



**Cyfoeth  
Naturiol**  
Cymru  
**Natural  
Resources**  
Wales

## **Marine Licensing Variation Decision**

The Marine and Coastal Access Act (2009)

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**Applicant: Menter Môn Morlais Limited**

**Holy Island, Anglesey**

**Tidal stream demonstration project off the west coast of Holy Island**

**Variation application reference no: ORML1938v1**

**Variation to amend parameters to allow Surface Emergent Seabed Mounted Device deployment within the Marine Development Zone.**

**27 April 2026**

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## **OUR DECISION**

Based on all the information available, and having regard to all relevant considerations NRW Marine Licensing Team (NRW MLT) has decided to grant the variation to the Existing Marine Licence (ORML1938) sought by the Variation Application subject to the changes set out in Annex 1.

This decision document:

- explains how the Variation Application has been determined, having regard to the relevant legal framework outlined in section 5;
- explains how relevant considerations have been taken into account and how each of the legal requirements have been considered in determining the Variation Application;
- provides a record of the decision-making process; and
- sets out the reasons for any conditions imposed in connection with any marine licence granted pursuant to the Variation Application.

## **1 APPLICATION DETAILS**

### **1.1 The Variation Application**

|  |  |
|--|--|
| Applicant name and address                       | The applicant is the Company set out below:<br><br>Company name: Menter Môn Morlais Limited<br>Company number): 10747114<br>Address: Neuadd Y Dref, Buckley Square, Llangefni, Gwynedd, Ynys Môn, LL77 7LR   |
| Variation Application reference number           | ORML1938v1   |
| Existing Marine Licence reference number         | ORML1938   |
| Date Variation Application was duly made         | 13 October 2025  |
| Description of variation                         | The variation application sought to include the deployment of Surface Emergent Seabed Mounted (SESM) devices and to amend the following parameters; <ul style="list-style-type: none"><li>• Device swept area amended from 982m<sup>2</sup> to 1200m<sup>2</sup> across the whole Marine Development Zone (MDZ).</li><li>• Blade width amended from 2m to 3m across the whole MDZ.</li><li>• Inclusion of devices with Height above Lowest Astronomical Tide (LAT) of up to 18m compared to 6.5m above surface level, with the change in height limited to the geographic area described in the new Figure 4-5 submitted with this application as the Green Hatched Restricted Area (Figure 4-5_Restricted_areas_plan_v5 submitted 10 October 2025).</li></ul> |
| Proposal[s] covered by the Variation Application | The project comprises a tidal technology demonstration zone specifically designed for the installation and commercial demonstration of multiple arrays of tidal energy devices up to an installed capacity of 240 Megawatts. The offshore development area where proposed installation can be placed covers an area of 35km <sup>2</sup> to the west of Anglesey. The Project will include communal infrastructure for tidal technology developers which   |

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|   | <p>provides a shared route to a local grid connection via nine export cable tails, an onshore landfall substation, and an onshore electrical cable route to a grid connection via an existing grid connection substation to the west of Holyhead.</p> <p>(the <b>Project</b>)</p>  |
| <p>Licensable marine activities</p>     | <p>Morlais Tidal Demonstration Zone for installation and commercial demonstration of multiple arrays of tidal energy devices up to an installed capacity of 240MW.</p> <p>The Marine project elements include construction of the following;</p> <ul style="list-style-type: none"> <li>• Up to nine export cables;</li> <li>• Up to nine export cable tails (shared with onshore components);</li> <li>• Navigation and environmental monitoring equipment;</li> <li>• Mooring and foundation structures;</li> <li>• Offshore electrical infrastructure, including submerged, floating, or surface emergent hubs; and</li> <li>• Up to 620 tidal devices, each comprising:             <ul style="list-style-type: none"> <li>• Foundation or anchors on or within the seabed;</li> <li>• A supporting substructure or mooring;</li> <li>• One or more Tidal Energy Convertors (TEC); and</li> <li>• Cable connections.</li> </ul> </li> </ul> <p>(the <b>Proposed Activities</b>)</p>  |
| <p>Marine Plan area</p>                 | <p>Welsh inshore region and Welsh offshore region</p>  |
| <p>Variation Application documents:</p> | <p>The following documents were submitted in support of the Variation Application;</p> <ul style="list-style-type: none"> <li>• ORML1938v1 - Application Form Clean submitted 19 September 2025</li> <li>• ORML1938v1 1. MOR-MM-DOC-0135 Morlais ES Addendum v1.0 submitted 10 October 2025</li> <li>• ORML1938v1 2. MOR-RHDHV-DOC-0004 ES Vol I Ch4 Project Description vF5.0 submitted 10 October 2025</li> <li>• ORML1938v1 3. MOR-MM-DOC-0136 ES Vol II Ch4 Figure 4-5_Restricted_areas_plan_v5 submitted 10 October 2025</li> <li>• ORML1938v1 4. MOR-SLR-DOC-0004 Addendum to ES Vol I Chapter 24 SLVIA submitted 10 October 2025</li> <li>• ORML1938v1 5. MOR-SLR-DOC-0005 Addendum to ES Vol II Chapter 24 SLVIA Appendix A submitted 10 October 2025</li> <li>• ORML1938v1 6. MOR-SLR-DOC-0006 Addendum to ES Vol II Chapter 24 SLVIA Appendix B submitted 10 October 2025</li> <li>• ORML1938v1 - MOR-RHDHV-DOC-0127b Morlais Variation PDE Matrix V2 submitted 10 October 2025</li> </ul> <p>NRW MLT requested further information from the applicant on the 17 December 2025. The following information was submitted on the 12 February 2026</p> <ul style="list-style-type: none"> <li>• ORML1938v1 Morlais Demonstration Zone Navigation Risk Assessment Issue03 MGN654 Annex 6 MGN checklist submitted 12 February 2026</li> </ul> |

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|  | <ul style="list-style-type: none"><li>• ORML1938v1 Morlais Demonstration Zone Navigation Risk Assessment Issue03 submitted 12 February 2026</li><li>• ORML1938v1 MMML Responses on NRA to NRW submitted 12 February 2026</li></ul> <p>On the 14 April 2026 the applicant submitted the following document in response to representation received to further information;</p> <ul style="list-style-type: none"><li>• ORML1938v1 Response Letter dated 14 April 2026</li></ul> |
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## **2 VARIATION APPLICATION PROCEDURE**

### **2.1 The Variation Application**

The Variation Application was accepted by NRW MLT and considered duly made on 13 October 2025. This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we needed to complete that determination, and the documents considered may therefore include documents provided after the Variation Application was first made.

### **2.2 Documents considered**

In reaching its decision, NRW MLT has considered the documents listed in section 1 of this decision document along with such other information provided by the applicant or received during any consultation, that NRW MLT considered relevant.

### **2.3 Commercial Confidentiality**

The applicant made no claim that any information forming part of the Variation Application was subject to commercial confidentiality and we have not received any information in relation to the Variation Application that appears to be commercially confidential.

### **2.4 Publicity and advertising**

In compliance with s. 68 of the Marine and Coastal Access Act 2009 (the 2009 Act) and regulation 16 of the Marine Works (Environmental Impact Assessment) Regulations 2007, public notice advertising the Project was placed in Holyhead, Anglesey and Bangor Mail on 22 and 29 October 2025 (the Public Notices) and a notice was published on NRW's website. The variation application documents were made available to the public at Llangefni Town Hall, Llangefni, LL77 7LR and they could also be requested from Natural Resources Wales Marine Licensing Team.

The public were given a period of 42 days from the date of the first Public Notice to provide comments on the application.

No public responses were received in response to the Public Notice.

Following the submission of further information received on the 12 February 2026 a further public notice was placed in Holyhead, Anglesey and Bangor Mail on 18 and 25 February 2026 (the Public Notices) and a notice was published on NRW's website. The variation application documents and further information were made available to the public at Llangefni Town Hall, Llangefni, LL77 7LR and they could also be requested from Natural Resources Wales Marine Licensing Team.

One Public Response was received.

All representations have been considered in coming to our decision. Details of our considerations can be found in section 5.

