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Morlais Project

Signposting response to public representations to Marine Licence applications

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1 INTRODUCTION

1. Menter Môn Morlais Limited ('the Applicant'), is a not for profit social enterprise company developing the Morlais tidal array ('the Project') which will provide a generating capacity of up to 240 MW of tidal energy off the north west coast of Anglesey, within the Morlais Demonstration Zone (MDZ).
2. An application was submitted for the Project in September 2019 for the following consents:
 - A Transport and Works Act Order under the Transport and Works Act 1992; and
 - A Marine Licence under the Marine and Coastal Access Act 2009 (MCAA).
3. Since submission of the Marine Licence application, the Applicant has reviewed feedback received on the application, engaged in ongoing consultation with stakeholders and worked to develop mitigation measures where possible. Further Environmental Information has been provided to NRW Licensing Team.
4. Section 2 of the document provides the Applicant's overarching position on the range of topics included in stakeholder feedback on the application and is supported by a various technical documents identified in the responses.
5. Appendix 1 provides a complete list of the public representation made to the Marine Licence application.

2 COMMENTS ON REPRESENTATIONS

6. The Applicant has reviewed each of the representations and objections submitted by stakeholders and interested parties in response to the Project.
7. A summary of the key topics raised in the representations and objections, along with the Applicant's response is provided in each of the sections below. Each representation has been assigned a number by NRW which are reflected below. All representations with the numbering are including at Appendix 1.
8. In some cases, where representations provide detailed comments, these are being considered further and discussed through ongoing consultation. Menter Môn is committed to minimising impacts in order to develop a sustainable project that delivers benefits for the local community. The period to determination will be used by Menter Môn to proactively engage with stakeholders to work through concerns and issues.

2.1 Fish and Shellfish Ecology

Table 1 Applicant responses to Relevant Representations in relation to Fish and Shellfish Ecology

Representation Number	Applicant's Response
8, 29, 32, 34	<p>A response to comments on ES Chapter 10 Fish and Shellfish Ecology is provided in document no. MOR/RHDHV/DOC/0114.</p> <p>Further information relevant to impacts on fish is provided in document no. MOR/RHDHV/DOC/0127.</p>

2.2 Ornithology

Table 2 Applicant responses to Relevant Representations in relation to Ornithology

Representation Number	Applicant's Response
1, 2, 4, 5, 9-13, 15-17, 19-23, 26, 27, 29, 31-35, 37, 38, 40-43, 45, 46, 49, 50, 52-54, 58-60, 62, 63, 65, 67, 68, 70-78, 80-84, 86, 91-98, 101-107, 111, 112, 118	<p><u>Marine Ornithology</u></p> <p>In consultation with NRW and in parallel with the assessment of marine mammals (discussed in Section 2.4), the Applicant has assessed an initial phased deployment which could be adopted as part of a monitoring and adaptive management strategy to ensure that there would be no significant impacts on ornithology or marine mammals. Information on Marine Ornithology Collision Risk Modelling is provided in document no. MOR/RHDHV/DOC/0115.</p>

Representation Number	Applicant's Response
	<p>The adaptive management strategy will be developed along with an ornithology monitoring strategy as part of the Environmental Mitigation and Monitoring Plan (EMMP), in consultation with NRW and in accordance with the Outline EMMP provided in document no. MOR/AEC/DOC/0001(2)</p> <p><u>Onshore Ornithology</u></p> <p>In response to comments from, and ongoing consultation with NRW, an updated assessment for chough is provided in document no. MOR/RHDHV/DOC/0120.</p> <p>To minimise potential impacts on chough at nests closest to the Onshore Development Area and ensure there would be no adverse effect on the Glannau Ynys Gybi / Holy Island Coast SPA, two additional works exclusions zones for the chough breeding season (20 March to the 31 July) have been identified. These exclusion zones also cover the core foraging areas for the breeding chough. This is discussed further in document no. MOR/RHDHV/DOC/0120.</p> <p>Further information relevant to ornithology can be found in the response to RSPB provided in document no. MOR/RHDHV/DOC/0126.</p>

2.3 Underwater Noise

Table 3 Applicant responses to Relevant Representations in relation to Underwater Noise

Representation Number	Applicant's Response
76	<p>The Applicant commissioned underwater noise modelling in response to stakeholder feedback. The underwater noise modelling report is provided in document no. MOR/RHDHV/DOC/0116.</p> <p>Document no. MOR/RHDHV/DOC/0117 provides an assessment of underwater noise impacts on marine mammals based on the modelling results. The findings of this new work is compared to the assessment presented in the ES, demonstrating that the underwater noise modelling is consistent with, and supports the assessment and conclusions presented in the ES.</p> <p>Further information on underwater noise is provided in document no. MOR/RHDHV/DOC/0127.</p>

2.4 Marine Mammals

Table 4 Applicant responses to Relevant Representations in relation to Marine Mammals

Representation Number	Applicant's Response
<p>2, 3, 5, 6, 8, 15, 24, 31, 32, 34, 37, 38, 43, 45, 46, 49, 50, 54, 58-60, 62, 63, 65, 67, 68, 70-78, 80-82, 86, 92, 94, 95, 97, 98, 101-103, 105-107, 111, 112, 118</p>	<p>In consultation with NRW and in parallel with marine ornithology (discussed in Section 2.2), the Applicant has re-assessed an initial phased deployment which could be adopted as part of a monitoring and adaptive management strategy to ensure that there would be no significant impacts on marine mammals or ornithology. Information on Marine Mammal Collision Risk Modelling is provided in document no. MOR/RHDHV/DOC/0118.</p> <p>The adaptive management strategy will be developed along with a monitoring strategy as part of the Environmental Mitigation and Monitoring Plan (EMMP), in consultation with NRW and in accordance with the Outline EMMP provided in document no. MOR/AEC/DOC/0001. A review of Marine Mammal Monitoring and Mitigation Options is provided in MOR/RHDHV/DOC/0119.</p> <p>In addition, and as discussed above, an assessment of underwater noise is provided in document no. MOR/RHDHV/DOC/0117 based on the underwater noise modelling (document no. MOR/RHDHV/DOC/0116). This demonstrates that there are no changes to the conclusions of the ES as a result of the supplementary noise modelling undertaken since submission of the ES.</p> <p>Further information relevant to marine mammals is provided in document no. MOR/MM/DOC/0011 and document no. MOR/RHDHV/DOC/0127.</p>

2.5 Shipping and Navigation

Table 5 Applicant responses to Relevant Representations in relation to Shipping and Navigation

Representation Number	Applicant's Response
<p>1-8, 25, 32, 34, 37, 38, 50, 58, 66, 69, 71, 75, 82, 86, 94, 98, 109, 114</p>	<p>In response to stakeholder comments and following further consultation with sea users including kayakers, further mitigation has been proposed to adjust the western boundary of the area where only submerged tidal devices with a minimum under keel clearance (UKC) of 8m can be deployed, thereby increasing the area available for passage for small vessels and kayaks. This change is reflected in the updated Figures 4.1 to 4.5 provided in document no. MOR/RHDHV/DOC/0108</p> <p>Further stakeholder engagement has been undertaken with the canoeing and kayaking representatives who requested additional information on socio-economics, tourism and recreation and also details of changes in the hydrodynamic regime.</p> <p>The Applicant commissioned additional studies by Bangor University. The following reports and plans are provided with this submission:</p>

Representation Number	Applicant's Response
	<ul style="list-style-type: none"> • Supplementary Tourism and Recreation Assessment (document no. MOR/BAU/DOC/0001) • Supplementary Socio-economics Assessment (document no. MOR/BAU/DOC/0002) <p>The Applicant has also commissioned hydrodynamic, waves and sediment transport modelling, undertaken by HR Wallingford. The modelling report is provided in document no. MOR/HRW/DOC/0001.</p> <p>In response to stakeholder comments the Applicant has provided details of Proposed Embedded and Additional Mitigation measures in document MOR/RHDHV/DOC/0124.</p> <p>The Applicant is committed to resolving concerns from stakeholders and has engaged in consultation with key shipping and navigation stakeholders as discussed in document MOR/RHDHV/DOC/0124. This consultation is ongoing.</p> <p>Responses to feedback on ES Chapter 15 Shipping and Navigation and the Navigation Risk Assessment are provided in MOR/RHDHV/DOC/0124. In addition, at the time of submission an incorrect version of the Navigation Risk Assessment was submitted. The correct version is provided with this submission (document no. 18UK1479-RN-MM-NRA-20_03).</p> <p>Further navigational responses are provided in documents no. MOR/MM/DOC/0011, MOR/RHDHV/DOC/0144, MOR/RHDHV/DOC/0130, MOR/RHDHV/DOC/0131, MOR/RHDHV/DOC/0132 and MOR/RHDHV/DOC/0133.</p>

2.6 Socio-economics, Tourism and Recreation

Table 6 Applicant responses to Relevant Representations in relation to Socio-economics, Tourism and Recreation

Representation Number	Applicant's Response
<p>1, 2, 4, 11, 15, 22, 24, 32-34, 37, 38, 43, 53, 50, 54, 58, 60, 65, 66, 71, 73, 75, 76, 82, 91, 94, 98, 109, 114</p>	<p>In response to stakeholder comments on socio-economics, tourism and recreation the Applicant commissioned additional studies by Bangor University. The following reports and plans are provided with this submission:</p> <ul style="list-style-type: none"> • Supplementary Tourism and Recreation Assessment (document no. MOR/BAU/DOC/0001) • Supplementary Socio-economics Assessment (document no. MOR/BAU/DOC/0002) • Outline Skills and Training Action Plan (document no. MOR/BAU/DOC/0003) and

Representation Number	Applicant's Response
	<ul style="list-style-type: none"> Outline Tourism and Recreation Monitoring Strategy (document no. MOR/BAU/DOC/0004). <p>Menter Môn is committed to a series of measures to deliver the socio-economic benefits of the Project. This includes, amongst others, a commitment to deliver and monitor the spend profile of the Project in the region, commitment to monitor and mitigate impacts upon tourism and the commitment to improve the skills within the local workforce. Menter Môn has agreed with IoACC that these will be secured through appropriate pre-commencement conditions attached to the deemed planning permission.</p> <p>Further information is provided in document no. MOR/MM/DOC/0011 and document no. MOR/WSP/DOC/0019.</p>

2.7 Archaeology and Cultural Heritage

Table 7 Applicant responses to Relevant Representations in relation to Archaeology and Cultural Heritage

Representation Number	Applicant's Response
98	<p>In response to stakeholder comments, an updated archaeology desk based assessment is provided in document no. MOR/WES/DOC/0001. In addition, this is supplemented by further information regarding the impacts on heritage setting associated with the offshore infrastructure (document no. MOR/RHDHV/DOC/0125).</p> <p>As discussed in Section Error! Reference source not found., the Applicant has committed to additional mitigation in order to reduce visual impacts which serves to also minimise impacts on heritage setting. This is incorporated in document no. MOR/RHDHV/DOC/0125.</p> <p>Further responses to the IoACC comments are provided in document MOR/RHDHV/DOC/0122.</p> <p>The Applicant is committed to developing onshore and offshore Archaeological Written Scheme of Investigation (WSI) to deliver mitigation measures in relation to archaeology prior to commencement of the offshore and onshore construction works.</p> <p>Further information is provided in document no. MOR/RHDHV/DOC/0134.</p>

2.8 Onshore Ecology

Table 8 Applicant responses to Relevant Representations in relation to Onshore Ecology

Representation Number	Applicant's Response
1, 3- 6, 8, 9, 11, 13, 14, 17, 18, 20, 23, 27, 28, 33, 34, 35, 37, 39, 40, 44-46, 49, 50, 52, 56, 58-60, 62, 63, 65-70, 72-86, 89-91, 93-98, 100-108, 112, 117, 118	<p>As discussed in Section Error! Reference source not found., in response to ongoing consultation with NRW, the Applicant has refined the approach to trenching of cables at the landfall, should HDD not be possible. Both options, trenching and HDD were assessed in the ES and HDD remains the preferred option, however trenching represents the worst case scenario. The Applicant has significantly refined the Project Design Envelope in order to mitigate impacts on Holy Island Coast SSSI, SPA and SAC to ensure there will be no adverse effects on site integrity. This is detailed in document no. MOR/RHDHV/DOC/0110.</p> <p>Further information on Chough is provided in document no. MOR-RHDHV-DOC-0120.</p>

2.9 Seascape, Landscape and Visual Impacts

Table 9 Applicant responses to Relevant Representations in relation to Seascape and Landscape Visual Impact

Representation Number	Applicant's Response
2-5, 11, 28, 32, 34, 38, 44-46, 49, 53, 54, 58-60, 62, 63, 66-70, 72-74, 76, 78, 81-83, 87, 94, 97, 98, 102-106, 112, 114	<p>As discussed in Section Error! Reference source not found., the Applicant has committed to additional mitigation in order to reduce visual impacts.</p> <p>In light of this mitigation and in response to stakeholder comments, further information is provided in document no. MOR/SLR/DOC/0001, which is supported by revised photomontages.</p> <p>In addition, a revised Outline Landscape Management Plan is provided in document no. MOR/SLR/DOC/0002.</p> <p>Further information on SLVIA is provided in document no. MOR/MM/DOC/0011.</p>

3 APPENDIX 2 – List of public representations

No.	Response
1	<p>Sir</p> <p>I wish to formally record my objections to the proposed development scheduled in the above planning application.</p> <p>The coast line of Anglesey and in particular the areas to the west of the island have become recognised as a world class venue for sea kayaking. Not only do these waters provide a facility for advanced paddlers who can take on some of the best tidal races available but also the area is a perfect environment to learn the sport. The cliffs, beaches, shorelines and large tidal range provides a habitat for a hugely diverse environment for wildlife including many migratory birds.</p> <p>All this within a few hours of large areas of population!</p> <p>It is paramount that no risk to this precious environment should be risked or tolerated, indeed low impact tourism should be encouraged to witness such a place.</p> <p>I a , my family and many friends have enjoyed this place for over 50 years and we want to continue to do this!</p> <p>Regards</p>
2	<p>Dear Marine Licensing</p> <p>I am XXXX of XXXXXXXXXXXXX</p> <p>I am a sea kayaker and an environmentalist. I have taught environmental education in the sensitive coastal area of xxxxx, Dorset.</p> <p>I wish to strongly oppose the giving of a marine license to Morlais.</p> <p>The reasons are as follows:</p> <ol style="list-style-type: none"> 1. Their impact research is inadequate. They show a radar picture of sea traffic in the area on two weekends. However, as we have discovered from visits to RNLI stations for conversations about sea safety, Sea Kayaks are not picked up by Radar. So no sea kayaks will be shown in these pictures. You cannot go to this area on a sunny day without struggling to park and then on the tide race itself, there will be so many people that you risk colliding with other sea kayakers - such is the popularity of the area. It is popular for both advanced and improving sea kayakers because it is quite a safe tidal race as should you capsize you will drift out into an eddy and not on to sharp rocks and there is a life boat service around the corner should things get too tricky for the people you are with to deal with. Morlais used Jim Krawieski's book - 50 sea kayak journeys in Wales to show that this area is for advanced sea kayakers only and that there are not many of these. Well, I am certainly not an advanced paddler - I am 62 years old and overweight and I choose to go there under certain tidal conditions to improve my skills. If you ask any of the many sea kayak coaches in the area they will tell you that the same. In fact you can travel this area without any significant flow if you get your timings right and then it is suitable for a wide range of kayakers. 2. The environment impact is woefully inadequate. Cetaceans die because of blows by ships. These turbine blades will be just like ships . They will kill the cetaceans. The chains used to connect the floating devices will scourge the sea bed which homes rare marine species. The razor bills and guillemots (and our sea birds are in serious decline) will go. There is far more than a visual impact on the environment. 3 The cost to this poor economically environment through reduced tourism has not been calculated. There are more seakayaking coaches on Anglesey than anywhere else in the world per square mile - so businesses will be affected and the tourism from sea kayakers from around the world will move elsewhere. Just see the countries represented at the annual Anglesey Sea Kayak Symposium in May each year. I've met people from Australia to Kenya and from Canada and USA to South Africa and so many european countries. These people will go to other locations and it will impact on the economy of Sir Mon (Anglesey) 4. The impact on the night sky - there will be bright lights on all the above water structures as well as boats which will damage the near dark sky environment. I like star gazing - don't you? 5. I so enjoy this area and have been paddling it for the last 4 years on a regular basis. I have fallen in (capsized) and sometimes rolled - but always rescued by fellow kayakers if I have not rolled up. I have enjoyed the area with marine porpoises and dolphins, been bombarded by razor bills, and guillemots, shared quiet moments in caves with seals and spotted puffins. Please do not take this wondrous area away from us. There are other ways and places which can generate electricity without such damage to the environment. <p>Please reconsider the issuing of this license to Morlais</p> <p>Yours sincerely XXXXXXXXXXXX</p>

3 Please see my comments below with regard to the scheme above. I believe the submission fails to fully take into account the enormous landscape, biodiversity and recreational value of the area for unpowered craft.

I last sea kayaked from Soldier's Point to Porth Dafarch passing, North and South Stack and Penrhynmawr on 10th September. It was a truly magical and uplifting day, giving a respectful berth to breeding seals on the many beaches between the stacks and being visited by feeding porpoise in the race off South Stack. I would be heartbroken to think that might be the last time I get to enjoy that outstanding section of coast unspoilt and undamaged, or even at all: the scheme has the potential to make these powerful races unsafe to human-powered traffic.

My husband was lucky enough to return on 3rd November 2019 to Penrhynmawr and enjoyed the latest of many exhilarating surfing sessions with friends. While my skills are not at his level, I visited back in February and worked with a team of female paddlers on our tiderace skills as part of a Women's symposium: in the right conditions, the area is a fantastic teaching resource of world-renowned quality. I can support this with photographic evidence if required. I have participated in numerous kayak gatherings over the years that make a virtue of this beautiful resource and have brought international and national tourists to the island, bringing a sustainable income stream to Ynys Cybi. It is endlessly fascinating and we will keep coming back: if there remains something to come back for.

Please consider the wildlife, the tranquil character of this protected landscape and the enormous recreational value of this place for future generations in considering this licence, as is your duty under the Wellbeing of Future Generations Act.

Yours faithfully,

XXXXXXXXXXXXXX

I am writing to object and to Express my concern about this project, which has just come to my attention.

I would draw attention to the lack of consultation with any representative groups for human-powered craft eg Canoe Wales and other local businesses and clubs in the kayaking sector. Ynys Mon, and in particular the area around the Stacks and Penrhynmawr, is an area of international importance attracting exponents from across the globe for journeys, training and events, in so doing supporting outdoor businesses such as Anglesey Outdoors, Sea Kayaking Wales, Kayak Essentials, Seakayaking UK and many more, that employ local people and bring in tourism income to the area. I am concerned that these proposals will have an irrevocable impact on the tidal flows around Holy Island and will render large areas of well-visited paddling zones unsafe to unpowered craft, thus destroying an internationally renowned recreational resource in the AONB.

This area is not just for 'advanced' paddlers. Whilst guides are obviously keen to deter the unprepared, as a firmly intermediate paddler I have accessed these areas many times and enjoyed the challenge and wildlife spectacle that they offer. At the right tide state, with some planning, knowledge or expert guidance, this area is the premier training ground on which anglesey's paddling reputation has been built. I fear the proposed array would block access, not just during the construction phase, but afterward: a swimmer close to a rotating turbine would be at severe risk and the lifeboat may not be able to approach close enough to safely rescue a paddler who runs into difficulty. I see friends posting pictures from Penrhynmawr on a nigh on weekly basis - this is a popular and growing sport.

it is not simply the recreational impact I fear - although the visual impact of tethered barges etc would seem to be unacceptable in such a popular area attracting so many visitors to attractions such as South Stack RSPB reserve each year. The area is a breeding ground for our threatened seal populations, which kayakers have long appreciated from a safe distance during the breeding season when the caves around the lighthouses are loud with seal song and busy with young. I have concerns about the disturbance impact and the long term risk to the animals themselves and the damage to the food sources on which they depend. sea floor disturbance could have detrimental impact on the whole food chain in a protected marine area. the noise impact and potential collision impact may also drive away porpoise and dolphin populations which habitually feed in the tide races here. Orca have even been sighted off South Stack. Their populations are under stress and this could be just one more cumulative damaging impact.

