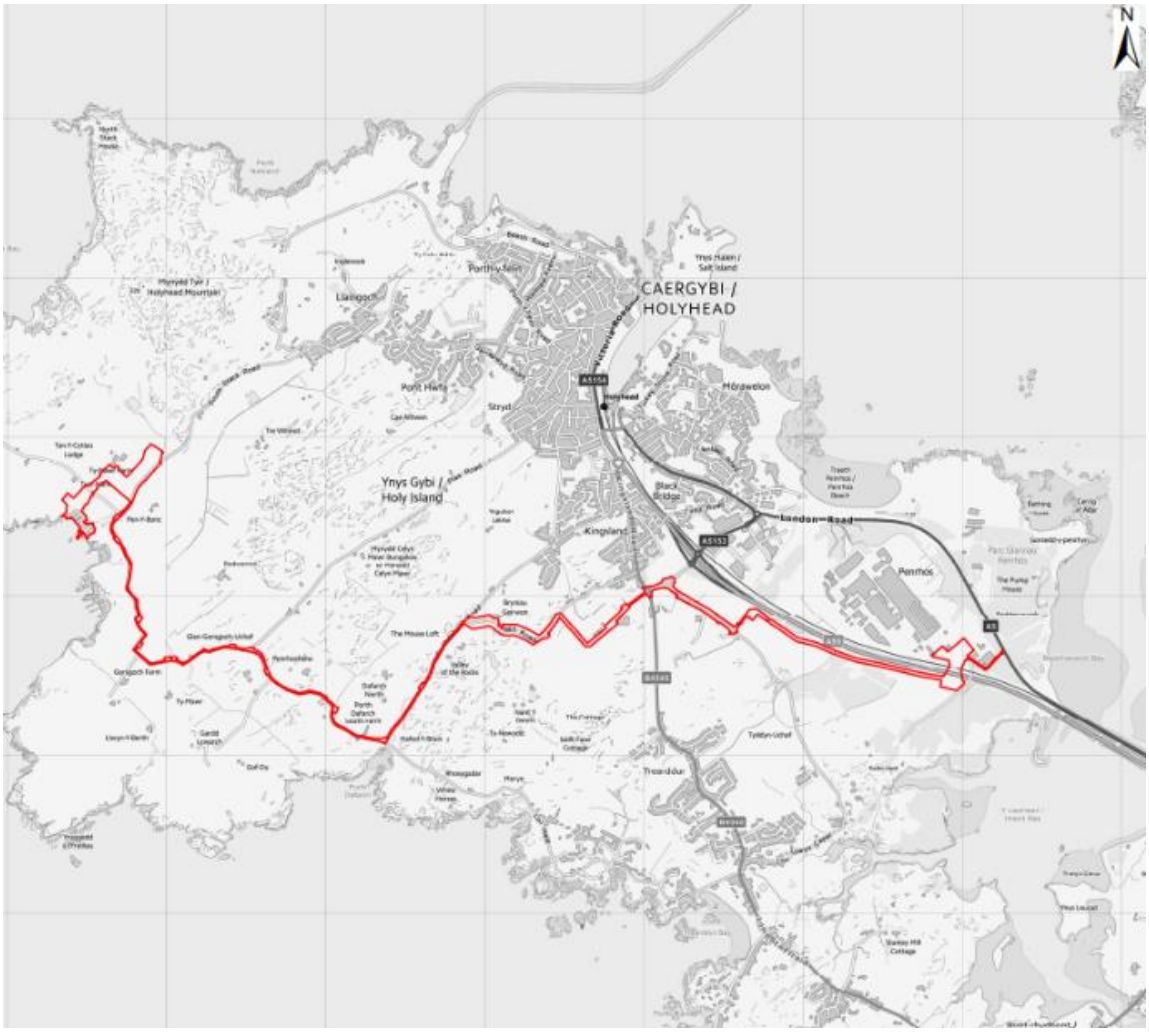
ID	Area	WGS84 Lat/Long (Degrees Decimal Minutes) Longitude	Latitude
1	MDZ	04° 44' 8044"W	53° 20' 0232"N
2	MDZ	04° 45' 8658"W	53° 17' 4900"N
3	MDZ	04° 45' 8658"W	53° 15' 5400"N
4	MDZ	04° 41' 4552"W	53° 15' 5400"N
5	MDZ & ECC	04° 41' 0129"W	53° 15' 9503"N
6	MDZ & ECC	04° 42' 5328"W	53° 18' 3882"N
7	MDZ & ECC	04° 41' 2896"W	53° 20' 0232"N
8	ECC	04° 40' 8918"W	53° 19' 4553"N
9	ECC	04° 42' 1572"W	53° 18' 3923"N
10	ECC	04° 41' 4538"W	53° 18' 0234"N
11	ECC	04° 41' 3192"W	53° 17' 9827"N
12	ECC	04° 41' 0437"W	53° 17' 4793"N
13	ECC	04° 41' 4248"W	53° 17' 2703"N
14	ECC	04° 41' 1701"W	53° 16' 8109"N

ONSHORE

58. The landfall aspect of the Proposed Development will be located inshore of the bay on the western coast of Holy Island, known as Abraham's Bosom. Because of the overlap of marine and terrestrial planning jurisdiction in the intertidal, an area of 15,102m^2 (0.0151 km^2) of the intertidal is shared between the terrestrial and marine areas of the Proposed Development. This area is included in both the Transport and Work Act Order (TWAO) and Marine Licence applications for consent and the site location plan referred to in the request for deemed planning permission.

59. The Landfall Substation is within land currently farmed by Ty-Mawr farm, in the area of Holy Island known as Penrhos Feilw. From the Landfall Substation location, most of the onshore cable route follows the minor road network towards the A55 and Holyhead to Bangor Rail line. The proposed switchgear building is located within Parc Cybi, whilst the grid connection substation is located within Orthios, both on the eastern side of Holy Island, as shown in **Figure 4-2** below.

Figure 4-2 Onshore Development Area



60. The Site is located within the Anglesey Area of Outstanding Natural Beauty (AONB); Heritage Coast; C2 Flood Risk Zone; Holy Island Coast Special Area of Conservation (SAC); Holy Island Coast Site of Special Scientific Interest (SSSI); and Holy Island Coast Special Protection Area (SPA). Furthermore, the Site is in proximity to, if not within the curtilage of, two Scheduled Ancient Monuments and several Listed Buildings.

4.2. PLANNING HISTORY

THE SITE

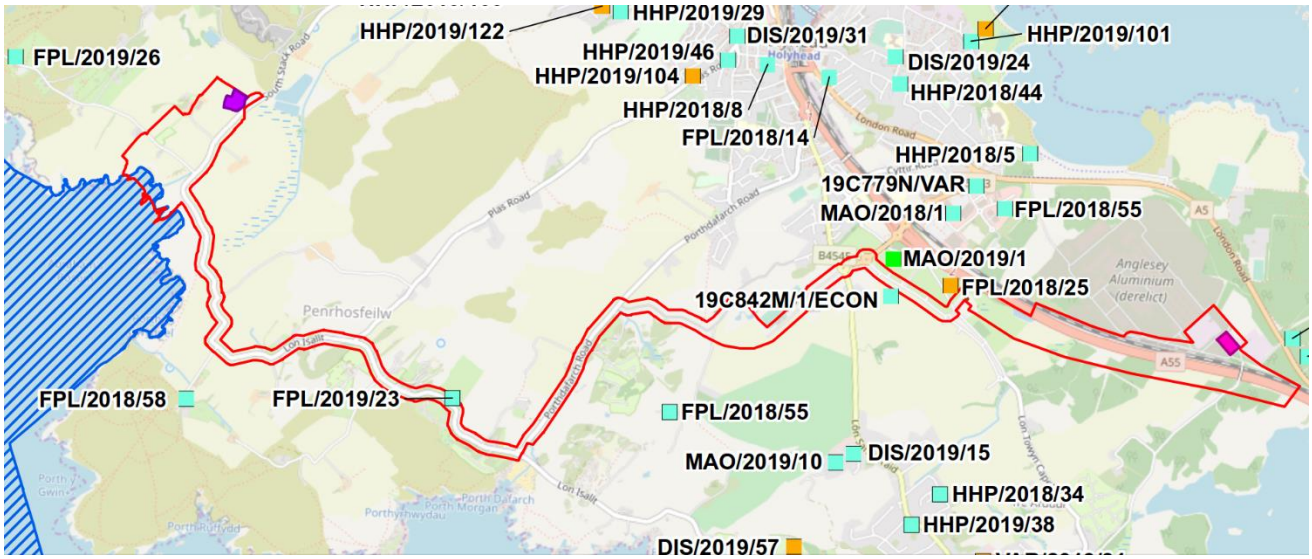
61. This section lists the recent planning decisions both on the Site and within the surrounding area. From a review of the Isle of Anglesey County Council planning register, **Table 4-1** below set out the recent records that are in proximity to the Site and surrounding area, respectively, with **Figure 4-3** identifying the locations of those applications.

Table 4-1 Application Site Planning History

Reference	Description	Decision
FPL/2019/23	Full application for the subdivision of existing dwelling into two dwellings together with alterations and extensions at Cefn Coch, Bae Treaddur Bay	Approved 13th March 2019
MAO/2019/1	Minor amendments to scheme previously approved under planning permission 19C842E/1/TR/ECON so as to amend the plans of the approved scheme at Premier Inn, Holyhead	Approved 23rd January 2019
19C842E/1/TR/ECON	Full application for the erection of a hotel, associated infrastructure and earthworks at Parc Cybi, Caergybi/Holyhead	Approved 1st December 2017
DIS/2019/4	Application to discharge condition (04) (Slab Levels), (06) (Foul, surface water and land drainage scheme), (10) (Traffic management plan), (11) (Construction environmental management plan), (13) (Lighting Scheme), (14) (External elevation samples), (18) (Welsh Language Signage scheme) and (20) (Local Supply Chain Scheme) from planning permission 19C842M/1/ECON on land adjacent to Roadking, Parc Cybi, Holyhead,	Discharged 20th June 2019
19C842M/1/ECON	Full application for the erection of a hotel ancillary to the existing truck stop, with associated car parking, alteration to the vehicular access, drainage infrastructure and other associated works on land adjacent to Roadking, Parc Cybi, Caergybi / Holyhead	Approved 10th September 2018
FPL/2018/25	Full application for the erection of a building to be used as a builder's merchant with warehouse and sales floor areas (sui generis use), construction of new vehicular site access, storage yard, loading areas together with soft and hard landscaping areas on land at Parc Cybi, Holyhead	Approved 6th June 2019

62. As **Table 4-1** above demonstrates, the proposed onshore aspect of the development overlaps with a relatively minimal amount of planning applications, either extant or being determined. Those which it does overlap with are, with respect, relatively minor developments and the Proposed Development is unlikely to impact the proposals.

Figure 4-3 Extract from Cumulative & In combination Chapter of the ES



SURROUNDING AREA

63. **Figure 4-4**, **4-5** and **Table 4-2**, shown below, identify the location of projects in wider proximity to the Site. These projects are at various stages of development – further details of which are available in Chapter 26, and the associated appendix, of the ES. The only application which the Proposed Development is likely to interact with is Minesto Holyhead Deep (number 1 in **Figure 4-4** overleaf).

Figure 4-4 Extract from Cumulative & In combination Chapter of the ES

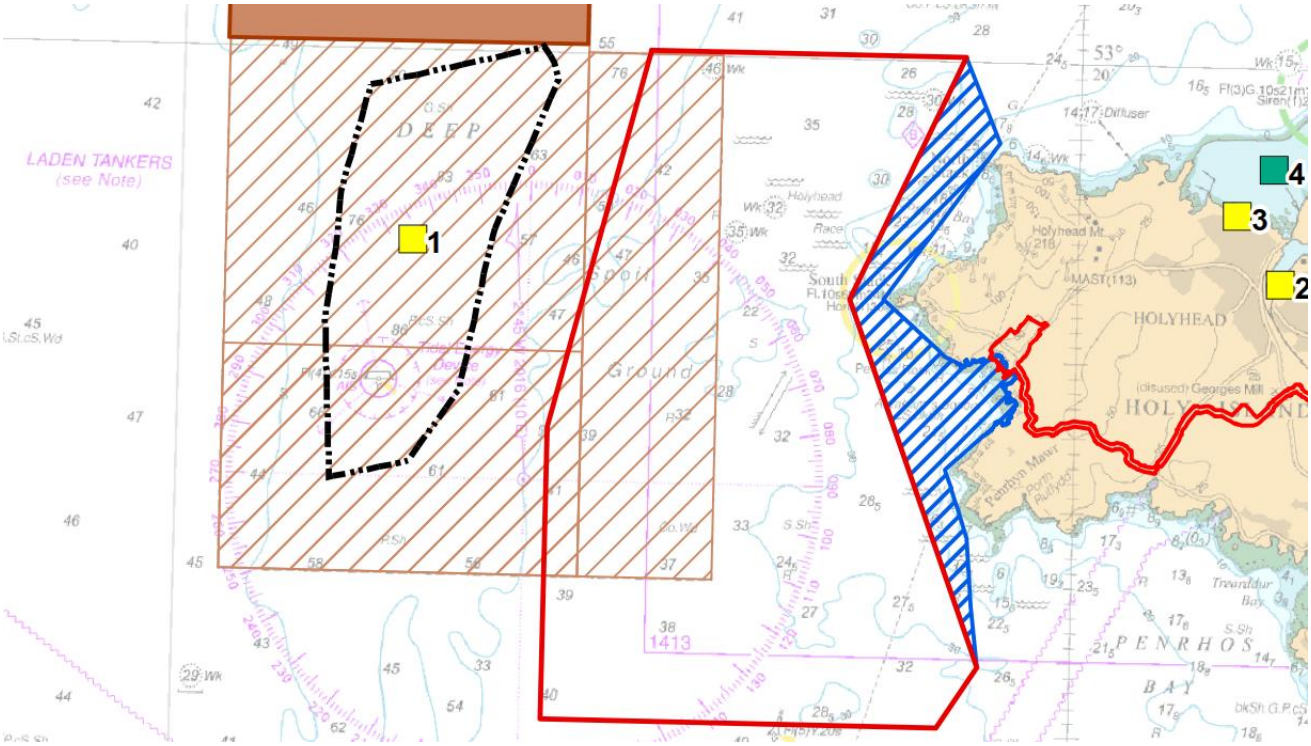


Figure 4-5 Extract from Cumulative & In combination Chapter of the ES

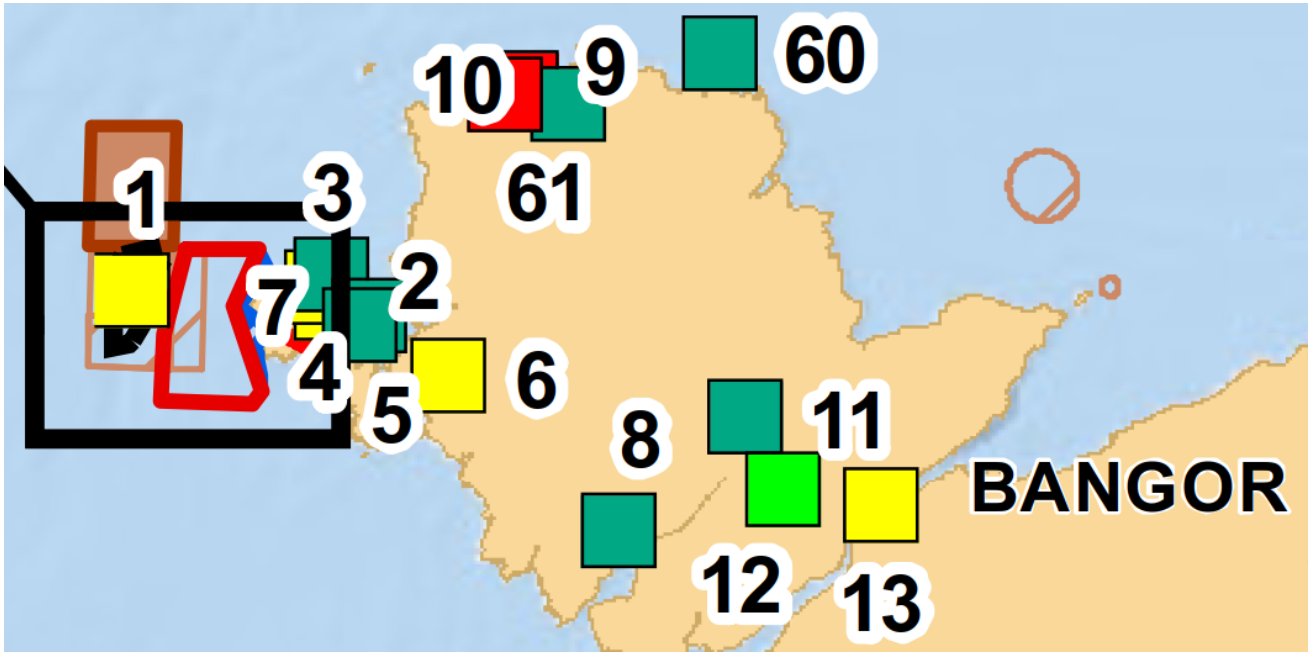


Table 4-2 Planning History Map Key

Project	No.	Project	No.
Holyhead Deep Phase I / Holyhead Deep – 80MW project	1	Reclamation adjacent to Terminal 4 of the Port of Holyhead	2
Holyhead Waterfront Redevelopment	3	Holyhead Harbour Maintenance Dredging	4
Holy Island Resort	5	Sirius SBC	6
Anglesey Eco Park Power Station	7	Wind Turbine	8
North Wales Connection Project / Wylfa Decommissioning / Wylfa Nuclear Power Plant	9	Rhyd-y-groes Repower	10
Coleg Menai Llangefni	11	M-SParc	12
Third bridge across the Menai Straits	13	Amlwch LNG	60
Visitor and Media Reception Centre	61		