## **3 CONSULTATION**

### **3.1 Consultees**

NRW MLT considered it appropriate to consult the bodies listed in the table below on 22 October 2025, due to their particular expertise. These bodies were consulted for a period of 42 days. Those bodies

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have responded to the consultation an 'Y' can be found in the response received column, those who did not respond to consultation an 'N' can be found in the response received column:

| <b>Consultee</b>  | <b>Response received (Y/N)</b> | <b>Date(s) of receipt</b> |
|---|--------------------------------|---------------------------|
| The Crown Estate  | N                              |                           |
| NRW Advisory (A)  | Y                              | 20 November 2025          |
| Ministry of Defence - Safeguarding Defence                        | Y                              | 30 October 2025           |
| Maritime & Coastguard Agency (MCA)                                | Y                              | 21 November 2025          |
| Trinity House   | Y                              | 02 December 2025          |
| UK Hydrographic Office  | Y                              | 24 October 2025           |
| Royal Yachting Association  | Y                              | 11 December 2025          |
| Local Biodiversity Officer [Anglesey]                             | N                              |                           |
| Local Planning Authority [[Anglesey]                              | Y                              | 03 December 2025          |
| Local Harbour/Port Authority [Stenaline]                          | N                              |                           |
| Snowdonia National Park Authority                                 | N                              |                           |
| Royal Society for the Protection of Birds (RSPB)                  | N                              |                           |
| Welsh Government Marine Enforcement Officers                      | Y                              | 01 December 2025          |
| Welsh Archaeological Trust  | Y                              | 03 December 2025          |
| Royal Commission on the Ancient and Historical Monuments of Wales | Y                              | 03 November 2025          |
| Cadw  | Y                              | 26 November 2025          |
| Chamber of Shipping   | N                              |                           |
| NATS Safeguarding   | Y                              | 24 October 2025           |
| National Federation of Fishermen's Organisation                   | N                              |                           |
| Welsh Fishermens Association                                      | N                              |                           |
| Public Health Wales   | N                              |                           |

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|---|---|------------------|
| Department for Transport - wrecks                             | N |                  |
| Inshore Fisheries Conservation Authority (North West)         | Y | 28 November 2025 |
| PEDW  | N |                  |
| JNCC  | Y | 29 November 2025 |
| Department for Energy Security and Net Zero (decommissioning) | N |                  |

Consultees who did not provide a response were assumed to have no comments.

Following a submission of further information, received on the 12 February 2026, NRW MLT consulted the bodies listed in the table below on the 18 February 2026, due to their particular expertise in matters arising in relation to this application. These bodies were consulted for a period of 42 days. For those bodies that responded to the consultation an 'Y' can be found in the response received column, and those which did not respond to the consultation an 'N':

| <b>Consultee</b>                                 | <b>Response received (Y/N)</b> | <b>Date(s) of receipt</b> |
|--|--------------------------------|---------------------------|
| The Crown Estate                                 | N                              |                           |
| NRW Advisory (A)                                 | Y                              | 26 February 2026          |
| Ministry of Defence - Safeguarding Defence       | N                              |                           |
| Maritime & Coastguard Agency                     | Y                              | 05 March 2026             |
| Trinity House                                    | Y                              | 01 April 2026             |
| UK Hydrographic Office                           | N                              |                           |
| Royal Yachting Association                       | N                              |                           |
| Local Biodiversity Officer [Anglesey]            | N                              |                           |
| Local Planning Authority [[Anglesey]             | N                              |                           |
| Local Harbour/Port Authority [Stenaline]         | N                              |                           |
| Snowdonia National Park Authority                | N                              |                           |
| Royal Society for the Protection of Birds (RSPB) | N                              |                           |
| Welsh Government Marine Enforcement Officers     | Y                              | 24 February 2026          |

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|---|---|------------------|
| Welsh Archaeological Trust  | Y | 18 February 2026 |
| Royal Commission on the Ancient and Historical Monuments of Wales | Y | 11 March 2026    |
| Cadw  | N |                  |
| Chamber of Shipping   | Y | 20 February 2026 |
| NATS Safeguarding   | N |                  |
| National Federation of Fishermen's Organisation                   | N |                  |
| Welsh Fishermens Association                                      | N |                  |
| Public Health Wales   | Y | 19 February 2026 |
| Department for Transport - wrecks                                 | N |                  |
| Inshore Fisheries Conservation Authority (North West)             | N |                  |
| PEDW  | N |                  |
| JNCC  | Y | 31 March 2026    |
| Department for Energy Security and Net Zero (decommissioning)     | N |                  |

Consultees who did not provide a response were assumed to have no comments.

NRW MLT has had regard to all consultation responses received in making its decision. Where these have impacted on NRW MLT's decision making, this has been noted in the relevant paragraph in section 5 of this decision document.

#### **4 ENVIRONMENTAL IMPACT ASSESSMENT**

Council Directive 2011/92/EU (as amended) on the assessment of the effects of certain public and private projects on the environment ("the EIA Directive") aims to protect the environment and the quality of life by ensuring that projects which are likely to have significant environmental effects by virtue of their nature, size or location are subject to an EIA before permission is granted.

The Marine Works (Environmental Impact Assessment) Regulations 2007 ("the Regulations") transpose the EIA Directive in Wales and England for marine licence applications.

##### **4.1 Screening and Scoping**

The Variation Application was considered by NRW MLT to constitute an EIA development under the Regulations, and a Screening and Scoping Opinion (ref SC2502) was issued on 01 July 2025.

Pursuant to Regulation 8 of the Regulations, NRW MLT considered under SC2502 that the proposed works fell under Schedule A2 of the Regulations on the assessment of the effects of the project on the environment, specifically:

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- Schedule A2, paragraph 89 “Any change to or extension of development of a description listed in paragraphs 1 to 87 of this Schedule where that development is already authorised, executed or in the process of being executed.”

The Screening concluded the proposed variation seeks to make changes to the parameters of the Morlais Tidal Stream Demonstration Project and due to the scale of the Project and the changes being outside what was originally assessed NRW MLT considered that a statutory Environmental Impact Assessment was required.

### **4.2 EIA assessment**

Marine Licence ORML1938 issued 14 December 2021 was accompanied by an Environmental Statement (ES). NRW MLT assessed the Project as an EIA development under the Regulations and issued a Written Confirmation of the EIA Consent Decision (ORML1938 Written Confirmation of the EIA Consent Decision) on 14 December 2021. The Written Confirmation is available on the NRW public register ([ORML1938 Written Confirmation of the EIA Consent Decision](#)). NRW MLT is satisfied that the information incorporated in the EIA Consent Decision is up to date at the time of this decision.

To support the application for a variation the applicant provided an addendum to the Original ES.

NRW MLT have assessed the Variation Application as an EIA development under the Regulations.

In accordance with Regulation 24 of the Regulations, the following information is included in subsequent sections of this document:

- Conclusion of EIA assessment
- Any conditions, mitigating and monitoring measures described in the regulatory decision
- Description of features/measures to avoid, prevent, reduce and offset likely significant adverse effects on the environment
- The main reasons and considerations on which this regulatory decision is based
- A summary of the results of consultations undertaken and how these have been incorporated into this regulatory decision

### **4.3 Conclusion of the EIA assessment**

NRW MLT issued a Written Confirmation of the EIA Consent Decision in relation to the Variation Application, containing the conclusion about the environmental impacts arising from the project and the EIA Consent Decision. In reaching the conclusion, NRW MLT considered the following information:

- The application for a Variation to the Marine Licence
- The Environmental Statement Addendum submitted
- Any further information provided
- The responses to public consultation
- The responses to the technical consultation
- Any comments received from another EEA state
- Any features of the project, or proposed measures, to avoid, prevent, reduce or offset any likely significant adverse environmental effects

NRW MLT considered the likely significant effects of the project, and reached a conclusion on the likely significant effects of the project with regard to the following:

- Population and human health
- Biodiversity
- Land, soil, water, air and climate
- Material assets, cultural heritage and landscape
- Risk of major accidents and disasters relevant to the project
- Cumulative impacts and in-combination impacts

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A summary of the conclusion on the likely significant effects of the project is incorporated below. Full details of the conclusion on the likely significant effects of the project can be found in the Written Confirmation of the EIA Consent Decision.

### **4.3.1 Population and human health**

NRW MLT consider the conclusion detailed for the Project within *Written Confirmation of the EIA Consent Decision* dated 14 December 2021 for the existing Marine Licence ORML1938 remain applicable.

In relation to the proposed changes NRW MLT consider risk to navigational safety and human life have been considered as part of the Navigational Risk Assessment (NRA) and assessed as ALARP or lower with necessary risk controls and mitigation in place. This includes the requirement to update the site-wide NRA every 2 years and provide a device specific NRA prior to deployment.