If this scheme is genuinely a pilot, the scale seems disproportionate and if the impacts are then shown to be too great or the income too poor, we will have destroyed 3 of the four shoreline tide races of Holy Island in one fell swoop to create a white elephant, at great cost to local business, environment and landscape.

I hope I am not too late for these comments to be considered.

best wishes,

XXXXXXXXXXXX

4

Dear NRW

I hereby make representation regarding the application and the environmental statement

**OBJECTION TO THE
NOTICE OF APPLICATION FOR MORLAIS TIDAL STREAM DEMONSTRATION PROJECT LOCATED TO THE WEST OF
ANGLESEY**

Dated- 18 December 2019

Representation by - XXXXXXXXXXXXXXXX

Please see contact details at bottom of correspondence.

I herby object to the tidal scheme proposed development in Holyhead.

It will have serious impact on my work and I will lose access to my crucial and main work and activities area. It will decimate the stunning and spectacular sea scape and sea kayaking that forms part of the "Adventure Capital of North Wales"

I have lived in Anglesey for 36 years and as part of that in Holyhead for 11 years.

I am a self employed local resident who lives in the **Pentre Feliw area in Holyhead overlooking The Irish Sea and Abraham's Bosom** directly across to where the scheme is proposed.

For the past 10 years I have been operating as a sea Kayak coach, leader and guide. I am invited to coach worldwide and recently was endorsed by British Canoeing, my National Governing Body, as a National Trainer Provider. I assess NGB endorsed sea kayak awards and assessments which includes a substantial element of coaching and assessing leadership in the moderate to advanced water environment. I also work as a free lance coach for many of the local providers including the English National Centre, Plas y Brenin.

I am one of a small handful of top qualified female coaches in the U.K. and in fact in the world.

75% of my clientele who visit Holyhead and to have coaching with me come from overseas. Most clients come as a group of 6 and stay for a week or longer. They book local accommodation, b&bs, centres or book the local sea cadet units, they use local restaurants and cafes, spend their money locally and above all else they all want to paddle in the stunning, peaceful, beautiful and clean sea area abundant with wildlife and renowned all over the world for its tide that is the sea area of the West Coast of Anglesey.

The crux paddle everyone wants, dreams or aspires to is "around the stacks" and to paddle in "Penrhyn Mawr"; one of our most famous tide races. You can search Youtube for the infinite number of videos posted there relating to Penrhyn Mawr and various mis-spellings of it.

As an idea here is a list of the countries where people are from who booked me (or used me to help facilitate) to take them to the specific area where the tidal scheme is proposed - This is the last 3 years.

- ISREAL
- USA
- JAPAN
- CHILE
- FINLAND
- SWITZERLAND
- DENMARK
- FRANCE
- SPAIN
- SWEDEN
- GERMANY
- ISLE OF MAN
- IRELAND
- NETHERLANDS
- NORWAY
- BELGIUM
- ICELAND

“The Stacks” is a classic and world famous sea paddle.

This paddle is seen as the jewel of the emerald seas of not just Anglesey, not even just in North Wales or the UK but AROUND THE WORLD”

The journey may start from Holyhead Harbour or the big boulder beach at Soliders Point or it may start from the beach at Porth Dafarch which can provide some special historical interest all of its own.

The lunch spot and should it ever be needed, emergency exit route is the beach(s) at Abraham’s Bosom.

The journey may be a one way trip or a return trip. It will all depend on the group and what the outcome of the day is about.

Most all of the clientele who come want to visit and learn and (we use the term “play”) to experience the tidal flows at the tide race to improve their skills as a safe and competent sea kayaker and sea kayak leader.

The main tidal race we use is locally known as Penrhyn Mawr. Part of the area that will be massively effected if this tidal scheme goes ahead.

The race is absolutely perfect and a remarkable and unique Coaching and learning environment in the whole world for a number of reasons.

It has 3 main workable and safe areas. There is the “chicken shoot”, where the fast flowing waters are closer to land and provide many safe “opt out” areas, rest areas and coaching or “play” areas.

This is the best location to take beginners to tidal flow or those looking to improve their more “flat” water moving water skills.

Of course weather (wind) and the state of the tide (springs / neaps etc) all have a significant effect on what the water is doing as how it will behave.

The tidal race of Penrhyn Mawr only works on the flood tide.

The “middle or inner” race is the next step up and the next area away from land.

A lovely area with safe eddies and places to opt out or rest in. In any rescue situation where by someone capsizes and exits their kayak be it for real or for practice the natural flow and dynamic of the water has the capsized kayak washed into Eddies closer to the shore.

It is a unique area and this quality makes it such a superb venue for learning about tidal flows and how to handle a kayak in this environment. Whether for personal skills or progressing to leadership or developing into advanced leadership.

The final area within Penrhyn Mawr is the “outer” race. Again, many people consider this only for advanced paddlers however in the right conditions it makes a very suitable and unique learning environment for less experienced paddlers - under quality instruction and guidance.

Following the sea from The outer race leads the paddler - on an exciting tidal journey past Abraham’s Bosom. It is necessary to stay quite far out to sea here or the paddler is caught in a “back eddy” where the flows are going in the opposite direction to the flow and progress forwards is either not possible or quite hard work.

As we approach South Stack - we have the option to head towards land where we will look at the possibility of going under the foot bridge that leads to the light house. Or we can STAY OUT TO SEA and bounce through the tidal race or stay closer to the lighthouse itself.

South Stack tide race, which works at its best on the ebb tide has the most beautiful clean green waves.

Can you imagine coming from anywhere in the world or a city such as London, Liverpool or Manchester and surfing these off shore waves to the incredible and magnificent scenery and nature that is The sea area of South Stack. It is no wonder sea kayak and adventure tourism to Anglesey is on such a dramatic increase. You only have to drive to the beach at Porth Dafarch in the summer to see the volume of sea kayak carrying vehicles to realise this.

The small boat mapping undertaken by Morlais will not include sea kayaks as sea kayaks will not be shown up on this type of radar.

The same idea Continues to North Stack where the tidal race is close to shore.

Most all of this unique teaching, learning, paddling environment will either changed and made less safe or be lost of this development is allowed to continue.

I will use this area 3-4 times a week during the months of April - October.

If we under-estimate each group to be say 3 in number as some clients book private one-one - that could be about 200 paddles with people that I alone manage in one main season.

On any one day, if a group of paddlers come to learn and see and enjoy the stunning local area of the tide, a trip from Porth Dafarch to South Stack and back may well be the highlight of that persons year or paddling life so far. Can you imagine that.

Holyhead is world famous for sea Kayaking

Paddlers have it on their bucket list.

Not just from overseas from from all over the UK.

This area of sea needs celebrating and preserving not violating.

I have paddled this area hundreds of times. Yet due to season changes, the wildlife that there is always interaction with, the ever changing tide and weather. The journey is never ever the same twice over. This sea area is a very very special and unique place.

Wildlife encounters are a major draw for people to come as well. We have seen numerous species, sun fish , Risso dolphin, harbour porpoise, Atlantic seals, puffins, razorbills, Guillemots and now there is a new colony of gannets developing on "Middle Mouse" Rock on the North coast there are always 5-10 gannets seen diving for fish in the tidal development proposed area.

If this scheme is given the go ahead the beauty of the area will be decimated and lost.

Tourism will be massively effected.

I will lose a lot of my clients and work. People will have their dreams taken away from them.

One of the best sea kayak Coaching and learning environments ever will be lost and destroyed. Why even consider doing it?

Then there is the light pollution at night and we will lose the dark night sky we currently have here.

I live on a small working farm looking out across Abraham's Bosom. Which had to diversify in order to make a living and now supports 4 holiday cottages and 2 shepherds huts. The owner of the farm and cottages works exceptionally hard to maintain a top class standard and guests and artists arrive from all corners for the peace, clear and beautiful sea views, Coastal walking, tranquility and dark skies.

The owner employs a farm manager and an assistant on the farm along with up to 10 other local people to clean, garden, maintain the businesses. Without the guests in the cottages the farm will fail and these jobs could be lost. I may lose my place to live which is also where I store all my work gear, trailer, kayaks etc.

Many holiday guests come for star gazing and wildlife spotting. We have red kites, Choughs (quite rare) pheasants, foxes, badgers. It is such a beautiful area of the countryside.

On a clear night there is no light pollution here. THIS WILL BE LOST IF THE SCHEME IS ALLOWED.

A lot of the wildlife spotting is done at night. Badgers in the Holyhead area are "clean" and do not carry TB and guests love to be out at night in the blackness of the night trying to glimpse a Badger and see and learn about the stars and night skies.

This element of tourism will be gone. People will not want to stay during or after construction and look out at 40 - 120 x 72m Bright yellow barges. They will complain.They will not return again.

What will happen to the business? The noise pollution and light pollution and visual horror will be devastating.

Local jobs will be lost.

Holyhead is always regrettably seen as a deprived rural area and not for what it truly is. The part of Holyhead that is centred South Stack (ie from Porth Dafarch or Porth Rhuffydd to North Stack or Soldiers Point) should be seen for the Area of Outstanding Natural Beauty that it is. This area AND THAT INCLUDES THE SEA should be

specially protected and rejoiced for what we have on our doorstep.

We are part of THE ADVENTURE CAPITAL of North Wales and Europe.
We have the best sea Kayaking and the best sea cliff climbing anywhere.
It cannot be beaten.
Please save it.

This tidal scheme if it is given the go ahead will strip that bear and destroy what nature has provided.

Also what about the environmental impact and what about broken debris from this commercial turbine test platform . With damaged equipment there come fuel oil spills and this is an even bigger environmental problem for the Irish Sea. All turbines whether wind or water have oils in them. Wind turbine out at sea have been getting damaged badly in recent years and are starting to show a high operating cost that is outweighing there usefulness. hence why want to have a testing program like the one in this proposal.

What happened in the Pentland Firth with those chosen tidal generators?

Please hear my objection and understand that this is not a suitable location for this proposal. Morlais have advised that there are indeed other locations that are more industrial. These areas will be far more suitable for such a project.

The seas around Holyhead are special and unique. Please help protect them not destroy them.

Yours faithfully
XXXXXXXXXX

Please do not print my personal details and contact information below.
This is for representation, return address , validation and verification purposes.

You may print my name but the information below is to remain confidential please.

Thank you.
XXXXXXXXXXXX

5

Dear Sir/Madam,

Menter Môn Morlais Ltd

Application for the Morlais tidal stream demonstration project located to the west of Anglesey

I write to strongly object to the proposals for the Morlais tidal stream demonstration project located to the west of Anglesey.

I am a sea-kayaker with 20 years of experience and kayak in that area frequently – indeed, it is an internationally famous sea-kayaking area, renowned for its tidal streams, but also for its marine beauty, coastal scenery and wildlife. This proposal would damage all of those aspects of this unique place.

Contrary to the statements in the proposal, this is not an area exclusive to experienced sea-kayakers. Only at peak tidal flows are the races of Penrhynmawr and the Stacks somewhat more challenging. For much of the time – 24 hours a day around neap tides, around slack water on all tides – the sea can be quite docile. Penrhynmawr is only significant on the flood anyway, and the races off the Stacks tend to be larger on the ebb.

Hence it is an area that can be enjoyed (and is enjoyed) by sea-kayakers of all abilities. My second trip ever in a sea-kayak was from Soldiers Point to Porth Dafarch – a fine calm day, with little swell and only small waves. And it was probably the fourth or fifth trip when I was introduced to Penrhynmawr on a flooding tide at neaps. Therein lies one of its great attractions – it is an excellent training ground for those who aspire to be better paddlers. Similarly, the Stacks offer a range of conditions to enhance any kayaker's skills.

The construction phase would completely prevent our enjoyment of this part of the Anglesey coast, and the subsequent installations would be likely to seriously affect the nature and strength of the tidal currents – whether the tidal power structures were sub-sea, or deployed from barges.

One of the great joys of paddling in this area is the sight of all the sea-birds making use of the sea for fishing, and nesting on the cliffs, particularly around South Stack. It is certain that these proposals, if allowed, will disturb the sea-bird population, perhaps preventing breeding, and further endangering some already declining species. It would be a tragedy, for instance, if the choughs of the Stacks were frightened away for ever.

The proposals will also affect the marine life in the area. I have stood on South Stack and seen a pod of about 40 dolphins swim by very close to South Stack Island. There would be no chance of me ever being able to see that again. And on many occasions I have enjoyed seeing seals in the coves and caves along this part of the coast, giving them a wide berth when they have pups. They too would be frightened away by the tidal power works. Additionally, there would certainly be incalculable effects on the other marine life in the vicinity.

I don't have a complete record of my kayaking trips in the relevant zone, but can confirm the following:

15th October 2005 – Soldiers Point to Porth Dafarch. Some swell around the Stacks.

5th August 2006 – Soldiers Point to Porth Ruffydd and back. Calm sea. Gentle flow on Penrhynmawr.

22nd September 2007 – receiving tuition on Penrhynmawr race.

13th October 2007 - Soldiers Point to Porth Dafarch. Good standing waves at the Stacks.

20th October 2007 – Porth Dafarch to Soldiers Point. No waves on the flood at Penrhynmawr or the Stacks.

7th June 2008 – Penrhynmawr practising in medium water, plus the Stacks.

6th July 2012 – Round Holy Island. Not made any comment about Penrhynmawr or the Stacks.

7th August 2015 - Porth Dafarch to Soldiers Point and back. Very calm.

I've **attached photos** of some of those trips showing the benign conditions usually encountered making for great days out.

Please acknowledge receipt of this communication.

Yours faithfully

6

I am an active Sea kayaker and had in 2017 the possibility from 24th to 29th April 2017 to visit a very precious and one of the most beautiful places I have paddled in so far. That place was Anglesey in Wales. What you have there cannot be paid for or balanced out with any money in the world. It is a natural wonder of high flow tides, overfalls and tideraces and high rocks and caves.

The area is a "Mekka" in the world of Seakayaking and it is quite a large world. Seeing now the planning reports I have read about the MORLAIS Project in the area bears in my opinion huge risks not only for the accessibility of the area but also for the wildlife there.

From the seakayaking point of view the mappings with radar and AIS are definitely completely useless. You will never spot a seakayak on any radar.

On top of it all no one who is not a paddler will understand why paddlers are in areas where no one would ever go with a motorized or sailing vessel.

But this way of transport and to enjoy the nature it totally different to what can be done with a motorized vessel that significantly disturbs wildlife and nature a lot more.

If with this Project arrays of generators are places on the seabed with structures that are places partially even above water this may destroy the complete area for anyone attempting to go there again with a non motorized vessel.

Any structure that is above water and I mean any whatsoever even an anchored buoy is a life threatening object to any paddler in high flows.

Just something has to happen and a rescue is needed and all help might be too late.

I live right now in Montreal and the river here has exactly such buoys in some places which are possible to navigate for more experiences paddlers but even then there have been deadly accidents happening. Also for small boats these objects can be tremendously dangerous.

Regarding the environmental impact I am very concerned that the obstructions in the flow may badly affect wildlife. Humans have generally a very poor understanding of the sea and its processes as of today. How the restrictions in flows will affect the natural featured generated by the flows is not possible to predict with the huge scale of this project as it is being planned at the moment.

I seriously hope you have done very thorough studies of the impact on wildlife and the general status of the sea for this area.

Considering the strength of the flow and the size of the Project I am seriously concerned that a lot of wildlife (fish, seals, other sea mammals etc) might simply be killed by these devices in the sea.

I did not have the chance to go back yet as I moved for some time to Canada and I paddled instead in the Bay of fundy which is the Canadian equivalent to your area but has by far not the same density of attractive places as Anglesey to offer.

However the area is largely completely undisturbed and one can see and notice it in many ways.

I therefore very much hope that I will be able to return still many times to Anglesey. I plan to go back in 2020 as my next visit.

I do have GPS tracks of my movements in the area, however these are locally saved on a Computer in Finland so I cannot send these right now.

I very much hope you will get in touch with the local kayaking community in Anglesey that has a very high level reputation even in Canada and USA. Please have intensive and thorough discussions with the guides and British Canoeing in general before continuing the planning on this Project.

There must be a way to generate renewable energy and have little or no impact on the environment and the area in general.

With highly concerned regards,
XXXXXXXXXXXX

7	<p>I am appalled at the plans to introduce energy production on the West Coast of Anglesey. Anglesey is a gem of the British Isles with a unique heritage and natural beauty. The natural coastline is a healing place for those who need to get away from the stress of everyday life.</p> <p>I am learning to sea kayak and at the same time teaching my husband. We have been raising our children to adulthood and now we care for our parents. Paddling around Anglesey gives us chance to calm our minds and hearts.</p> <p>I have been fortunate to sail around Anglesey on a yacht for an elderly gentleman who needs crew. The tide races help us to plan our journey times and reach destinations further away. They add excitement to the journey.</p> <p>Please leave things as they are and find another location to generate the much needed electricity.</p> <p>With thanks, XXXXXXXXXXXXX</p>
8	<p>To whom it may concern</p> <p>I am raising an objection to the proposed marine licence for Morlais to build The Morlais project in the sea near Holyhead including South Stack, North Stack and Penrhyn Mawr.</p> <p>This is an area of outstanding natural beauty and home to many species of wildlife including seals, porpoise, dolphins and many species of fish.</p> <p>This is an important area for sea kayaking, both recreational & commercial and draws visitors from all over the world wishing to kayak here.</p> <p>I have no sea kayak qualifications yet I am a regular visitor to the site, often staying overnight at Anglesey Outdoors, shopping and eating in Holyhead bringing vital input to the economy. I also attend the Anglesey sea kayak symposium held at Anglesey outdoors every year in May.</p> <p>The seascape that Morlais propose to develop is an important area that draws in these visitors and the development is not welcome. It will destroy the area and make the area unsafe to use for small craft disrupting existing and future recreational and commercial use.</p> <p>Yours sincerely XXXXXXXXXXXXX</p>
9	<p>I am extremely worried about the proposed west Anglesey tidal demonstration zone. Although fully behind renewable energy tackling climate change, this cannot be done to the detrimental effect of the UK's wildlife. We hold internationally important numbers of seabirds in the UK and we have a responsibility to protect these wonderful charismatic tourist attracting birds. This development threatens killing 60% of the guillemots and 98% of the razorbills found at South Stack, a truly terrible statistic. There are plenty of other places where this development could be located so do the right thing and tell the developers to site it where it won't cause such shocking damage to our wildlife.</p>
10	<p>I am deeply concerned about the impact of the proposed Tidal stream development to the RSPB South Stake bird populations. Whilst we need power, this cannot be at the expense of both rare and protected birds. Would you please assure me that you will be taking the safety of seabirds into account when making decisions on viability of the scheme?</p>