4.3. THE PROPOSED DEVELOPMENT

64. The proposal is for the development of 240MW of tidal generating capacity within the Morlais Demonstration Zone. Consent through the TWAO application (including the direction as to the deemed planning permission), and the marine licence application is sought for:

> *Construction, Operation, Maintenance, Repowering and Decommissioning of a New Offshore Energy Generating Station with A Gross Output Capacity of Up To 240 Megawatts Comprising Tidal Stream Devices and Associated Infrastructure Offshore Together with Infrastructure, Cabling and Connection to The Existing Electricity Network Onshore'*

65. Several different tidal devices and array configurations may be deployed at the Project. Tidal devices will be deployed in multiple arrays within the MDZ, to a maximum installed capacity of 240MW.

66. The Proposed Development will provide the supporting electrical infrastructure to connect tidal stream devices within the MDZ and export the electricity generated to the grid. The Proposed Development aims to secure a broad consent envelope which will encompass a range of tidal device types and technologies with the potential to be installed and operated as part of the Project. The final details of all equipment to be installed, including tidal devices, will be confirmed following consent and prior to deployment.

67. The Proposed Development comprises two development areas:

- Offshore Development Area: including all intertidal and offshore areas where offshore infrastructure may be placed and encompassing the MDZ (covering an area of 35km^2),

and the export cable corridor (covering an area of 4.75km^2). The Offshore Development Area is shown in **Figure 4-1**; and

- Onshore Development Area: including all intertidal and onshore areas where infrastructure may be placed (covering an area of 1km^2). The Onshore Development Area is shown in **Figure 4-2**.

4.4. OFFSHORE

68. The Proposed Development will put infrastructure and consents in place offshore to allow project developers of tidal energy converters or utility companies to deploy their devices. The developers will become tenants of Menter Môn Cyf and pay for the right to use its site and infrastructure.

69. The key components of the offshore works associated with the Proposed Development are detailed within the ES and include:

- Tidal devices, Tidal Energy Converters and inter-array cables within the MDZ;
- Up to nine export cable tails (shared with onshore components);
- Navigation and environmental monitoring equipment;
- Mooring and foundation structures; and
- Offshore electrical infrastructure, including submerged, floating or surface emergent hubs.

4.5. ONSHORE

70. The key components of the onshore works associated with the Proposed Development are detailed within Chapter 4 of the ES and include:

- Cable landfall works, including:
    - Up to nine HDD ducts or trenched equivalents;
    - Up to nine transition pits or bays; and
    - Up to nine export cable tails (shared with offshore components).
- A landfall substation at Ty-Mawr;
- A switchgear building at Parc Cybi;
- A grid connection substation at the existing Orthios Eco-Park to the east of Holyhead;
- Onshore cable circuits installed between Ty-Mawr, Parc Cybi and Orhtios Eco-Park and

- Onshore cable route joint bays.

71. Landfall will be located within the bay on the western coast of Holy Island, known as Abraham's Bosom. There are two main methods which could be used for cable installation at landfall: open cut trenching; or Horizontal Directional Drilling (HDD) (with HDD being the preferred option).

72. The Landfall substation will house the connection between the offshore export cable(s) and the onshore cable to the inland substation. The location of the landfall substation is within currently farmed , in the area of Holy Island known as Penrhos Feilw.

73. It is proposed to construct a grid connection substation to convert the electricity produced into a format that can be accepted by the existing energy supply. The cable would be routed from the landfall substation, via trenching, to a 33kV switch room location at Parc Cybi then to a substation at Orthios Eco-Park to the east of Holyhead and grid connection substation. Further information is available on the Project Description within Chapter 4 of the ES.

5. POLICY CONTEXT

5.1. INTRODUCTION

74. In determining an application for a TWAO to authorise works, and any related application for deemed planning permission, the Welsh Ministers will have regard to, amongst other things, relevant national, regional and local planning policies: '*In line with the plan led system for determining planning applications, projects that conflict with relevant policies in the development plan are unlikely to be authorised, unless material considerations indicate otherwise', (*paragraph 1.28 of '*A Guide to TWA Procedures')*.

75. This section reviews the planning policy framework against which the Proposed Development is to be considered and which the applicant considers material to the Welsh Minister's decision. This includes the Secretary of State planning policy and guidance at the UK and Welsh Government level, as well as adopted and emerging development plan documents.

5.2. NATIONAL PLANNING POLICY

76. The Plans and Guidance which comprises National Planning Policy include: National Policy Statements; Planning Policy Wales (10th Edition); Wales Spatial Strategy; Technical Advice Notes and National Marine Policy. In addition to these adopted policies, the Welsh Government are currently consulting on the National Development Framework, which is an emerging policy.

77. The following text provides an overview of these documents in regard to the Proposed Development.

National Policy Statements

78. As a direction from is sought under section 90(2A) of the Town and Country Planning Act 1990 for deemed planning permission, National Policy Statements (NPSs) are likely to be a material consideration in decision making (in accordance with policy set out in para. 1.2.1 of the Overarching NPS for Energy – EN-1). Whether, and to what extent, NPS is a material consideration should be judged on a case by case basis. The Proposed Development is a generating station with a capacity considerably over 50MW (the threshold to be considered a Nationally Significant Infrastructure Project were the project to be located in England) and because the policies in the NPSs are devised specifically for generating stations and energy infrastructure of this scale, policy within the NPS is considered to be important and relevant, can be usefully employed as a framework for assessment, and as such should be considered to be material to the determination of the TWAO.

National Policy Statements for Energy Infrastructure

79. All six energy NPS were designated in July 2011 and were published by the former Department of Energy and Climate Change, now the Department for Business, Energy and Industrial Strategy. EN-1 is the overarching NPS in relation to energy projects. Whilst there is no

technology specific NPS for tidal stream, EN-3: Renewable Energy and EN-5: Electricity Networks; are also considered to be important and relevant to this application, particularly as the technology associated with tidal stream technology has progressed since the NPS was written in 2011 to an extent where it is technically viable.

80. In both EN-1 and EN-3 the UK Government has made clear the urgent need for new energy generating capacity. EN-3 considers that the need for any renewable energy NSIP is already established and need not be further considered in determining consents.

Overarching National Policy Statements for Energy (EN-1) (2011)

81. EN-1 EN-3 provides specific policies relating to renewable energy infrastructure. Section 2.6 of EN-3 contains policy in relation to offshore wind farms. As the generating station element of the Project is offshore with a significant amount of the Proposed Development located in the offshore environment, it is considered that this assessment framework is of most relevance to the consideration of the project.

82. Section 2.2 notes that policy set out in existing planning guidance in Wales relevant to renewables will provide important information to applicants who should explain in their applications how their proposals fit with the guidance and support its targets.

83. Paragraph 2.6.42 recognises the complex nature of offshore wind farm development, complexities which are shared with tidal stream projects, and that many of the details of a proposed scheme may be unknown to the applicant at the time of the application for consent, including precise location of turbines, foundation type, and cable routing. In accordance with section 4.2 of EN-1, decision makers should accept that some flexibility may be required in the consent and that based on an assessment of the maximum adverse case scenario, the decision maker should allow for uncertainty in the consideration of an application.

84. Section 2.4 of the NPS sets out criteria for 'good design' for energy infrastructure, noting that "*proposals for renewable energy infrastructure should demonstrate good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology*".

National Policy Statement for Electricity Networks Infrastructure (EN-5) (2011)

85. NPS EN-5 covers infrastructure including distribution systems (lower voltage lines from 132kV to 230V from transmission substations to the end-user) and associated infrastructure e.g. substations.

86. The new electricity generating infrastructure that the UK needs to move to a low carbon economy, whilst also maintaining a security of supply, will be dependent on the availability of a fit for purpose and robust electricity network.

87. The general location of electricity network projects is often determined by the location, or anticipated location, of a particular generating station and the existing electricity network

infrastructure taking electricity to centres of energy use. It is envisaged that applications for new generating stations and related infrastructure should be contained in a single application.

88. As climate change is likely to increase risks to the resilience of some of this infrastructure, applicants for any form of development should set out to what extent the Proposed Development is expected to be vulnerable, and how it would be resilient to, such matters such as: flooding; effects of wind; higher average temperatures; and earth movement.

89. Proposals for electricity networks infrastructure should demonstrate good design in their approach to mitigating the potential adverse impacts. At the same time, there will usually be some flexibility around the location of the associated substations, with applicants giving consideration to how they are placed in the local landscape, taking account of matters such as local topography and the use of screening.

PLANNING POLICY WALES (10TH EDITION, 2018)

90. PPW outlines the Welsh Government's approach to ensuring that the planning system contributes to the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.

91. PPW recognises that the planning system plays a key role in delivering clean growth and the decarbonisation of energy, as well as being crucial in building resilience to the impacts of climate change. It notes that the transition to a low carbon economy not only brings opportunities for clean growth and quality jobs, but also has wider benefits of enhanced places to live and work, with clean air and improved health outcomes. Furthermore, it advises that the planning system should support new development that has very high energy performance, supports decarbonisation, tackles the causes of climate change, and adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures.

92. It calls on planning authorities to facilitate renewable and low carbon energy development and seek to ensure their area's full potential for renewable and low carbon energy generation is maximised and renewable energy targets are achieved.

WALES SPATIAL PLAN (2008)

93. The Wales Spatial Plan was adopted by the National Assembly for Wales on 17th November 2004. It covers a 20-year period, although it is subject to review. An update of the Wales Spatial Plan was adopted on 8th July 2008. The Welsh Assembly Government sees the Spatial Plan as providing high level strategic guidance and a framework for collaborative action.

94. The Wales Spatial Plan provides the context and direction of travel for local development plans and the work of local service boards. The Wales Spatial Plan aims to: produce evidence; shape policy; ensure better engagement and governance; inform plans; and align investment.

95. The Wales Spatial Plan introduced a strategic framework for directing development and policy interventions in Wales in the future. Anglesey is part of the North-West Wales Area: Eyri a Mon. Its visions for this zone is:

> *A high-quality natural and physical environment supporting a cultural and knowledge-based economy that will help the area to maintain its distinctive character, retain and attract back young people and sustain the Welsh language.*

TECHNICAL ADVICE NOTES

96. Technical Advices Notes (TANs) provide detailed planning advice which are considered by Local Planning Authorities when preparing development plans. TANs, like PPW, comprise national planning policy. The TANs relevant to the Proposed Development are:

- TAN 5: Nature Conservation and Planning (September 2009);
- TAN 8: Renewable Energy (July 2005);
- TAN 11: Noise (October 1997);
- TAN 12: Design (March 2016);
- TAN 14: Coastal Planning (March 1998);
- TAN 15: Development and Flood Risk (July 2004);
- TAN 18: Transport (March 2007);
- TAN 23: Economic Development (February 2014); and
- TAN 24: The Historic Environment (2017).

THE WELL BEING OF FUTURE GENERATIONS (WALES) ACT 2015

97. The Well-Being of Future Generations (Wales) Act 2015 (WBFGA) promotes the improvement of the social, economic, environmental and cultural well-being of Wales. The WBFGA places a statutory duty on public bodies in relation to sustainable development, based on seven well-being goals, as set out in Table 6-1 of this Statement.

98. Climate change is integral to the well-being goals, which recognise that the case for action on climate change is clear and fundamental to the future prosperity and the future resilience of communities. The WBFGA provides a mechanism for public bodies to set targets and report progress against indicators, such as local environment quality and integral qualities of place. Through its well-being objectives, the WBFGA sets a clear agenda for sustainable development.

NATIONAL MARINE POLICY

Marine Policy Statement (2011)

99. The Marine Policy Statement (MPS) adopted by the UK administrations in March 2011 provides the policy framework for the preparation of marine plans and establishes how decisions affecting the marine area should be made to enable sustainable development. The MPS sets out a vision of having "*clean, healthy, safe, productive and biologically diverse oceans and sea*" by supporting the development of Marine Plans.

100. The MPS states that "*Marine based activities can provide opportunities for employment in long established industries such as … new and developing industries such as the renewable energy sector and associated offshore electricity transmission*." The MPS estimates that up to 20% of the UK's current energy demand could be supplied by wave and tidal energy. Furthermore, it is expected that "*wave and tidal stream technologies also have significant potential in the medium to long-term*".

101. All public bodies are required to consider the MPS and relevant Marine Plans when making decisions regarding the marine area. This requirement ensures that marine resources are used in a sustainable way in line with high-level marine objectives.

Draft Welsh National Marine Plan (2018)

102. By adopting the MPS, the Welsh Government committed to the requirement to introduce Marine Plans for Wales. The Welsh Government consulted on a draft of the Welsh National Marine Plan (WNMP) from 7th December 2017 until 29th March 2018.

103. The draft WNMP aims to ensure multiple benefits from the marine environment and to optimise opportunities for the sustainable exploitation of all sectors, including renewable energy. Furthermore, practical opportunity to secure ecosystem recovery to support resilience whilst enabling the sustainable exploitation of natural resources should be taken. Finally, there should be a greater focus on providing benefits to society, particularly for coastal communities from the marine environment.

104. The draft WMNP notes that the marine environment in Wales provides a wealth of benefits, including providing renewable energy sources that can help tackle climate change, supporting the well-being of coastal communities and wider society. Supporting policy 'ELC_01: Low Carbon Energy (supporting)' strongly encourages proposals for all types of marine renewable energy generation including tidal stream demonstration zones.

105. The draft WNMP contains several other policies which are relevant to the Proposed Development which are outlined within chapter 2 of the ES and the respective ES topic chapters.