As discussed in section 7 of the Written Confirmation the potential for a significant impact on visual receptors remains after mitigation. The Project promotes renewable energy growth and in so doing minimising climate change through allowing commercial demonstration of different technologies and arrays of tidal devices. In addition, a key objective of the Project is to support local economic growth including the potential for job creation.

NRW MLT consider that although impacts remain to visual receptors, there has been a clear and convincing case set forward for proceeding with the Project.

### **4.3.2 Biodiversity**

NRW MLT consider the conclusion detailed for the Project within *Written Confirmation of the EIA Consent Decision* dated 14 December 2021 for the existing Marine Licence ORML1938 remain applicable.

### **4.3.3 Land, soil, water, air and climate**

NRW MLT consider the conclusion detailed for the Project within *Written Confirmation of the EIA Consent Decision* dated 14 December 2021 for the existing Marine Licence ORML1938 remain applicable.

### **4.3.4 Material assets, cultural heritage and landscape**

NRW MLT consider the conclusion detailed for the Project within *Written Confirmation of the EIA Consent Decision* dated 14 December 2021 for the existing Marine Licence ORML1938 remain applicable.

### **4.3.5 Risk of major accidents and disasters relevant to the project**

NRW MLT consider the conclusion detailed for the Project within *Written Confirmation of the EIA Consent Decision* dated 14 December 2021 for the existing Marine Licence ORML1938 remain applicable.

### **4.3.6 Cumulative impacts and in-combination impacts**

NRW MLT consider the conclusion detailed for the Project within *Written Confirmation of the EIA Consent Decision* dated 14 December 2021 for the existing Marine Licence ORML1938 remain applicable.

## **4.4 EIA Consent Decision**

NRW MLT issued a Written Confirmation of the EIA Consent Decision associated with the Variation Application, containing the conclusion about environmental impacts arising from the Project and the EIA Consent Decision. NRW MLT concluded that the environmental impacts of the Project have been

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adequately identified, described and assessed. Accordingly, NRW MLT concluded a favourable determination and that EIA consent for the project should be given.

### **4.5 Mitigation and monitoring requirements**

NRW MLT considered that mitigation and monitoring already secured to Marine Licence ORML1938 remain applicable.

The Written Confirmation of the EIA Consent Decision associated with the Variation Application made reference to specific measure relevant to the proposed variation namely;

- Given that the full details of the devices and deployment location are currently unknown, licence conditions will be required to ensure a Device Deployment Protocol (DDP) is submitted to NRW MLT prior to construction of any tidal devices or operational hubs. The DDP will include details on the number, dimensions, depth and location of specific device types, as well as the construction methodology, and considerations on seascape include cumulative effects and measures to minimise seascape impacts.
- Licence conditions will be required to ensure that the site-wide NRA is updated every two years to acknowledge relevant emerging data and consider in-combination effects with the already deployed devices.
- Licence conditions will be required to ensure that a tidal device or array specific NRA is submitted to the Licensing Authority for approval prior to each phase of deployment.

NRW MLT has considered these requirements in making this regulatory decision, and note that the mitigation above has already secured through the existing Marine Licence and remain applicable.

### **4.6 Consideration of consultations undertaken**

The consultation process described in section 2.4 and section 3 of this document was undertaken to ensure comment was received from appropriate parties.

### **4.7 Description of features/measures to avoid, prevent, reduce and offset likely significant adverse effects on the environment**

NRW MLT consider the features/measures to avoid, prevent, reduce and offset likely significant adverse effects on the environment detailed for the Project within Written Confirmation of the EIA Consent Decision dated 14 December 2021. Of specific relevance to the proposed Variation Application are;

- A specific seascape, landscape and visual impact assessment will be carried out for each deployment of tidal energy devices as part of the DDP. Such a requirement ensures continual review and monitoring of the development effects with a continual consideration of cumulative effects to inform any additional mitigation.
- A deployment (array) specific NRA will be carried out by the developer of each array in accordance with MGN 654 and to seek agreement from NRW MLT (in consultation with relevant organisations) so that the project risk is deemed to be As Low As Reasonably Practicable (ALARP).
- In addition, as part of the proposed changes to the Project commitment was made that SESM devices up to 18 meters in height would be restricted to an area of the MDZ furthest offshore.

### **4.8 Main reasons for this regulatory decision**

The main reasons for the regulatory decision made are described in section 5 of this decision document.

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The conclusion of this regulatory decision is stated in section 6 of this decision document.

### **5 BASIS FOR OUR DECISION**

In determining this application, including the terms on which it was granted, and the conditions attached to it, NRW MLT has had regard to the factors set out in section 5 below in accordance with the 2009 Act.

Under the 2009 Act NRW MLT is required to have regard to the following:

- the need to protect the environment (see sub-section 5.1);
- the need to protect human health (see sub-section 5.2);
- the need to prevent interference with legitimate uses of the sea (see sub-section 5.3);
- in the case of an application for a licence to authorise construction, alteration or improvement of works within the UK marine licensing area, the effects of any use intended to be made of the works in question when constructed, altered or improved (considered, if relevant in sub-sections 5.1 to 5.5 below);
- any representations which it has received from any person having an interest in the outcome of the Variation Application (summarised in section 3 and where relevant considered in sub-sections 5.1 to 5.5 below); and
- such other matters as it thinks relevant (see sub-section 5.5 below).

#### **5.1 The need to protect the environment:**

The reference to the “environment” includes the local and global environment; the natural environment; and, by virtue of section 115(2) of the 2009 Act, any site of historic or archaeological interest. The natural environment may include the physical, chemical and biological state of the sea, the sea-bed and the sea-shore, and the ecosystems within it, or those that are directly or indirectly affected by an activity, whether within the marine licensing area or otherwise.

In considering the need to protect the environment we have considered the relevant environmental legislation set out below.

##### **5.1.1 Water Framework Directive, Groundwater Directive and Water Environment Regulations**

###### **(a) The legal framework**

The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (**Water Environment Regulations**) implement the requirements of the Water Framework Directive (**WFD**) (Directive 2000/60/EC) which requires consideration as to whether that proposals for development may cause deterioration or prevent a water body from achieving ‘good status’. Proposals likely to cause deterioration or prevent a waterbody from achieving good status should be rejected, unless derogation procedures have been applied.

Under the Water Environment Regulations, NRW must exercise its relevant functions to ensure compliance with the requirements of the WFD, the Environmental Quality Standards Directive (Directive 2008/105/EC) and the Groundwater Directive (Directive 2006/118/EEC).

**(b) Factors relevant to our determination**

NRW MLT has considered the potential effect of the Proposed Activities on the following WFD waterbodies:

- Caernarfon Bay North – Coastal
- Holyhead Strait - Coastal
- Holyhead Bay – Coastal
- Ynys Mon Secondary – Ground water

A Water Framework Directive Compliance Assessment has been undertaken for the Proposed Activities and taken into account in this decision. This assessment concluded that the proposal, when considered alone and in-combination, will not pose a risk to deterioration of the above listed waterbodies.

Further details are described within the Water Framework Directive Compliance Assessment.

**5.1.2 Biodiversity and resilience of ecosystems duty**

**(a) The legal framework**

Section 6 of the **Environment Wales Act 2016** requires that we seek to maintain and enhance biodiversity in the exercise of our functions, and in so doing promote the resilience of ecosystems, in a manner that is consistent with the proper exercise of our functions.

**(b) Factors relevant to our determination**

NRW MLT consider that the Variation Application does not introduce any changes to the potential impacts on biodiversity considered as part of the determination of the existing Marine Licence and as detailed within the Decision Document dated 14 December 2021. An updated section 7 list of species and habitats of principal importance in Wales was published on the 20 March 2026. NRW MLT consider that the Licence Holder as part of their existing Licence are required to carry out pre-construction surveys in order to determine the location, sensitivity and abundance of Annex I habitats, OSPAR and Section 7 habitats in the vicinity of the deployment area or export cable corridor. If sensitive habitat is identified the Licence Holder will need to consider the need to micro-site infrastructure to minimise impact on these habitats. Where it is not possible to avoid damage or loss via micro-siting, biodiversity enhancement measures would be presented. This was secured through condition 3.40 of the existing Marine Licence.

NRW MLT consider that the conclusion of this decision remain applicable, and that through the same measures the Licence Holder can show consideration of the updated section 7 list.