11	<p>Whilst I am all in favour of green energy - this is a ridiculous application... Turbines covering miles of the sea's surface within 500 metres of South Stack ??</p> <ul style="list-style-type: none"> • South Stack is a well-established Area of Outstanding Natural Beauty with breath-taking views out over the Irish Sea - and visited by 200,000 people every year. Who could possibly condone an application which will ruin those views? • It would have a huge impact on the Lighthouse site; the wildlife reserve, and the Coastal & Mountain paths. If this application is granted, the local economy will suffer as a result of declining numbers of visitors - put off by what could only be described as an act of utter landscape vandalism. A deprived area - perhaps already over-dependant on seasonal Tourism - will suffer even more. • Even disregarding the visual impact of hundreds of yellow floats on South Stack - this is a protected wildlife area famed for its conservation of bird and marine wildlife. Who has assessed the clear risks to wildlife from such a huge change to the local eco-system ? Where is the data / risk management forecast in relation to underwater turbine blades and tethering cables? How will we ensure that hitherto highly successful conservation projects are not completely ruined ? • If the placing of a couple of parking meters at RSPB South Stack is capable of arousing local indignation and political turmoil, then I shudder to think what will happen if you license this proposed monstrosity... <p>I am absolutely certain you will receive hundreds of objections... There could not be a more inappropriate location for such a project ! I respectfully urge you to give local concerns proper consideration, and to reject this application.</p>
12	<p>At a time when seabirds are struggling against the climate emergency for survival, it seems entirely the wrong time to be considering the wide scale deployment of a technology that causes devastating damage to foraging seabirds, in and adjacent to such well known, successful and important breeding colonies. As a power engineer myself I understand the need for this technology but I urge you in the strongest terms to rule against this scale of deployment in this location.</p>
13	<p>I am writing to express my concern regarding Menter Môn Morlais Ltd's tidal energy proposal. I understand that the public consultation is only open until the 8th of January.</p> <p>I am very much an advocate of green energy technology. However, we are not only facing a climate change emergency but also a biodiversity crisis. This area of West Anglesey is home to a great array of seabirds and aquatic life and areas such as South Stack are a popular visitor attraction for this very reason. In one of the modelling estimates (and not necessarily the worst one for biodiversity loss), up to 98% of the razorbill and 60% of the guillemot populations could be lost. This is an unacceptable level of biodiversity loss. More research is clearly needed and the relevant care is required to introduce technology that is green yet located where it can be efficient in its energy production but also not harmful to Wales's fantastic seabird colonies.</p>
14	<p>Hi firstly we d like to reiterate we are all for green energy and a respect for our planet we live in the shadow of wind turbines in an area ravaged by coal and abandoned and we don't have an issue with the turbines they are less destructive than coalmines but some areas are just too precious to develop they have become last outposts for hopelessly depleted marine life where maybe one day they will recover and recolonise the world when we have become more enlightened but if we drive them out from these last places there will be no recovery ever so please do not develop at south stack please lets hold on to the remnants so we can avoid mass extinctions</p>
15	<p>I am writing to express my concern regarding the Morlais tidal energy development proposed off the coast of Ynys Môn.</p> <p>Whilst I very supportive of renewable energy in order to tackle the climate emergency, I think we must find ways to deploy this technology in ways that do not further damage our natural world. The inshore location of the tidal devices means there is the potential to put our important sea bird populations at risk at South Stack (I understand that the Morlais environmental modelling suggests that full deployment of the zone could lead to an almost complete loss of the razorbill population and 60% loss of the guillemots). This is clearly an unacceptable risk to our native wildlife (which are also a major tourist draw on Holy island). I also understand that the impacts on dolphins and porpoises could also be very significant.</p> <p>I urge you to seek an approach to renewable energy developments that safeguards our marine life including seabirds – this means limiting development to a level that can be demonstrated as safe for nature and researching the effects of novel technology to improve scientific understanding. The climate and nature crises need to be tackled together. More renewable energy is a crucial part of tackling climate change, but plans need to work for nature and wildlife as well.</p>

16	I would be grateful if you would consider the impact of the turbine scheme near Anglesey on seabirds more carefully. I am very concerned that the scale of the scheme will cause the death of many birds and given the widespread decimation of the wildlife in Wales we should try and help nature all we can .
17	<p>I am writing with significant concern for the new proposed developments for a renewable energy project off the coast of Isle of Anglesey.</p> <p>I am not going to concentrate on the the damage this could cause to current biodiversity, habitat, and ecosystem functions within this area. As I assume you have had a lot of emails concerning this development.</p> <p>I am writing to you with concern for the potential future of restoring White-tailed Sea Eagles to Wales. The Isle of Anglesey is one of the core areas in Wales that is able to support a healthy population of sea eagles. This area is a key suitable area attributed to the lack of renewable energy projects. Wales holds the most abundant and densest onshore wind farms in Britain, which is a HUGE problem for many of our birds of prey and terrestrial biodiversity.</p> <p>In regards to offshore wind farms do we really want to litter our coastlines aswell? There are many areas in Europe that have declined offshore wind farms due to the negative impacts they have on multiple marine and migrating species. I strongly believe that Wales needs to start putting thier wildlife and habitats first! By accepting this licence you are contributing to creating an area that will decimate an entire Marine Protected Area and the potential to restore native biodiversity.</p> <p>By declining the licence you are not contributing to littering our coast with hazardous obstacles, like we have already done within the terrestrial surface of Wales. I thank you for your time in advance and really hope that we can start prioritising biodiversity and habitats in Wales.</p>
18	<p>Whilst I fully appreciate the importance of developing new technology to provide greener energy, would it not be possible to find a site that is not likely to have devastating consequences for wildlife in the area short term? South Stack is so important for many reasons and though I am not an expert there must be other sites around Anglesey (or indeed other places) that this project could be piloted without having such a significant impact. Hope that you consider this site and the far reaching consequences in a balanced way and come to the best conclusion when all factors are carefully taken into consideration.</p> <p>XXXXX</p>
19	<p>I have recently been made aware of the tidal licence application for an area near South Stack on Anglesy. This is one of the most beautiful and precious habitats in Wales and beyond question internationally important for breeding birds.</p> <p>Our planet is under so much pressure and I like so many others hope that Wales could be a beacon of change and a place people dream of coming to because we have done the right thing.</p> <p>Please please consider very carefully any new development in this area, we have already damaged our childrens inheritance far too much</p> <p>Yours gratefully</p>
20	I support bio diversity and sustainable energy. But they have to work safely together. Please ensure that any marine turbines and sustainable developments are sited to prevent loss of angleseas special wild life (sea birds in particulate but marine life too). And that the machines are safe preventing collision or entanglement of wildlife
21	I am concerned about the effects of the above project on the seabirds off South Stack Anglesey if this project is allowed to take place. Guillemot and razorbill numbers could be decimated by collision with the turbine blades. Please take advice from the RSPB when considering the impact of this development.
22	As previously stated, I am extremely concerned about the proximity of the proposed tidal array to a vital seabird colony, which not only provides nesting sites for so much of our beleaguered wildlife but also gives, as a direct result of their presence, a much-needed boost to the tourist industry of Anglesey on which so many local people depend for their living. Others, such as the RSPB, can give you far more accurate predictions regarding the potential disasters this siting would precipitate – I would beg you to heed their warnings and reject this application.
23	We are writing to ask that you ensure that the interests of seabirds are taken into consideration in your assessment of this Marine Licence Application. We understand that this application could result in the deployment of 620 turbines over 35 square kilometres of sea to generate around 240MW of renewable electricity by harnessing tidal currents. It is proposed that some of the turbines would be fixed to the seabed whilst others would be floating on the surface. The proposed site for this Marine Demonstration Zone off the west coast of Anglesey is close the RSPB's South Stack reserve and other important sites for wildlife. This is a sensitive area whose ecosystem supports puffins, guillemots, kittiwakes and razorbills. Over 10,000 guillemots and 1,300 razorbills can be seen roosting on the sea cliffs in summer. Therefore development of the proposed site must be limited to a level that can be demonstrated to be safe for nature. This application does not adequately address the risks to seabirds and could have an unacceptable impact on biodiversity. Modelling of the effects of the development show that around 60% of guillemots and 98% of razorbills from RSPB South Stack could be lost through collision with turbines. The planet faces biodiversity collapse and a climate emergency,

	both these crises need to be tackled together. More renewable energy is a crucial part of tackling climate change, but developments need to be sited and planned in ways that avoid adding to the nature crisis.
24	Please add us to the numbers of objections to the planning for offshore Wind Turbines at South Stack. The reasons for our objection should be very obvious to anyone who respects Areas of outstanding natural beauty. South Stack being AONB is a tourist attraction for the island to show off it's fantastic variety of bird and mammal life. It's skies and seas need to be protected not shattered into a decaying mass of wind turbines which will poison the seas and kill not only marine and bird life but also deter tourists whose support of Anglesey brings huge benefits to it's economy. Second possibly only to farming, Anglesey depends on the tourist industry. With the world environment suffering as it is our efforts should be directed at preserving nature wherever possible. Wind turbines, as I have understood, don't generate income. They are ugly and cumbersome and interfere with nature itself and the long term negative impact on the environment will become more evident long term, after we are all dead they will be a reminder of how greedy industries ruined our world. Why not stop cities from burning excessive electricity with the lights polluting the night and the environment - to reduce that usage by 50% would be do-able surely. We on Anglesey try to be environmentally responsible - so don't penalise us. The whole idea is toxic and the use of C3 gas should be stopped.
25	I make my living from making sea kayaking films and teaching and guiding sea kayaking. I have travelled all over the world sea kayaking and Anglesey is unique and special in having such a high concentration of tidal races, beautiful scenery and largely undeveloped coastline. Kayaking around "The Stacks" and Penrhyn Mawr is THE classic and the best paddling journey on Anglesey. I moved to North Wales because of these tidal races and I lived there for 15 years. I have now moved to Canada because I met my partner there but we come back to Anglesey for a month every year. We are also running a week-long commercial kayaking trip based out of Anglesey Outdoors in October 2020. I know of several sea kayaking businesses who make their living from taking people kayaking in these areas who could be adversely affected by these. Adventure Elements Sea kayaking Wales Sea kayak Anglesey Kayak Essentials Coastal Spirit Seakayaking UK There are also at least a dozen other instructors who work taking people out in the tidal races. I am in favour of renewable energy and if the tidal races are still awesome and still accessible to kayakers then I would be for this development. Otherwise please find somewhere else that is not a world class sea kayaking destination.
26	This is my strong Objection to proposed marine project mdz potentially impacting adversely on the seabird population.
27	I would like to register my deepest concern regarding the above proposed development in close proximity to a vital seabird breeding site. As an RSPB member for many years, I am very much aware of the plight of many of our bird species populations in recent years. I also spend several weeks during the Summer as a residential volunteer at the reserve, helping the thousands of visitors from all over the world who come to enjoy this wildlife spectacle. Whilst I recognise and support alternative non fossil fuel energy generation, I feel that the scale of the proposed development, coupled with the fact that it presents an untested level of risk to the thousands of seabirds that nest at South Stack and feed in the waters for miles around the reserve. Such a development is bound to adversely impact this delicate ecosystem, which in turn will lead to significant declines in the numbers of puffins, guillemots, razorbills etc that come ashore to breed on this reserve every year. It is vital that we continue to protect such special wildlife reserves for future generations and not threaten it with such a development. In this regard, any proposal will I'm sure be heavily scrutinised under the Welsh Government's flagship legislations namely The Environment Act and The Future Generations Act To summarise, I am against such a relatively unproven/untested energy generation development being built in the ecosensitive zone proposed. I do hope that the above comments will be carefully taken into account when considering this proposal.
28	In general I am in favour of this development with the following caveats 1 - the local impact on biodiversity needs to be determined and if severely adverse the development refused 2 - in the absence of confirmatory data, a rigorous monitoring regime must be implemented and mitigation measures prepared 3 - principles of good design should be applied to minimise impacts on visual amenity 4 - the value of visual amenity and biodiversity should be determined using HM Treasury " Green Book" with decisions based on minimising the reduction
29	The energy island project run by mentor mon it is going to destroy the unique seabed around south stack , the range and further not to mention the destruction of bird breeding sites and fish habitats and will impact on the land with initial cables for porthdafarch/millrd etc ..in short 'morlais' tidal project wiil result in the mortality of

	our Holy Island coastline! it will have catastrophic impact including flooding, as noted in scoping reports, can i implore you to reject Transport and Works Act Order and marine licence.
30	As an inhabitant of Wales who is trying to manage our own land for wildlife I am concerned about the size of the marine turbine project proposed near Anglesey and the lack of scientific monitoring. As someone who has worked in medical research I know how important it is to monitor the effects of our actions. Although it is also important to act to minimise climate change, it is also vital to ensure that we do not increase the damage we are doing to nature.
31	I writ to express concern over the proposed demonstration zone location. As I understand this is a novel renewable energy technology. In principle to be welcomed but with unknown environmental impacts. Locating it close to important seabird colonies such as at South Stack therefore appears unwise. I hope that the pilot/demonstration can be relocated where there are lower potential ecological risks and be carefully monitored to determine its impacts on marine and bird life, before determining its viability and least impact future locations if the demonstration is deemed successful.
32	I write to object to the licence application for the Morlais Tidal Array, Ref. 3234121 Transport and Works Act on the following grounds. These tidal array structures will seriously compromise the feeding area of the well-established and large colonies of sea birds – guillemots, puffins, razorbills and gulls to be found on the sea cliffs on the west coast of Holy Island and especially at South Stack. The South Stack colony is a world-renown site managed by the Royal Society for the Protection of Birds attracting coach-loads of bird watchers throughout the year but especially during the breeding season. There is evidence to suggest that not only would the tidal array affect the ability of the birds to feed in the area but could actually kill these underwater swimming birds. Also at risk from the underwater turbines are the numerous marine mammals to be found in the area which also constitute a considerable tourist attraction. The views off the west coast between Trearddur Bay and South Stack are iconic and reflect the designation of the area as an Area of Outstanding Natural Beauty. There are many postcards and calendar photographs depicting stunning sunsets with the South Stack lighthouse in the foreground and the unspoilt Irish Sea beyond. A view containing the tidal array will be an industrialisation of a currently beautiful, natural scene and one not to be altered if tourism is to continue and flourish. The area between Trearddur Bay and South Stack is much used by fishermen for both sport angling and commercial shellfish abstraction. The area taken up by the tidal array will substantially reduce the activities of the fishing community and seriously impact on their livelihoods. In a similar way, the area is extensively used for recreation by sailors, kayakers and other users of marine craft. To have such a large area placed off-limits will undoubtedly affect the local economy derived from the many visitors to take part in these activities. The whole area between Trearddur Bay and South Stack is one of prime tourism for the whole island of Anglesey: used by those on the water as well as those walking the coastal footpath or using the beaches. The attraction for these tourists is the sense of place, peace and beauty – not the sight of mechanical devices protruding from the surface of the sea. It was my understanding that the tidal array was to be installed on the north coast of the island, not the west. Given that the views from Anglesey to the east are already despoiled by a vast array of wind turbines, siting the array in that area would not impact on a currently pristine view. I would urge you not to approve this licence application.
33	I would like to register my deepest concern regarding the above proposed development in close proximity to a vital seabird breeding site. Has a committed RSPB member for 35 years I have spent several summers working at South Stack as a residential volunteer, being part of this wonderful place. Each year I am blown away by the visitors from all over the world, including Australia Canada, Mexico, USA, Africa, South America, New Zealand, almost every county in Europe along with the United Kingdom, welcoming these visitors, engaging with them is pure pleasure, showing them the wildlife with the thousands of seabirds that nest at South Stack and feed in the waters for miles around the reserve along with our Choughs Peregrines and many birds mammals and flowers. This development is truly worrying as even during the time I am there the sea birds are threatened by speed boats and jet skies coming so close to the cliffs and in area where the birds are feeding or resting. Such a development is bound to adversely impact this delicate ecosystem, which in turn will lead to significant declines in the numbers of puffins, guillemots, razorbills etc that come ashore to breed on this reserve every year. It is vital that we continue to protect such special wildlife reserves for future generations and not threaten it with such a development. In this regard, any proposal will I'm sure be heavily scrutinised under the Welsh Government's flagship legislations namely The Environment Act and The Future Generations Act To summarise, I am against such a relatively unproven/untested energy generation development being built in the ecosensitive zone proposed. I do hope that the above comments will be carefully taken into account when considering this proposal.

34	<p>I wish to register my VERY STRONG OBJECTION to granting a Marine License to the proposed Morlais Menter Mon development – the West Anglesey Tidal Demonstration Zone in the vicinity of South Stack, Holy Island. I was raised and educated on Holy Island, and I have intimate knowledge of the area of Outstanding Natural Beauty which is South Stack. As a dedicated conservationist, I am appalled at the prospect of the unseemly and highly detrimental development in the waters and land adjoining South Stack. I am a permanent resident on Holy Island and own a stretch of the coastline. I have direct visual contact from my house of the part of the proposed zone adjoining the Fangs at Penrhosfeilw. I am greatly concerned at the following aspects : a, The wholly undesirable degradation of the appearance and character of the locality, which is internationally known for its immense beauty and charm. b. The huge damage and disruption that would be caused to the environment and ecology of the area, especially to the habitats, breeding patterns and way of life of the highly important bird colonies, as well as the equally significant fish and marine mammals. c. The inevitable damage that would be done to tourism and the thousands of tourists to whom South Stack is a huge attraction. The local economy would take a big hit with reduced numbers of tourists. d. The whole area is very popular with sailors of all sorts, and the concept of having a string of multiple connected barges would represent a clear danger to safe navigation. I would be obliged if you would take note of my VERY STRONG OBJECTION and send me a note that this has been done. I further request that you inform me when the application for a Marine License has been determined.</p>
35	<p>I write to object to the application for tidal stream development system off the coast of Anglesey. Modelling shows a range of effects are possible from the tidal system. My understanding is that one estimate (which is not the worst case) is that around 60% of the guillemots and 98% of the razorbills at RSPB South Stack could be lost through collision with the turbines. It is therefore highly uncertain what level of tidal stream development might avoid adverse effects on the seabird populations at RSPB South Stack. I am concerned about the scale of the consent that is being sought. My view is that the application has not adequately addressed the risks to seabirds and that it could have unacceptable impacts on nature. For this reason, I object to the application for a Transport and Works Act Order which is needed in addition to a Marine Licence.</p>
36	<p>I am writing due to the concern I have with the proposed and what would appear to be very nearly consented Mentor Mon “Morlais Tidal Array”. Grounds of my objection: May I draw your attention to the “Morlais Tidal Array Scoping Report” Doc #: I&BPB5034R001F0.1 and specifically 8.1.2 “Potential Impacts”. On reading this section you will observe under the column headed “Anticipated Significance” every single input reads “Potential impact significance unknown” To consent and gamble with this unique and Iconic AONB is simply not acceptable giving the sights value to tourism (Anglesey’s #1 trade) and the potentially significant and irreversible destruction to the rich Bio-diversity. More time is required for independent expertise to fully evaluate the risk/benefits of this project, considering this project has been sold on the “good for the Islands Economy and Environment” mantra it seems somewhat hypocritical to rush this project forward Gambling the economy and environment of this Iconic and hugely popular place.</p>
37	<p>I am writing to express my concern at the proposed plan to develop a tidal energy facility off the stacks in Anglesey. I have paddled this area in a sea kayak with paddlers from all over the uk, Scandinavia, Spain, Iceland and the USA/Canada. The tidal flow here creates a safe environment in which to experience conditions that are the envy of paddlers over the world. It is our favoured destination and if conditions allow there will always be paddlers there. Access to this environment will inevitably be impacted by the plans in terms of installation of infrastructure, maintenance, and unpredictable effects on tidal flow. In addition to the fun that can be had, all sea kayakers are concerned with protecting the natural habitat and enjoy the presence of seals dolphins and the myriads of sea birds that nest on the cliffs here. I realise the need for green energy and although we are saddened by the windmills and array of lights off Rhos on sea due to the wind farm we accept this development. I am not convinced that the impact of this project can be fully assessed and find it difficult to believe there are not other sites that could be used with less impact on the local economy, tourism, leisure and wildlife XXXXXXXXXXXX on sea resident.</p>
38	<p>I would like to object to the Morlais Tidal Array marine license application by Menter Mon for the West Anglesey Tidal Demonstration Zone on the following grounds:-Research by Morlais has shown a high mortality of seabirds such as guillemots and razorbills caused by these devices which could lead to the entire population of breeding razorbills at RSPB South Stack being wiped out and a severe reduction in the number of guillemots. These birds are already under threat due to overfishing and climate change. Other birds including puffins and gannets could also be affected. There is a lack of data on how marine mammals would be affected both by collision with blades and by noise from turbines - seals, harbour porpoises and both bottle-nosed and Risso dolphins are regularly seen in the area. It is unclear how effects would be monitored or mitigated in this sensitive ecosystem. 180,000 people a year visit the South Stack area, and South Stack lighthouse is one of the top visitor attractions on Anglesey with the RSPB reserve also being very popular. Many will wish to take that iconic photograph of the lighthouse from the cliffs, and the visual impact of the turbines will be extremely negative. The visual impact of this project would also affect the local tourist industry between Trearddur Bay and South Stack, and the local economy would suffer greatly, as many people use this area for holidaying, kayaking, canoeing, pleasure boat</p>