NATIONAL DEVELOPMENT FRAMEWORK

106. The Planning Directorate in Wales is working on the production of a National Development Framework (NDF), which will set out a 20-year land use framework for Wales and will replace the current Wales Spatial Plan. The NDF will:

- Set out where nationally important growth and infrastructure is needed and how the planning system – nationally, regionally and locally – can deliver it;
- Provide direction for Strategic and Local Development Plans and support the determination of Developments of National Significance;
- Sit alongside Planning Policy Wales, which sets out the Welsh Government's planning policies and will continue to provide the context for land use planning;
- Support national economic, transport, environmental, housing, energy and cultural strategies and ensure they can be delivered through the planning system; and
- Be reviewed every five years.

107. The Welsh Government consulted on the Issues and Options' associated with the NDF between April and July 2018. Consultation on the draft NDF will take place between August and November 2019 with the NDF is expected to be published in September 2020.

Issues and Options Consultation (2018)

108. 'Issue B. Climate Change, Decarbonisation & Energy – Wales Today & Drivers of Changes' identifies that climate change is, arguably, the greatest challenge the world faces. To this end, the documented noted it is important that Wales is resilient to the impacts of climate change and reduces its greenhouse gas emissions.

109. The Issues and Options consultation identified that "*there is significant renewable energy potential off our coastline, including tidal*" and that proposed tidal energy schemes would make significant contributions to Wales' and the UK's future renewable energy needs, with benefits for local supply chains and employment needs (albeit this comment is made about tidal range rather than tidal stream). 'Alternative Option 1 – A spatial strategy focussing growth in the strongest market areas' identified that "*areas of greatest potential for wind, solar, tidal and other energy generation are the focus for new development*".

Draft National Development Framework (2019)

110. From the 7th August to 1st November, the Welsh Government is consulting upon the draft NDF. The draft NDF sets out Welsh Government's direction for development over the next 20 years It sets a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, decarbonisation, developing resilient ecosystems and improving the health and well-being of communities.

111. The NDF is a spatial plan, which means it provides a framework for investment in infrastructure and development . The NDF will be the highest tier of development plan and is focused on issues and challenges at a national scale. The development of renewable energy is identified as a matter of national importance.

112. In assessing challenges and opportunities, the draft NDF notes that Wales can become a world leader in renewable energy technologies. The wind and tidal resources and support for large and community scaled projects, as well as ensuring that the planning system provides a strong lead for renewable energy development, means that there is support for the renewable sector to both attract new investment and reduce carbon emissions.

113. Outcomes 9 and 11 of the draft NDF seek to create a Wales where people live: in places that sustainably manage their natural resources and reduce pollution; and in places which are decarbonised. With regard to the latter, decarbonisation and renewable energy commitments and targets will be treated as opportunities to build a more resilient and equitable low-carbon economy. Priority Areas for Wind and Solar Energy are identified, where there is a presumption in favour of large scale on-shore and solar energy development. The aim of this policy approach is to bring a critical mass of new renewables developments together to build a case for new or reinforced grid infrastructure. The Morlais project, located in proximity to Priority Area 1 (Solar and Wind Energy) will assist in the creation of such a critical mass of renewables infrastructure.

114. Draft Policy 13 supports, in principle, other renewable energy technologies. The Welsh Government is preparing an Energy Atlas to identify opportunities for all types of renewable projects. In the meantime, draft Policy 13 requires that proposals are assessed in terms of the impacts on the natural environment (including landscape and visual impacts and setting of Areas of Outstanding Natural Beauty, heritage assets and nature conservation) and communities, and their positive social, environmental and economic benefits.

115. Supporting text to draft Policy 13 notes that large scale renewable schemes can generate direct social and economic benefit to local communities across the country. Local ownership of projects in whole or part can ensure these benefits are accrued over the long-term, generating funds to development community facilities and help address fuel poverty. Menter Môn's involvement in the Morlais project will ensure that generating funds will, in part, be used to develop community projects.

116. Policy 22 focuses on 'North West Wales and Energy', stating that the Welsh Government supports North West Wales as a location for new energy development and investment. The policy notes that new energy-related development should support local and regional communities; provide jobs and investment in training and skills; and maximise new investment to support the wider region.

117. The supporting text to the policy notes that the planning system has a key role in supporting renewable energy and ensuring the North plays its part in decarbonising society. The region has strong potential for generating wind, solar and tidal energy.

5.3. LOCAL PLANNING POLICY

ANGLESEY AND GWYNEDD JOINT LOCAL DEVELOPMENT PLAN 2011-2026 (2017)

118. The JLDP was adopted on 31st July 2017. The JLDP sets out both Council's land use policies and proposals to control development in the area up to 2026, and gives a clear indication of where development will be encouraged and where it will be resisted.

Figure 5-1 JLDP Proposals Map with red line boundary of Proposed Development overlaid

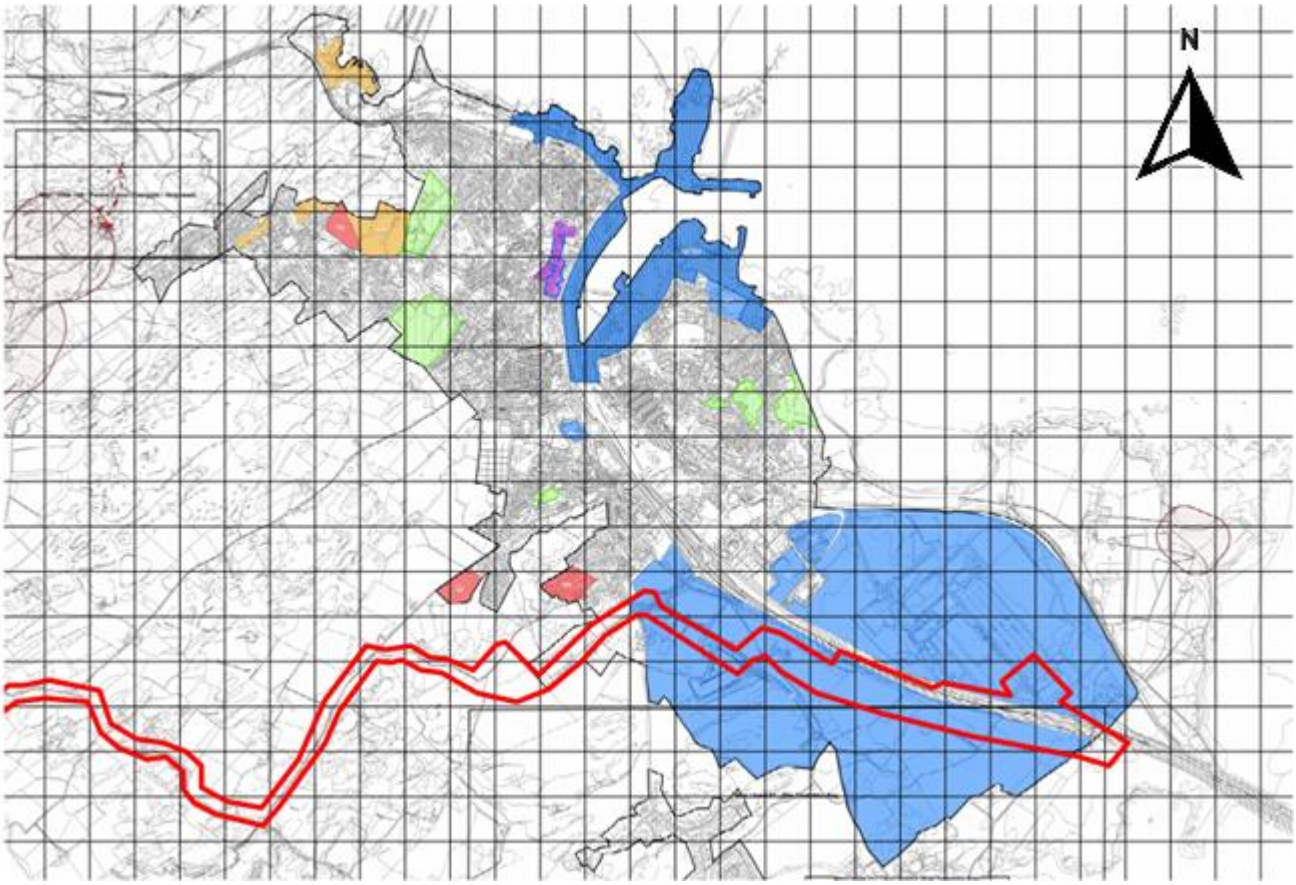


Table 5-1 JLDP Proposals Map Key

	Safeguarded Employment Site		Development Boundary		Housing allocation without planning permission
	Proposed Development				

119. As shown in Figure 5-1 and Table 5-1, most of the Site is located in the land identified as open countryside on the JLDP Proposals Map. The eastern extent of the Site is within the 'Development Boundary' of Holyhead and within a 'Safeguarded Employment Site'. An extract of the JLDP Proposals Map is not available to the area to the West i.e. around the landfall site. Notwithstanding this, the rest of the Site is identified as being located in the open countryside.

Figure 5-2 JLDP Constraints Map

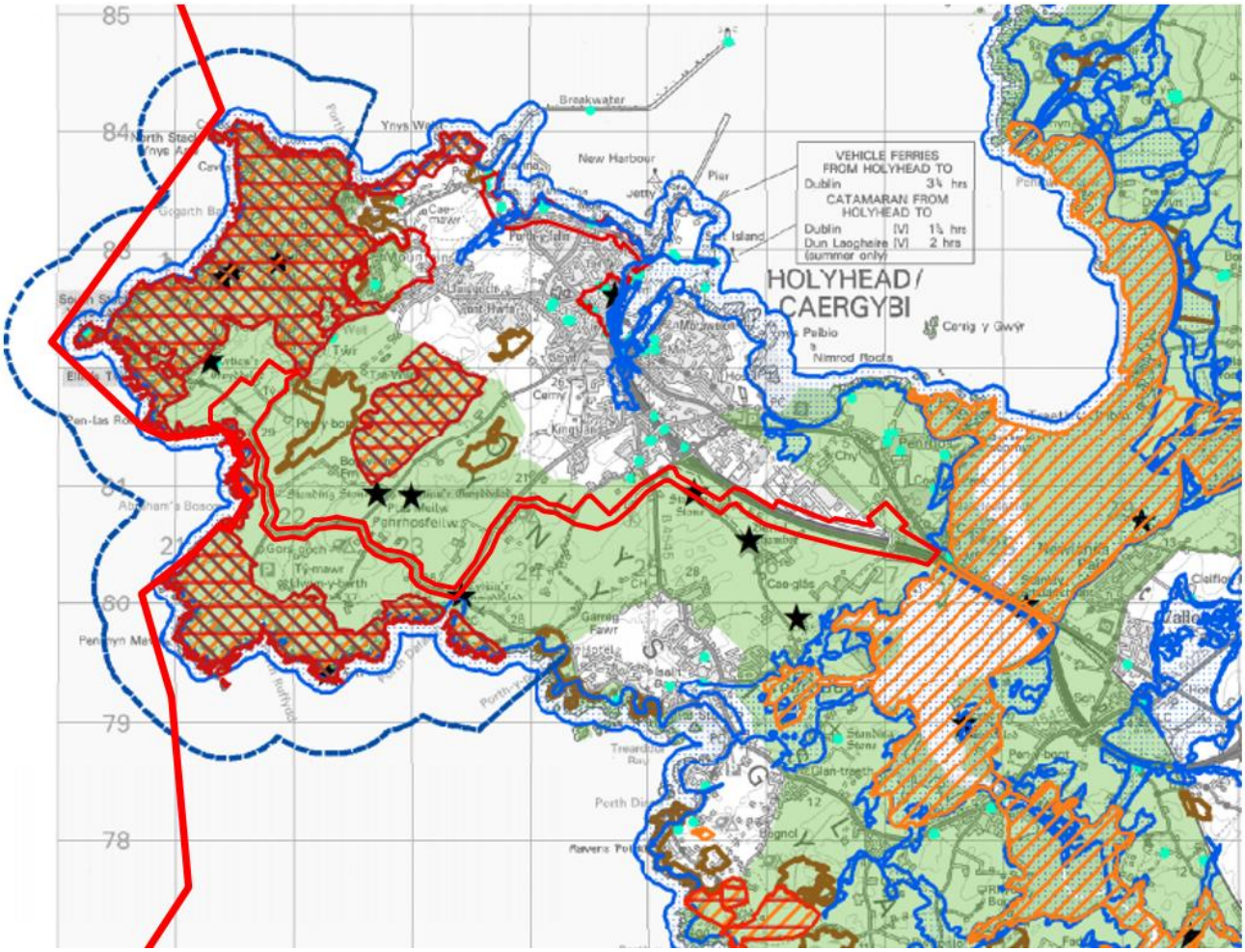


Table 5-2 JLDP Constraints Map Key

	AONB		Special Area of Conservation		Site of Special Scientific Interest
	Special Protection Area		Listed Building		Scheduled Ancient Monument
	C2 Flood Risk Zone		Heritage Coast		Proposed Development

120. As shown in **Figure 5-2** and **Table 5-2**, the Site is located within the Anglesey AONB; Heritage Coast; C2 Flood Risk Zone; Holy Island Coast Special Area of Conservation (SAC); Holy Island Coast Site of Special Scientific Interest (SSSI); and Holy Island Coast Special Protection Area (SPA). Furthermore, the Site is in proximity to, if not within the curtilage of, two Scheduled Ancient Monuments and several Listed Buildings.

121. The following policies from the adopted JLDP are of relevance to the determination of the Proposed Development:

- PS1: Welsh Language and Culture;
- PS5: Sustainable Development;
- PS6: Alleviating and Adapting to the Effects of Climate Change;
- PS7: Renewable Energy Technology;
- PS13: Providing opportunity for a flourishing economy;
- PS19: Conserving and Where Appropriate Enhancing the Natural Environment;
- PS20: Preserving and Where Appropriate Enhancing Heritage Assets;
- PCYFF2: Development Criteria;
- PCYFF3: Design and Place Shaping;
- PCYFF4: Design and Landscaping;
- PYCFF5: Carbon Management;
- TRA4: Managing Transport Impacts;
- ADN3: Other Renewable Energy and Low Carbon Technologies;
- AMG1: Area of Outstanding Natural Beauty Management Plans;
- AMG4: Coastal Protection;
- AMG5: Local Biodiversity Conservation; and
- AMG6: Protecting Sites of Regional or Local Significance.

SUPPLEMENTARY PLANNING DOCUMENTS

122. In addition to the JLDP, Anglesey and Gwynedd Councils have adopted Supplementary Planning Guidance (SPG), the following SPGs are of relevance to the Proposed Development:

- Maintaining and Creating Distinctive and Sustainable Communities (Consultation Draft, December 2018);
- Planning and the Welsh Language (September 2007); and
- Design Guide for the Urban and Rural Environment (Adopted 4th March 2008).

5.4. OTHER PLANS & STRATEGIES

123. In addition to the above noted Development Plan documents, which must be considered when determining planning applications, it is considered that the following plans and strategies are material considerations in the assessment of the application.

NATIONAL

Prosperity for All: A Low Carbon Wales (March 2019)

124. Welsh Government published 'Prosperity for All: A Low Carbon Wales' in March 2019. This sets out how Welsh Government will meet the first carbon budget for the period 2016-2020. The Plan outlines the approach to "*cut emissions and transition to a low carbon economy in a way which maximises wider benefits for Wales, ensuring fairer, healthier and more equal society*".

125. The Plan furthers the Welsh Government's commitment for a route to market the most affordable renewable technologies, whilst also seeking innovative approaches that can enable new generations to continue to deploy within Wales. There is recognition that Wales is well placed to take advantage of the potential for wave and tidal energy in Wales. The Plan refers to the funding already allocated to the demonstration zones, including the MDZ.