NRW MLT are satisfied that we have taken into account and had due regard to this duty in so far as it is consistent with the function of determining an application for a Marine Licence under the Marine and Coastal Access Act 2009.

**5.1.3 European Protected Sites and Ramsar Sites**

**(a) The legal framework**

European sites are those designated under the Conservation of Habitats and Species Regulations 2017 (**Habitats Regulations 2017**) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (**Offshore Habitats Regulations 2017**) as Special Protection Areas (SPAs) and Special Areas of Conservation (SACs).

The Habitats Regulations 2017 and the Offshore Habitats Regulations 2017 require that any project that is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects) must be subject to an appropriate assessment.

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NRW MLT undertakes a Habitats Regulation Assessment (HRA) to establish whether an appropriate assessment is required.

In addition NRW MLT must exercise its functions under the 2009 Act so as to secure compliance with the requirements of the relevant European Directives. NRW also has a duty under the Habitats Regulations 2017 to support wild birds by protecting habitats and avoiding pollution.

A Ramsar site is a wetland which has been designated under the Ramsar Convention. The Ramsar Convention does not place specific legal requirements on its parties (though Ramsar sites are often SSSIs or SPAs, considered below), however Ramsar status is considered by NRW as matter of policy in its decision making.

### **(b) Factors relevant to our determination**

The Project is located within and overlaps with the following European Protected Site.

- Anglesey Terns SPA
- Holy Island Coast SAC
- Holy Island Coast SPA
- North Anglesey Marine SAC

Within the HRA a likely significant effect (LSE) from the proposed activities seaward of MHWS could not be ruled out on the following sites with marine features:

- Afon Gwyrfa i Llyn Cwellyn SAC
- Bristol Channel Approaches
- Cardigan Bay/ Bae Ceredigion SAC
- Llyn Peninsula and the Sarnau SAC
- North Anglesey Marine SAC
- North Channel SAC
- Pembrokeshire Marine/ Sir Benfro Forol SAC
- The Maidens SAC
- West Wales Marine SAC
- Aberdaron Coast and Bardsey Island SPA
- Ailsa Craig SPA
- Anglesey Terns SPA
- Copeland Islands SPA
- Grassholm SPA
- Irish Sea Front SPA
- Morecambe Bay and Duddon Estuary SPA
- Morecambe Bay Ramsar
- Ribble and Alt Estuaries SPA
- Ribble and Alt Estuaries Ramsar
- Skomer, Skokholm and the Seas off Pembrokeshire SPA
- Lambay Island SAC
- Lambay Island SPA
- Howth Head Coast SPA
- Ireland's Eye SPA
- Rockabill to Dalkey Island SAC
- Saltee Islands SAC
- Saltee Islands SPA

Following application of mitigation measures, including the commitment to a detailed Environmental Mitigation and Monitoring Plan (dEMMP), incorporating the backstop mitigation of device operation cessation if needed, it was concluded that the proposal activities would not lead to an Adverse Effect On Site Integrity, either alone or in-combination, on any marine features of designated sites. This mitigation remained appropriate for the proposed changes to the Project applied for as part of this Variation Application.

Further details are described within the Habitats Regulations Assessment.

#### **5.1.4 European Protected Species**

##### **(a) The legal framework**

The Habitats Regulations 2017 and the Offshore Habitats Regulations 2017 also confer protection on certain designated species (European Protected Species). A licence (EPS licence) must be obtained in order, whether deliberately or accidentally, to capture, kill, disturb or injure such a species, damage or destroy their breeding or resting places or obstruct access to their resting or sheltering places.

##### **(b) Factors relevant to our determination**

NRW MLT consider that the Variation Application does not introduce any changes to the potential impacts on European Protected Species than those considered as part of the determination of the existing Marine Licence and as detailed within the Decision Document dated 14 December 2021. NRW MLT consider that the conclusion of this decision remain applicable.

NRW MLT has taken into account the requirements for issuing an EPS licence in making this decision and is satisfied on the basis of the information it has considered that it is not unlikely that an EPS licence would be granted for the Project

Any determination made as part of this decision are without prejudice to the consideration NRW is required to give an EPS licence application as the body with a statutory responsibility for its determination and do not constrain or bind NRW in exercising this function. Should an application for an EPS licence in relation to the Project be made it will be determined by NRW based on all the relevant information available to NRW at that time.

#### **5.1.5 Marine Conservation Zones**

##### **(a) The legal framework**

Marine Conservation Zones (MCZ) were established under the 2009 Act to protect nationally important, rare or threatened habitats and species. The only currently designated MCZ in Wales is Skomer.

Under the 2009 Act, NRW MLT must exercise its functions in the manner which it considers best furthers the conservation objectives stated for any MCZ or, where that is not possible, in the manner which it considers least hinders the achievement of those objectives.

##### **(b) Factors relevant to our determination**

NRW MLT is satisfied that there is no significant risk on the Skomer Marine Conservation Zone (MCZ) due to the distance between the proposed activities and the MCZ.

#### **5.1.6 Sites of Special Scientific Interest (SSSIs)**

##### **(a) The legal framework**

Sites of Special Scientific Interest are designated under the Wildlife and Countryside Act 1981 (**1981 Act**) and protected by law to conserve their wildlife or geology. NRW must take reasonable steps, consistent with the proper exercise of its functions, to further the conservation and enhancement of the

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flora, fauna or geological or physiographical features by reason of which an SSSI is of special scientific interest.

### **(b) Factors relevant to our determination**

NRW MLT consider that the Variation Application does not introduce any changes to the potential impacts on SSSI than those considered as part of the determination of the existing Marine Licence and as detailed within the Decision Document dated 14 December 2021. NRW MLT consider that the conclusion of this decision remain application.

NRW MLT is satisfied that the Proposed Activities are not likely to damage a SSSI when undertaken in accordance with Marine Licence ORML1938.

### **5.1.7 The Waste (England and Wales) Regulations 2011**

#### **(a) The legal framework**

The Waste (England and Wales) Regulations 2011 (as amended) establish a legal framework for treating waste. This is designed to protect the environment and human health by emphasising the importance of proper waste management, recovery and recycling techniques to reduce pressure on resources and improve their use. Waste generated by a project or activity must in general terms be dealt with in an environmentally friendly way. To achieve this the Regulations describe a waste hierarchy which gives an order of preference for how waste is dealt with (prevention, re-use, recovery for other purposes such as energy, and finally disposal).

#### **(b) Factors relevant to our determination**

NRW MLT consider the conclusion detailed for the Project within Decision Document dated 14 December 2021 for the existing Marine Licence remain applicable. NRW MLT is satisfied that the Proposed Activities meet the requirements of The Waste (England and Wales) Regulations 2011.

### **5.1.8 Other matters in considered relevant to the need to protect the environment**

NRW MLT consider the conclusion detailed for the Project within Decision Document dated 14 December 2021 for the existing Marine Licence remain applicable.

NRW MLT has had regard to a number of issues raised by consultees in the relation to the Variation Application within the EIA Consent Decision. These include;

#### Seascape and Landscape and Visual Impact

The Variation Application included increasing the permissible device height above Lowest Astronomical Tide (LAT) to 18m compared to 6.5m above surface level, with this change restricted to a geographic area described in the new Figure 4-5 submitted with this application as the Green Hatched Restricted Area.

The applicant submitted an Addendum to *Chapter 24 Seascape, Landscape and Visual Impact Assessment* submitted 10 October 2025 in order to assess the proposed increase in device height. The assessment concluded that the proposed change did not increase the magnitude of landscape or visual effects previously identified as significant as part of the 2019 Environmental Statement.

NRW A in representation dated 23 October 2025 and Isle of Anglesey County Council (IACC) in representation dated 3 December 2025, confirmed that they considered the proposed change would lead to impact at a broadly similar level to what had been previously assessed and consented as part of the existing Marine Licence. NRW A welcomed the commitment by the developer to restrict

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deployment of the SESM devices to a location far as possible offshore within the MDZ. Both NRW A and IACC did note the potential for greater incoherence across the array through the inclusion of a differing device type and height, however were satisfied that this could be mitigated through the existing mechanism of a DDP. The DDP of the existing Licence requires that device specific SLVIA consideration is given prior to deployment which would include an assessment of cumulative impacts. NRW A and IACC note this should include consideration of appropriate colour to reduce impact while also maintaining navigation safety.