	<p>cruises, diving, fishing etc. In conclusion although I support the concept of tidal energy, I feel this is the wrong type in the wrong place.</p>
39	<p>I would like to register my strong concern for the detrimental effect of this proposed development on the wildlife in this important habitat. Finding renewable sources of energy is of course imperative for the future but protecting already vulnerable wildlife such as that found around South Stack is also as important. I would urge decision makers to vote against passing plans to allow this to go forward.</p>
40	<p>https://community.rspb.org.uk/getinvolved/wales/b/wales-blog/posts/help-us-to-save-rspb-south-stack-s-seabirds?fbclid=IwAR1FTQdHe2reV9c6W4ffdM54oKXZgRwXe6g_LAe51GRWap945zciMfxs0Bc Whilst I agree for the need for more sustainable energy sources, these need to be sited where they have minimal negative effects on all living species. I therefore object to this proposed development near south stack</p>
41	<p>We do need more renewable energy to reduce the effects of global warming and protect the bio-diversity (inc humans) of this planet. However what is the point of a scheme that could potentially have a significant impact on creatures the scheme is presumably seeking to protect. Seabirds already are threatened by warming seas that is reducing their food supply. Please say NO to this development, would monies be better spent putting up solar panels, installing air source heat pumps and better insulation of homes.</p>
42	<p>I'm emailing to voice my strong concern over the proposed MDZ near South Stack. I believe any pressure put in the sea birds at this site is of huge detriment to the nature crisis/ diversity crisis. Seabirds are already struggling and there surely must be more appropriate locations for this device. Thankyou, XXXXXXXXXXXXX</p>
43	<p>I am writing to give you my objections to the proposed Morlais development off South Stack Anglesey - Planning application reference 3234121 - Transport & Works Act, your ref: ORML 1938. My address is, XXXXXXXXXXXXXXXX. As a full time resident of Anglesey and volunteer at RSPB South Stack I am objecting to the proposed planning application.1. The modelling studies indicate that there will be significant mortality for the guillemot and razorbills, however this is not given any visibility in the application summary/conclusion. These colonies are vital, and cannot be ignored, along with any impact on other seabirds such as the manx shearwaters and gannets which use these waters. Overall the monitoring and mitigation for seabirds is not properly founded.2. The risks to marine mammals such as grey seals, harbour porpoise and dolphins has not been sufficiently considered.3. The technology is unproven and therefore the impact of such a large implementation cannot be determined with any certainty.4. This in an Area of Outstanding Natural Beauty which deserves to be securely protected. The impact on tourism if this is spoiled will be disastrous to the local economy across a wide spectrum of associated businesses.</p>
44	<p>I am objecting against planning application reference ORML1938 Marine License ApplicationPlease can you confirm email receipt of this document.I was appalled to understand that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead marina around the iconic south stack lighthouse to Trearddur Bay. Whilst I appreciate that more renewable energy is a crucial part of tackling climate change, I believe that the developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. I understand that Morlais have submitted a planning application which proposes installations for turbines that harness tidal currents and that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others 'painted orange and/or yellow' would be floating on the surface. I am concerned that as a result of these plans Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area; an area which I and thousands of others have enjoyed walking along over the years. Please do not allow Menter Môn to put this area at risk.</p>
45	<p>I was horrified when I found out that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead marina around the iconic south stack lighthouse to Trearddur Bay. I am aware that more renewable energy is a crucial part of tackling climate change, but developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. Trading protected and environmentally sensitive habitats and iconic seascape and landscapes for low efficiency renewable energy projects must at best be fundamentally wrong. Surely such projects should seek areas of very low sensitivity and utilise high efficient devices?I have been made aware that Morlais have submitted a planning application which proposes installations for turbines that harness tidal currents and that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others 'painted orange</p>

	<p>and/or yellow' would be floating on the surface. The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high. I am concerned Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area. At a time where wildlife is in trouble I simply can't see why we would risk losing this iconic area. Over many years I have enjoyed walking this area of the coast watching the Guillemots, Razorbills, Puffins, Chough, Seals, Dolphins, Orcas and many more species at South Stack. Please do not allow Mentor Môn to put this area at risk.</p>
46	<p>I was horrified to understand that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead marina around the iconic south stack lighthouse to Trearddur Bay. I am concerned that Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area. At a time where wildlife is in trouble I simply can't see why we would risk losing this iconic area. Over many years I have enjoyed walking this area of the coast watching the Guillemots, Razorbills, Puffins, Chough, Seals, Dolphins, Orcas and many more species at South Stack. Please do not allow Mentor Môn to put this area at risk. I am aware that more renewable energy is a crucial part of tackling climate change, but developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. Trading protected and environmentally sensitive habitats and iconic seascape and landscapes for low efficiency renewable energy projects must at best be fundamentally wrong. Surely such projects should seek areas of very low sensitivity and utilise high efficient devices? I have been made aware that Morlais have submitted a planning application which proposes installations for turbines that harness tidal currents and that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others 'painted orange and/or yellow' would be floating on the surface. The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high.</p>
47	<p>I'm writing to argue that the Menter Mon Morlais Ltd application (the application) does not provide enough information about sea kayaking to enable a decision about the granting of a marine licence to be made.</p> <p>Sea kayaking is a named tourism and recreation opportunity in the UK government's marine planning framework¹. Tourism and Recreation is one of eleven chosen sectors included in the marine plan adopted by the Welsh Government in November 2019². These sectors must be considered as part of any marine planning.</p> <p>The application's Environmental Statement includes less information about sea kayaking³ in Anglesey than can be on a leaflet handed to beach visitors by the RNLI⁴. This says: "Mae Ynys Môn cynnig rhai o'r lleoliadau caiacio mor gorau yn y Deyrnas Unedig - Anglesey is home to some of the best sea kayaking in the United Kingdom". This RNLI pocket guide, just one A4 page, shows that the application has neglected an important 'established activity'. Sea kayaking is part of 'Tourism and Recreation' and so is subject to sector safeguarding policies⁵ to protect it from adverse impacts from developments in other sectors, such as Renewable Energy⁶</p> <p>As a member of British Canoeing, who has visited Anglesey for sea kayaking for more than ten years, I want to provide some evidence of the importance of Holy Island as a sea kayaking destination and of the contribution that related businesses make to the local economy. My information is based on published resources plus some sample data collected from a local Yorkshire Canoe Club.</p> <p>Anglesey's unique geography and tidal environment made it the birthplace of modern sea kayaking and continue to make it the sport's present-day mecca. The unique features of the tidal waters off the West Coast of Holy Island drive a virtuous cycle of sustainable economic growth. The classroom and playground provided by these waters⁷ have sustained the development of a range of goods and services for sea</p> <p>The cluster of businesses for sea kayaking and dependent support services include:</p> <ul style="list-style-type: none"> • Two factories in Holyhead⁹, the first established over 25 years ago, designing and manufacturing world class sea kayaks which are sold direct to paddlers in Holyhead as well as via dealers all over the world • Anglesey based kayak training and coaching companies employing local paddlers. The RNLI leaflet lists seven local organisations, but coaches based in North Wales and further afield also host courses in Anglesey. A sample of just one Coaching Calendar including dates from Feb – Nov 2020¹⁰, demonstrates that this is not just a seasonal business. • Training and Assessment for British Canoeing paddle awards, which have international recognition. There is even more potential with the new British Canoeing paddle awards introduced in 2019¹¹. These recognise specialist skills in different paddling environments, from sheltered waters to advanced conditions.

Demand for these awards is driven by the availability of coaches and suitable paddling destinations and brings students to Anglesey from all over the world. • Festivals and events based around sea kayaking also attract visitors from Europe and beyond. The annual Anglesey Sea Kayak Symposium anticipates its 38th event¹² in 2020 with c150 participants and guest instructors from all over the globe meeting to share experiences and paddle Anglesey’s wonderful coastline. Sea Kayak Symposiums now take place in many other parts of the world – but Anglesey was the first and continues to nurture the paddling community and international cultural exchange.

- Retailers and dealers, such as Summit to Sea¹³ which first opened as a small shop selling kayak equipment in Valley, then expanded and now operates out of a warehouse in Holyhead selling a wide range of equipment for outdoor activities.
- Accommodation suitable for eco-tourists and outdoor enthusiasts. There are two substantial businesses on Holy Island providing eco-friendly camping and bunkhouse style accommodation¹⁴ to a clientele of kayakers and rock climbers all year, as well as a host of other campsites and B & Bs.
- Cafes, restaurants and pubs for hungry visitors, especially at Treaddur Bay, Rhoscolyn, Church Bay and Menai.
- And, not forgetting Isle of Anglesey County Council parking charges.¹⁵

In conclusion...

Sea kayaking encourages environmental awareness and is a low impact sport, even picnicking kayakers like to ‘leave no trace’. Perhaps it’s then no surprise that this low key, sustainable marine economy in Holy Island seems to have gone literally under the radar.

However, there is a risk that the proposed development will destroy something that is very special to Anglesey, a world class centre of excellence that supports the local economy and that enhances the UK’s reputation as an eco-tourism destination.

I’d therefore urge that sea kayaking is properly considered as part of the decision about the application.

Feature Box 1: What makes the west coast of Holy Island so important for sea kayaking?

The unique geography of Anglesey as a small island with strong tidal flows occurring in many locations make it that rare thing for kayakers – a location that will provide a range of options for kayaking in most weather conditions and throughout the year. Whatever the weather there is likely to be sheltered or challenging kayaking somewhere on the island, and the presence of strong tidal flows means that coaches can find ‘conditions’ somewhere every day and at all times of the year. This means that kayaking coaching and guiding businesses can operate throughout the year and not just in the summer months.

The really special thing about Anglesey as a sea kayaking venue is that trips that are inherently challenging are a short distance from safe launch spots and support services and therefore easily accessible. Anglesey is also well connected with mainline train services, the A55 expressway and motorway network, close to Manchester and Liverpool Airports and ferries to Ireland. It is one of the few places in Europe that provides challenging seas in close proximity to global transport networks. Most alternatives are much less accessible. The area is also well served by friendly Coastguard support, nearby RNLi stations which gives a sense of security.

This explains why the ‘features’ on the North West coast of Holy Island, the proposed site of the arrays, are a magnet for sea kayakers of all levels of ability from all over the world. A play session in the tide race of Penrhyn Mawr or off the North and South Stacks when there are spring tides and strong winds may be for advanced kayakers. However, in the right conditions and with a suitably qualified local guide, a trip around The Stacks is accessible to a moderately competent kayaker, as well as being one of the most beautiful day trips that you could do – an inspiration to acquire the skills that would give you confidence to paddle these waters without a guide.

Feature Box 2: How many kayakers visit Anglesey – and what do they spend?

I carried out a small survey with sea kayakers within my local Yorkshire Canoe Club. This is one of 286 clubs in England affiliated to British Canoeing. Out of c140 members 13 currently own a sea kayak and travel to the coast to paddle. I asked them how many trips they made to Anglesey in 2019, how many days they spent paddling and how many were led by a paid coach. I also asked them about specific paddling locations.

I received complete responses from 85% of this group. In total these eleven paddlers made 47 person trips to Anglesey with 134 person days of paddling which 96 were led by a qualified coach. 30 paddles started at Porth Darfach which is within the demonstration zone.

To summarise, 9% of our local inland club are sea kayakers and they made an average of four trips each accounting for an average 12 days paddling in Anglesey per person of which 9 were coach led and 3 started in the demonstration zone. British Canoeing (2017 Annual Report) reports over 35,000 members. Assuming our club is representative in terms of the interest in sea kayaking, then there are over 3,000 sea kayakers in England alone. And based on our figures there are tens of thousands of trips to Anglesey for sea kayaking each year and thousands of days of coach led paddling.

	<p>Based on my fellow paddlers experience, each of these trips also includes paying for accommodation food and parking. Including coaching costs, our average per capita spend in Anglesey was over £700 - multiply this by 3,000 and the income to local Tourism and Recreation sector is over £2 million.</p> <p>This excludes expenditure on kit, although I know at least 3 boats were bought by this group from Anglesey manufacturers this year.</p>
48	<p>My wife and I (both born and brought up in Holyhead and Rhoscolyn) have lived very close to X for 10 years and have built from nothing a very successful self-catering holiday cottage business.</p> <p>We understand the undisputable need for clean energy, support the concept of the deeper offshore subsurface project led by Minesto and originally fully supported the Morlais project even discussing potential use of our land with the Menter Mon team.</p> <p>However, the more we have learnt about the Morlias project the more concerned we have become to the point at which we can no longer support the project for reasons that I shall describe further below.</p> <p>I'm not sure exactly who will be reading this letter but if you don't know the area, take a look at the picture below, this summary (all local pictures to S.Stack not random google images) really doesn't start to do the place justice. It has to be one of the best coastlines in the UK and is iconic, often featuring on TV and advertising with fantastic marine life and a large seabird colony. I think it's important that those reviewing the consent application understand what a very special place this is. Which is why I'm horrified at the thought that the NRW and others would potentially approve any tidal energy devices so close to South Stack let alone floating devices.</p> <p>Objection 1. Effectivity Of Consultation Process, Communication & Transparency</p> <p>Menter Mon (Gerallt Llewelyn) approached us in 2015/16 with a view to potentially siting the substation on our land re-assuring us that the project was sub sea and he as a local would do nothing to negatively impact our beautiful coastline, our ecology or our business. (not the case)</p> <p>We had a handful of meetings and exchanged numerous emails eventually determining that we were not going to agree on the recompense for any subsequent lease. MM then sought alternative options which was obviously fine however what was disappointing is that there was no further communication from MM to keep us informed especially when the project scope changed to incorporate floating tidal devices. (MM no longer needed us and therefore dropped all contact)</p> <p>We know that MM will claim that they have followed due process in regard to letters and public information days, but we do not think that the consultation process has been effective or transparent. We attended one of the PID's, where we discussed mainly the planned roadworks and related impact on our business, at no point did we see or hear anything the led us to believe that the project now included floating tidal devices.</p> <p>MM have been careful not to openly communicate the use of floating turbines not actively discussing it unless prompted and using misleading PID posters at the public information days (see example below, can you see the floating turbines?) so as not to raise local concern.</p> <p>It was a local neighbour who in the end informed us in Aug 19 that MM were now intending to deploy floating turbines despite the fact that we live on the doorstep and had already been engaged in discussions with MM. We have since spoken to other neighbours and locals none were aware of the details of the project or the plan for floating devices.</p> <p>MM may have followed a process but it has not been effective in openly communicating the extent of the project to the public and everything has been spun to look and sound as positive as possible, since discovering in August 2019 that MM were planning to use floating devices we have met face to face with MM and other neighbours to discuss our concerns, it has taken these face to face meetings to pull information from MM and even then we have had to search through volumes of the planning application to really understand the project. MM as the developer could have very easily summarised all of the key aspects of the project but it suited them not to do this in the hope that the project would slip under the radar of locals.</p> <p>Objection 2. Visual Impact (Chapter 24)</p> <p>In discussion with MM it was explained that one expert from NRW decided that the floating devices should be sited from South Stack, past Abrahams Bosom and around the old riffle range (zones 4-8 I believe). The rationale given for this was that this was already developed where as zones 1-3 between South Stack and North Stack is undeveloped and must be protected. This is absolutely bizarre as zones 1-3 cannot be seen unless you walk to the backside of the mountain where as all visitors to the RSPB car park (180k+), all local residents and all local holiday cottage businesses like ours look out directly into zones 4-8 and will be directly impacted every day. If we are forced to accept floating devices, then surely zones 1-3 makes a lot more sense if impact to seabirds and marine mammals can indeed be mitigated of which I'm very sceptical. I feel the specific area for any floating devices needs a lot more debate with a panel of experts, RSPB and locals involved and not based upon one NRW expert's opinion.</p>

MM have not given due consideration to protecting the seascape around South Stack and the range, their impact assessment also seems to be in direct contradiction to the Minesto visual impact assessment that focuses on the very same seascape. See extract from Minesto's visual impact assessment, how can we have two assessments that draw different conclusions ...?

"The sea is an important backdrop in the views of the lighthouse contributing to its aesthetic value"

"Views of the sea and of the tower as a picturesque feature with the sea as a backdrop contribute to the towers aesthetic and historic value"

We also have big concerns over the accuracy of the photomontages and MM have refused to use anything else to give us something real to scale from to validate their assumptions despite my direct requests.

I think I'm right in saying that a lot of the photomontages show only an example of a 40MW array too which is not representative of worst case. Some are also taken from a distance (north stack) so they conveniently look very small. Lastly it's impossible for Joe Public to know what exact position in the zone they have assumed (is it as close in as they will ever get?) and also the specific data/process used to generate the photomontages so it's impossible for us to challenge them without our own independent specialist, we all know that data and processes can be manipulated within a range to give a preferred outcome. The photomontages produced by MM do not reflect reality, we have questioned these in various meetings and requested validation but all we get told is that they have been drawn to a recognised process. (this needs testing)

The images below show vessels at various points in the zone, I realise that the length and freeboard is different to a proposed 60m tidal device, they are however undisputable real physical vessels that do confirm that the photomontages are not a true representation of the potential visual impact of this project which is misleading the public and the planning inspectorate as they try to visualise the impact.

Today the area is rugged and unspoilt and this is what attracts hundreds of thousands of visitors to the area every year, floating devices will ruin the area for locals, naturalists and tourists alike. Never again will we all enjoy images like this, MM's Environmental Statement (Chapter 4, page 21) states a maximum of 620 devices of a yet undefined split between surface and subsea. Can you imagine what this image will look like with multiple 60m+ floating tidal devices (the industry is already stating that the technology will only get bigger as they look for efficiencies of scale), I can't believe anyone would approve such a project purely on the visual impact alone despite all the other concerns this project poses.

Objection 3. Landfall & Cables (Chapter 4 Volume I, section 4.4.1.2)

MM propose an option to run cables down (30m width) the side of the cliff if for some reason (probably cost) directional drilling is not an option. We are talking about an area that is an AONB, SSSI, SPA, SAC, Heritage coast and world Geopark where planning laws are normally very restrictive, even dictating the colour we could paint our holiday cottage windows so the thought that we could have cables running down the cliff is outrageous and I think demonstrates that MM have lost sight of protecting our beautiful coastline in their hunger to see this project across the line at any cost. (see cliff in question below)

The project also states use of a potential 270 rock bags or concrete mattresses covering an area of 4,860m² and yet there is very little documented in terms of the impact assessment on the seabed and associated marine life.

Objection 4. Impact on ecology- marine mammals, marine ecosystem, seabirds (Chapter 11,12,4 and appendices in vol 2&3)

The coastal waters off South stack are a sensitive ecosystem with a wide variety of marine life. Implementing such a large scale poorly defined project as close as 500m to 1km to the cliff line with unproven technology makes an accurate impact assessment impossible. As there is a lack of data from the manufacturers on the acoustic signature there is no way of knowing to what level the impact will be let alone on a cumulative scale. Added to that there are no proposals on how the actual impacts will be monitored merely vague statements about "adaptive management". To be meaningful adaptive management needs data, there is no such monitoring plan.

Seabird mortality for guillemot and razorbill in the modelling studies is very high and is not shown in the summary and conclusions. We are aware that like us the RSPB are very concerned and have additional concerns for other species of seabirds including, red throated diver, shag, Manx shearwater and Gannets.

There is very little solid mitigation and monitoring for seabirds specified and what is detailed is unprecedented. We regularly see seals, seal pups, and dolphins in and around the planned zone and are very concerned that with little data available, no clarity of the type, location and quantity of devices the risk to marine mammals particularly grey seals, bottle-nosed dolphin and harbour porpoise is unknown and likely high due to the effects of acoustics and potential mortality from impact. (We even had Orca's pass South Stack in 2018, would we have seen these beautiful creatures with all that acoustic noise!) Again, there is a lack of mitigation and monitoring related to the marine mammals. The famous and very popular seabird colony is a huge draw and the birds depend heavily on the waters close to South to feed themselves and their young, we realise that the area has been chosen for its strong tidal flow but its not the only area with strong tides

so why on earth would you allow tidal turbines so close to a large important seabird colony and ruin the stunning (supposedly protected) seascape around south stack in the process.