LOCAL

Anglesey Area of Outstanding Natural Beauty (AONB) Management Plan 2015-2020 (2015)

126. Section 4.6 of the AONB Management Plan, recognises the importance of the Anglesey Energy Island Programme in putting Anglesey at the forefront of energy research and development, production and servicing, which will bring potentially huge economic rewards. However, it is highlighted that all Proposed Development, including the Proposed Development, should have regard to the AONB designation in terms of the AONB's primary purpose of conserving and enhancing natural beauty.

Anglesey Local Flood Risk Management Strategy (2013)

127. The Local Flood Risk Management Strategy highlights the steps that are to be taken to improve knowledge of flood risk on the island and reducing that risk. The purpose of the Strategy is to address potential flood risk arising from local sources within the boundaries of the Local Authority area.

IoACC Destination Anglesey Management Plan (2016-2020) (2016)

128. The Destination Management Plan coordinates all the aspects of a destination that contribute to a visitor's experience, taking account of their 'wants' and 'needs'. The Plan is a shared statement of intent to manage Anglesey and articulates the roles of different stakeholders, as

well as identifying clear action that will take care of visitors, residents, businesses and the environment.

129. Strategic Objective 6 – Energy Projects and Strategic Infrastructure, aims to ensure that proposed large-scale investment has close cooperation between everyone involved, ensuring that development can go ahead with minimal disruption to local communities and the tourism economy, mitigating the risks.

Anglesey Energy Island Programme (2010)

130. The Anglesey Energy Island Programme is a collaborative approach between a number of stakeholders in the public and private sectors (including the UK Government and the Welsh Government) to place Anglesey at the forefront in terms of energy research and development, generating and servicing, which will be a means of influencing major infrastructure projects brining economic and social benefits to the Island and north-west Wales.

131. The IoACC views the development of major projects as key to transforming the Island's future economy and providing a high and sustainable quality of life for Anglesey's residents. The Council is investing a lot of resources to ensure that the Island can take full advantage of the inward investment by the private sector.

132. In the context of renewable energy technology and through the Anglesey Energy Island Programme, the IoACC support community, rural and large-scale ventures, where appropriate. The Programme sets a framework to capitalise on the planned investment and growth potential of the low carbon energy sector. The programme has also received support and 'buy-in' of agencies and government who have provided resources, when and where required, to assist with the delivery of the programme. It is envisaged that it will become a major economic driver for Anglesey, North Wales and Wales.

6. POLICY ASSESSMENT

6.1. OVERVIEW

133. This section considers the Proposed Development against the relevant planning policies. The assessment is broken down by environmental topic and mirrors, where relevant, the reporting structure of the ES.

134. Having established the context for the Proposed Development and existing planning policy context, the material considerations raised by the Proposed Development are considered to include the following:

- The Principle of the Proposed Development
- Climate Change
- Design
- Welsh Language
- Socio-economics
- Onshore Ecology
- Onshore Archaeology & Heritage
- Water Resources & Flood Risk
- Ground Conditions & Contamination
- Noise & Vibration
- Air Quality
- Traffic & Transport
- Seascape, Landscape & Visual Impact Assessment
- Metocean & Coastal Processes
- Marine Water & Sediment Quality
- Offshore Ecology, including:
    - Benthic & Intertidal and
    - Fish & Shellfish.
- Marine Ornithology

- Marine Mammals
- Marine Infrastructure & Other Uses
- Offshore Archaeology & Heritage
- Commercial Fisheries and
- Shipping & Navigation.

135. Except for 'The Principle of the Proposed Development', 'Climate Change', 'Design', 'Welsh Language' and 'Socio-economics', the above topics have been categorised into Onshore matters and Offshore matters, albeit Seascape, Landscape and Visual Impact Assessment covers both onshore and offshore. This approach has been taken to aid the decision maker when considering the separate sections, and consenting regimes, associated with the Proposed Development. the Project will secure consent through the Transport and Works Act Order with an application for a direction deeming planning permission granted for the authorised works applied for at the same time. It is acknowledged that a marine licence will also be required and an application has been submitted to Natural Resources Wales (NRW) contemporaneously. **Appendix A** provides an overview of the policies and the schemes compliance.

6.2. THE PRINCIPLE OF THE PROPOSED DEVELOPMENT

136. The Proposed Development represents an opportunity for the development of wave and tidal technology to be furthered. The Proposed Development provides an opportunity to generate energy from a renewable source, tidal stream, as well as promoting and supporting the shift away from traditional fossil fuel energy production.

137. Furthermore, the Proposed Development is seeking consent for up to 240MW of generating capacity which demonstrates that tidal technology has been developed in recent years and has become a viable option for contributing to the renewable energy mix within the UK. The 'demonstration' aspect of the Project will also further enhance the industry and highlights the progress which has been made since the publication of NPS EN-3 in 2011.

138. The Proposed Development accords with the aims and objectives set out within the introduction, key planning principles and Chapter 5 - Energy of PPW, in so much as helps moves towards a low carbon and resilient society, whilst representing sustainable development by maximising the benefits to the economy and community whilst balancing potential environmental and social effects – which directly accords with policy PS5 of the JLDP. This movement towards a low carbon energy sector also ties in with one of the features of a 'productive and enterprising place' within PPW and policies PS7, ADN3 AND PS13 of the JLDP.

139. TAN 8 notes the potential contribution which tidal stream technology can make in providing a source of renewable energy. This potential and the low carbon nature of the Proposed Development ties in with the aims and objectives set out within the Welsh Governments 'Prosperity for All: A Low Carbon Wales', which aims to "*cut emissions and transition to a low*

carbon economy in a way which maximises wider benefits for Wales, ensuring fairer, healthier and more equal society". The Proposed Development seeks to build on the potential noted within TAN 8 and the need for a low carbon economy noted within the Welsh Governments Prosperity for all plan, whilst also according within the energy hierarchy set out within PPW and in policy PS6 of the JLDP.

140. The Applicant is a not for profit, third sector social enterprise, delivering socioeconomic development projects across North Wales in various sectors. The involvement of Mentor Mon in the Morlais project will ensure that generating funds will, in part, be used to develop community projects. This approach is supported by Welsh Government in PPW at paragraph 5.9.20.

141. Regarding the WBFGA, it is considered that the Proposed Development satisfies the seven well-being goals, as demonstrated in **Table 6-1** below.

Table 6-1 WBFGA & the Proposed Development

Goal	Description	Policy Assessment
A prosperous Wales	An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.	If built, the Proposed Development would have a design life of approximately 37 years, after which it may be either decommissioned or repowered (subject to separate consenting). During its operation, the Proposed Development will continue to reach global, European and national targets on CO_2 reduction and renewable energy production. It is estimated that the Proposed Development could produce enough electricity each year to power the equivalent of up to 188,000 houses. The Proposed Development will provide jobs in the locality and enhance the local supply chain.
A resilient Wales	A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example, climate change).	The ES details the considerations of the Proposed Development on the baseline environment for several key receptors. A HRA has been compiled to determine whether the Proposed Development has the potential to have an adverse effect on the integrity and features of a Natura 2000 site. Where appropriate, mitigation measures are provided to ensure that no residual significant impacts are caused by the Proposed Development.
A healthier Wales	A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.	The Proposed Development will have no significant negative impacts on health and wellbeing, and is expected to have a minor beneficial impact to several receptors, including socio-economics.
A more equal Wales	A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).	The Proposed Development is being developed by Menter Môn Morlais Limited, who are a not for profit, third sector social enterprise, delivering socioeconomic development projects across North Wales. Menter Môn Morlais Limited's motivation for the Proposed Development is to position itself as a

Goal	Description	Policy Assessment
		community agency at the centre of renewable innovation, and to establish Anglesey as a marine energy hub, thereby securing maximum added value for the local economy and community.
A Wales of cohesive communities	Attractive, viable, safe and well-connected communities.	Menter Môn Morlais Limited has a strong local presence on Anglesey and are committed to developing renewable energy on the Island. Menter Môn Morlais Limited also has an objective to increase and diversify employment and economic development opportunities across the communities.
A Wales of vibrant culture and thriving Welsh language	A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.	Menter Môn Morlais Limited is a not for profit company providing solutions to the challenges facing rural Wales which has a focus on welsh language. The developer works with businesses, communities and individuals to deliver meaningful projects that harness their strengths and contribute to a sustainable future. Menter Môn Morlais Limited embrace and recognise the value of our resources and seek to add value for the benefit of the community. These include natural and built environment, cultural heritage, agricultural and food sectors and most importantly the Welsh people.
A globally responsible Wales	A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.	The Proposed Development seeks to provide a platform for commercial tidal energy device development, the first of this scale in the world. Evidencing the Proposed Developments importance, the development phase has been supported by the European Regional Development Fund.

142. The MPS establishes the principle that activities within the marine environment, particularly the renewable energy sector, present significant opportunities for employment which can provide wide, long term benefits for economies at both the local and national scale. In the case of the Proposed Development this is clearly a significant opportunity, given the unique nature of the scheme, as noted within Chapter 6.6 of this Statement and Chapter 26 of the ES.

143. There is significant support within the MPS for the Proposed Development, not least that it will contribute to providing a secure, sustainable and affordable supply of energy – which is of central importance to the economic and social well-being of the UK.

144. The Proposed Development accords with the aims and objectives of the draft WNMP. Both the draft WNMP and Proposed Development seek to utilise the marine environment to deliver renewable energy. This will have the effect of tackling climate change through the reduction of the reliance on fossils fuels and a reduction in emissions, as well as supporting coastal communities. Accordingly, the Proposed Development is supported by the draft WNMP

145. Accordingly, the Applicant considers that the principle of the Proposed Development accords with policies set out in MPS, draft WNMP, PPW, TANs and the JLDP.

6.3. CLIMATE CHANGE

146. The Welsh Government has set climate change targets for the reduction of greenhouse gas emissions and has adopted policies to support decarbonisation. This includes the setting of a target for Wales to generate 70% of its electricity consumption from renewable energy by 2030. The Proposed Development will generate up to 240MW of electricity and has potential to make a significant contribution to meeting the renewable energy target and, through demonstrating the commercial feasibility at this scale, the potential for further tidal stream development in Wales and elsewhere in the UK.

147. Welsh Government policy to ensure that targets for renewable energy are met, as set out in PPW, require that local authorities facilitate all forms of renewable and low carbon energy development, and in doing so ensure their area's full potential for renewable energy generation is maximised.

148. The need to mitigate the effects of climate change are recognised as a key issue (KI 24) in the JLDP. Policy PS5 of the JLDP supports development where it is demonstrated that it is consistent with the principles of sustainable development, including proposals that alleviate the causes of climate change. Furthermore, Policy PS6 sets out that development will only be permitted where it is demonstrated that it has taken account, inter alia, the energy hierarchy – including using low or zero carbon energy technologies. The Proposed Development complies with these policies. Again, the Proposed Development complies with this policy.

149. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in PPW and the JLDP, as well as other legislation, including national and international obligations on climate change.

6.4. DESIGN

150. The JLDP outlines that all proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environment context and contributes to the creation of attractive, sustainable places, as per policy PYCFF 3. In this regard, proposals should respect the context of the site and its placed within the local landscape; utilise materials which are appropriate to its surroundings and takes account of the site topography. To this end, policy PYCFF 4 states that all proposals should integrate into their surroundings, including, but not limited to, demonstrating how the proposals respects the natural contours of the landscape.

151. Building on the principles of PYCFF 3 & 4, policy AMG 3 requires development not to have significant adverse impacts upon the local landscape and should harmonise with the landform and landscape. The policy applies additional consideration to development within AONBs.

152. The Proposed Development has had regard to principles of good design and this is detailed in the Design and Access Statement submitted with the TWAO application. In summary, the

landfall substation is located within a recessed location in the landscape and utilised the surrounding landform to help integrate the structures into its surroundings; the onshore cable connection is underground so as to avoid visual impacts on the AONB designation; and the location of the Grid Connection substation is located in proximity to an existing substation and on a brownfield site so as to minimise visual impact. This approach accords with the criteria set out in policy AMG 3. Whilst detailed information has not been provided in respect of materials and finishes, the Proposed Development seeks use colours and materials that are consistent and similar to those used on surrounding buildings – with this varying across the three sites (especially between the landfall substation and the two other locations). A draft Planning Condition would be attached to Deemed Planning Consent requiring the submission of design details for the approval by the Planning Authority.

153. Further detail in respect of how the Proposed Development satisfies the design policies within JLDP, TAN 12 and PPW are within the Design and Access Statement.

6.5. WELSH LANGUAGE

154. The Welsh language is part of the social and cultural fabric of Wales. The JLDP plan area has the highest proportion of population that can speak, read and write Welsh (60% in 2011) compared with the Welsh average (14.6% in 2011). The Gwynedd and Anglesey Single Integrated Plan (2014) identified the need to ensure that the Welsh language thrives. Planning Policy Wales recognises that the land use planning system can contribute to sustaining and strengthening the Welsh language in communities.

155. Policy PS1 of the JLDP seeks to promote and support the use of the Welsh language in the Plan area, which will be achieved by, in part, requiring a bilingual signage scheme to deal with all operational signage in the public domain that are proposed in a planning application by public bodies and by commercial and business companies; and expecting that Welsh names are used for new development, houses and street names.

156. During consultation with IoACC, it was identified that consideration should be given to any Welsh language impacts arising from the Proposed Development. Menter Môn Morlais Limited have submitted a Welsh Language Impact Assessment that further considers the impact of the Proposed Development on Welsh Language and culture.

157. During construction there could be a minor adverse effect associated with cultural dilution from an influx of workers. Notwithstanding this, the operational and repowering phases have a low beneficial impact. The ES has identified that, as per the content of the JLDP, the Welsh language is in a strong position with good political support and widespread opportunities for learning the language.

158. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in PPW and the JLDP in relation to the Welsh language, including policy PS1.

6.6. SOCIO-ECONOMICS

159. As noted within the IoACC Destination Anglesey Management Plan, it is vitally important that resources are invested in to ensure that Anglesey can full capitalise on the potential inward investment, thereby positively contributing to the economic prosperity of Anglesey. Policy PS13 of the JLDP outlines that the Council will facilitate growth on appropriate sites which satisfy additional needs to those identified in the JLDP in order to ensure that economic opportunities are maximised.

160. TAN 23 provides guidance on the role of land use planning, including energy generation and other infrastructure and economic activity, in generating wealth, jobs and income. The aim of TAN 23 is to recognise the economic aspects of all development and that planning decisions are made in a sustainable way which balances social, environmental and economic considerations.

161. In line with the guidance within TAN 23, the ES assessed 12 impacts associated with socio-economics and economic development. All impacts were considered to be beneficial and significant, with the effects ranging from minor to major. Full details of the assessment and potential impacts on socio-economics can be found in Chapter 25 of the ES.

162. The marine sector in North Wales provides a major opportunity for transformation growth, for both the local economy and communities, which the applicant is looking to secure. The Proposed Development would play an important part in taking forward tidal stream technology and so accords with PPW policy to grow the economy in a sustainable manner through the generation of low carbon, renewable energy.

163. The assessment recognises that Anglesey is highly dependent on the tourism and recreation sectors, attracting 1.71 million visitors per annum. Accordingly, careful consideration has been given to the potential for negative impacts on tourism, particularly the potential impact on the area's landscape and natural beauty which plays a significant role in the number of visitors Anglesey receives. The assessment has taken into account embedded mitigation to minimise visual impacts of the Proposed Development from the coastline, including the commitment to avoid the deployment of visually prominent devices in some areas.