NRW MLT are satisfied that Seascape, Landscape and Visual Impact has been appropriately assessed. NRW MLT consider that in line with Policy SOC\_07 of the Welsh National Marine Plan (WNMP), the applicant has taken into account the potential impact on seascape, landscape and visual receptors within the ES and relevant supporting documentation. NRW MLT considers that the applicant has sought to avoid and minimise impacts where possible, including through restricting deployment of the SESM devices to an area of the MDZ furthest offshore and commitment to a DDP. NRW MLT consider it appropriate to secured the restricted zone and the DDP to the Marine Licence.

NRW MLT note that the potential for a significant impact on visual receptors remains after mitigation. The WNMP recognises that changes of the seascape character of the Welsh coastline are inevitable due to the prominence of further marine renewable infrastructure. EL\_03 details that proposal for offshore tidal stream generation will be supported where they contribute to the objectives of the WNMP, and comply with the relevant general policies and sector safeguarding policies. Policies ECON\_01 and 02 of the WNMP support proposals for economically sustainable activities identifying the renewable sector as a potential significant contributor. The Project promotes renewable energy growth and in so doing minimising climate change through allowing commercial demonstration of different technologies and arrays of tidal devices. In addition, a key objective of the project is to support local economic growth including the potential for job creation. NRW MLT consider that although impacts remain, there has been a clear and convincing case set forward for proceeding with the Project.

### **5.1.9 Conclusion of our considerations under the need to protect the Environment**

Having considered the need to protect the environment, NRW MLT does not consider that any impacts of the Project on the environment (either alone or in combination with other plans or projects) are sufficient on their own to justify refusal of the Variation Application provided that the Proposed Activities are implemented in accordance with the conditions of the Marine Licence.

### **5.2 The need to protect human health**

NRW MLT consider that the Variation Application does not introduce any changes to the potential impacts on human health considered as part of the determination of the existing Marine Licence and as detailed within the Decision Document dated 14 December 2021. NRW MLT consider that the conclusion of this decision remain application.

#### **5.2.1 Conclusion of our considerations under the need to protect human health**

**IN SUMMARY**, having considered the need to protect human health, NRW MLT does not consider that any impacts of the Project (either alone or in combination with other plans or projects) are sufficient on their own to justify refusal of the Variation Application provided that the Proposed Activities are implemented in accordance with the conditions of the Marine Licence.

### **5.3 The need to prevent interference with legitimate uses of the sea**

Legitimate uses of the sea include (but are not limited to): navigation (including taking any steps for the purpose of navigational safety); fishing; mineral extraction; and amenity use.

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NRW MLT consider the conclusion detailed for the Project within Decision Document dated 14 December 2021 for the existing Marine Licence ORML1938 remain applicable.

NRW MLT has had regard to a number of issues raised by consultees in the relation to Variation Application within the EIA Consent Decision. These include;

### Shipping and Navigation

The MCA raised concerns that the NRA had not been updated to include the assessment of the new device type proposed as part of the change to the Project.

To address this concern the applicant submitted an updated NRA on the 12 February 2026. The applicant had looked to amend the NRA submitted as part of the determination of existing Licence to include the proposed changes to the parameters. The assessment overall concluded that there was no change to the risk identified as a result of the inclusion the SESM devices, and that the navigation risk can be managed to a level which is acceptable or tolerable. The NRA highlights that a device specific NRA will be submitted for approval prior to any deployment which will include consideration of any device specific risk and mitigation requirements.

The applicant acknowledged within *Navigation Risk Assessment Issue03 MGN 654 Annex 6 MGN Checklist* that the vessel traffic survey data used in the updated NRA had not been updated since the original assessment and therefore falls outside the required standard, namely data collected within the previous 24 months. However commitment has been made to collect further data in 2026 and submit an updated site-wide NRA in line with conditions of the existing Marine Licence which requires a site-wide NRA to be submitted prior to any Licensed Activities and every 2 years thereafter.

The MCA confirmed that the further information submission addressed concerns made surrounding the proposed changes to the Project. MCA agreed that a new site-wide NRA should be completed with the collection of new traffic data, however for the purpose of the variation application were content that the proposed changes had been appropriately assessed.

The UK Hydrographic Office, Trinity House and Royal Yachting Association confirmed they had no objection to the proposal.

Paddle Cymru raised a number of concerns in respect of the NRA within representation dated 26 March 2026, these included;

- Concerns surrounding the methodology used within the NRA.
- Request that search and rescue incidents that have occurred were included in the NRA
- Requested further detail included in the NRA surrounding signage and marking commitments
- Further commitment that all reasonable practical measures including design, and proximity to shore of offshore infrastructure should be considered to minimise risk to vessels
- Inclusion of requirement for early engagement of turbine developers to ensure devices are designed in a manner to minimise snagging hazards

Paddle Cymru welcomed a number of commitments including the promulgation of information to local users.

In relation to the proposed changes to the Project, Paddle Cymru confirmed they had no objection to the changes in height of devices in the restricted area, welcoming that surface emerging devices with a height up to 18 meters would be restricted to an area of MDZ furthest offshore which would reduce the allision risk with unpowered vessels. Paddle Cymru were satisfied that any specific safety assessment and mitigation requirements could be resolved as part of a device specific NRA.

On the 14 April 2026 the applicant provided comment on representation received on the further information, this included confirmation of commitment to undertake further data collection to inform a new site wide NRA. The applicant has also confirmed that they intend to engage with local users, MCA, Trinity House, RNLI and water sport bodies including Paddle Cymru and Anglesey Sea Kayak Alliance as it produces further NRAs.

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NRW MLT acknowledge that a number of concerns raised by Paddle Cymru related to the site-wide NRA. As recognised by Paddle Cymru a number of these concerns surrounding the assessment methodology were raised during the determination of Marine Licence ORML1938 in 2021. The *Written Confirmation of the EIA Consent Decision* dated 2021 concluded that that the NRA met the methodology guidance and that all the data that fed into the NRA was reasonable, noting the applicants commitment to update a whole site NRA every 2 years as well as producing a device specific NRA for each deployment which will consider the specific parameters of the each device and proposed location.

NRW MLT recognise the data used in the in the NRA to support the variation application has not been updated since the original assessment therefore fall outside the standard requirements for data which has been collected in the previous 24 months. However there remains a requirement within the existing Marine Licence (condition 3.36.2) that a site wide NRA is submitted for approval prior to the commencement of Licensed Activities and every 2 years thereafter. Therefore NRW MLT are satisfied that an updated site wide NRA will need to be submitted in line with the most recent guidance and using up to date data. NRW MLT would encourage the applicant to discuss appropriate available data sources with stakeholders and marine users.

NRW MLT acknowledge that Paddle Cymru requested further details surrounding signage, lighting, notices within the NRA, as well as further commitment to consider location and design of devices deployment to ensure risk is minimised as far as reasonably possible. NRW MLT are satisfied that the exact details of mitigation measures required for specific devices can be appropriately controlled through the provision of a device specific NRA which is secured through the existing Marine Licence (condition 3.36.4). NRW MLT recognise that as a tidal demonstration zone that device design can be a matter for the technology developer, however NRW MLT are satisfied that through the requirement for a device specific NRA that appropriate consideration will be given surrounding navigation risk.

### 5.3.1 Conclusion of our considerations regarding the need to prevent interference with legitimate uses of the sea

**IN SUMMARY**, having considered the need to protect interference with legitimate uses of the sea, NRW MLT does not consider that any impacts of the Project (either alone or in combination with other plans or projects) are sufficient on their own to justify refusal of the Variation Application provided that the Proposed Activities are implemented in accordance with the conditions of the Marine Licence.

## **5.4 Marine Policy Documents**

### **(a) The Legal framework**

NRW MLT is required to take its decision in accordance with the appropriate marine policy documents unless relevant considerations indicate otherwise.

#### **UK Marine Policy Statement 2011 (MPS)**

The MPS is the framework for preparing Marine Plans and taking decisions affecting the marine environment.

#### **Welsh National Marine Plan (WNMP)**

The WNMP is the Marine Plan for the Welsh inshore region and the Welsh offshore region and sets out the Welsh Government's policies for and in connection with the sustainable development of this area.

### **(b) Our determination**

#### **UK Marine Policy Statement 2011**

This decision has been taken in accordance with marine policy as set out in the UK Marine Policy Statement 2011.