Objection 5. Roadworks

Due to the narrow nature of the lanes, the planned roadworks will be hugely disruptive to locals and to our businesses, there is no impact assessment that considers the impact on our businesses or that define a need to supply us local business owners with a clear project plan for the roadworks that will help us understand the impact on our businesses and allow us to plan for the disruption. No thought has been given to loss of business and revenue for local businesses like ours, will MM compensate us for loss of business?

As the roads are narrow I assume that miles of hedgerow and dry stone walls will be uprooted and destroyed resulting in the loss of habitat for wild birds, weasels, stoats etc, I have seen no impact assessment or mitigation related to this.

Objection 6. Impact on tourism

Anglesey has long been a favourite with tourists and the Isle of Anglesey County Councils own report on tourism from 2018 appears to be in direct conflict with projects such as this tidal energy project that will by MM's own impact assessment create an "Industrialization of our seascape".

Anglesey county council's own 2018 report (based on Wylfa) is very critical of the risk to its 1.71million annual visitors to the island and clearly highlights all of the risks that large scale energy projects pose to tourism and our natural environment. The same arguments apply so how the council can make such strong arguments against one project and then appear to support another that poses an even greater threat to an even more sensitive seascape and natural environment are beyond me. See extract from Anglesey County Council report below along with the full link that makes all the arguments for me.

In 2016, Anglesey was named the second-best UK holiday destination.

Anglesey's greatest tourism assets lie with its natural and historic environment, which have been acknowledged and designated nationally and internationally. Much of Anglesey's 201km coastline and coastal habitat is a designated AONB and it attracts a large and growing number of visitors to its beaches and 125m Coastal Path. The Isle of Anglesey AONB has 'one of the most distinctive, attractive and varied landscapes in the British Isles. It contains many diverse habitats supporting a wealth of marine and terrestrial wildlife, including rugged cliffs, heathland, sand dunes, salt marshes and mud flats.

Many of Anglesey's habitats have statutory protection, including Special Areas of Conservation (SAC), Special Protection Areas (SPAs), a National Nature Reserve (NNR), Sites of Special Scientific Interest (SSSI) and Local Nature Reserves (LNRs). Adjacent to WNP is the Cemlyn Nature Reserve, whilst the North Anglesey coast is home to internationally and nationally important wildlife. The diverse and frequently endangered wildlife species include: harbour porpoises, European eels, grey seals, silver studded blue butterflies, marsh fritillary butterflies, choughs, roseate and sandwich terns and red squirrels. The AONB is complemented by 50km of undeveloped Heritage Coasts: North Anglesey, Holyhead Mountain, and Aberfraw Bay. These coastal resources have been identified as Anglesey's Unique Selling Point (USP) for tourism and the protection, enhancement and management of these natural and heritage assets is recognised in the JLDP.³⁸ Clearly, Anglesey's appeal centres around its pristine environment, which inspires people to visit and explore. Its spectacular and varied coastline, most of which is a designated AONB. Anglesey's AONB is characterised by expansive views, conveying perceptions of 'exposure, openness, wilderness and a feeling of isolation. Energy production and transmission are threats to key aspects of the AONB including its expansive views and peace and tranquillity.

The AONB has high levels of quietness and tranquillity and in 2009 58% of it was designated as 'undisturbed. Tranquillity is a key measure and attraction of the AONB and it is a quiet area, which provides 'respite from noise,

ultimately improving quality of life, qualities that are highly valued by visitors.

[https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010007/EN010007-002423Isle%20of%20Anglesey%20County%20Council%20-%20Local%20Impact%20Report%20Annex%205%20-%20Anglesey%20Tourism%20Topic%20Report%20%20by%20Swansea%20University%20\(November%202018\).pdf](https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010007/EN010007-002423Isle%20of%20Anglesey%20County%20Council%20-%20Local%20Impact%20Report%20Annex%205%20-%20Anglesey%20Tourism%20Topic%20Report%20%20by%20Swansea%20University%20(November%202018).pdf)

Objection 7. Impact on our own holiday cottage business

Despite personally raising concerns over the impact to our own holiday cottage business with MM on a few occasions over the years MM have not only decided that this does not warrant even any kind of impact assessment, mitigation plan or potential agreement on compensation for loss of revenue but they have also failed to mention our business and that of some of our neighbouring businesses when listing the range of visitor

accommodation in the area in Folder 4 Tab 5 25.4.7.3 119. Naming Coastal Retreats, Ty Mawr & Blackthorn but ignoring Anglesey Sea Views (our business), Bodwarren Cottages and Ty Nant who all coincidentally have all raised significant concerns with MM!

Our own business specific concerns are centred on 4 main issues some of which have already been touched on.....

1. The impact on the fantastic seascape that our visitors all enjoy and come back for time and time again, our brand is 'Anglesey Sea Views' and not 'Anglesey Tidal Turbine Views' any negative impact on the seascape will have a significant and lasting impact on our business.
2. Impact on the business due to years of roadworks in the area putting new guests off coming and putting existing guests off repeat bookings. Why should our business suffer with no thought for minimising the specific impact on our business or any plan to offset any loss of revenue.
3. Decline in seabird colonies and marine mammals making the place less attractive to visiting guests
4. General reduction in business and property value due to all of the impacts already discussed

Objection 8. Size of the MW capacity in the zone does not tie with the infrastructure capacity
 MM are requesting approval for a 240MW development within the zone while Minesto have just announced a plan to grow to 80MW so that's a potential 320MW of power. Both projects share the same infrastructure to get the power ashore and to the grid. The planned substation and cable works under the roads is only rated to handle 180MW so in order to manage this 320MW in years to come there would need to be a fundamental expansion of the substation and they would have to dig all the roads up all over again and put us locals, our businesses, tourists and the environment through more pain all over again. This is a crazy plan so why is the MM application not limited to 100MW to tie back to the transformer and cable capacity?

Summary

We recognise the need for clean energy and with the right execution and governance could support more responsible development such as Minesto that is further from the seabird colony, in deeper water and where it recognises the need to protect the visual impact on our protected coastline however we believe that MM's plans to install tidal devices so close to South Stack and the range will have a devastating impact on our natural environment resulting over the years in a decline or total loss of some seabirds and marine mammals, significantly impacting the islands reputation and attraction to visitors and ruining this iconic coastline forever.

A report from the planning inspectorate examining the local joint development plan 2011-2026 highlights in Policy AMG1:

'Special Landscape Areas' is aimed at ensuring that development should aim to maintain, enhance or restore the recognised character and qualities of the sixteen Special Landscape Areas (SLAs) within the Plan area. The mechanism for their protection, as set out in the policy, is to only permit development that would not have a significant adverse impact on the landscape, and to seek that development should aim to maintain, enhance or restore the character and qualities of the designated

SLAs." <https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-andpolicies/Environment-and-planning/Planning-policy/Inspectors-Report-2017/1.-Anglesey-and-GwyneddJLDP-Inspectors-Report.pdf>

The Morlias development fails to take effective account of the areas special qualities and will certainly not maintain or enhance the qualities of the SLA.

We therefore look to the NRW and others at a minimum to reject the use of floating turbines in this hugely sensitive area

If the development is to proceed with sub surface devices, they should be shifted away from the main seabird feeding areas around South Stack and the range with strict limitations on qty and much improved plans for monitoring of impact on birds and other marine mammals.

What cannot happen is that we allow external pressure to produce clean energy to push through approvals for a poorly thought through project that will clearly have a hugely negative impact on one of the UK's most beautiful and sensitive coastlines, someone needs to stand up for our local environment and critical tourism economy.

Fully support clean energy but not at any cost, please please help us protect and nurture what we have today and don't let this project destroy South Stack as we know it today.

49	<p>I have been made aware that a developer (Menter Môn- Morlais) has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead marina around the iconic South Stack Lighthouse to Trearddur Bay. Morlais has submitted a planning application which proposes installations for turbines that harness tidal currents and if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others 'painted orange and/or yellow' would be floating on the surface. The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high. I am concerned that the plan proposed by Morlais will significantly damage local wildlife and habitats of this unspoilt, natural and rugged area. I cannot understand why, at a time where wildlife is already in grave danger, a project that would put this iconic area at such a risk would be allowed to go ahead. I have enjoyed walking this area of the coast over many years and have relished in watching the Chough, Puffins, Guillemots, Razorbills, Seals, Dolphins, Orcas and many more species at South Stack. Although I am aware that more renewable energy is a critical part of tackling climate change, developments need to be sited and planned in ways that do not add to our current and equally disturbing nature crisis. Trading protected, environmentally sensitive habitats and iconic seascape and landscapes for low efficiency renewable energy projects must be, at best, fundamentally wrong. Surely, such projects should be implemented in areas of very low sensitivity and utilise high efficiency devices in order to truly justify the disruption to the local environment? Please do not allow Morlais to put the South Stack area at risk of losing its sensational wildlife.</p>
50	<p>I wish to lodge my formal objection to the proposed tidal stream demonstration project planned for the West Coast of Anglesey. 1. My background... I am an Animal Scientist and I have been visiting the proposed site by sea for around 20 years. I am a private and commercial sea kayak Coach and I regularly use the area for instruction and with clients of all backgrounds and abilities. As a British Canoeing Guide, I introduce Club and commercial clients to the broad diversity of marine mammals and birdlife to be found in this area. 2. My objection... From a commercial and sporting perspective the altered flow will cause this region to lose its present state of international reputation. This will have a direct and adverse effect on my own and other local businesses. I have little doubt the regular visits by marine mammals will be adversely affected. Indeed, the whole ecosystem will be changed. Whilst I understand a need for renewable energy, why choose a site of such biodiversity, recreational and commercial interest where so many people run low impact businesses which enhance others lives and safety on the sea? I look forward to any response</p>
51	<p>We are objecting against planning application reference ORML1938 Marine License Application.</p> <p>2 OBJECTION 1 : Mentor Mon Communications</p> <p>2.1 Identity of objection</p> <p>Throughout the process communications with Morlais have not been transparent and in some instances misleading</p> <p>2.2 Ground for objection</p> <p>2.2.1 Misleading communications by Mentor Mon (MM).</p> <p>MM may have met all of the communication requirements in line with the 'process'. However, this objection relates to MM's inability to share with the general public the extent to which visible surface penetrating/flotation devices would be deployed in the MDZ zones. MM engaged with the public and landowners on the West Coast of Holy Island in an attempt to purchase land to enable infrastructure for the project. During the meetings they gave express verbal guarantees that there would be no surface penetrating devices (all devices would be seabed mounted) and as such there would be no seascape visual impact. Several meetings were held at my property, one in the presence of my legal council where MM stated that they would be no visual seascape impact. (11 am on Thursday 8th Nov 2018 Gerallt Llewelyn-Jones - MM and David Ellis - Land Agent MM). It is now clear that MM were aware of the magnitude of the potential for surface mounted devices and as such we were grossly misled. It was not until Monday 3rd June 2019 that Gerallt Llewelyn-Jones – MM visited my property and advised on the possibility that a minimum of 120 surface penetrating devices could be deployed in the zone not 1000m off the shore where the devices could be 60m long and 3m tall. I discussed this with other residents, business and landowners in the area who had been misled in the same way. This is a common theme and has been identified over the past 6 months. Further Mr Jones had the opportunity to discuss with me the TWAO and its potential significant impact to my property and its grounds. He failed to do this.</p> <p>2.2.2 TWAO MM Communications</p> <p>A TWAO questionnaire was submitted via post which was completed and returned to Baileys and Partners in early July 2019. No communication was then received from Bailey and Partners even after several email follow ups. A response eventually received from Edmund Bailey stating that he was in a meeting with MM and Engineers on the 1st August. No further updates were given by Bailey's, so further emails were sent as follows ups. Bailey's then advised that: 'There have been some changes made to the plans since the last meeting and when I am in a position to share these with you I will. What I can do at this stage is offer you assurance that the project does not envisage requiring any legal interest in property owned by you within vicinity of the proposed development. I hope this offers some re-assurance and</p>

I will try and ask that you are updated as and when there are relevant updates to give.' No further communications were received. It is clear from document MOR/WLP/SHEET1/V2 created by Bailey's Partners that there would be significant 360° visual impact to my property. Indeed, the parcel of land 'number 4' has a common wall/boundary with the South West of my property as does parcel of land numbers '3a and 1'. As a direct route of communication was open, this lack of communication is now interpreted as a deliberate attempt to withhold information as to the true extent of the TWAO and its impacted on my property and general living standard if the planning consent was approved.

3 OBJECTION 2: Cable Landfall (Morlais Project ES Chapter 4: Project Description Volume I (MOR/RHDHV/DOC/0004))

3.1 Identity of Objection: (Cut and paste sections from the application)

[Section 4.4.1/152]: 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:

- HDD; or
- Open cut trenching.

[Section 4.4.1/153]: HDD is the preferred method to achieve landfall. If HDD is not feasible, the proposed alternative method is to trench across the foreshore region. An excavator will create up to nine separate shallow trenches between 480 m to 740 m long (or installed within a single trench if possible) between landfall and transition pits. This will be followed by installation and pinning of ducting and/or subsea cable within the trench across the cliff top and fore shore, with a split-pipe used to carry cabling down the cliff face. If trenching is not possible in the foreshore, then cables will be surface laid and secured using concrete mattress and or rock bags. Quantities of rock bags or concrete mattresses for the export cable route, including the intertidal area, are included in Table 4-10.

[033 MORBAYDRW0002 TWAO Map1 Location Plan shows drawing MOR/WLP/Sheet1/v2] show a detailed works and land plan of the proposed routing and land fall of the cabling and proximity to my residence (Henborth)

[041 MORBAVDRW0008 SECTIONS shows drawing 12938-BVL-Z0-00-DR-C-00061] Show detailed engineering sectional drawing through work No3, Work No4 and Work No. 5 as described below:

- Work No. 3: Up to 9 export cables each comprising cables for the transmission of electricity and communication within the intertidal area either laid underground, over the surface of foreshore or within up to 9 open cut trenches with cable protection and connecting Work No. 2 and Work No. 4.
- Work No. 4: Up to 9 export cables each comprising cable for the transmission of electricity and communication within the area either laid underground, over the surface of foreshore cliff face and cliff top or within up to 9 open cut trenches with cable protection between Work No.3 and the transition joint bays forming Work No. 5.
- Work No.5 Works comprising up to 9 transition joint bays connecting Work No. 4 with Work No. 6.

3.2 Grounds for objection

3.2.1 Land area 4 shown on Map1 Location Plan shows drawing MOR/WLP/Sheet1/v2 has a common boundary with my property yet I have not been consulted on the TWOA even though documents were sent in respect to my land ownership to Baileys and Partners in early July 2019 (See section 1.2.2)

3.2.2 Land area 3a shown on Map1 Location Plan shows drawing MOR/WLP/Sheet1/v2 has a common boundary with my property yet I have not been consulted on the TWOA even though documents were sent in respect to my land ownership to Baileys and Partners in early July 2019 (See section 1.2.2)

3.2.3 Land area 1 shown on Map1 Location Plan shows drawing MOR/WLP/Sheet1/v2 has a common boundary with my property yet I have not been consulted on the TWOA even though documents were sent in respect to my land ownership to Baileys and Partners in early July 2019 (See section 1.2.2)

3.2.4 Ref Section 4.4.1.1: HDD Compound and Transition Pits. It is noted and accepted that HDD cables and drilling are the preferred method of cable installation and that the drilling location will be at the transition pit location approximately 100m from my residence. It is also noted that the transition pit will have acoustic fencing surrounding the compound and that the compound will be buried on completion of the works [4.4.1.1/155] however the following is not clear:

- The provided acoustic mapping for drilling during day-time and night-time overlap my property and from Table 4-18 Summary Table for Onshore Construction Schedule Parameters it appears that HDD is scheduled for 24 hours a days and 7 days per week for 10 months. As the acoustic map can only be indicative at best we would request that Morlais install acoustic recording devices at my property and that upper limits for day and night time are set by a specialist skilled in the art of acoustics and that any acoustic data recorded at or above the agreed limit results in the immediate cessation of activities until remedial actions are taken to remedy the route cause.
- Drawing 12938-BVL-Z0-00-DR-C-00061 show sections for Work numbers 5, 4 and 3. From the sections it is unclear how deep the 8 bore holes and cables will be below the centreline and how spread out from the centreline, hence how close to my property they will run. It is unclear what level and frequency of underground vibrations will emanated from the drilling of the 8 cores and as such what impact such vibrations will have on the geology of the bedrock and also the structural integrity of my property both in terms of my house and its foundations and any retaining walls and their foundations within and surrounding the grounds of the property. As any study predicting the amount, magnitude and frequency of vibrations can only be indicative at best, as

such we would request that Morlais install an industry standard array of vibration measurement devices. The system should include an array of devices to sense the vibration (accelerometer), magnitude and frequency of vibration capable of detecting the amount of vibration and disturbance that my property is being exposed to. Upper limits in respect of the amount, magnitude and frequency should be set by a specialist independent consultant skilled in the art and reviewed on a daily basis such that any data recorded at or above the agreed limit would result in the immediate cessation of activities until remedial actions are taken to remedy the route cause.

3.2.5 Ref Section 4.4.1.2. Landfall Trench/Surface Laying Option. It is noted and accepted that trench/surfacing laying option is a worst case and would only be used if HDD should prove to be not feasible. If in the event that the trench/surface laying option has to be exercised between work No5 and work No.3 whose location, description and magnitude are shown above and in Table 4-10 Key Parameters of the Export Cables. (See Map1 Location Plan drawing MOR/WLP/Sheet1/v2 & drawing 12938BVL-Z0-00-DR-C-00061) the following objections are raised:

- Significant work is planned/proposed in location number 3 (Map 1) during Work No.4 where nine shallow trenches of a total width of 30m would be created. Field number 3 is located immediately next to my property and topographically elevated above my property. Between the works and my property if a retaining wall with a 30' fall to my property (See photograph 5 Appendix I of this document). The concern and therefore the objection is both from an ongoing structural and health and safety perspective in that any industrial installation operations within the field may have an immediate or delayed structural effect on the retaining wall. A potential collapse of the retaining wall would create a landslide of literally 10's of tonnes of stone burying all in its immediate location. As my property has a patio below the retaining wall there is a significant risk to the health and safety of myself and my family and any guests sitting in this area.
- Significant works are planned/proposed for the cliff edge shown as location 3a (See schematic 1) where in the worst-case scenario, 9 J-tubes would be run down the cliff edge in full view of the tourist population from the Anglesey Coastal Path. Each tube being 350mm external diameter and 500mm separation. The total grouped J-Tubes would be non-transient and have a 30m wide footprint). This is completely unacceptable as the cliff edge amongst other protected designations is a spectacular coastal area which is noted for its biological, botanical and ornithological value and supports important seabird colonies. The following is relevant with regard to this objection as the cliff is located:
 - within an area of outstanding natural beauty and 9 tubes 30m wide would represent a highly visible scar which would be in full view from the Anglesey Coastal Path. 300,000 people walked the coastal path in 2015. 180,000 tourists visited the South Stack Reserve in 2018. If these numbers continue then a minimum of 180,000 visitors per year would have to witness this scar on the landscape at Abraham's Bosom. Images have been taken (see below) and points made in respect of this area of natural beauty and its potential destruction by MM:
 - Viewpoint A: The Coastal Path on the Range (See schematic 1 and photograph 1a and 1b). The proposed cliff location is clearly visible from the Anglesey Coastal Path on the Range.
 - Viewpoint B: South Stack Road from Porth Dafarch to South Stack. (See schematic 1 and photograph 2). The proposed cliff location is clearly visible from main road between Porth Dafarch and South Stack.
 - Viewpoint C: Anglesey Coastal Path above South Stack Road (See schematic 1 and photograph 3). The proposed cliff location is clearly visible from the Anglesey Coastal Path.
 - Viewpoint D: Anglesey Coastal Path Viewing Point (See schematic 1 view photograph 4a and 4b). This is a highly visited and well know viewing area at the end of the Anglesey Coastal Path. This vantage point is apx 100m from the proposed cliff location and directly overlooks the intertidal area.
 - Pre-Cambrian geology protected by SSSI - within and SSSI. (The bird assemblage of razorbill, guillemot and puffin are listed by NRW as a bonus feature of the SSSI. The SSSI citation states that the seabird colonies are important (and therefore need to be safeguarded)
 - within the heritage coast - within the SPA and its species (Designated for breeding and wintering though) - within the SAC and its habitats - part of the heritage coast - is home to an establish nesting colony of Jackdaws - is home to breeding seals - further;
 - limited seascape/landscape and visual assessment or environmental/ecological impact assessment has been conducted for this area in respect of running the J-Tubes up the cliff edge.
 - This area is extremely close to the shingle beach which I own. It is unclear of the immediate or ongoing structural stability impacts that such an installation may pose to the health and safety of any persons perusing leisure activities on the beach or in the sea below the beach.
 - The area where the K-tubes would be located is designated a Public Open Space (beach) as such it is unclear of the immediately or ongoing structural stability impacts that such an installation may pose to the health and safety of any persons perusing leisure activities on the beach - Further is in contravention of:
 - Policy PCYFF 4: Design and Landscaping' where all proposals should integrate into their surroundings
 - Strategic Policy PS 19: Conserving and Where Appropriate Enhancing the Natural Environment Manage development so as to conserve and where appropriate enhance the Plan area's distinctive natural environment, countryside and coastline
 - Policy AMG1: Area of Outstanding Natural Beauty (AONB) 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
 - Policy AMG 4: Coastal Protection Developments in Heritage Coasts must have overriding economic and social benefit and not cause unacceptable harm
 - Strategic Policy PS 14: The Visitor Economy Ensuring compatibility with the local economy and communities and ensuring the protection of the natural, built and historic environment
 - Policy AMG 5: LOCAL Biodiversity Conservation Proposals must protect and, where

appropriate, enhance biodiversity that has been identified as being important - Policy AMG 6: 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) 1 or regionally important geological / geomorphologic sites (RIGS) must have overriding economic and social benefit and not cause unacceptable harm - Policy PS 20: Preserving and Where Appropriate Enhancing Heritage Assets it is important that heritage assets - encompassing archaeology and ancient monuments, listed buildings, conservation areas and historic parks, gardens and landscapes are preserved - Significant works are planned for location 1 (Map1) during work No3. This represents an intertidal zone were in the worst case the nine J-Tubes will be held in place by 260 x 18m² 'rock bags' and/or concrete mattresses (see Table 4-10 Key Parameters of the Export Cables above) with total seabed footprint (nine cables plus cable protection systems and rock bags/mattresses) of 11,745m². This is completely unacceptable as the structures would be of a non-transient nature and the intertidal zone is: - within an area of outstanding natural beauty and a total seabed industrial footprint of 11,745m² would present a highly visible scar which would be in full view (with the exception of high tide) from the Anglesey Coastal Path from the Range, along South Stack Road, a highly visited viewing area on my land (which is part of the coastal path). See photograph 4a and 4b in the appendix section of this documents. - pre-Cambrian geology protected by SSSI - within and SSSI - within the heritage coast - within the SPA and its species. (Designated for breeding and wintering chough) - within the SAC and its habitats - part of the heritage coast - is home to breeding seals - further; - limited seascape/landscape and visual assessment or environmental/ecological impact assessment has been conducted for this area in respect of the total seabed industrial footprint of 11,745m² - limited to no assessment has been made of seabed scarring associated with the 260 rock bags and or concrete mattresses. - this area is extremely close to the shingle beach which I own. It is unclear of the immediate or ongoing structural stability impacts that such an installation may pose to the health and safety of any persons perusing leisure activities on the beach or in the sea below the beach. - the area is designated a Public Open Space (beach) as such it is unclear of the immediately or ongoing health and safety of any persons perusing swimming, leisure boat, scuba diving and sea kayak and other leisure activities on the beach. - Further is in contravention of: - Policy PCYFF 4: Design and Landscaping' where all proposals should integrate into their surroundings

- Strategic Policy PS 19: Conserving and Where Appropriate Enhancing the Natural Environment Manage development so as to conserve and where appropriate enhance the Plan area's distinctive natural environment, countryside and coastline - Policy AMG1: Area of Outstanding Natural Beauty (AONB) 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 - Policy AMG 4: Coastal Protection Developments in Heritage Coasts must have overriding economic and social benefit and not cause unacceptable harm - Strategic Policy PS 14: The Visitor Economy Ensuring compatibility with the local economy and communities and ensuring the protection of the natural, built and historic environment - Policy AMG 5: LOCAL Biodiversity Conservation Proposals must protect and, where appropriate, enhance biodiversity that has been identified as being important - Policy AMG 6: 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) 1 or regionally important geological / geomorphologic sites (RIGS) must have overriding economic and social benefit and not cause unacceptable harm - Policy PS 20: Preserving and Where Appropriate Enhancing Heritage Assets it is important that heritage assets - encompassing archaeology and ancient monuments, listed buildings, conservation areas and historic parks, gardens and landscapes are preserved.

4 OBJECTION 3: Socio-Economics, Tourism and Recreation Document Reference: PB5034ES-025 and statements in respect of Abraham's Bosom and the sight of landfall. (Ref section 116 of Morlais ES Chapter 25)

4.1 Identity of Objection:

Morlais states: Tourists are attracted to Anglesey for many reasons. A 2003 Survey carried out by Anglesey and Gwynedd Councils as part of the Local Joint Development Plan stated that 41 % of visitors were attracted to the region by the scenery and landscape, 19 % by the beaches and coastlines and 18 % by access to outdoor activities. Other factors included tranquillity, walking, castles and abbeys. Unequivocally, the area's landscape and natural beauty play a significant role in the number of visitors Anglesey receives, as does its rich and diverse cultural heritage. Whilst the cable landfall will be onto one of Anglesey's beaches, at Abrahams Bosom, this is not a busy or popular amenity beach, so effects on tourism are likely to be negligible.

4.2 Grounds for Objection

As can be seen in Appendix I of this document (photographs 1 – 4 and schematic 1). The area identified by Morlais is an extremely popular location for tourists walking the Anglesey Coastal Path. It is easily demonstrated that the visual impact alone by routing cables up cliff faces and within intertidal zones will massively detract from the scenery, natural beauty and rugged landscapes which 'Unequivocally, play a significant role in the number of visitors to this area of Anglesey'. The conclusion that Morlais have made is unacceptable and unfounded and will detract from the wealth, health and wellbeing of the area as well as destroy valuable untouched and natural landscape. Further, a reduction in tourism within this area could significantly impact the employment offered by the RSPB reserve and management therein. The RSPB reserve consists of a wide range of coastal habitats that supports a variety of wildlife. The sea cliffs provide nest sites for over 9,000 seabirds, including puffins,

guillemots, razorbills, kittiwake and fulmars. The reserve's heathland is part of the largest area of maritime heath in North Wales. The reserve is important for its coughts, with approximately breeding 10 pairs. Besides coughts, this important habitat supports the endemic plant spatulate fleawort, and the uncommon silver-studded blue butterfly. A reduction in employees at the RSPB due to a reduction in tourism could have a significant impact on the wellbeing of the biological, botanical and ornithological protection of the reserve and AONB.

5 OBJECTION 4 Acoustic Signatures of Deployed Devices into The Demonstration Zone

5.1 Identity of Objection

The Morlais Project looks to deploy new technology on a large scale off South Stack and the Heritage Coast in a sensitive ecosystem which is home to a wide variety of marine life and an extremely diverse ecosystem.

Implementation of such a large scale project as close as 500m to 1km radius to the cliff line using unproven technology makes any impact assessment unrealistic. Morlais and the 'manufacturer's' of devices have not developed, demonstrated or documented any acoustic signature data for the proposed devices, as such their individual and/or more importantly their cumulative direct impact on the ecosystem is completely unknown; more specifically their impact on the numerous species of echolocating marine mammals who are currently thriving in the demonstration zone.

5.2 Grounds for Objection

5.2.1 The acoustics impact assessment cannot realistically estimate the nature of the acoustic impact of the devices within the Rochdale Envelope (the modelling strategy that Morlais have adopted) so close to the Heritage Coast let alone the magnitude or cumulative effect of individual and/or cumulative device arrays on the ecosystem. Added to that there are no proposals on how the actual impacts will be monitored, merely vague statements about "adaptive management". The term Adaptive Management, to be meaningful must be based on real-time credible data. This data doesn't exist. There appears to be no real-time monitoring plan proposed to be conducted by experts in the field who are external to the Project. The following species of echolocating marine mammals are well documented in the demonstrations zone:

- Several species of dolphin including Risso's Dolphins and Bottle Nosed dolphins - Orcas - Harbour Porpoise

6 OBJECTION 5. Seabird mortality and impact assessment

6.1 Identify of objection

The Morlais Project looks to deploy new technology on a large scale off South Stack and the Heritage Coast in a sensitive ecosystem with a wide variety and diversity of bird life. Implementing such a large scale project as close as 500m to 1km radius to the cliff line with unproven technology makes any impact assessment unrealistic.

6.2 Grounds for Objection

6.2.1 The impact assessment on some bird species is questionable at best. At worst it can almost be dismissed. Ornithological specialists skilled in the art from the RSPB (who are extremely prominent in this area - RSPB South Stack Reserve) have reported that the assessment methodology within the application for birds is weak and questionable including but not limited to concerns over the effects on:

- seabird mortality for guillemot and razorbill in the modelling studies is very high and is not shown in the summary and conclusions - other species of seabirds including but not limited to red throated diver, shag, Manx shearwater and Gannets, further; the mitigation and monitoring for seabirds is weak and is unprecedented.

7 OBJECTION 6: The Rational & Location of Surface Penetrating Devices

7.1 Identity of Objection

Implementing such a large-scale project as close as 500m to 1km radius to the cliff line of the heritage coast with unproven surface penetrating technologies in a designated area of outstanding natural beauty (AONB) which is renowned for its spectacular seascape and rugged coastal landscapes is unacceptable. The whole of the demonstration zone is immediately visible from the Anglesey Coastal Path which is visited by millions of naturalists and tourists each year. The visitors to the area, (as well as being a huge source of revenue to the local economy) have not come to the AONB to witness an industrial seascape of large floating orange/yellow barges. The tourist impact assessment seems to indicate that tourist will visit the area just to see the devices?

7.2 Grounds for Objection

7.2.1 The conclusions on the impact on tourism appear weak and unsubstantiated, stating that 'there will be minimal disruption to tourism' which seems inconceivable even to the layman.

7.2.2 The area is within and SSSI, the heritage coast an SPA and SAC has a very high level of protection and for very good reasons. Introducing arrays of man-made industrial devices which have immediate and ongoing negative visual is unacceptable.

7.2.3 The whole of the demonstration area is immediately visible from the Anglesey Coastal Path. At some points along the coastal pathway the planned surface penetrating devices (circa 120) of 60m wide by 3.3m tall could be as little as 1000m off the shore.

Introducing such man-made industrial devices which have immediate negative visual impact is unacceptable in this area of natural beauty.

7.2.4 Surface penetrating devices and arrays of devices are to be painted yellow or orange making them even more conspicuous during daytime.

7.2.5 Surface penetrating devices and arrays of devices will be illuminated during the hours of darkness making them even more conspicuous during night-time.

7.2.6 The transition from mid-stream and bottom secured devices to surface penetrating devices has been determined due to the lower financial costs of surface penetrating devices. Technology exists to harness all of the devices below the sea surface as such having no visual impact to the landscape, seascape and local economy. Project costs have been prioritised over the costs and risks to the ecosystem, environment and local economy.

7.2.7 The location of surface penetrating devices have been moved from sub zones 1 – 3 and placed into 4 – 8 within the Demonstration Zone (South Stack Light House to Porth Dafarch) after consultation with NRW. This visually exposes the surface penetrating devices to a much higher footfall of tourists. The rationale for this move has been even been questioned by the Morlais Project. If surface penetrating devices have to be used they should be located in sub zones 1 -3 where there are higher tidal flows and much much lower footfalls and as such the visual impact to the landscape and seascapes would be minimised.

8 OBJECTION 7 Seascape Impact Assessment

Morlais are proposing surface penetrating devices, which in some instances can be as large as 60m x 3m orange devices and arrays of devices and these may be as little as 500m radius off the Heritage Coast Shoreline. The devices will create a significant negative seascape impact

Within the current offshore area there is already an established sub-sea project which has been developed by a company called Minesto. Minesto utilise a sub-sea strategy.

Two face to face meetings were conducted between concerned West Coast residents and business owners in the presence of MP Albert Owens. Mr. Owens in summing up in the second meeting advised that his recommendation is that all cables and tidal devices should be sub surface (sea and/or land).

8.1 Identity of Objection

The Morlais seascape visual impact assessment for surface penetrating devices in zones 4 – 8 (including photomontages) are simply not credible.

There is a significant divergence in seascape visual impact assessment between Morlais and Minesto even though both companies are employed within the same tidal energy sector.

8.2 Grounds for Objection

The Morlais Team were asked to geo-locate/place a 60m x 3m tall orange barge out to 1km off South Stack Lighthouse (Mtg of Friday, 13th of September Trearddur Bay Hotel in the presence of Albert Owens MP) such that real time images could be witnessed by MP's, councillors and residents and business owners and the information recorded and compared to the photomontages. This suggestion was not taken up by the Morlais Project Team, even when such a strategy could definitely conclude the visual impact to the seascape.

8.2.1 The photomontages showing the deployed surface penetrating devices lack credibility:

- When the viewpoints used for the photomontages are actually visited (especially those taken from the locations below) they are simply not credible. Even from layman's perspective the images are so hugely skewed in the

favour of the project that they are quite frankly ridiculous and lack any type of credibility in terms of what a vessel of 60m x 3m would actually look like. The images do however serve to show (even in their current guise) what a hugely negative impact the surface penetrating devices will have on the seascape of the AONB and South Stack seascape. Further, please see section 6.2.2. which documents Minesto's impact assessment of surface penetrating devices in this very geographic area: - Viewpoint 01, The Summit of Holyhead Mountain (Figure 24-3-1a) - Viewpoint 03, South Stack Car Park (Figure 24-3-3a/b/c) - Viewpoint 04, Ellin's Tower (Figure 23-3-4a/b) - Viewpoint 05, Cytiau'r Gwyddelod Scheduled Monument (Figure 24-35b) - Viewpoint 06, South Stack Cliffs Nature Reserve, Penrhyn Mawr (Figure 24-3-6a/b) - There are no photomontages taken from the coastline off the Range (West and South West Coast) and/or Abrahams Bosom which are directly opposite to sub- zones 4 – 8 where the majority of surface penetrating devices are proposed and where the devices will be very close to the shoreline. - Viewpoint 02, Near Parliament House, North Stack (24-3-2a/b) simply serves to show where any surface penetrating devices should be located as the coastal footfall is significantly minimized in this area due to the clifftop location and rigged nature of the coastline.

8.2.2 Part of Minesto's seascape visual impact assessment (on their web site) is shown below. How can Minesto's seascape visual impact assessment differ so markedly from the Morlais seascape visual impact when both companies are employed within the same tidal energy projects and in the same geographical area:

- "The sea is an important backdrop in the views of the lighthouse contributing to its aesthetic value" - "Views of the sea and of the tower as a picturesque feature with the sea as a backdrop contribute to the towers aesthetic and historic value"

	<p>9 Appendix I</p> <p>9.1 Pictures and images</p> <p>9.1.1 Viewpoint A: The Coastal Path on the Range (See schematic 1 and photograph 1a) Shows the location of the proposed 30m wide corridor (9 cables) up the cliff face. The cliff face is in full view of the Anglesey Coastal Path from the Range. This is one of the iconic viewing points showing South Stack Lighthouse in the background.</p> <p>9.2 Viewpoint B: South Stack Road coming from Porth Dafarch to South Stack. (See schematic 1 and photograph 2). Estimated 750,000 cars per year. The cliff face where the cables are planned to be located can easily be seen from the road.</p> <p>9.3 Viewpoint C: Anglesey Coastal Path above South Stack Road (See schematic 1 and photograph 3) The nine cables (30m corridor) will be run up the cliff face. The cliff face is in full view of the Anglesey Coastal Path above South Stack Road.</p> <p>9.4 Viewpoint D: Anglesey Coastal Path Viewing Point (See schematic 1 view photograph 4a). This is a highly visited and well known viewing area at the end of the Anglesey Coastal Path on my land which looks directly onto the intertidal area and the proposed cliff edge. 10's of thousands of visitors per year.</p> <p>9.5 Viewpoint D: Anglesey Coastal Path Viewing Point (See schematic 1 view photograph 4b). This is a highly visited and well known viewing area at the end of the Anglesey Coastal Path on my land which looks directly onto the intertidal area and the proposed cliff edge. Morlais propose rock bags and concrete mattresses (260 x 18m2 'rock bags' and/or concrete mattresses) to hold the 9 electricity cables in the intertidal area and to run the cables up the cliff edge.</p> <p>9.6 Schematic 1. This schematic shows where the 4 viewpoints are located on the Anglesey Coastal path and their relation to the proposed 30m corridor up the cliff edge at Abrahams Boson. The schematic also shows the intertidal area.</p> <p>9.7 Henborth Retaining Wall below field 3 (Photograph 5). This image shows how far below the surface of field 3 Henborth and its ground actually are located. Disturbance in field 3 could lead to disturbance of the retaining walls.</p>
52	<p>I am writing to make our objections known to the proposed development at South Stack. We are Anglesey residents and members of the RSPB. We regularly visit South Stack in order to see the bird life and enjoy the uniqueness of the place. We frequently take friends and family too who really value the range of marine life which can be experienced there. We also spend many hours voluntarily clearing rubbish and debris from our local beach at Ty Croes in order to help protect our local wildlife (I only say this to demonstrate our genuine commitment). We are wholeheartedly in favour of environmentally friendly ways of producing power, but I do not consider this method in this situation to fall into that category as it would be at the cost of our precious wildlife. I do not believe that humans have the right to destroy nature in order to provide for himself. Rather, we do have a responsibility to protect and nurture it. Thank you for your consideration.</p>
53	<p>I wish to object to the proposal by Morlais to site their underwater turbines 500 meters from the South Stack cliffs. This is a wildlife Reserve with a large colony of nesting seabirds who fish in the sea nearby. The turbines at this proximity to the cliffs pose a major threat to the birds. The visual impact, so close to the cliffs will be detrimental. The Reserve is a major tourist attraction in the area.</p>
54	<p>I would like to register my objection to the Morlais planning application for marine license. My address is XXXXXXXX which is my permanent residence. I am concerned about the impact on the Guillimot and Razorbill colonies on South Stack, along with the other seabirds such as Manx shearwaters and gannets that use the surrounding area. I feel the monitoring and mitigation is insufficient. The marine mammals such as Dolphins, Porpoises and Grey Seals do not appear to have been considered. Finally, as South Stack is an Area of Outstanding Natural Beauty and draws thousands of visitors to the area each year, this would have an impact on the local economy as the visual impact of the proposed structures would be detrimental to the area.</p>
55	<p>I am writing to object to the application for a marine licence in the waters off Holy Island, Anglesey by Morlais. I want to make it clear that I am supportive to the development of tidal energy and am interested in the developments in the Irish Sea undertaken by Minesto, which seem to use less intrusive technologies. I am a sea kayaker and walker and live on Anglesey. Over the years I have used the waters between Porth Ruffydd and North Stack for kayak enjoyment and often walk the Range and the South Stack area. I am a member of the Snowdonia Canoe Club and the impact of the proposed development has been discussed at length by club members. I am not considered an expert sea kayaker but I think it is important to understand that the stretch of waters at Penrhyn Mawr, South Stack and North Stack, while often thought of as an excellent and internationally important area of 'expert' kayakers, is also used by more cautious kayakers such as myself using knowledge of the tides to travel at times when the tides are calmer. The experience of moving water, the</p>