164. The assessment has considered the temporary disruption to the north-west of Holy Island tourism accommodation during construction of onshore infrastructure, including road closures, diversions and highways works, particularly along the South Stack access road. There is potential for temporary closures to the Public Rights of Way (PRoW), including the Wales Coast Path, during the construction phase of the Project. This potential impact was assessed via the initial impact screening exercise (see Appendix 25.1 (Volume III) of the ES). This exercise concluded a minor adverse impact, therefore this potential impact was not assessed further within Chapter 25 of the ES. As the closures will be very temporary in nature, they are not assessed as likely to result in significant disruption to access. The effects on tourism of the cable landfall at the beach at Abrahams Bosom, are likely to be negligible given the use of the beach and the nature of development.

165. The construction and operation of the Proposed Development has been assessed to give rise to moderate and major beneficial effects on socio-economics, tourism and recreation through increased local expenditure, the creation of job opportunities and requirement for up-skilling of the workforce, and the decarbonisation, strengthening of the 'green credentials' of the locality and providing energy security for the local, regional and UK energy supply.

166. £32.5M has already been invested in Anglesey by the Welsh Government alone, in the Morlais and Minesto demonstration projects. The Proposed Development would deploy up to 240MW with substantial further investment and research associated with these deployments. A recent report by Marine Energy Wales (State of the Sector 2019, Economic Benefits for Wales) highlights that with a UK deployment of 100MW per year from 2021/22, and a realistic share of a growing global market, the tidal stream industry could generate a net cumulative benefit to the UK by 2030 of £1.4 billion, consisting of £1.6 billion GVA from the domestic market and £1.1 billion GVA from exports, offset by £1.3 billion of revenue support. The report states that Wales has the potential to establish an early mover advantage in an export market worth an estimated £76 billion by 2050. The MDZ when fully built out would contribute significantly to this realising these benefits.

167. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in PPW, TAN23 and the JLDP.

6.7. ONSHORE ECOLOGY

168. As previously noted, the Site is partially located the within the Holy Island Coast Special Area of Conservation (SAC); Holy Island Coast Site of Special Scientific Interest (SSSI); and Holy Island Coast Special Protection Area (SPA). To this end, PPW and TAN 5: Nature Conservation & Planning set out the objectives for conserving and improving the natural environment, including ensuring that statutorily designated sites are properly protected and managed.

169. Paragraphs 5.9.16 and 5.9.17 of PPW, note that in determining applications for a range of renewable and low carbon energy technologies, planning authorities should give significant weight to the Welsh Government's targets to increase renewable and low carbon energy generation and "*in circumstances where protected landscape, biodiversity and historical designated buildings are considered, only the direct irreversible impacts on statutorily protected sites and buildings and their setting should be considered*". In accordance with TAN 8, the Proposed Development has sought to contribute to the protection and improvement of the environment and has avoided irreversible harmful effects on the natural environment through the proposed design and embedded mitigation measures included within the Proposed Development.

170. Policy PS19 of the JLDP seeks to conserve and, where appropriate, enhance the area's distinctive natural environment, countryside and coastline. Policy ADN3 requires that low carbon development conserve or enhance all locally, nationally and internationally important biodiversity designations. Furthermore, policy AMG5 requires that development must protect and, where appropriate, enhance biodiversity that has been identified as being important to the local area by avoiding significant harmful impacts through the sensitive location of development;

and considering opportunities to create, improve and manage wildlife habitats and natural landscape.

171. Policies AMG 5 and AMG 6 note that proposals affecting Local nature Reserves, Wildlife Sites, regionally important geological / geomorphologic sites or sites of local biodiversity importance will be refused unless they can demonstrate that, inter alia, appropriate mitigation measures are included as part of the proposal, that there is an overriding social, environmental and / or economic need for the development, and that there is no other suitable site that would avoid having a detrimental impact.

172. As part of the EIA process, the Applicant has used information obtained from baseline ecological field surveys and undertaken an assessment in line with guidance published by the Chartered Institute of Ecology and Environmental Management. Full details of the assessment and potential impacts on onshore ecology can be found in Chapter 19 of the ES.

173. The main potential impacts of the Project on terrestrial ecological receptors have been identified in the ES. These have included impacts to statutory and non-statutory designated sites, temporary habitat loss, and potential injury or killing of protected and notable species during the construction phase of the project. Construction impacts will be managed through micro siting of the Onshore Cable Route and through measures (such as exclusion zones around nests during breeding bird season, sensitive lighting regime, and habitat reinstatement) set out in the outline Code of Construction Practice. These measures are secured through a draft Planning Condition to be attached to Deemed Planning Consent requiring the submission of a detailed Code of Construction Practice, substantially in accordance with the outline Code of Construction Practice which must then be implemented as approved.

174. The preference for bringing the cables ashore at landfall is to use HDD technology. Bringing the cables ashore at landfall via HDD technology will result in no impact to the Holy Island Coast SSSI / SPA / SAC or its designated / notified species or habitats. Consultation with NRW and RSPB will be undertaken to agree the final micro siting of the landfall cable route if HDD cannot be achieved Should HDD not be viable, there will be temporary impacts up to moderate adverse significance to the habitat in the footprint of the cable trenching and associated construction buffer. Although the project will impact on the designated habitat, the percentage of the designated site affected is assessed to be de minimis with permanent impacts affecting 0.004% of the designated site, and no impact to site integrity is anticipated.

175. Following the adoption of the recommended best practice guidance and mitigation measures, the residual impacts to most ecological receptors from the construction of the Proposed Development will be of negligible to minor adverse significance, thereby according with policies AMG 5 and AMG 6 of the JLDP.

176. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in PPW, TAN 5 & 8 and the JLDP.

6.8. ONSHORE ARCHAEOLOGY & HERITAGE

177. PPW and TAN 24: The Historic Environment provide guidance on how to assess impacts on onshore archaeology and heritage arising from the Proposed Development.

178. Paragraphs 5.9.16 and 5.9.17 of PPW note that in determining applications for a range of renewable and low carbon energy technologies, planning authorities should give significant weight to the Welsh Government's targets to increase renewable and low carbon energy generation and "*in circumstances where protected landscape, biodiversity and historical designated buildings are considered, only the direct irreversible impacts on statutorily protected sites and buildings and their setting should be considered*".

179. Policy AMG3 of the JLDP seeks to protect and enhance features and qualities that are distinctive to the local landscape character and requires that development does not cause significant impact to built landscape. Policy ADN3 of the JLDP requires that all impacts on heritage assets are adequately mitigated when assessing proposals for the development of low carbon technology.

180. The JLDP, through Policy PS20, seeks to support the wider economic and social needs of the Plan area through the preservation and enhancement of its unique heritage assets. Proposals which preserve and enhance heritage assets, their settings and significant views, both into and out of, will be granted.

181. Full details of the assessment and potential impacts on onshore archaeology & heritage can be found in Chapter 20 of the ES. In accordance with PPW, TAN 24 and the JLDP, both a Desk-Based Assessment and heritage setting assessment were undertaken to inform the assessment of the Proposed Development. The ES has identified that several heritage-specific impacts could occur. Principally, potential archaeological remains could be partially or completely removed due to extraction works during construction, whilst several other assets could be indirectly impacted due to changes in their setting. The assessment has concluded that the worst-case scenario would likely lead to minor to moderate adverse on the setting of the South Stack Lighthouse (Grade II Listed Building) and Ellin's Tower (Grade II Listed Building) during construction and operation. All other impacts being minor, non-significant or n/a. Embedded mitigation includes the considered siting, design and layout of the offshore infrastructure. The use of neutral colouring of the tidal devices and navigational lighting requirements will be considered during detailed design stage as further mitigation. A draft Planning Condition would be attached to Marine Licence requiring the submission of design details for the approval of Welsh Ministers in consultation with the Planning Authority.

182. Whilst the siting of the Proposed Development has sought to minimise the impact on archaeological remains as far as reasonably possible, for example, installing the cable within the current road network wherever possible, there are predicted direct impacts on non-designated buried remains at Porth Dafarch Hut Circles, Ty-Mawr Standing Stone (associated with the scheduled area), the Cemetery at Porth Dafarch (associated with the scheduled area) and at Parc Cybi. Further micro siting will be undertaken following further evaluation (geophysical survey potentially followed by trial trenching) with avoidance of sites wherever

possible, ensuring they are preserved in-situ. Where avoidance is identified as not being viable, consultation with GAPS will be undertaken to confirm where phases of archaeological excavation or monitoring of ground works will be required, to ensure any remains are identified and recorded.

183. These measures are secured through a draft Planning Condition to be attached to Deemed Planning Consent requiring the submission of a Written Scheme of Investigation (WSI) prior to development, for the approval by the Planning Authority, to include details of further evaluation and monitoring and proposals for preserving, recording and reporting.

184. With mitigation it is not considered that the impacts on heritage assets are significant and the effects on setting are not considered to be amount to harm to the significance of the Listed Buildings and the effects would not be irreversible. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in PPW, TAN-5 and the JLDP relating to onshore archaeology and heritage.

6.9. WATER RESOURCES & FLOOD RISK

185. In addition to legislation and guidance relating to the water environment, the key planning policy drivers in respect of water resources and flood risk are PPW, TAN 15, the Anglesey Local Flood Risk Management Strategy (2013), the Anglesey AONB Management Plan 2015-2020, and JLDP policies PS5 and ADN 3.

186. PPW states that development should reduce, and must not increase, flood risk arising from river and / or coastal flooding on and off the development site itself, with the priority being the protection of the undeveloped or unobstructed floodplain from development and to prevent the cumulative effects of incremental development. TAN 15 provides technical guidance which supplements the policy set out in PPW as well as advising on development and flood risk and providing a framework to assess risks arising from river and coastal flooding. PS5 of the JLDP requires proposals to manage flood risk and maximise the use of sustainable drainage schemes and policy ADN 3 requires that development does not have a significant unacceptable effect on the quality and supply of water.

187. The ES identified a number of potential impacts from the Proposed Development, including the direct disturbance of surface water bodies; increased sediment supply; accidental release of contaminants; increased surface water runoff and flood risk; and groundwater flows and flood risk.

188. Potential mitigation measures have been included within the assessment, which include restatement of bed and banks; best practice measures to manage sediment and surface drainage and measures to minimise the impact of temporary culverts. Full details of the assessment and potential impacts on water resources & flood risk can be found in Chapter 17 of the ES.

189. Mitigation measures including measures to minimise the impacts of temporary watercourse crossings, best practice measures to manage sediment and surface drainage and pollution

control measures are set out in the outline Code of Construction Practice. These measures are secured through a draft Planning Condition to be attached to Deemed Planning Consent requiring the submission of a detailed Code of Construction Practice, substantially in accordance with the outline Code of Construction Practice.

190. The assessment of water resources and flood risk has identified that, post mitigation, all impacts will have a maximum residual impact of minor adverse, if not negligible or no impact.

191. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in PPW, TAN 25, TAN 15, the Anglesey Local Flood Risk Management Strategy (2013), the Anglesey AONB Management Plan 2015-2020, and JLDP policies PS5 and ADN 3.

6.10. GROUND CONDITIONS & CONTAMINATION

192. The Proposed Development is located within an area which has a number of sensitive land uses and designations, including: AONB; Environmentally Sensitive Areas; SSSI; SPA and SACs. In addition to these sensitive land uses, the whole of the Anglesey is a designated UNESCO Geopark. Accordingly, policies PS5, ADN3, AMG5 and AMG6 are of relevance to the assessment of ground conditions & contamination and Pollution Prevention Guidance.

193. Policy PS5 requires that all proposals should avoid pollution and protect soil quality, whilst Policy ADN 3 sets out that, where required, the Proposed Development is removed from the Site in accordance with a restoration and aftercare scheme. Polices AMG 5 and AMG 6, require proposals to avoid significant harmful impacts through the sensitive location of development and the need for mitigation measures to safeguard a site's biodiversity and geological importance, respectively.

194. To inform the ES, a desk based review, a walk over and Preliminary Risk Assessment were undertaken. The onshore study area is largely agricultural, where areas of significant contamination are not anticipated. However, there are parts of the onshore development area that cross potentially contaminated land including a railway and aluminium works. In these areas Potential Contaminants of Concern could be present and represent a risk to construction workers, the public, and future site end-users (i.e. maintenance staff) if exposed during construction activities. There is also potential for soil and/or groundwater contamination associated with historical and current land uses. Full details of the assessment and potential impacts on ground conditions and contamination can be found in Chapter 18 of the ES.

195. Measures to control pollution, including a commitment to follow good environmental practice, in accordance with the Pollution Prevention Guidance (PPG1, PPG5, PPG6, PPG21 and PPG22) are set out in the outline Code of Construction Practice. These measures are secured through a draft Planning Condition to be attached to Deemed Planning Consent requiring the submission of a detailed Code of Construction Practice, substantially in accordance with the outline Code of Construction Practice. With these measures, the residual impact from the Proposed Development is considered to be negligible in respect of ground conditions and contamination.

196. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in NPS, the JLDP and Pollution Prevention Guidance.

6.11. NOISE & VIBRATION

197. In addition to legislation and guidance relating to noise and vibration, the key relevant planning policies in respect of noise and vibration are PPW, TAN11, and Policy PCYFF2 of the JLDP. Amongst other provisions, PPW identifies the need to minimise impacts on local communities from noise. The planning system must protect amenity, which can be disturbed via noise and/or vibration and should not rely on statutory nuisance under the Environmental Protection Act 1990 to do so. TAN 11 requires that noise generating developments does not cause an unacceptable degree of disturbance.

198. Policy PCYFF2 of the JLDP states that planning permission will be refused where the Proposed Development would have an unacceptable impact in respect of nuisance, including noise and vibration. As noted in Policy ADN3, all proposals for low carbon energy technology should adequately mitigate all impacts on landscape character, heritage assets and should conserve or enhance all local, national and international landscape and heritage designations – any increase in noise or vibration could affect the setting of such designations so should the proposal should mitigate or conserve the existing noise and vibration baseline.

199. To inform the noise and vibration impact assessment, a baseline noise survey was undertaken to quantify the existing noise environment in the area around the Proposed Development. Potential impacts in respect of noise were identified as arising from construction works in a small number of locations along the onshore cable route. Full details of the assessment and potential impacts on noise and vibration can be found in Chapter 21 of the ES.

200. With mitigation measures in place, including activity specific buffer zone/separate distances between the construction activity and receptors and through best practice measures, the Proposed Development is assessed to have no significant impacts in relation to noise. These measures are out in the outline Code of Construction Practice at para. 129. These measures are secured through a draft Planning Condition to be attached to Deemed Planning Consent requiring the submission of a detailed Code of Construction Practice, substantially in accordance with the outline Code of Construction Practice.

201. Impacts associated with offshore aspects of the Proposed Development were scoped out of the assessment as it was considered that there was limited potential for effects at receptors onshore. Furthermore, no significant cumulative effects were identified through the assessment of the Proposed Development.

202. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in PPW, TAN-11 and the JLDP in relation to noise and vibration.

6.12. AIR QUALITY

203. PPW notes that clean air contributes to a positive experience of place as well as being necessary for public health, amenity and well-being, and highlights the health imperative of good air quality in contributing to the overall character and quality of places. Policy ADN3 of the JLDP requires that all impacts on natural resources are adequately mitigated and that biodiversity designations are conserved or enhanced. Furthermore, Policy PCYFF2 states that development will be refused where the proposal has an unacceptable adverse impact on health.

204. The ES considered the potential air quality impacts at both human and ecological receptors during the construction, operation and decommissioning phases of the Proposed Development. Impacts associated with offshore aspect of the Proposed Development were scoped out of the assessment, as it was considered that there was limited potential for effects at receptors onshore. Full details of the assessment and potential impacts on air quality can be found in Chapter 22 of the ES.