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## **Welsh National Marine Plan (WNMP)**

As detailed in section 5.1.8 NRW MLT consider that in line with Policy SOC\_07 of the WNMP, the applicant has taken into account the potential impact on seascape, landscape and visual receptors within the ES and relevant supporting documentation. NRW MLT considers that the applicant has sought to avoid and minimise impacts where possible, including through restricting deployment of the SESM devices to an area of the MDZ furthest offshore and commitment to a DDP. NRW MLT consider it appropriate to secured the restricted zone and the DDP to the Marine Licence.

NRW MLT note that the potential for a significant impact on visual receptors remains after mitigation. The WNMP recognises that changes of the seascape character of the Welsh coastline are inevitable due to the prominence of further marine renewable infrastructure. EL\_03 details that proposal for offshore tidal stream generation will be supported where they contribute to the objectives of the WNMP, and comply with the relevant general policies and sector safeguarding policies. Policies ECON\_01 and 02 of the WNMP support proposals for economically sustainable activities identifying the renewable sector as a potential significant contributor. The Project promotes renewable energy growth and in so doing minimising climate change through allowing commercial demonstration of different technologies and arrays of tidal devices. In addition, a key objective of the project is to support local economic growth including the potential for job creation. NRW MLT consider that although impacts remain, there has been a clear and convincing case set forward for proceeding with the Project.

### **5.5 Other matters NRW thinks relevant**

#### **5.5.1 Well-being of Future Generations (Wales) Act 2015**

##### **(a) The legal framework**

In making its decision, NRW is required to take all reasonable steps to meet its published well-being objectives, which are designed to maximise NRW's contribution to achieving each of the well-being goals set out in the Well-being of Future Generations (Wales) Act 2015. NRW must also act in accordance with the principles of sustainable development.

##### **(b) Our determination**

NRW MLT has taken into account its well-being objectives and is satisfied that its decision is consistent with meeting those objectives.

NRW MLT is also satisfied that its decision is consistent with the sustainable development principle i.e. seeking to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

#### **5.5.2 Sustainable management of natural resources**

##### **(a) The legal framework**

NRW's general purpose is to pursue the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources as set out in section 4 of the Environment (Wales) Act 2016 so far as consistent with the proper exercise of its functions.

##### **(b) Our determination**

NRW MLT is satisfied that this decision, when implemented in accordance with the attached conditions, is consistent with its general purpose of pursuing the sustainable management of natural resources in relation to Wales, and applying the principles of sustainable management of natural resources.


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## **6 Conclusions and Recommendations**

Based on all the information available, and having regard to all relevant considerations including consultation responses, NRW MLT's decision is to grant the variation to the Existing Marine Licence sought by the Variation Application. We have reached this decision having had regard to the relevant legal framework outlined in section 5 and have also explained in section 5 how each of the legal requirements have been considered. NRW MLT has determined that a Marine Licence for the Proposed Activities should be granted.

Changes made to the Marine Licence have been set out in in Annex 1.

### **AUTHORISATION**

|   |                               |  |
|---|-------------------------------|--|
| <b>Report by: Peter Morrison</b><br><br><b>Position:</b> Lead Specialist Officer      | <b>Date:</b> 27 April 2026    | <b>Signed:</b> <i>Peter Morrison</i>   |
| <b>Authorised by: Emmer Litt</b><br><br><b>Position:</b> Marine Licensing Team Leader | <b>Date:</b><br>27 April 2026 | <b>Signed:</b><br> |

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### ANNEX 1 Changes to the marine licence

1. Reference to document *MOR-RHDHV-DOC-0004 ES Vol I Ch4 Project Description* has been updated to *ORML1938v1 MOR-RHDHV-DOC-0004 ES Vol I Ch4 Project Description vF5.0*
2. Table 7 has been included which details the co-ordinates bounding the area where SESM devices may be deployed. Table 7 has also been added to Appendix 6 to reflect the changes in Degrees Minutes Seconds. Subsequent table numbers have been updated accordingly.
3. Correction has been made in Table 1 to ensure that reference to the Environmental Mitigation and Monitoring Plan Condition is correctly referred to as condition 3.38.
4. Table 6 has been amended to denote the area of floating, surface emergent and submerged tidal (non SESM) devices
5. Table 7 has been added to denote the area of floating, surface emergent and submerged tidal devices, including surface emergent seabed mounted devices (SESM).
6. The document list of approved documents has been updated to comprehensively include the documents supporting the determination of licence ORML1938 in addition to those submitted as part of the Variation application. These have been added in Appendix 7.

| Document Title  | Comments          |
|---|-------------------|
| ORML1938 ML Application Cover Letter  | 17 September 2019 |
| ORML1938 Morlais Tidal Array - Scoping Opinion                                | 17 September 2019 |
| ORML1938 Consultation Report  | 17 September 2019 |
| ORML1938 Environmental Statement Volume II – Figures                          | 17 September 2019 |
| ORML1938 ES Volume III – Appendices   | 17 September 2019 |
| ORML1938 HRA Information to Support Habitats Regulations                      | 17 September 2019 |
| ORML1938 Non-Technical Summary  | 17 September 2019 |
| ORML1938 Crynodeb Annhechnegol Non-Technical Summary: Welsh Version           | 17 September 2019 |
| ORML1938 Statements of Common Ground (SoCG) Record Ornithology                | 17 September 2019 |
| ORML1938 Statements of Common Ground (SoCG) Record Marine Mammals             | 17 September 2019 |
| ORML1938 Statements of Common Ground (SoCG) Record SLVIA                      | 17 September 2019 |
| ORML1938 Outline Construction Environment Management Plan (CEMP)              | 17 September 2019 |
| ORML1938 Outline Landscape Management Plan (LMP)                              | 17 September 2019 |
| ORML1938 Outline Invasive Non-Native Species Management Plan (ISMP)           | 17 September 2019 |
| ORML1938 Outline Code of Construction Practice (CoCP)                         | 17 September 2019 |
| ORML1938 Outline Pollution Prevention and Management Plan (PPMP)              | 17 September 2019 |
| ORML1938 Design and Access Statement  | 17 September 2019 |
| ORML1938 Application for Deemed Planning Permission                           | 17 September 2019 |
| ORML1938 Planning Statement   | 17 September 2019 |
| ORML1938 Site Location Plan   | 17 September 2019 |
| ORML1938 Indicative Site Plan – Landfall Substation                           | 17 September 2019 |
| ORML1938 Indicative Site Plan – Switchgear Building                           | 17 September 2019 |
| ORML1938 Indicative Site Plan – Grid Substation                               | 17 September 2019 |
| ORML1938 Existing Site Plan – Landfall Substation                             | 17 September 2019 |
| ORML1938 Morlais Environmental Statement Volume I 071119                      | 07 November 2019  |
| ORML1938 Marine Licence Application Form v3                                   | 25 November 2019  |
| ORML1938 Morlais Assessment of Interactive Boundaries 20UK1619 RN MM VTS02-02 | 08 July 2020      |