	<p>excellent cliffs and the wildlife and birds are unparalleled on the Anglesey coastline. In addition the experience of walking this coastline, which I regularly explore, would be diminished by the sea scape being altered by the proposed sea surface installations proposed in this development. I have a number of concerns about the evidence put forward by Morlais:</p> <ol style="list-style-type: none"> 1 . The map of the boat traffic presented by Morlais does not show the kayak traffic, I am well aware that our craft does not show up on radar and so this map is a massive underrepresentation of the amount of traffic in the area. Kayak traffic in this area is considerable and continues throughout the year. The area is constantly in use by sea kayakers and this is an area used by kayakers who are training, who are using the area for journeying as well as by 'experts' playing on the tide races. 2. I have concerns that, while the arrays in other areas are sub-surface, this proposal is for arrays attached at water surface, some to massive barges which, given the amount of kayak and small boat traffic, would pose a real hazard particularly when craft are in difficulties or kayak rescues are taking place with the danger of drifting into the barges and other fixings seems more likely than the Morlais evidence suggests. 3. I am also concerned that the projections of the impacts of the proposed installations on the tidal flows are insufficiently complex to show the relationship between the differing tidal arrays and their inter-relationship impact on the tidal flows, particularly close inshore. Given that the tides in this area are already complex and the impact from day to day, from Springs to Neaps the impact of one tidal array on the next seems likely to be more complex than suggested. 4. i am concerned that the evidence appears to ignore the fact that the area is used by individual kayakers from all over the UK and indeed the world and supports a number of businesses directly and indirectly involved in both kayaking and coasteering, using this area as the most important attraction. 5. I am concerned about the apparent dismissive approach to the impact on marine and bird life. I am a regular visitor, along with others to the RSPB reserve at South Stack. This is a nationally important nesting area which is irreplaceable and I would urge caution on granting a licence if this would endanger the ability of the sea-birds to nest in this area. <p>I hope that you will take this objection into consideration in your assessment of the proposed Marine Licence.</p>
56	<p>I am concerned that Morlais will harm the wildlife around Anglesey's North coastline. Wildlife is in trouble, and why we would risk losing more. I love watching the wildlife in the summer along with thousands of other people who visit this beautiful island.</p>
57	<p>I would like to place my objection to the above licence application on the grounds that I think that Morlais have missed important recreational activities out of their information in the application. Specifically, it is stated that they held radar surveys of sea traffic in the area concerned. However, I feel that they have missed out an important sector of the traffic as Sea Kayakers do not reflect radar well, if at all, thus missing a large number of journeys. Also I feel the time scale used in the survey was too short. The area concerned is an extremely popular area for both training and experienced paddlers. People travel worldwide to use the tidal streams off Penrhyn Mawr and both North and South Stack. I have been using these areas for at least thirty years now and feel that the scale of the planned operation does not suit such an area mainly due to the danger to paddlers if they come near to the barges and infrastructure. Paddlers cannot paddle against such strong streams of water and if they happen to be capsized they be will be unable to avoid being washed into the vicinity of these structures, Capsizes are a common occurrence in the area and this sometimes results in people swimming. Indeed any drifting vessel would be in great danger of unavoidable collision. Already a yacht has collided with the Minesto buoy that is much further out from the land and considerably smaller. I do not think that Morlais have considered the implications of such scenarios of placing such structure in this area. I am also concerned that there will be restrictions in the areas during construction, how on earth will this be policed as any kayakers will not be able to return until the tide turns. I feel that this construction is far too near the land in the way it will affect the tidal streams leaving small vessels nowhere to go at times. Because sea kayakers are so small and hard to see from land I believe that they have been overlooked as a vital part of the areas recreational role. I am also concerned about the scale of the plan with regard to the disturbance to bird and marine life. It is so close to a very important area of cliff nesting birds. The visual impact from the land is also going to be massive as it is so close to land and the barges are so large and won't be discreetly painted, indeed they will be made to stand out day and night. I do not object to tidal arrays per se but I feel the Morlais plan is too large and not right in this area.</p>

58 I appreciate having the opportunity to make representation on the marine licence application from Morlais Reference: ORML1938. I am objecting from a personal perspective as an individual who lives on Anglesey. Dated 6th January 2020, my name is XXXXXXXX, My email address isXXXXXXXXX I have concerns' over the scale of the project being over an area of 35sqkm for duration of 37 years (including the instillation and decommissioning) with a potential of 620 devices. Without knowing from the manufacturers of the potential electricity generating devices what noise, movement etc they will have it cannot be known what impact the project will have on the wildlife outlined in the Environmental Statement. Project size: The document named HRA 016 MORRHVDOC0067 point 14 mentions that' the phased approached of the development may be taken, with scale and time frame of potential phasing determined by assessments and considerations of mitigation and management undertaken in the ES'. It does not cover that there 'will be' a phased approached in the ES. Although outline plans for 40mw then an upscale to 240mw is mentioned in the ES the effects of this scaling in such a short time frame leaves questions to the validity of monitoring and mitigating impact. Within the HRA criteria cited in point 80 'that there should not be a reduction in the area of habitat'. With such a large scale project inevitably there will be. Seabirds: The impact on the Razorbill and Guillemot colony is not acceptable when Wales has responsibilities to biodiversity. Wales failed to meet the 2010 international and national biodiversity target with in the SoNaRR (Sustainable Management of Natural Resources and the Environment (Wales) Act 2016, published in September 2016, many species are in decline. South stack is a nesting site to approximately 11% of the Welsh population of Razorbills, the predicted models show an extinction of these birds over 25 years. A decline in Guillemot numbers are also not acceptable with approximately 10,000 birds in 2019 breeding on the cliff line around south stack lighthouse and Ellin's tower. This equates to approximately 19% of the population in Wales. A decline of these species would impact on Wales biodiversity. Cetaceans: Within the Environmental Act 2016 section 7 listed species such as Risso's Dolphin, Porpoise and bottle nosed dolphin 'should be maintained and enhancing biodiversity in relation to Wales'. The documentation provided in the planning documents has weak data. The neighbouring SAC's Llyn peninsular and Sarnau SAC and cardigan bay SAC for bottle-nosed dolphins are identified with a 98% avoidance which seems height considering they don't know what they will be avoiding. Points 632, 633, 634 talk about mitigation would significantly reduce risk deployment, monitoring and adaptive management and an EMMP. These processes are assumed again due to an unknown device or number of devices. This is not evidence what they will implement or will be implemented to do this. Once permission is granted Morlais will have free rein to do what they deem appropriate. This contravenes the HRA. Porposie: Harbour porpoise (phocoena phocoena) are protected within the North Anglesey Marine Special Area of Conservation. Morlais have recognised the multiple other SAC's with porpoise populations that feed/transit through the proposed area. There is a lack of data, methodology and mitigation. Displacement of 20% seasonal on any given day and/or exceed 10% over the season is one of the SAC requirements mentioned. It is good to see there is base line data by SEACAMS for noise but I am concerned about whether they will monitor this as the wording is such that they can have a free rein to deem what is cost effective. There is little known about what devices would be suitable for this and again it is not known what and how many devices they will be monitoring. Statements then follow about how no mitigation will create a 4% loss in point 646 which is below the required rate. This seems unacceptable as it does not account for the number of devices or the cumulative effect over circa 25 years. In the HRA point 650 reference is made based on' no marine mammal entanglement' this is not a balanced reference to the scale of this project. Without an actual known method and mitigation based on the technologies being deployed many of the conclusions drawn seem mute. Seals: Although grey seals are not a listed species there are many nurseries along the coast next to the proposed demonstration zone with 23 seal pups born this year so far, some on the range and coves near Gors goch in Abrahams bosom which is within view of the proposed cable landfall site.. They aren't shown in ES CH12 table 12-20. I have concerns about the lack of data and inclusion of this species and the potential impact on them. Landfall: Much of the land adjacent to the project is Glannau Ynys Gybi/Holy Island Coast SAC. With species such as Chough which are also listed as an SPA and within the SSSI for both breeding nest sites and roost sites outside of the breeding season. The cable landfall will be in a Chough forging area and will require habitat repair. I respect that Morlais have acknowledged to do cable work outside of the breeding season which may then conflict with pupping seals. Economic impact: Anglesey has approximately 2 million visitors a year, it brings in money to support and grow businesses which in turn create employment. Local outdoor pursuits such as kayaking, pleasure boat cruises to see the wildlife and views, fishing and fishing trips, diving, canoeing. The other businesses including accommodation, cafes, restaurants, visitor attractions etc. There are concerns on the potential decline in income from these due to the loss of wildlife and the visual impact of the project. This impact should be calculated to see if it would outweigh the potential employment form the demonstration zone. These are known business not hypothetical jobs created by the project. I don't believe the economic value of the project will out way these factors. The documents on this are using mitigation to 'encourage' suppliers and companies to bring business to Anglesey. As the technologies are developed elsewhere and the proposal is to use the demonstration zone for testing there is as much probability that they won't go to manufacture on Anglesey or Wales. I asked a member of staff at one of the open days about this and was told that there is a probable scenario once the companies that own the technology have used the test zone their requirements will be to sell the technology to a business that can manufacture. This will then be up to the owner

	<p>as to which country in the world would be best suited with costing and skill sets. There is no plan on how to get them to come here just vague statements like 'encourage'. Visual impact: The demonstration zone is large scale and I have concerns over the negative visual impact to the landscape should surface water devices be deployed, the AONB and the Grade 2 listed buildings. South stack is seen as one of Wales most iconic landscapes, it is used by Visit Wales in media advertising wales as a destination around the world. Much of the coastline adjacent to the proposed planning application area is in an AONB, designated in 1967 for its sense of wild and to be protected from inappropriate development. The size of this project with surface devices will have a visual impact. Chpt 24 outlines the project as having 'some significant localised effect' but not overall on the total area of the AONB. The scale of the seascape being large and would accommodate the project. This approach seems to take away from what an iconic wild landscape this is, as one of the most visited destinations on Anglesey, photos of which are used by IOACC to advertise Anglesey as a destination. The views from Penhrosfeilw also known as the range will have devices 500meters from the headland. Morlais have shown some views but only by visiting by appointment at 2 locations on Anglesey but finding this out has been difficult. The views with the greatest visual impact have not been shown to the public. Morlais doesn't have a social media page, it links to Menter mon with little information about the project. The choice of angles of the horizon for the developments aren't typical viewpoints people use. Their public consultation has been weak. It will change the iconic view and lose its sense of wild that so many of the visitors come for. To highlight the importance of this area South stack cliffs has approximately 180,000 visitors a year from all over the world. Over 300,000 people walk the coastal path annually. Listed buildings: Both Ellin's Tower and the South stack lighthouse and adjoining lighthouse keepers accommodation are Grade 2 listed and should not have developments near them that will have an adverse effect on the setting of these listed buildings. I believe green energy is necessary and I worked in the industry in Wales developing a new type of wind turbine for a couple of years and understand the importance both at a national and international scale. Also the rigorous testing on turbines that's required for long periods of time without producing the much needed green electricity. Minesto is the size of project that realistically develops technology in a way that can be monitored and mitigated. Any project needs to be done in a way that has minimum impact on the ecosystems it is installed in. The scale of the proposed project by Morlais/menter mon coupled with the sensitive ecosystem both maritime and land based does not seem appropriate when the net gain against Wales CO2 reduction targets is small. There is no way of knowing if any of the technologies implemented are likely to produce anywhere the predicted levels of green energy as they are in a test zone and at what cost to nature/biodiversity? I object to the scale of the project, unknown data on what will be installed, the cumulative effects of the technology, close proximity to known breeding and feeding sites of marine life, lack of monitoring impact, lack of mitigation. The visual impact within an AONB with grade II listed buildings within a heritage coastline. More work on the impact on the economic effects of the project needs to be done.</p>
59	<p>I was horrified to understand that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead marina around the iconic south stack lighthouse to Trearddur Bay. I am aware that more renewable energy is a crucial part of tackling climate change, but developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. Trading protected and environmentally sensitive habitats and iconic seascape and landscapes for low efficiency renewable energy projects must at best be fundamentally wrong. The RSPB have put £10,000 into securing the nature in this area, all of this will be wasted and for nothing if this type of project goes ahead. Surely such projects should seek areas of very low sensitivity and utilise highly efficient devices? I have been made aware that Morlais have submitted a planning application which proposes installations for turbines that harness tidal currents and that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others 'painted orange and/or yellow' would be floating on the surface. The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high. As others are, I am concerned that Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area. At a time where wildlife is in trouble, I simply can't see why we would risk losing this iconic area. Over many years, (30+) I have enjoyed walking this area of the coast watching the Guillemots, Razorbills, Puffins, Chough, Seals, Dolphins, Orcas and many more species at South Stack. Please do not allow Mentor Môn to put this area at risk.</p>

60	<p>I am writing to express my objection to the proposed development above ref:ORML1938. The area for the proposed development is a unique section of coastline that has no equal in the UK and probably he world. Aside from the aesthetic distraction it the home to thousands of seabird and marine mammals. this development has not had a full environmental impact assessment as far as I can see but common sense would surely dictate that submerged spinning turbines in the sea, close to the coast and in relatively shallow water would surely disturb the birds and marine mammals let alone possible entrapments that may occur. the seabed flora and fauna are also likely to be affected. It also is a key area for the Harbour porpoise. Risso dolphins, common dolphins and bottlenose are regular visitors This is an area of outstanding beauty that could recover to its former pre industrialisation ecosystem given proper management and we should be looking at designating it Marine protected area not commercial development. Also, although I have no data I suspect that it is an important area for visitors to Anglesey and leisure users and likely that approving this development would have a negative effect on local economy, especially in summer. I hope a more detailed assessment is made before this is even considered for approval. our seas and wildlife are having more than their fair share of issues to deal without adding further pressure to them.</p>
61	<p>I strongly disagree with what is proposed for the sea off south stack</p>
62	<p>I am would like to record my objection to planning application reference ORML1938 Marine License Application I was shocked to understand that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead Marina, around the iconic South Stack Lighthouse, to Trearddur Bay. Whilst I agree that more renewable energy is crucial in tackling climate change, surely such developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. Further, I have been made aware that Morlais's planning application proposes installations for turbines that harness tidal currents that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Whilst some of the turbines would be fixed to the seabed others would be floating on the surface and 'painted orange and/or yellow' . The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high. Surely this trading of protected and environmentally sensitive habitats, iconic seascape and landscapes for low efficiency renewable energy projects must be fundamentally wrong. Surely such projects should seek areas of very low sensitivity and utilise high efficient devices? I am concerned that Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area. At a time where wildlife is in trouble I simply can't see why we would risk losing this iconic area. Over many years I have enjoyed walking this area of the coast watching the Guillemots, Razorbills, Puffins, Chough, Seals, Dolphins, Orcas and many more species at South Stack. Please do not allow Mentor Môn to put this area at risk.</p>
63	<p>I was horrified to understand that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead marina around the iconic south stack lighthouse to Trearddur Bay. I am aware that more renewable energy is a crucial part of tackling climate change, but developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. Trading protected and environmentally sensitive habitats and iconic seascape and landscapes for low efficiency renewable energy projects must at best be fundamentally wrong. Surely such projects should seek areas of very low sensitivity and utilise high efficient devices? I have been made aware that Morlais have submitted a planning application which proposes installations for turbines that harness tidal currents and that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others 'painted orange and/or yellow' would be floating on the surface. The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high. I am concerned that Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area. At a time where wildlife is in trouble I simply can't see why we would risk losing this iconic area. Over many years I have enjoyed walking this area of the coast watching the Guillemots, Razorbills, Puffins, Chough, Seals, Dolphins, Orcas and many more species at South Stack. Please do not allow Mentor Môn to put this area at risk.</p>
64	<p>I live in NW England and visit Anglesey to kayak for several weekends each year. I have often kayaked within and inshore of the Export Cable Corridor (ECC), and occasionally in the eastern part of the Morlais Demonstration Zone (MDZ) itself.</p> <p>The impact assessment fails to identify potentially serious effects on the safety of sea kayakers and the local sea kayaking tourist economy.</p> <p>I agree with the need for sustainable electricity generation and I do not want to stop the project.</p> <p>It is important that the impact on kayak safety and kayak related tourism is fully assessed so that the details of the project can be amended to mitigate the risks.</p> <p>My comments on the application are in two stages:</p>

1. To show that the impact assessment is invalid because it identifies sea kayaking as an activity that may be impacted but makes no assessment of this.

2. To identify the risks to the safety of kayakers and the economic effects on kayak based tourism.

1. Failure to properly consider sea kayaking

1.1. Sea kayaking is correctly identified in Ch15 Table 6-2 as a recreational use of the MDZ and the areas inshore.

1.2. No kayaking organisations, providers, clubs, governing bodies or individuals are identified in the list of consultees and I am not aware of any having been approached.

1.3. The amount of sea kayaking taking place is not appreciated in the analysis, nor is the special status which this area has within the sea kayaking community. It is genuinely a world famous attraction, visited by kayakers from many countries. In the area between the MDZ and the coast I normally see far more kayaks than other recreational users.

1.4. The vessel tracks in Ch15 do not include kayaks. My Figure 1 below shows the track of myself and five other kayakers in November 2017. Fig 11 of Ch15 Vol III purports to show all tracks during 2017 but does not include this. Nor does it show many tracks through areas of high kayaking interest, such as Penrhyn Mawr tide race, which hundreds of kayaks use each year, either passing through or remaining for several hours to surf the waves.

1.5. Ch15 para 142 identifies the area as being recommended for experienced kayakers and appears to imply that this means usage is low and no further assessment is required. A reference (Krawiecki & Biggs) is quoted. This is a guidebook for kayakers, to be used and understood by kayakers. In suitable conditions, with experienced leaders and choice of routes, the area is currently accessible to a wide range of kayakers. Mr Krawiecki, who wrote the section on Holyhead, considers that his work has been taken out of context.

1.6. The tidal stream modelling doesn't identify locations of particular significance to sea kayakers, and hence the effects of interest for kayaking are not addressed. The tide races at North stack and Penrhyn Mawr are easily accessible and challenging but relatively safe (in suitable weather conditions) and so are highly valued by kayakers.

As an engineer with experience of computer modelling I believe the modelling of tidal stream effects is likely to be inaccurate, overall, and particularly so in the inshore zone which is of most interest to kayakers. I am concerned by the following aspects:

1.6.1. The model has been validated for natural sea bed conditions only. No validation is presented for the modelling of the turbines, e.g. by using a similar model to predict the effects at existing tidal stream sites (such as Strangford Lough) and comparing with measurements. Since the objective is to model the turbine effects the model is invalid.

1.6.2. It is unclear whether the modelling considers the additional energy lost in turbulence downstream of the turbines.

1.6.3. The thrust curve (Ch7 Vol III Fig 4.1) is highly non-linear, peaking at 2m/s. The changes in peak spring tide speed in, for example, Figs 5.20 and 5.1 cannot therefore be extrapolated, pro rata, using the baseline speed at other stages of tide or tidal cycle. This makes the overall effect on kayaking very difficult to understand.

1.7. Ch25 does not identify any adverse risk to the numerous business based on sea kayaking, such as coaching, accommodation, equipment retailing and even kayak and paddle manufacture. These businesses are based in Holyhead specifically because of the opportunities for sea kayaking. The area between Holyhead and Trearddur Bay is the key attraction, based on the intricacies of the tidal flow, the cliff scenery and the wildlife.

2. Risks arising from failure to consider kayaking

The failure to address the potential effects of the Morlais Project on sea kayaking is significant in terms of both the safety of kayakers and the economic loss from kayaking based businesses. My concerns are:

2.1. The use of substantial moored structures in strong tidal streams is a serious hazard to unpowered vessels such as kayaks, since the current flows under the structures and the tidal stream moves faster than a kayaker can paddle. My Figure 2 below shows the GPS track when another kayaker and I followed the ebb stream from North Stack. We reached the boundary of the proposed MDZ only seven minutes after leaving North Stack. It is quite feasible that a group of kayaks could be carried into the MDZ. We would have been carried further west had we not deliberately paddled strongly into Gogarth Bay. I was present during an incident in 2006 when a kayaker capsized at North Stack; while he was in the water both he and the kayaker assisting him were carried by the tide to the south of South Stack. While I do not know their exact track it is very likely to have been further into the MDZ than my excursion.