205. In accordance with air quality guidance, a suite of best-practice mitigation measures has been identified, which are in proportion with the level of dust risk of the construction activities. With the implementation of the mitigation measures, dust impacts are considered to not be significant and cumulative impacts with other relevant projects are also assessed as being not significant.

206. Mitigation measures include best practice dust minimisation and suppression methods as recommended by the IAQM. These measures are out in the outline Code of Construction Practice at para. 132. These measures are secured through a draft Planning Condition to be attached to Deemed Planning Consent requiring the submission of a detailed Code of Construction Practice, substantially in accordance with the outline Code of Construction Practice.

207. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in PPW and JLDP, including policies AND3 and PCYFF2 in relation to air quality.

6.13. TRAFFIC & TRANSPORT

208. TAN 18 outlines the transport issues to considered when assessing planning applications, including reference to integration of land use and transport planning; the location of development; regional transport plans and the design of development. Policy TRA 4 of the JLDP notes that proposals that would cause unacceptable harm to the safe and efficient operation of the highway, public transport and other movement including pedestrian and cycle routes, public rights of way and bridle routes will be refused. In consenting low carbon technologies, policy ADN3 of the JLDP requires that proposals do not have any significant unacceptable effects on sensitive uses located nearby. Furthermore, policy PYCFF2 identifies that any proposals which have an unacceptable adverse impact on health, safety or amenity of occupiers of local residences will be refused, including impacts associated with increased activity and disturbance.

209. The ES assessed a number of effects, including on severance, pedestrian / cycle amenity; road safety and driver delay. Full details of the assessment and potential impacts on traffic and transport can be found in Chapter 23 of the ES.

210. Thirteen highway links were assessed for the effects of severance, pedestrian amenity, road safety and driver delay. Following the application of mitigation measures, the Proposed Development is assessed as having a moderate adverse impact where direct access cannot be maintained to a property. Measures to manage this impact include the provision of temporary parking facilities and banksmen to guide and assist residents during the temporary works. A moderate adverse impact was identified during construction for driver delay associated with the construction of the landfall substation. Proposed traffic management measures, including provision of a new access, advanced warning signs and a temporary speed limit, will reduce the impact to a minor adverse impact. The movement of Abnormal Indivisible Loads (AIL) to the landfall substation may lead to delays on the highway network. An AIL study is provided within Appendix 23 (Volume III) and details the management measures to be employed to minimise the disruption to baseline traffic, and identifies no significant issues. The transport of AILs to install the TEC devices would be by sea from the construction port.

211. A draft Planning Condition would be attached to Deemed Planning Consent requiring the submission of a Construction Traffic Management Plan, detailing arrangements for the management of construction traffic, for the approval by the Planning Authority.

212. Accordingly, the Applicant considers that with these mitigation measures, and policies relevant to traffic and transport, the Proposed Development accords with policies set out in TAN-18 and the JLDP.

6.14. SEASCAPE, LANDSCAPE & VISUAL IMPACT ASSESSMENT

213. Paragraphs 5.9.16 and 5.9.17 of PPW, note that in determining applications for the range of renewable and low carbon energy technologies, planning authorities should give significant weight to the Welsh Government's targets to increase renewable and low carbon energy generation and "*in circumstances where protected landscape, biodiversity and historical designated buildings are considered, only the direct irreversible impacts on statutorily protected sites and buildings and their setting should be considered*".

214. Policies AMG 1 and AMG 3 of the JLDP states that proposals within or affecting the setting and / or significant views into and out of the AONB must, where appropriate, have regard to the relevant AONB Management Plan. In accordance with the noted policy and AONB Management Plan, the Proposed Development seeks to conserve and enhance natural beauty by ensuring that all impacts on landscape character have been adequately mitigated, ensuring that the special qualities of all local, nationally and internationally important landscapes are conserved or enhanced, as per policy ADN3.

215. TAN 14 sets out the key issues which proposals may have on the coastal area, including the likely physical and biological processes along the coast, potential visual impacts from both land

and sea and the effects of statutory and other nature and landscape conservation policies in the coastal zone.

216. PPW and policies PS3 and PS7 of the JLDP, require that new power lines should, wherever possible, be laid underground. The site selection process and design of the proposed structures have sought to respond to the local environment and integrate into the surroundings so to contribute to the creation of attractive, sustainable places – as per policy PCYFF3 & PCYFF4 of the JLDP.

217. The assessment has been undertaken on key seascape, landscape and visual issues identified and agreed in consultation with NRW and IoACC and has been informed through desk-based assessment, field surveying and reporting good practice guidance.

218. Construction phase impacts to seascape and landscape are considered to be relatively small in extent and of short duration, with the restoration of disturbed land and reinstatement of landscape features following completion of the work.

219. In terms of seascape, reversible significant impacts (moderate to major adverse) have been identified for the Seascape Character Areas of Holyhead Mountain, Rhoscolyn and West of Anglesey due to their remote locations and the introduction of man-made elements would be apparent in relation to the off-shore elements.

220. It is predicted that the onshore components of the Proposed Development would not result in significant adverse effects on seascape or landscape character for any of the 14 Seascape Character Areas and Landscape Character Areas identified in the baseline assessment, including the Rhoscolyn and Holyhead SCAs in which the substations would be located due to sympathetic locations and design, including locating the cables underground.

221. A locally significant impact of moderate adverse significance is identified for the area of the Isle of Anglesey AONB designation and a major adverse impact is predicted to the area of the Holy Island Heritage Coast designation closest to the Site, specifically Abraham's Bosom. However, no overall significant effect is predicted for the whole of the AONB or the other sections of Heritage Coast.

222. Major to moderate adverse impacts are predicted on dispersed residential properties and on users of minor roads. Impacts on recreational users in the closest part of the coastline area assessed as moderate / major adverse. The Proposed Development has an overall lifespan of 37 years, following which the devices and structures would be removed which would reverse the potential effects and impacts.

223. No significant effects are considered on any designated sites due to a combination of the intervening distance, limited inter-visibility and / or context of the Proposed Development.

224. Embedded landscape mitigation measures are set out in the Outline Landscape Mitigation Plan at para. 19. Further consideration will be given during detailed design to the colour of the tidal devices, the navigational lighting that is required, and the layout configurations of tidal devices within arrays. A draft Planning Condition is proposed to be attached to Deemed Planning

Consent requiring the submission of design details for the approval by the Planning Authority which will be required to be implemented as approved.

225. In line with the advice within TAN 14, following mitigation the impacts associated with the Proposed Development on receptors is assessed to be negligible with regard to the coastline, including its numerous designations. Policy ADN3 of the JLDP, as well as other policies within both PPW and the JLDP requires that any proposal does not have a significant unacceptable effect on visual amenity and that all impacts on landscape character have been adequately mitigated, as demonstrated by the above and within Chapter 24 of the ES.

226. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in PPW, TAN 14, the JLDP and other local guidance relating to Seascape, Landscape & Visual Impact Assessment.

OFFSHORE CONSIDERATIONS

227. The following matters have been included for information only, as they relate to aspects of the scheme which are located offshore. The offshore elements will be consented through the TWAO although a separate Marine Licence will also be required.

6.15. METOCEAN & COASTAL PROCESSES

228. The Marine Policy Statement sets out that development which may affect areas at high risk and probability of coastal change should not be considered unless the impacts can be managed. Any geomorphological changes that an activity or development will have on coastal process, including sediment movement should be minimised and mitigated. The draft Welsh National Marine Plan requires that proposals demonstrate that they are resilient to coastal change over their lifetime.

229. TAN 14: Coastal Planning provides guidance on the coastal zone and includes advice on heritage coasts and shoreline management plans. TAN14 sets out coast-specific considerations, such as the risks to any form of development associated with the physical processes and ground conditions on the coast, that will need to be incorporated into an application for development in this location. TAN 14 states that the onus rests on the developer to provide sufficient and appropriate information to demonstrate that the Proposed Development and Site can be safely developed without significant adverse effects.

230. As set out in policy AMG 4 of the JLDP, when considering a proposal on the coast, including the Heritage Coast, there is a need to ensure that the proposal conforms to several criteria, including the need to locate the development on the coast and an overriding economic and social benefit from the scheme, as well as ensuring that the proposal does not cause unacceptable harm to, inter alia, the landscape or seascape character and the area's biodiversity interests.

231. The assessment of Metocean and coastal processes considered the impacts of the Proposed Development on waves, currents and movement of sediment. There is limited potential for the sediment deposited from different turbine locations to coalesce and remain on the sea bed given

the strong tidal currents in the demonstration zone. Due to the predominance of exposed bedrock on the sea bed, with occasional gravel cobbles and boulders, the Project will not cause significant changes in bed levels. The predicted magnitude of effects in respect of Metocean and coastal processes are assessed as being negligible to medium.

232. Potential cumulative impacts with one other project, the Minesto Holyhead Deep tidal energy project was identified in the assessment. However, any cumulative effects were considered unlikely to coalesce. The effects of either project would be small scale and temporary. Full details of the assessment and potential impacts on Metocean and coastal processes can be found in Chapter 7 of the ES.

233. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in MPS, draft WNMP, TAN-14 and the JLDP relating to Metocean & Coastal Processes.

6.16. MARINE WATER & SEDIMENT QUALITY

234. Policy AMG 4 of the JLDP notes that when considering a proposal on the coast, including the Heritage Coast, there is a need to ensure that the proposal conforms to several criteria, including the need to locate the development on the coast and an overriding economic and social benefit from the scheme, as well as ensuring that the proposal does not cause unacceptable harm to, inter alia, water quality.

235. From the assessment, many of the impacts to the Marine and Sediment Quality throughout the various stages of development are likely to be of minor adverse significance, even when assessed against the worst-case scenario. Therefore, it is considered that the Proposed Development is unlikely to cause long-term changes to the environment and surrounding region, either through direct changes in the species composition or due to changes in sediment structure. Full details of the assessment and potential impacts on marine water and sediment quality can be found in Chapter 8 of the ES.

236. The effects on the Marine Water and Sediment Quality are unlikely to cause long-term changes to the MDZ environment and surrounding region, either through direct changes in the species composition or due to changes in sediment structure.

237. Measures to reduce the risk of potential pollution during construction, and to minimise any impacts predicted are set out in the Outline Construction Environmental Management Plan (CEMP). A draft condition will be submitted with the Marine Licence application requiring the submission of a detailed CEMP substantially in accordance with the outline CEMP, for the approval of NRW.

238. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in the JLDP in relation to marine water & sediment quality.

6.17. OFFSHORE ECOLOGY

239. The Marine Policy Statement aims to ensure the halting, and if possible, a reversal of biodiversity loss with species and habitats operating as part of healthy, functioning ecosystems. As a general principle, development should aim to avoid harm to marine ecology, biodiversity and geological conservation interests. Where significant harm cannot be avoided, then appropriate compensatory measures should be sought.

240. Annex A of TAN 8 sets out a policy statement on renewable energy which notes aims to secure the right mix of energy provision in Wales whilst minimising associated environmental impacts.

241. Paragraph 5.9.17 of PPW, notes that "*in circumstances where protected landscape, biodiversity and historical designated buildings are considered, only the direct irreversible impacts on statutorily protected sites and buildings and their setting should be considered*". In accordance with TAN 8, the Proposed Development has sought to contribute to the protection and improvement of the environment and sought to avoid irreversible harmful effects on the natural environment.

242. The ES has considered the potential effects on fish and shellfish including noise, physical disturbance of habitat, increased suspension of sediment, collision risk, electromagnetic field, barrier effects to movement, With the embedded mitigation of cable protection, all impacts on fish and shellfish ecology are predicted to be minor during the construction, operation and maintenance, repowering and decommissioning phases.

243. The ES has considered the potential effects on intertidal ecology including disturbance of habitat, increased suspension of sediment, potential release of pollutants due to accidental events, changes to hydrodynamic, and potential spread of invasive non-native species . Mitigation measures, including an Emergency Response Cooperation Plan and a Marine Pollution Contingency Plan, are outlined in the outline CEMP and outline Invasive Species Management Plan. A draft condition will be submitted with the Marine Licence application requiring the submission of a detailed CEMP substantially in accordance with the outline CEMP, for the approval of NRW. The scope of the CEMP will include a Marine Pollution Contingency Plan. In addition, a draft condition will be submitted with the Marine Licence application requiring the submission of a detailed Invasive Species Management Plan substantially in accordance with the outline ISMP, for the approval of NRW.

244. Full details of the assessment and potential impacts on offshore ecology, including benthic and intertidal ecology; and fish and shellfish ecology can be found in Chapters 9 & 10, respectively, of the ES.

245. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in PPW, TAN 8 and the JLDP in relation to offshore ecology.

6.18. MARINE ORNITHOLOGY

246. PPW sets out objectives for conserving and improving the natural environment including the conservation of native wildlife and habitats. Furthermore, TAN 5 requires local authorities to seek to avoid irreversible harmful effects on the natural environment when deciding planning applications. Policy AMG5 of the JLDP requires that proposals avoid significant harmful impacts and that appropriate mitigation or compensation measures are included as part of the proposal.

247. The ES has assessed effects on marine ornithology including disturbance and displacement, collision risk, barriers to movement and indirect effects. During the construction, installation and decommissioning phases of the Proposed Development impacts on marine ornithology are assessed to be minimal.

248. During operation / repowering, underwater collision the ES assessed the potential for significant impacts on the South Stack Penlas SMP sub colonies, guillemot and razorbill. With a mitigation and monitoring plan in place as part of a phased deployment, the impact is reduced to minor adverse. Mitigation, monitoring and phased deployment measures along with governance arrangements through a Morlais Advisory Group, including representation from NRW, are set out in the outline Environmental Mitigation and Monitoring Plan (EMMP). The outline EMMP will be considered as part of the Marine Licence application and it is anticipated that a final version of the EMMP will be the subject of draft condition on the Marine Licence consent requiring the Proposed Development to be undertaken in accordance with the final EMMP.

249. Other effects on marine ornithology are anticipated to result in impacts of negligible to minor adverse significance, with minor beneficial impacts for cormorant and shag in so far as the presence of structures enables extension of the foraging range of these species.

250. During construction, installation repowering and decommissioning, there is required mitigation to avoid disturbance at breeding sites. The outline CEMP includes a commitment that all vessel activities within 300 m of seabird colonies will be prohibited during the breeding season, unless otherwise advised by the ECoW. A draft condition will be submitted with the Marine Licence application requiring the submission of a detailed CEMP substantially in accordance with the outline CEMP, for the approval of NRW.

251. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in PPW, TAN 5 and the JLDP.

6.19. MARINE MAMMALS

252. As noted previously, PPW sets out objectives for conserving and improving the natural environment including the conservation of native wildlife and habitats. Furthermore, TAN 5 requires local authorities to seek to avoid irreversible harmful effects on the natural environment when deciding planning applications. Policy AMG5 of the JLDP requires that proposals avoid significant harmful impacts and that appropriate mitigation or compensation measures are included as part of the proposal.

253. The ES has assessed the potential effects of the Proposed Development on marine mammals including barrier effects, noise disturbance, entanglement in moorings and changes in prey availability. Throughout the construction, operation and maintenance, repowering, and decommissioning phases, the impact on marine mammals from these effects is considered to be of negligible or minor adverse significance, with measures to control and prevent pollution and management measures to ensure marine mammals are not impacted by noise during drilling activities, cable installation and cable protection activities. These measures are outlined in the outline CEMP. A draft condition will be submitted with the Marine Licence application requiring the submission of a detailed CEMP substantially in accordance with the outline CEMP, for the approval of NRW. The scope of the CEMP will include a Marine Pollution Contingency Plan.