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|   |               |
|---|---------------|
| ORML1938 Covering Letter MOR-MM-DOC-0064  | 03 July 2020  |
| ORML1938 Signposting Response to Letter 05/06/20 MOR-RHDHV-DOC-0130                                       | 03 July 2020  |
| ORML1938 Non-Technical Summary and ES Chapter 27 Summary Addendum MOR-RHDHV-DOC-0131                      | 03 July 2020  |
| ORML1938 Fish Ecology Issues Responses to NRW comments (Revised) MOR-RHDHV-DOC-0114 (02)                  | 03 July 2020  |
| ORML1938 Additional Fish Ecology Responses to NRW comments MOR-RHDHV-DOC-0132                             | 03 July 2020  |
| ORML1938 CIA Matrix (Revised) MOR-RHDHV-DOC-0125 (03)   | 03 July 2020  |
| ORML1938 Addendum to the CIA Chapter MOR-RHDHV-DOC-0133   | 03 July 2020  |
| ORML1938 CIA Signposting Document MOR-RHDHV-DOC-0134  | 03 July 2020  |
| ORML1938 Cliff Habitat Survey Report MOR-BSG-DOC-0001   | 03 July 2020  |
| ORML1938 Cliff Habitat Design Refinement Note MOR-RHDHV-DOC-0135  | 03 July 2020  |
| ORML1938 NRA Clarification Note MOR-RHDHV-DOC-0136  | 03 July 2020  |
| ORML1938 Navigation Risk Assessment 18UK1479-RN-MM-NRA-20_03  | 28 May 2020   |
| ORML1938 Cover letter response to ORML1938 Request for Further Information 160420 MOR/MM/DOC/0010         | 22 May 2020   |
| ORML1938 Response and signposting to ORML1938 Request for Further Information 160420 MOR/MM/DOC/0011      | 22 May 2020   |
| ORML1938 Signposting for responses to ORML1938_all public representations 210120 MOR/RHDHV/DOC/0135       | 22 May 2020   |
| ORML1938 Further consultation summary MOR/MM/DOC/0012   | 22 May 2020   |
| ORML1938 PDE Matrix Spreadsheet (Including Phase 1 parameters) MOR-RHDHV-DOC-0127                         | 22 May 2020   |
| ORML1938 WNMP update MOR/RHDHV/DOC/0128 (02)  | 22 May 2020   |
| ORML1938 Response to Chough comments F2.0 PUBLIC MOR-RHDHV-DOC-0120                                       | 22 May 2020   |
| ORML1938 Response to Chough comments MOR-RHDHV-DOC-0120 CONFIDENTIAL Figures F1.0                         | 22 May 2020   |
| ORML1938 Partrac hydrographic and geophysical report Vol 1 Operation Report MOR/RHDHV/DOC/0137            | 22 May 2020   |
| ORML1938 Vol 2 Survey Report MOR/RHDHV/DOC/0139   | 22 May 2020   |
| ORML1938 ISOPACHYTHE MOR/RHDHV/DOC/0140   | 22 May 2020   |
| ORML1938 BATHYMETRY MOR/RHDHV/DOC/0141  | 22 May 2020   |
| ORML1938 SSS Mosaic MOR/RHDHV/DOC/0142  | 22 May 2020   |
| ORML1938 Wave model worst case clarification note MOR/RHDHV/DOC/0143                                      | 22 May 2020   |
| ORML1938 Figure 15-14 GIS kayaking routes and illustrating operational exclusion zones MOR/RHDHV/DOC/0144 | 22 May 2020   |
| ORML1938 Project Additional Environmental Information updated MOR/RHDHV/DOC/0107                          | 02 April 2020 |
| ORML1938 Cover letter   | 27 March 2020 |
| ORML1938 Traffic Clarification Note MOR/RHDHV/DOC/0109  | 27 March 2020 |
| ORML1938 HR Wallingford Coastal processes modelling report MOR/HRW/DOC/0001                               | 27 March 2020 |
| ORML1938 Metocean and Physical Processes Numerical Modelling Supplementary Note MOR/RHDHV/DOC/0112        | 27 March 2020 |
| ORML1938 Metocean and Physical Processes ES Supplementary Note MOR/RHDHV/DOC/0111                         | 27 March 2020 |
| ORML1938 Water Framework Directive Compliance Assessment MOR/RHDHV/DOC/0126a                              | 27 March 2020 |
| ORML1938 ES Volume II WFD Figures MOR/RHDHV/DOC/0126b   | 27 March 2020 |
| ORML1938 Benthic and Intertidal Ecology Issues Responses to NRW comments MOR/RHDHV/DOC/0113               | 27 March 2020 |

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|   |                  |
|---|------------------|
| ORML1938 Marine Ornithology Collision Risk Modelling MOR/RHDHV/DOC/0115                         | 27 March 2020    |
| ORML1938 Underwater Noise Modelling Report MOR/RHDHV/DOC/0116                                   | 27 March 2020    |
| ORML1938 Marine Mammals Underwater Noise Modelling Note MOR/RHDHV/DOC/0117                      | 27 March 2020    |
| ORML1938 Marine Mammals Addition Collision Risk Modelling MOR/RHDHV/DOC/0118                    | 27 March 2020    |
| ORML1938 Marine Mammals Monitoring and Mitigation Options MOR/RHDHV/DOC/0119                    | 27 March 2020    |
| ORML1938 Navigation and Shipping Responses MOR/RHDHV/DOC/0124                                   | 27 March 2020    |
| ORML1938 Supplementary Tourism and Recreation Assessment MOR/BAU/DOC/0001                       | 27 March 2020    |
| ORML1938 Supplementary Socio-economics Assessment MOR/BAU/DOC/0002                              | 27 March 2020    |
| ORML1938 Outline Skills and Training Action Plan MOR/MM/DOC/0008                                | 27 March 2020    |
| ORML1938 Outline Tourism and Recreation Monitoring Strategy MOR/MM/DOC/0009                     | 27 March 2020    |
| ORML1938 Onshore Archaeology Settings Assessment for Offshore Infrastructure MOR/RHDHV/DOC/0125 | 27 March 2020    |
| ORML1938 Onshore Archaeology Supplementary Note MOR/RHDHV/DOC/0122                              | 27 March 2020    |
| ORML1938 Terrestrial Ecology Assessment Update MOR/RHDHV/DOC/0110                               | 27 March 2020    |
| ORML1938 Terrestrial Archaeology & Walkover Survey Text MOR/WES/DOC/0001 (1)                    | 27 March 2020    |
| ORML1938 Terrestrial Archaeology & Walkover Survey Figures MOR/WES/DOC/0001 (2)                 | 27 March 2020    |
| ORML1938 Terrestrial Archaeology & Walkover Survey Plates MOR/WES/DOC/0001 (3)                  | 27 March 2020    |
| ORML1938 Seascape Landscape and Visual Impact Assessment response MOR/SLR/DOC/0002              | 27 March 2020    |
| ORML1938 Outline Landscape Management Plan MOR/SLR/DOC/0002                                     | 27 March 2020    |
| ORML1938 MMC001 MOR-EVS-DOC-0014 Statement of Case - Morlais Demonstration Zone                 | 19 February 2021 |
| ORML1938 MMC007 MOR-MSP-DOC-0020 Restricted Area Plan   | 19 February 2021 |
| ORML1938 MMC011(2) MOR-ESI-DOC-0001 (02) Morlais Draft Marine Licence Conditions                | 19 February 2021 |
| ORML1938 MMC021 MOR-BAY-DRW-0002 TWAO Map1 Location Plan  | 19 February 2021 |
| ORML1938 MMC022 MOR-BAY-DRW-0003 TWAO Map2 Location Plan  | 19 February 2021 |
| ORML1938 MMC023 MOR-BAY-DRW-0004 TWAO Map3 Location Plan  | 19 February 2021 |
| ORML1938 MMC024 MOR-BAY-DRW-0005 TWAO Map4 Location Plan  | 19 February 2021 |
| ORML1938 MMC025 MOR-BAY-DRW-0006 TWAO Map5 Location Plan  | 19 February 2021 |
| ORML1938 MMC026 MOR-BAY-DRW-0007 TWAO Map6 Location Plan  | 19 February 2021 |
| ORML1938 MMC027 MOR-BAY-DRW-0008 TWAO Map7 Location Plan  | 19 February 2021 |
| ORML1938 MMC028(2) MOR-BAY-DRW-0009 (02) TWAO Map8 Location Plan                                | 19 February 2021 |
| ORML1938 MMC029(2) MOR-BAY-DRW-0010 (02) TWAO Location & Key Plan (Overview Plan)               | 19 February 2021 |
| ORML1938 MMC177(2) MOR-RHDHV-DOC-0125 (04) Cumulative Impact Assessment Matrix                  | 19 February 2021 |
| ORML1938 MMC181(2) MOR-RHDHV-DOC-0133a(02) Morlais CIA Addendum                                 | 19 February 2021 |
| ORML1938 MMC186 MOR-RHDHV-DOC-0147 ES Volume II Chapter 4 Figures                               | 19 February 2021 |
| ORML1938 MMC187 MOR-RHDHV-APP-00126a Appendix 8.1 WFD Compliance Assessment                     | 19 February 2021 |