254. The ES has also considered the potential collision risk of marine mammals with operational turbines. Initial collision risk assessments have informed the assumptions about the type of device to be installed, the position in the water column for some devices and maximum potential number of devices. The impact on marine mammals has been precautionarily assessed as having a potentially minor adverse impact. A very precautionary minor to moderate impact is assessed for bottlenose dolphin, although the risk is likely to be lower as bottlenose dolphins have not been recorded in the MDZ and are more likely to move along the coast than through the MDZ array area. With a mitigation and monitoring plan in place as part of a phased deployment, the impact is reduced to minor adverse (not significant). Mitigation, monitoring and phased deployment measures along with governance arrangements through a Morlais Advisory Group, including representation from NRW, are set out in the outline Environmental Mitigation and Monitoring Plan (EMMP). The outline EMMP will be considered as part of the Marine Licence application and it is anticipated that a final version of the EMMP will be the subject of draft condition on the Marine Licence consent requiring the Proposed Development to be undertaken in accordance with the final EMMP.

255. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in PPW, TAN 5 and the JLDP.

6.20. MARINE INFRASTRUCTURE & OTHER USES

256. EN-3 contains policies which aid the assessment of the Proposed Development, including the need to understand the potential impact of the Proposed Development on existing or permitted offshore infrastructure or activities. Furthermore, the draft Welsh National Marine Plan, PPW and TANs 5 & 8 and JLDP have informed the assessment of the Proposed Development.

257. With regard to the WBFGA, it is considered that the marine infrastructure and other uses aspect of the scheme satisfies three of the seven well-being goals.

258. The MPS sets out, when considered energy infrastructure, that decision makers should take into account the positive wider environmental, societal and economic benefits of low carbon electricity generation as key technologies for reducing carbon dioxide emissions and, furthermore, that renewable energy resources can only be developed where the resource exists and where economically feasible. Additionally, the decision maker should note the potential

impact of inward investment in tidal stream related manufacturing and deployment activity, as well as the impact of associated employment opportunities on the regeneration of local and national economies – all of which support the objective of developing the UK's low carbon manufacturing capability.

259. The ES considered effects on offshore wind farm projects, oil and gas activity, marine aggregate extraction, marine disposal sites, military exercise areas, telecommunications and electricity cables, pipelines, port developments, capital and maintenance dredging, a coal and brine consultation area and unexploded ordnance. Full details of the assessment and potential impacts on marine infrastructure and others uses can be found in Chapter 16 of the ES.

260. Adverse impacts would be avoided through agreements, detailed assessments with potential for micro siting in respect of unexploded ordnance and ongoing engagement with relevant operators. A draft condition will be submitted with the Marine Licence application requiring a 500m safety buffer to be implemented around the active CeltixConnect telecommunications cable and Emerald Bridges Fibres.

261. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in the draft WNMP, PPW, TANs and the JLDP.

6.21. OFFSHORE ARCHAEOLOGY & HERITAGE

262. Paragraph 5.9.17 of PPW, notes that "*in circumstances where protected landscape, biodiversity and historical designated buildings are considered, only the direct irreversible impacts on statutorily protected sites and buildings and their setting should be considered*".

263. The draft WNMP requires proposals to demonstrate how potential impacts on historic assets and their setting have been taken into consideration and an early stage and should avoid, minimise and mitigate adverse impacts. Furthermore, policy AMG 6 of the JDLP requires that proposals which are likely to cause harm to geological / geomorphological sites must have overriding economic and social benefit and not cause unacceptable harm. Whilst TAN 24 provides guidance on how to consider the historic environment when making planning decisions.

264. The known offshore archaeological baseline comprises charted wrecks and obstructions and previously unidentified anomalies of possible maritime or aviation origin. The approach to mitigation is to avoid these features via Archaeological Exclusions Zones and micro-siting during detailed design to ensure that direct impacts will not occur. Other mitigation measures include a Written Statement of Investigation, micro-siting and avoidance or design modification and reporting by geoarchaeological assessment. These measures are secured in both draft planning conditions to be attached to the Deemed Planning Consent and draft conditions to be submitted with the Marine Licence application.

265. The time limited life of the Proposed Development, noted as 37 years, and the reversible nature of much of the Scheme should be considered alongside paragraph 5.9.17 of PPW which states that "in circumstances where protected landscape, biodiversity and historical designations and buildings are considered in the decision-making process, only the direct irreversible impacts on

statutorily protected sites and buildings and their setting (where appropriate) should be considered.

266. With the application of mitigation measures, significant impacts to offshore and intertidal archaeology, including cumulative and transboundary impacts) would not occur. Accordingly, the Applicant considers that the Proposed Development accords with policies set out in PPW, draft WNMP and TAN 24.

6.22. COMMERCIAL FISHERIES

267. Objective 10 of the MPS notes the need to "maintain and enhance the resilience of marine ecosystems and the benefits they provide in order to meet the needs of present and future generations". EN-3 sets out that where there is a possibility that advisory safety areas will be sought around offshore infrastructure, potential effects should be included in the assessment on commercial fishing. Furthermore, the assessment by the applicant should include detailed surveys of the effects on fish stocks of commercial interest and any potential reduction in such stocks, as well as likely constrains on fishing activity within the development boundaries.

268. Based on a review of official Marine Management Organisation landings and activity data, there is a low level of commercial fishing activity within the MDZ / export cable corridor compared to other areas off the Welsh Coast. There appears to be targeted whelk fisher within the MDZ but this is limited in scale compared to other fisheries. It should be noted that there appears to be limited habitat for whelks in the MDZ, therefore this may be an artefact of the scale of data collection.

269. Within the study area, the key commercial species are whelk, scallops, crab and lobster. These same species are also the main species landed at the three most important local ports: Holyhead; Amlwch and Morfa Nefyn. Effects on commercial fisheries associated with construction, operation and decommissioning are anticipated to result in negligible to minor adverse significance.

270. Accordingly, the Applicant considers that the Proposed Development is acceptable in respect of commercial fisheries.

6.23. SHIPPING & NAVIGATION

271. NPS EN-3 states that site selection should have been made with a view to avoiding or minimising disruption or economic loss to the shipping and navigation industries. Furthermore, the scheme must be designed to minimise the effects on recreational craft, with applications which pose unacceptable risk to navigational safety, after all possible mitigation measures have been considered, will not be consented.

272. The shipping and navigation assessment considered the transport of goods or persons by vessel, for either commercial or recreational purposes. To inform the assessment, a variety of both summer and winter marine traffic survey data was collected. The assessment identified that impacts included vessel displacement, an increase in vessel to vessel collision risk, the

potential for a vessel to interact with the wind farm structures or subsea infrastructure. Also considered was the potential diminishment of Search and Rescue resources.

273. With suitable mitigation measures implemented, impacts were considered to be within acceptable or tolerable limits. Mitigation measures include restrictions to navigation through the MDZ, the deployment of devices that provide an appropriate 20m Under Keel Clearance and some areas, the use of guard vessel(s) to monitor passing traffic, the Implementation of Safety Zones, and temporary navigation aids as required by Trinity House, These measures are secured within the TWAO.

274. Accordingly, the Applicant considers that the Proposed Development is acceptable in respect of shipping and navigation in line with NPS EN-3.

7. CONCLUSION

7.1. THE PROPOSED DEVELOPMENT

275. Deemed planning permission is sought for the 'Construction, Operation, Maintenance, Repowering and Decommissioning of a New Offshore Energy Generating Station with A Gross Output Capacity of Up To 240 Megawatts Comprising Tidal Stream Devices and Associated Infrastructure Offshore Together with Infrastructure, Cabling and Connection to The Existing Electricity Network Onshore' in pursuant to section 16 of the TWA and section 90(2A) of the Town and Country Planning Act 1990.

276. In accordance with section 70(2) of the Town and Country Planning Act 1990, the request for a direction deeming planning permission should be determined in accordance with the Development Plan unless material considerations indicate otherwise. The proposals have been assessed against the requirements of national policy, the statutory and emerging development plan, and the principle of the development is considered to be acceptable. As noted in Section 5 of this Statement, other policies, guidance and legislation are also supportive of the Proposed Development as a whole.

277. The Proposed Development presents a well-considered development, which responds positively to the relevant planning policy context at the local, national and European levels, including the Joint Local Development Plan, Planning Policy Wales and the Well-being of Future Generations Act.

7.2. NEED FOR THE PROPOSED DEVELOPMENT

278. As detailed within Section 2 of this Statement, there is widespread support for the development of a renewable, low carbon, sustainable energy supply in European, National and Local policy documents. Generating such an energy supply from tidal stream is one of the solutions available to substantially reduce carbon emissions and address energy demand.

279. Indigenous energy production has fallen year on year since 1999 and the reliance on importing energy is an unsustainable energy model. The UK faces a challenge of increasing energy supply and security whilst also reducing carbon and greenhouse gas emissions.

280. Increasing renewable energy and resource efficiency is one of the Welsh Government's national priorities for managing natural resources. the Proposed Development represents one of the nascent technologies identified by the UK Government which will have a role in the decarbonisation of the UK, with Wales being well placed to take advantage of tidal energy schemes. To this end, the European Union have identified tidal energy as having the potential to contribute significantly to climate change reduction, as well as socio-economic and energy security objectives.

281. The deployment of the technology linked to the Proposed Development will facilitate the deployment and development of solutions to the need to tackle climate change, provide a secure and renewable energy supply and provide new energy infrastructure. Linked to this is the

economic driver for such developments and the benefits which it can provide at a national, regional and local level in terms of economics, socially and environmentally.

7.3. BENEFITS & MATERIAL CONSIDERATIONS

282. PPW states that "*in determining applications for the range of renewable and low carbon energy technologies, planning authorities should take into account: the contribution a proposal will make to meeting Welsh, UK and European targets; the contribution to cutting greenhouse gas emissions; and the wider environmental, social and economic benefits and opportunities from renewable and low carbon energy development" (Paragraph 5.9.16, PPW). Furthermore, paragraph 5.9.17 states that "planning authorities should give significant weight to the Welsh Government's targets to increase renewable and low carbon energy generation, as part of our overall approach to tacking climate change and increasing energy security*".

283. As demonstrated in this Statement, the Proposed Development makes a significant contribution to reducing greenhouse gas emissions and provides a wide range of environmental, social and economic benefits and opportunities, in line with the definition of sustainable development. Accordingly, significant weight should be attached to the provision of a renewable and low carbon energy source.

284. By way of summary, and to aid the decision maker in considering the planning balance, **Table 7-1** provides a summary of the material considerations associated with the Proposed Development.

Table 7-1 Summary of Material Considerations

Topic	Summary
The Principle of the Proposed Development	In providing 240MW of renewable, low carbon electricity, the Proposed Development accords with the various aims, objectives and policies set out within the NPSs, PPW, TANs and the JLDP, including PS19, AMG5 and AMG6, amongst other plans and guidance.
Climate Change	In line with policies PYCFF 5 & 6 of the JLDP, the Proposed Development has considered and accords with the energy hierarchy noted within PPW – as it seeks to alleviate the causes of climate change and develop low carbon renewable technologies.
Design	The Proposed Development has been designed and located so to integrate with the surrounding landform and structures, whilst the entirety of the cabling has been located underground. Whilst detailed material specification has not been provided, the finer details will utilise materials and finishes which are consistent and similar to its surroundings, in line with polices PCYFF3, PCYFF4 and AMG of the JLDP, as well as TAN 12 and PPW.
Welsh Language	The assessment of the Welsh language within chapter 25 of the ES and in the Welsh Language Impact Assessment, has identified that whilst the possible influx of non-welsh speaking workers could lead to a possible cultural dilution, the Proposed Development represents a beneficial opportunity for the development of the Welsh language at a regional level, leading to positive impacts in accordance with PPW and the JLDP.

Topic	Summary
Socio-economics	In line with guidance within TAN 23, the Proposed Development was considered to have beneficial and significant impacts to 12 assessed areas, with effects ranging from minor to major. These positive effects accord with objectives set out within 'National Sustainable Placemaking Outcomes' within PPW, as well as the IoACC Destination Anglesey Management Plan.
Onshore	
Onshore Ecology	Residual impacts to Onshore Ecology are assessed to be of negligible to minor adverse significance, with the Proposed Development according with policies set out in PPW, TAN 5 and the JLDP.
Onshore Archaeology & Heritage	The Proposed Development is assessed as having reversible minor to moderate adverse effects on two heritage assets, with minor and non-significant effects for all other assets. In combination with the economic and social benefit of the scheme, the proposal accords with the policies and criteria set out within AMG4 of the JLDP, as well as policy PS20, PPW and TAN 24.
Water Resources & Flood Risk	Impacts on water resources and flood risk have a worst-case scenario of a minor adverse, if not negligible or no impact. The assessment and low level of impact ties in the guidance set out within PPW, the Anglesey Local Flood Risk Management Strategy and the Anglesey AONB Management Plan.
Ground Conditions & Contamination	Notwithstanding the sensitive land uses surrounding the Site, including AONB, SSSI, SPA and SAC, the Proposed Development is assessed to have a negligible effect in respect of ground conditions and contamination.
Noise & Vibration	In accordance with both TAN 11 and policy PCYFF2 of the JLDP, with mitigation measures the Proposed Development is considered to have no significant impacts in relation to noise and would not have an unacceptable impact in respect of nuisance, noise or vibration.
Air Quality	In line with the 'Productive and Enterprising Places' section of PPW, the importance of clean air in contributing to a positive experience of place as well as being a good health imperative is retained by the proposal. Residual air quality impacts, notably dust, are considered not to be significant.
Traffic & Transport	The assessment of traffic and transport has identified residual impacts of no greater than moderate adverse. The application has considered the matters noted within TAN 18 as well as the criteria set out in policy TRA 4 of the JLDP.
Seascape, Landscape & Visual Impact Assessment	PPW, TAN14 and the JLDP include several aims, objectives and policies which aim to protect the AONB and the heritage coast. The power lines are to be laid underground, in line with both PPW and the JLDP, as well as other measures such as site refinement and appropriate design of the structures to minimise any effects on the AONB. Following mitigation, the Proposed Development does not have a significant adverse effect on landscape character.
Offshore	
Metocean & Coastal Processes	In line with TAN 14 and policy AMG 4 of the JLDP, the Proposed Development is considered to have small scale, localised and temporary effects on Metocean and coastal processes, with low, negligible and no impacts, respectively. The economic and social benefit from the scheme, as well as its need to be located on the coast support the need for the scheme.
Marine Water & Sediment Quality	Overall, no significant impacts on marine water and sediment quality were identified and following mitigation measures all impacts are not significant and considered to be small scale, localised and temporary. Again, the proposal accords with the provisions of AMG 4 of the JLDP.

Topic	Summary
Offshore Ecology, including: Benthic & Intertidal; and Fish & Shellfish.	PPW, TAN 8 and the JLDP provide guidance for the assessment of ecology. In accordance with the development plan, impacts on fish and shellfish is considered to be of minor adverse significance, with impacts to benthic and intertidal ecology also being of minor adverse significance. The Proposed Development is unlikely to cause long-term changes to the MDZ. Together, policies PS7 and PS19 require that proposals for renewable energy technology do not individually or cumulatively compromise the objectives of international, national and local nature conservation designations.
Marine Ornithology	The effect of the Proposed Development on Marine Ornithology is anticipated to result in impacts of negligible to minor adverse significance, with minor beneficial impacts for some species. Collision risk during the operational phase of the scheme was assessed to be no more than a minor adverse impact.
Marine Mammals	The impact on marine mammals is considered to be of negligible or minor adverse significance throughout the construction, operation and maintenance, repowering and decommissioning phases. With a mitigation and monitoring plan in place as part of a phased deployment, the impact is reduced to minor adverse (not significant).
Marine Infrastructure & Other Uses	Considering the provisions within the draft WNMP, PPW, TANs and the JLDP (as well as the WBFGA), the Proposed Development will lead to minor adverse residual impacts at worst. Adverse impacts would largely be avoided as there is a requirement for industries to co-operate.
Offshore Archaeology & Heritage	Both PPW and TAN 24 seek to consider and mitigate any adverse impacts on the historic environment. Through the application of mitigation measures, significant impacts to offshore archaeology are considered not to occur. The known archaeological baseline comprises charted wrecks and obstructions.
Commercial Fisheries	Effects on commercial fisheries associated with the Proposed Development are considered to result in negligible to minor adverse significance. Notwithstanding this, potential beneficial impacts may arise on commercial receptors via opportunities to support marine operations.
Shipping & Navigation	Through the implementation of mitigation measures, impacts to shipping and navigation are considered to be acceptable.

285. Taking the above into consideration, this Statement demonstrates that the Proposed Development is consistent with national and local planning policies, as well as other legislation, aims and objectives, and will not lead to significant adverse impacts. The Environmental Statement demonstrates that the potential impacts of the Proposed Development have been carefully considered and the proposed mitigation measures will reduce and manage impacts.

286. The Proposed Development seeks to provide a significant quantum of low carbon, renewable energy via a sustainable energy supply, the tidal stream. The Site's location is driven by the need to be in proximity to this energy supply. By understanding the constraints and opportunities which the Proposed Development offers, the scheme has sought to mitigate any adverse impacts and enhance any positive effects. The residual adverse impacts are outweighed by the benefits of renewable energy generation, the economic benefits to Anglesey (between £3.2m and £41.4m), North Wales (between £2m and £25m), and the rest of Wales (between £14.5m

to £33m) annually for the life of the Project, and the estimated 467 jobs per year during construction and the 465 jobs during operation and maintenance.

287. Accordingly, we respectfully suggest that the Proposed Development be approved and the direction for deemed planning permission be granted.

Appendix A

Joint Local Development Plan Policy Assessment

Appendix A – Joint Local Development Plan Policy Assessment

Policy	Policy Text	Policy Assessment
PS1: Welsh Language and Culture	The Councils will promote and support the use of the Welsh language in the Plan area. This will be achieved by: 4. Requiring a bilingual signage scheme to deal with all operational signage in the public domain that are proposed in a planning application by public bodies and by commercial and business companies. 5. Expect that Welsh names are used for new developments, house and street names.	The design of the infrastructure has been and will be undertaken with a view to maximising local content and developing locally based skills, with social value (including sub-contracts) an important consideration in the procurement strategy. During development of the procurement strategy, efforts will be made to identify local suppliers and contractors who could undertake each contract, in accordance with Goal 6 of the WBFGA, a Wales of vibrant culture and thriving Welsh language.
PS5: Sustainable Development	Development will be supported where it is demonstrated that they are consistent with the principles of sustainable development. All proposals should: 1. Alleviate the causes of climate change and adapting to those impacts that are unavoidable in accordance with Strategic Policy PS 6; 4. Protect, support and promote the use of the Welsh Language in accordance with Strategic Policy PS 1; 6. Protect and improve the quality of the natural environment, its landscape and biodiversity assets, including understanding and appreciating them for the social and	The Proposed Development helps moves towards a low carbon and resilient society, whilst representing sustainable development by maximising the benefits to the economy and community whilst balancing potential environmental and social effects. During its operation, the Proposed Development would contribute to reaching global, European and national targets on carbon dioxide reduction and renewable energy production.

	economic contribution they make in accordance with policy PS 19;	
PS6: Alleviating and Adapting to the Effects of Climate Change	In order to alleviate the effects of climate change, proposals will only be permitted where it is demonstrated that they have fully taken account of and responded to the following: 1. The energy hierarchy: a. Reducing energy demand; b. Energy efficiency; and c. Using low or zero carbon energy technologies wherever practical, viable and consistent with the need to engage and involve communities; protect visual amenities, the natural, built and historic environment and the landscape. 2. Reducing greenhouse gas emissions, help to reduce waste and encourage travel other than by car.	The nature of the Proposed Development is to alleviate the causes of climate change and develop low carbon, renewable technologies. As per criterion c. of the policy, the proposal utilises low carbon energy technologies.
PS7: Renewable Energy Technology	The Councils will seek to ensure that the Plan area wherever feasible and viable realises its potential as a leading area for initiatives based on renewable or low carbon energy technologies by promoting: 1. Renewable energy technologies within development proposals which support energy generation from a range of sources. This will be achieved by: 3. Ensuring that installation in areas covered by international or national landscape designations and visible beyond	The Proposed Development helps moves towards a low carbon and resilient society, whilst representing sustainable development by maximising the benefits to the economy and community whilst balancing potential environmental and social effects. The principle of the Proposed Development seeks to build need for a low carbon economy, whilst also

	their boundaries, or areas of local landscape value, in accordance with Strategic Policy PS 19 do not individually or cumulatively compromise the objectives of the designations especially with regard to landscape character and visual impact; 4. Ensuring that installation in accordance with PS19 do not individually or cumulatively compromise the objectives of international, national and local nature conservation designations; 5. Supporting installation outside designated areas provided that the installation would not cause significant demonstrable harm to landscape character, biodiversity or amenity of residential or holiday accommodation, either individually or cumulatively. To lessen the visual impact of overhead lines associated with such installations, especially in sensitive locations, the lines should be placed underground unless this causes significant harm to other acknowledge interests or the viability of the scheme, which cannot be negated or mitigated.	according within the energy hierarchy. The Proposed Development will install new power lines underground. See table 6-1 of the Planning Statement to see an assessment of the Proposed Development against the WBFGA goals.
PS13: Providing opportunity for a flourishing economy	Whilst seeking to protect and enhance the natural and built environment, the Councils will facilitate growth in accordance with the spatial strategy of the Plan by: 3. Facilitate appropriate sites which become available on windfall sites which could satisfy additional needs to those indicated in criterion 1 and in accordance with the principles given in Strategic Policy PS5 and PS6 and the	

	Plan's Spatial Strategy, in order to ensure that economic opportunities are maximised.	
PS19: Conserving and where appropriate enhancing the natural environment	The Councils will manage development so as to conserve and where appropriate enhance the Plan area's distinctive natural environment, countryside and coastline, and proposals that have a significant adverse effect on them will be refused unless the need for and benefits of the development in that location clearly outweighs the value of the site or area and national policy protection for that site and area in question. When determining a planning application, consideration will be given to a number of criteria within the policy.	Following the adoption of the recommended best practice guidance and mitigation measures, the residual impacts to most ecological receptors from the construction of the Proposed Development will be of negligible to minor adverse significance. Bringing the cables ashore at landfall via HDD technology will result in no impact to the Holy Island Coast SSSI / SPA / SAC or its designated / notified species or habitats. Should HDD not be viable, there will be temporary impacts up to moderate adverse in significance to the habitat in the footprint of the cable trenching and associated construction buffer.
PS20: Preserving and Where Appropriate Enhancing Heritage Assets	In seeking to support the wider economic and social needs of the Plan area, the Local Planning Authorities will preserve and where appropriate, enhance its unique heritage assts. Proposals that will preserve and where appropriate enhance heritage assets, their setting and significant views into and out of the building/area will be granted.	The assessment has identified that several heritage-specific impacts could occur. Principally, potential archaeological remains could be partially or completely removed due to extraction works during construction, whilst several other assets could be indirectly impacted due to reversible

		changes in their setting. The assessment has concluded that the worst-case scenario would likely lead to minor to moderate adverse on two heritage assets, with all other impacts being minor, non-significant or n/a.
PCYFF 2: Development Criteria	A proposal should demonstrate its compliance with: 1. Relevant policies in the Plan; 2. National planning policy and guidance. Additionally, planning permission will be refused where the Proposed Development would have an unacceptable adverse impact on: 6. The health, safety or amenity of occupiers of local residences, other land and property uses or characteristics of the locality due to increased activity, disturbance, vibration, noise, dust fumes, litter, drainage, light pollution, or other forms of pollution or nuisance.	As demonstrated in this Table and within Section 6 of the Planning Statement.
PCYFF 3: Design and Place Shaping	All proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places. Innovative and energy efficient design will be particularly encouraged. Proposals, including extensions and alterations to existing buildings and structures, will only be permitted provided they conform to all of the following criteria, where relevant:	The Proposed Development is located within a recessed location in the landscape and utilised the surrounding landform to help integrate the structures into its surroundings, in line with the criteria set out in policy AMG 3. Whilst detailed information has not been provided in respect of materials

	1. It respects the context of the site and its place within the local landscape, including its impact on important principal gateways into Gwynedd or into Anglesey, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skyline or ridges; 2. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate, in line with Policy PCYFF 4;	and finishes, the Proposed Development seeks use colours and materials that are consistent and similar to those used on surrounding buildings – with this varying across the three sites (especially between the landfall substation and the two other locations).
PCYFF 4: Design and Landscaping	All proposals should integrate into their surroundings. Proposals that fail to show how landscaping has been considered from the outset as part of the design proposal will be refused. A landscape scheme should, where relevant: 2. Demonstrate how the Proposed Development respects the natural contours of the landscape; 4. Respect, retain and complement any existing positive natural features, landscapes, or other features on site;	The Proposed Development is located within a recessed location in the landscape and utilised the surrounding landform to help integrate the structures into its surroundings, in line with the criteria set out in policy AMG 3. Whilst detailed information has not been provided in respect of materials and finishes, the Proposed Development seeks use colours and materials that are consistent and similar to those used on surrounding buildings – with this varying across the three sites (especially between the landfall substation and the two other locations).

PCYFF 5: Carbon Management	Proposals will need to demonstrate how the energy hierarchy set out in policy PS 6 has been applied and how the contribution from renewable or low carbon energy to satisfy the proposals need for energy and waste has been maximised.	The nature of the Proposed Development is to alleviate the causes of climate change and develop low carbon, renewable technologies.
ADN3: Other Renewable Energy and Low Carbon Technologies	Proposals for renewable and low carbon energy technologies, other than wind or solar, which contribute a low carbon future will be permitted, provided that the proposal conforms to the following criteria: 1. All impacts on landscape character, heritage assets and natural resources have been adequately mitigated, ensuring that the special qualities of all locally, nationally and internationally important landscape, biodiversity and heritage designations, including, where appropriate, their settings are conserved or enhanced; 2. That the proposal does not have a significant unacceptable effect on visual amenities; 6. That the development does not have cumulative unacceptable effects with any prominent features in the landscape or townscape; 7. Where required, the equipment and associated infrastructure are removed from the site in accordance with a restoration and aftercare scheme submitted to and agreed by the Local Planning Authority. Where necessary, proposals should be informed by a landscape and visual impact assessment.	No significant effects are considered on any designated sites due to a combination of the intervening distance, limited inter-visibility and / or context of the Proposed Development. The Proposed Development will install new power lines underground so to reduce any visual effects. The Proposed Development has an overall lifespan of 37 years, following which the devices and structures would be removed which would reverse the potential effects and impacts.

AMG1: Area of Outstanding Natural Beauty Management Plans	Proposals within or affecting the setting and/ or significant views into and out of the AONB must, where appropriate, have regard to the relevant Area of Outstanding Natural Beauty Management Plan.	It is predicted that the onshore components of the Proposed Development would not result in significant adverse effects on seascape or landscape character for any of the 14 Seascape Character Areas and Landscape Character Areas identified in the baseline assessment, including the Rhoscolyn and Holyhead SCAs in which the substations would be located due to sympathetic locations and design. A locally significant impact of moderate adverse significance is identified for the area of the Isle of Anglesey AONB designation and a major adverse impact is predicted to the area of the Holy Island Heritage Coast designation closest to the Site, specifically Abraham's Bosom. However, no overall significant effect is predicted for the whole of the AONB or the other sections of Heritage Coast. Major to moderate adverse impacts are predicted on dispersed residential properties and on users of minor roads. Impacts on recreational users in the closest part of the coastline area

		assessed as moderate / major adverse.
AMG4: Coastal Protection	In considering a proposal on the coast, including the Heritage Coast, there will be a need to ensure that the proposal conforms to the following criteria: 1. The development due to its nature must be located on the coast, or in open estuaries, or nearby, and that there is an overriding economic and social benefit from the development; 2. It does not cause unacceptable harm to receptors noted within the policy; 3. Priority is given to locations with a close visual connection to current buildings or existing structure; 4. There are no suitable alternative locations on the coast that have been developed; 5. That the development is consistent with other policies within the Plan including Policy ARNA1.	The assessment has identified that several heritage-specific impacts could occur. Principally, potential archaeological remains could be partially or completely removed due to extraction works during construction, whilst several other assets could be indirectly impacted due to changes in their setting. The assessment has concluded that the worst-case scenario would likely lead to minor to moderate adverse on two heritage assets, with all other impacts being minor, non-significant or n/a. It should be noted that the Proposed Development represents one of the best opportunities to evaluate the archaeological potential for part of Holy Island, which is poorly understood archaeologically
AMG5: Local Biodiversity Conservation	Proposals must protect and, where appropriate, enhance biodiversity that has been identified as being important to the local area by:	Following the adoption of the recommended best practice guidance and mitigation measures, the residual impacts to most ecological receptors from the construction of the Proposed

	a) Avoiding significant harmful impacts through the sensitive location of development; A proposal affecting sites of local biodiversity importance will be refused unless they can conform with all of the following criteria: 1. That there are no other satisfactory alternative sites available for the development; 2. The need for the development outweighs the importance of the site for local nature conservation; 3. That appropriate mitigation or compensation measures are included as part of the proposal. Where necessary, an Ecological Assessment which highlights the relevant local biodiversity issues should be included with the planning application.	Development will be of negligible to minor adverse significance. Bringing the cables ashore at landfall via HDD technology will result in no impact to the Holy Island Coast SSSI / SPA / SAC or its designated / notified species or habitats. Should HDD not be viable, there will be temporary impacts up to moderate adverse in significance to the habitat in the footprint of the cable trenching and associated construction buffer.
AMG6: Protecting Sites of Regional or Local Significance	Proposals that are likely to cause direct or indirect significant harm to Local Nature Reserves (LNR), Wildlife Sites (WS) or regionally important geological / geomorphologic sites (RIGS) will be refused, unless it can be proven that there is an overriding social, environmental and/or economic need for the development, and that there is no other suitable site that would avoid having a detrimental impact on sites of local nature conservation value or local geological importance.	Following the adoption of the recommended best practice guidance and mitigation measures, the residual impacts to most ecological receptors from the construction of the Proposed Development will be of negligible to minor adverse significance. Bringing the cables ashore at landfall via HDD technology will result in no impact to the Holy Island Coast SSSI / SPA / SAC or its designated / notified species or habitats. Should HDD not

		be viable, there will be temporary impacts up to moderate adverse in significance to the habitat in the footprint of the cable trenching and associated construction buffer.
TRA 4: Managing Transport Impacts	Where appropriate, proposals should be planned and designed in a manner that promotes the most sustainable modes of transport having regard to a hierarchy of users: 1. Pedestrians, including people with prams and/or young children; 2. Disabled people with mobility impairments and particular access needs; 3. Cyclists; 4. Powered two-wheelers; 5. Public transport; 6. Vehicular access and traffic management within the site and its vicinity; 7. Car parking and servicing; 8. Coach parking; and 9. Horse-riders. Proposals that would cause unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks including pedestrian and cycle routes, public rights of way and bridle routes, will be refused. The degree of	The Proposed Development is considered to have no greater than moderate adverse impacts in relation to traffic and transport. A moderate adverse impact was identified during construction for driver delay due to road closures where direct access cannot be maintained to three local properties that would be within the road closures

	unacceptable harm will be determined by the local authority on a case by case basis.	