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|  |                  |
|--|------------------|
| ORML1938 MMC188 MOR-RHDHV-DOC-0148 Morlais Project - Air Quality Response  | 19 February 2021 |
| ORML1938 MMC191 MOR-RHDHV-DOC-0150 Tagging of Guillemots and Razorbills  | 19 February 2021 |
| ORML1938 MMC192 MOR-RHDHV-DOC-0128 (03) WNMP Comparison Note   | 19 February 2021 |
| ORML1938 MMC193 MOR-BAU-DOC-0003 Supplementary Kayaking And Sailing Activities Assessment  | 19 February 2021 |
| ORML1938 MMC194 MOR-MSP-DOC-002 Vol 1 Ch 15 Shipping and Navigation (Revised)  | 19 February 2021 |
| ORML1938 MMC196 MOR-MCO-DOC-001 Navigation Risk Assessment Addendum - 01/09/2020   | 19 February 2021 |
| ORML1938 MMC292 MOR-GAT-DOC-0001 Archaeological Evaluation: Trial Trenching Areas 2 3 7 8  | 19 February 2021 |
| ORML1938 MMC293 MOR-GAT-DOC-0002 Archaeological Evaluation: Trial Trenching Areas 7,8,10,24,25   | 19 February 2021 |
| ORML1938 MMC303 MOR-RHDHV-DRW-0089 (02) Vol II_Chapter 15: Shipping and Navigation (Revised)   | 19 February 2021 |
| ORML1938 MMC308 MOR-RHDHV-DOC-0128 Welsh National Marine Plan Comparison Note  | 19 February 2021 |
| ORML1938 MMC341 Provision of 'Updated assessments for terrestrial ecology (excluding chough) in response to comments made on the ES by NRW and RSPB' Technical Note (the EclA Update) by MM to NRW (February 2019) | 19 February 2021 |
| ORML1938 MMC350(2) MOR-HRW-DOC-0002 (02) Further information on predicted changes to currents  | 19 February 2021 |
| ORML1938 MMC351 MOR-MSP-DOC-003 Additional Information to Support Morlais Habitats Regulations Assessment (migratory fish)   | 19 February 2021 |
| ORML1938 MMC352 MOR-MSP-DOC-004 Further Environmental Information Benthic Annex 1 habitats   | 19 February 2021 |
| ORML1938 MMC353 MOR-RHDHV-DOC-0110 (4) Terrestrial Ecology Assessment Update   | 19 February 2021 |
| ORML1938 MMC360 MOR-RHDHV-DOC-0153 Marine Ornithology Revised Collision Risk Modelling Signposting document  | 19 February 2021 |
| ORML1938 MMC362 MOR-RHDHV-DOC-0016 (04) Vol I_Chapter 11: Marine Ornithology   | 19 February 2021 |
| ORML1938 MMC363 MOR-RHDHV-APP-0019 (04) Vol III_Chapter 11.3: Marine Ornithology   | 19 February 2021 |
| ORML1938 MMC364 MOR-RHDHV-DOC-0118 (02) Marine Mammals Addition Collision Risk Modelling   | 19 February 2021 |
| ORML1938 MMC365 MOR-RHDHV-DOC-0020 (02) Vol I_Chapter 12: Marine Mammals   | 19 February 2021 |
| ORML1938 MMC366 MOR-RHDHV-APP-0022 (02) Vol III_Chapter 12.2: Marine Mammals   | 19 February 2021 |
| ORML1938 MMC367 MOR-RHDHV-DOC-0067 (02) Information to Support HRA   | 19 February 2021 |
| ORML1938 MMC368 MOR-RHDHV-DOC-0154 Marine Mammals Revised Collision Risk Modelling Signposting document  | 19 February 2021 |
| ORML1938 MMC448 MOR-RHDHV-DOC-0155 Statement of Common Ground - Trinity House - Shipping and Navigation  | 19 February 2021 |
| ORML1938 MMC476 MOR-RHDHV-DOC-0157 Statement of Common Ground - NRW - Marine Mammals   | 19 February 2021 |
| ORML1938 MMC477 MOR-RHDHV-DOC-0158 Statement of Common Ground - NRW - Ornithology  | 19 February 2021 |
| ORML1938 MMC480 MOR-RHDHV-DOC-0161 Statement of Common Ground - NRW - SLVIA  | 19 February 2021 |
| ORML1938 MMC481 MOR-RHDHV-DOC-0162 Statement of Common Ground - NRW - Other topics   | 19 February 2021 |
| ORML1938 MMC482 MOR-WSP-DOC-0017 Statement of Common Ground - IoACC  | 19 February 2021 |

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| ORML1938 MMC483 MOR-RHDHV-DOC-0156 Statement of Common Ground - MCA - Shipping and Navigation   | 19 February 2021  |
| ORML1938 MMC555 MOR-RHDHV-DOC-0164 Outline Marine Biodiversity Enhancement Strategy   | 19 February 2021  |
| ORML1938 MMC576 MOR-RHDHV-DOC-0167 Responses to TWAO FEI and Modelling Comments from NRW  | 19 February 2021  |
| ORML1938 MMC577 MOR-RHDHV-DOC-0168 Potential for Underwater Noise from Operational Turbines and ADDs to Significantly Disturb Marine Mammals        | 19 February 2021  |
| ORML1938 MMC578 MOR-RHDHV-DOC-0169 Outline Habitat Enhancement Plan   | 19 February 2021  |
| ORML1938 MMC599 MOR-RHDHV-DOC-0170 Menter Mên Comments on NRW Request for Further Information and Stakeholder Marine Licence Consultation Responses | 19 February 2021  |
| ORML1938 MMC600 MOR-MM-DOC-0024 Morlais Socio-Econ Response to NRW ML Request for FEI   | 19 February 2021  |
| ORML1938 MOR-EVS-DOC-0018 (05)  | 19 February 2021  |
| ORML1938 MOR-EVS-DOC-0019 (05)  | 19 February 2021  |
| ORML1938 Menter Mon Closings FINAL  | 09 June 2021      |
| ORML1938 MOR-RHDVH-DOC-0072 (10) Outline EMMP(version 10) 140621  | 15 June 2021      |
| ORML1938 MOR-MM-DOC-0039 Signposting of Morlais response_NRW Licensing  | 15 June 2021      |
| ORML1938v1 - Application Form Clean   | 19 September 2025 |
| ORML1938v1 1. MOR-MM-DOC-0135 Morlais ES Addendum v1.0  | 10 October 2025   |
| ORML1938v1 2. MOR-RHDHV-DOC-0004 ES Vol I Ch4 Project Description vF5.0   | 10 October 2025   |
| ORML1938v1 3. MOR-MM-DOC-0136 ES Vol II Ch4 Figure 4-5 Restricted areas plan v5   | 10 October 2025   |
| ORML1938v1 4. MOR-SLR-DOC-0004 Addendum to ES Vol I Chapter 24 SLVIA  | 10 October 2025   |
| ORML1938v1 5. MOR-SLR-DOC-0005 Addendum to ES Vol II Chapter 24 SLVIA Appendix A  | 10 October 2025   |
| ORML1938v1 6. MOR-SLR-DOC-0006 Addendum to ES Vol II Chapter 24 SLVIA Appendix B  | 10 October 2025   |
| ORML1938v1 - MOR-RHDHV-DOC-0127b Morlais Variation PDE Matrix V2  | 10 October 2025   |
| ORML1938 MOR-MM-DOC-0132 Construction Duct Installation Method Statement v4.0   | 22 December 2025  |
| ORML1938v1 Morlais Demonstration Zone Navigation Risk Assessment Issue03 MGN654 Annex 6 MGN checklist   | 12 February 2026  |
| ORML1938v1 Morlais Demonstration Zone Navigation Risk Assessment Issue03  | 12 February 2026  |
| ORML1938v1 MMML Responses on NRA to NRW   | 12 February 2026  |

7. Marine Government Marine Enforcement Officers contact details have been updated.
8. The project parameters in Appendix 1 have been updated to reflect the changes to parameters, Specifically;

Table 1 – Addition of the SESM Device Type

Table 2 – Additional parameter for Height above sea level LAT (for Surface Emergent Seabed Mounted device) within the green hatched area and parameter for maximum blade width.

Table 3 – Additional parameter for surface SESM Device Type

9. The map provided in Appendix 5 has been updated to include the area for SESM devices.

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10. The project parameters in Appendix 1 have been updated to include SESM devices
11. Within Appendix 6 Co-ordinates in degrees, decimal minutes, Table 6 has been amended to denote the area of floating, surface emergent and submerged tidal (non SESM) devices and Table 7 has been added to denote the area of floating, surface emergent and submerged tidal devices, including surface emergent seabed mounted devices (SESM).
12. The methods statement document supporting the approval of HDD works within chough breeding season granted on 07 January 2026 (ORML1938 MOR-MM-DOC-0132 Construction Duct Installation Method Statement\_v4.0) has been added to the approved document list.