	<p>2.2. It is an accepted part of kayaking that a kayak might capsize and the kayaker then require assistance from other members of the group. Standard rescue techniques are regularly practiced and are part of the Sea Kayak Leader qualification. To be swept into moored structures while a rescue is in progress could be fatal. The assessment includes no discussion of the effects of underwater rotors on persons in the water at the surface.</p> <p>2.3. Similar or more severe concerns exist regarding the risk to kayakers carried NNW from Penryn Mawr tide race during the flood tide, as this will lead into the eastern end of subzone 5, where floating and surface emergent devices are to be deployed and represent an obvious hazard to kayaks and any kayakers in the water.</p> <p>2.4. A 500m exclusion zone during construction has the potential to block transit along the coast, making kayak journeys more difficult or impossible. A full exclusion near the position of the landfall site will block most journeys. The strength of the tidal streams means that many kayak trips are 'end to end' rather than 'there and back', so kayaking as far as the exclusion area and returning is only possible when the tides are suitable. A way needs to be found to enable kayaks to pass safely through or around construction areas.</p> <p>2.5. The approach proposed in respect of other recreational users appears to be that if the construction or operation of the MDZ would create a hazard, they will be warned to keep away. This would seriously impact kayakers' use of the area; they do not have the capability to reroute to the west of the MDZ, besides which, to do so would negate the whole point of paddling in the area. The suggestion that "the sea kayaking community... will be kept informed of the development of the site" is inadequate; if the livelihood of local coaches and providers is to be curtailed (which seems likely) this must be considered now.</p> <p>2.6. The assessment is ambiguous regarding the proximity of structures to the water surface. Ch15 states that structures on the East boundary will be >8m below water, but Ch24 says that "The tidal devices would form prominent structures..." which contradicts this. Unfortunately the illustrations in Ch24 V2 and Vol III, which would enable a better understanding of this, are not available online.</p> <p>2.7. The combination of increased risk to kayakers, obstruction to passage and the possibility that the uniquely valued tide races might be affected will result in considerable loss of custom for coaches and kayaking providers. The Anglesey Sea Kayak Symposium is now in its 38th year and caters for 150 visiting kayakers, many of them international (plus coaches), for a week, bringing substantial economic benefit to Holyhead. It might need to be cancelled during the construction phase at least, unless the risks can be mitigated.</p> <p>2.8. Many kayakers and other users rely on marine VHF radio for safety. There is no discussion of the potential for radio interference from generating plant and shore facilities.</p> <p>It is crucial that issues such as these are fully assessed and mitigation is identified before the project is approved.</p>
65	<p>I am very concerned about the proposal for the Morlais Tidal Stream Demonstration Project West of Anglesey ORML1938 as it could potentially cause disturbance and harm to thousands of the seabirds that nest, mate and breed at the RSPB South Stack reserve and feed and use the surrounding coastal waters of west Anglesey. I am particularly concerned about the risks to auks, especially the guillemots and razorbills at RSPB South Stack, marine mammals and the sensitive marine ecosystem off the Anglesey coast. The planet faces biodiversity collapse and a climate crisis, both these emergencies need to be tackled together. More renewable energy is a crucial part of tackling climate change, but developments need to be sited and planned in ways that avoid adding to the nature crisis. The project is for a Marine Demonstration Zone (MDZ) for tidal stream energy based on tidal current turbines and if fully developed it could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others floating on the surface. The MDZ lies off the west coast of Anglesey close to the RSPB South Stack reserve and other important sites for nature, in an area where species including puffin, guillemot, kittiwakes and razorbills can be spotted each summer. More than 180,000 people flock to the area where they can see over 10,000 guillemots and 1,300 razorbills roosting on the sea cliffs - making it a valuable tourist hotspot on Anglesey. The proposal is based on a novel technology and the impacts on marine life are hard to quantify. However, modelling shows a range of effects are possible - one estimate in the developer's environmental assessment report (which is not the worst case) is that around 60% of the guillemots and 98% of the razorbills at RSPB South Stack could be lost through collision with the turbines. It is therefore highly uncertain what level of tidal stream development might avoid adverse effects on the seabird populations at RSPB South Stack. I am concerned about the scale of the consent that is being sought. My view is that the application has not adequately addressed the risks to seabirds and that it could have unacceptable impacts on nature. I am also concerned about the potential impacts on marine mammals who use the waters off South Stack as again, the developer's environmental report indicates potential significant impacts to them. I want to see an approach to development of marine renewables in Wales that safeguards our seabirds and other marine wildlife and habitats - this means limiting development to a level that can be demonstrated as safe for nature and researching the effects of novel technology to improve scientific understanding. I therefore urge NRW to ensure you fully safeguard RSPB South Stack's seabirds and other sealife when assessing this application. We are already facing wildlife declines and seabirds are one of the hardest hit bird families globally - please protect our wonderful seabirds here in Wales for current and future generations.</p>

66	<p>I live in Manchester and visit Anglesey to go sea kayaking a couple of times each month. I have often paddled in and around the areas marked as the ECC and the MDZ. The impact assessment doesn't take into account the potentially serious effects on the safety of sea kayakers and the detrimental effect the substantial local sea kayaking tourist economy. Whilst I agree with the need for sustainable and renewable energy, I feel it is important that the impact on the safety of paddlers and potential detrimental effect on related tourism is properly taken into account. Sea kayaking is shown as a recreational use of the MDZ and other areas closer to the shore but no kayakers, local kayak businesses, local canoe / kayak clubs, or Canoe Wales have been consulted. No effort has been made to assess the impact this project will have. The use of substantial moored structures in strong tidal streams is a serious hazard to kayakers. No effort has been made to assess the risks to the safety of kayakers or other recreational water users, especially if in distress. under command. It seems that sea kayaking has not been properly considered in this application. The coast between Soldiers Point and Porth Dafarch is highly regarded, not just in the UK but globally. This area has a special reputation in the international sea kayaking community. It seems that the importance of this area to a large number of sea kayakers has been vastly underestimated. Chapter 15 paragraph 142 identifies the area as being recommended for experienced kayakers and appears to imply that few people go there and no further assessment is required. A reference (Krawiecki & Biggs) is quoted. This is a guidebook for kayakers, to be used and understood by kayakers. In the right conditions with suitable guidance the area is accessible to paddlers with a wide range of experience and is one of the most popular sea kayaking coastlines in the UK. xxxxxx xxxxx xxxxxxxx and I feel that my work has been taken out of context. Chapter 25 does not take into account the adverse risk to the numerous sea kayaking based businesses, such as coaching, accommodation and manufacture. These businesses are based in Holyhead specifically because of the opportunities for sea kayaking. The area between Holyhead and Trearddur Bay is the key attraction, for the intricacies of the tidal flow, the cliff scenery and the wildlife. The Anglesey Sea Kayak Symposium is now in its 38th year and caters for 150 international visiting kayakers (plus coaches) for more than a week. This event also employs local administrative and catering staff. It might need to be cancelled during the construction phase. Future events could also be in jeopardy. Putting these events to one side, there are at least 10 local sea kayak coaching / guiding businesses that will be affected. These businesses also employ support staff and provide work to other local businesses such as motor vehicle maintenance. It is my view that the above issues are given reasonable and proper consideration before this project is given the go ahead.</p>
67	<p>I was horrified to understand that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead marina around the iconic south stack lighthouse to Trearddur Bay. I am aware that more renewable energy is a crucial part of tackling climate change, but developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. Trading protected and environmentally sensitive habitats and iconic seascape and landscapes for low efficiency renewable energy projects must at best be fundamentally wrong. Surely such projects should seek areas of very low sensitivity and utilise high efficient devices? I have been made aware that Morlais have submitted a planning application which proposes installations for turbines that harness tidal currents and that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others 'painted orange and/or yellow' would be floating on the surface. The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high. I am concerned that Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area. At a time where wildlife is in trouble I simply can't see why we would risk losing this iconic area. Over many years I have enjoyed walking this area of the coast watching the Guillemots, Razorbills, Puffins, Chough, Seals, Dolphins, Orcas and many more species at South Stack. Please do not allow Mentor Môn to put this area at risk.</p>
68	<p>I am would like to record my objection to planning application reference ORML1938 Marine License Application I was shocked to understand that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead Marina, around the iconic South Stack Lighthouse, to Trearddur Bay. Whilst I agree that more renewable energy is crucial in tackling climate change, surely such developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. Further, I have been made aware that Morlais's planning application proposes installations for turbines that harness tidal currents that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Whilst some of the turbines would be fixed to the seabed others would be floating on the surface and 'painted orange and/or yellow' . The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high. Surely this trading of protected and environmentally sensitive habitats, iconic seascape and landscapes for low efficiency renewable energy projects must be fundamentally wrong. Surely such projects should seek areas of very low sensitivity and utilise high efficient devices? I am concerned that Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area. At a time where wildlife is in trouble I simply can't see why we would risk losing this iconic area. Over many years I have enjoyed walking this area of the coast watching the Guillemots,</p>

	Razorbills, Puffins, Chough, Seals, Dolphins, Orcas and many more species at South Stack. Please do not allow Mentor Môn to put this area at risk.
69	I am writing to object to any visible or environmental change that the tidal power project imposes on Anglesey. My objection is based on grounds of: A) the negative effect on an area of outstanding natural beauty. B) the disturbance to tide flow, wildlife and sea life. I wish my objection to be logged.
70	I was horrified to understand that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead marina around the iconic south stack lighthouse to Trearddur Bay. I am aware that more renewable energy is a crucial part of tackling climate change, but developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. Trading protected and environmentally sensitive habitats and iconic seascape and landscapes for low efficiency renewable energy projects must at best be fundamentally wrong. Surely such projects should seek areas of very low sensitivity and utilise high efficient devices? I have been made aware that Morlais have submitted a planning application which proposes installations for turbines that harness tidal currents and that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others 'painted orange and/or yellow' would be floating on the surface. The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high. I am concerned that Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area. At a time where wildlife is in trouble I simply can't see why we would risk losing this iconic area. Over many years I have enjoyed walking this area of the coast watching the Guillemots, Razorbills, Puffins, Chough, Seals, Dolphins, Orcas and many more species at South Stack. I also remember walking down to South Stack lighthouse with my new young family so it remains a special place to both me and future generations. Please do not allow Mentor Môn to put this area at risk.
71	I am writing to object to the navigation restrictions that the Morlais Demonstration Zone Turbines will place on my sea kayaking company's journeying activities around South Stack, Penrhyn Mawr and North Stack. My company turned over circa £45,000 in revenue last year, which included taking hundreds of guests on journeys around South Stack. We are very concerned that the Morlais development will: a) restrict our navigation b) change the tidal flows intensity. Many of our guests travel from all over the World to enjoy the World famous tide races of Penrhyn Mawr, South Stack and North Stack. These areas are very important for skill development and surfing activities. Our activities here are <u>not</u> restricted to expert sea kayakers and <u>include novices</u> wanting to enjoy boat handling techniques in dynamic waters and/or beautiful journeys around the Stacks. Our other concern is the effect that these turbines will have on seabirds and marine mammals. Again our guests are drawn to this area to enjoy the wildlife. South Stack would appear to be a very poor choice of venue for this project.
72	I was horrified to understand that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead marina around the iconic south stack lighthouse to Trearddur Bay. I am aware that more renewable energy is a crucial part of tackling climate change, but developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. Trading protected and environmentally sensitive habitats and iconic seascape and landscapes for low efficiency renewable energy projects must at best be fundamentally wrong. The RSPB have put £10,000 into securing the nature in this area, all of this will be wasted and for nothing if this type of project goes ahead. Surely such projects should seek areas of very low sensitivity and utilise highly efficient devices? I have been made aware that Morlais have submitted a planning application which proposes installations for turbines that harness tidal currents and that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others 'painted orange and/or yellow' would be floating on the surface. The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high. As others are, I am concerned that Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area. At a time where wildlife is in trouble, I simply can't see why we would risk losing this iconic area. Over many years, (30+) I have enjoyed walking this area of the coast watching the Guillemots, Razorbills, Puffins, Chough, Seals, Dolphins, Orcas and many more species at South Stack. Please do not allow Mentor Môn to put this area at risk.

73	<p>I wish to object to the application by Morlais for a marine licence off the west coast of Anglesey near South Stack, the reason for my strong objections are: 1. The impact that this will have visually in an area of outstanding natural beauty. 2. The detrimental effect for local residents. 3. The negative impact on tourism. 4. In my opinion the most important objection is the harm this will cause for the wildlife at South Stack, not only the sea birds such as Guillemot's and Razorbills but also the marine life mainly porpoise and dolphins.</p>
74	<p>I was horrified to understand that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead marina around the iconic south stack lighthouse to Trearddur Bay. I am aware that more renewable energy is a crucial part of tackling climate change, but developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. Trading protected and environmentally sensitive habitats and iconic seascape and landscapes for low efficiency renewable energy projects must at best be fundamentally wrong. Surely such projects should seek areas of very low sensitivity and utilise high efficient devices? I have been made aware that Morlais have submitted a planning application which proposes installations for turbines that harness tidal currents and that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others 'painted orange and/or yellow' would be floating on the surface. The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high. I am concerned that Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area. At a time where wildlife is in trouble I simply can't see why we would risk losing this iconic area. Over many years I have enjoyed walking this area of the coast watching the Guillemots, Razorbills, Puffins, Chough, Seals, Dolphins, Orcas and many more species at South Stack. Please do not allow Mentor Môn to put this area at risk.</p>
75	<p>I wish to make a representation with regards to the marine licence for Morlais Turbines. My primary concern is the effect on wildlife, at the south stacks, which is an important site for many sea birds including puffins, guillemots, kittiwakes and razorbills. While I appreciate there may be other areas in the UK where these birds may exist this development would affect their feeding areas and further squeeze on the habitats for these birds. According to the RSPB 60% of guillemots and 98% of razorbills could be lost at the south stacks. Also, the RSPB site has over 180,000 visitors to the site to see these birds, if there are no birds then these people will then not be coming to Anglesey and not be using local shops, and hotels and could impact on the local economy. Furthermore, what will the true impact be for marine wildlife particularly the porpoises and seals, which as a sea kayaker I have had the pleasure of observing around Anglesey. My secondary concern is as a sea kayaker. From what I have read this will increase the current velocity in the area and as a relatively new kayaker would make it unsafe for me to use this area. Also, Anglesey attracts people internationally for the conditions in the area what impact will this have on the local economy if it is not possible to enjoy the current conditions of kayaking in Anglesey.</p>
76	<p>I am objecting to the planning application reference 3234121- Transport & works Act. My name is XXXXXXXXXXXXXXXXXXXX. Producing green energy is vitally important and I accept that view should not be top priority but before I even mention the ecology and biodiversity, to place what Morlais are proposing so close to one of the most beautiful, iconic and famous coastlines in Wales hence it being one of the busiest visitor attractions in North Wales and as close as 500m to the cliff line is just mind boggling, the visual impact within an AONB is just not acceptable. There are nationally rare and protected species alongside one of the largest and most accessible seabird colonies in North Wales it is the coastline and breath-taking views that make a huge part of visitor numbers, far more than actual birdwatchers RSPB estimate c180,000 visitors annually. It's a destination and I think that this going ahead at the scary scale proposed will kill that element of South Stack which is bound to effect visitor numbers and tourism for the local area. Many film companies film the scenery and wildlife of South Stack annually as well as organisations such as visit wales to boost tourism to the local area. I have seen pictures of what this project will look like visually and I strongly believe that South Stack will no longer be the wild escape that so many people come here for. I am Holyhead born and bred, my great grandfather was a lighthouse keeper on South Stack lighthouse and my grandfather spent his early years there so I have a strong roots and connection to this area and I have a very keen interest in the wildlife. I have looked at the documents and agree with many specialists with expertise in this area that have scrutinised them that the methodology and environmental impact assessments and conclusions are weak and questionable to say the least. Morlais have stated that they expect seabird mortality to be high in the modelling studies but their mitigation and monitoring is weak and not convincing. There is no mention of how they will monitor the impact on diving birds and to say there will be minimal impact on dolphins and porpoise and there is no mention of how the breeding seal population which is increasing at South Stack with pups been born on beaches very close to the project will be affected. The worrying part of this project is the uncertainty and unproven technology, how can a valid assessment be made? As there is a lack of data from the manufacturers on the acoustic signature there is no way of knowing to what level the impact will be let alone on a cumulative scale. There are no proposals on how the actual impacts will be monitored merely vague statements about "adaptive management". This is highly unacceptable surely to be meaningful adaptive management needs data, there is no monitoring plan. I strongly</p>

	<p>urge you to reconsider this project especially the scale of the development and the unknown impact and vague mitigation and monitoring from Morlais.</p>
77	<p>I am highly concerned about the impacts the proposed tidal stream development 'Morlais' could have on the seabird and marine mammal populations around Anglesey. I urge you to ensure that any potential impacts are properly considered as part of the marine license process. The area is particularly special for its seabird populations – especially razorbills, guillemots, puffins and chough. I am very concerned about the impact this proposal could have on these populations as well as any marine mammals as the area is known for its dolphins and porpoise. The seabirds are incredibly special to the local area drawing thousands of visitors every year. Species are in decline across Wales (and globally) we need to ensure in tackling the climate crisis we don't damage our wildlife and ecosystems upon which life on earth depends. Renewables of course are essential to tackling the climate emergency but we must not cause further declines in our wildlife in our efforts to tackle this.</p>
78	<p>I was horrified to understand that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead marina around the iconic south stack lighthouse to Trearddur Bay. I am aware that more renewable energy is a crucial part of tackling climate change, but developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. Trading protected and environmentally sensitive habitats and iconic seascape and landscapes for low efficiency renewable energy projects must at best be fundamentally wrong. Surely such projects should seek areas of very low sensitivity and utilise high efficient devices? I have been made aware that Morlais have submitted a planning application which proposes installations for turbines that harness tidal currents and that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others 'painted orange and/or yellow' would be floating on the surface. The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high. I am concerned that Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area. At a time where wildlife is in trouble I simply can't see why we would risk losing this iconic area. Over many years I have enjoyed walking this area of the coast watching the Guillemots, Razorbills, Puffins, Chough, Seals, Dolphins, Orcas and many more species at South Stack. Please do not allow Mentor Môn to put this area at risk.</p>
79	<p>I am writing to object to the marine energy project proposal by morlais off South Stack. I find the scale and location of this project extremely concerning and will undoubtedly have a negative impact on the marine life for which South Stack is so important. I am local to Holyhead and know how important and abundant the sea life is off the coasts off South Stack and to place what has been proposed right in the middle of it just isn't right.</p>
80	<p>I object to the proposed marine energy project proposal by morlais, as a local resident I have strong concerns that if it goes ahead at the scale proposed it will have severe consequences for the marine life of south stack changing the ecosystem and wildlife that South Stack is so important for. I understand there is the need for green energy but to locate such a huge project such as this right in the middle of such an important place for breeding/migratory seabirds, dolphins, porpoise and breeding seals is unacceptable.</p>

81	<p>I was horrified to understand that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead marina around the iconic south stack lighthouse to Trearddur Bay. I am aware that more renewable energy is a crucial part of tackling climate change, but developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. Trading protected and environmentally sensitive habitats and iconic seascape and landscapes for low efficiency renewable energy projects must at best be fundamentally wrong. Surely such projects should seek areas of very low sensitivity and utilise high efficient devices?! I have been made aware that Morlais have submitted a planning application which proposes installations for turbines that harness tidal currents and that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others 'painted orange and/or yellow' would be floating on the surface. The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high. I am concerned that Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area. At a time where wildlife is in trouble I simply can't see why we would risk losing this iconic area. Over many years I have enjoyed walking this area of the coast watching the Guillemots, Razorbills, Puffins, Chough, Seals, Dolphins, Orcas and many more species at South Stack. Please do not allow Mentor Môn to put this area at risk.</p>
82	<p>I live in Switzerland and but have British roots and spend a lot of time on Anglesey. I have been following the Morlais Project. I strongly appreciate the efforts to find a way to produce renewable energy, and using the power of the sea seems obvious around Britain with the strong tidal movement. I am however very concerned about the "side effects" of the Morlais Project. Anglesey is an area of „outstanding natural beauty“, and anyone who has visited South Stack is stunned by the incredible beauty and power of the place. If the Morlais project is visible on the sea there will be an enormous impact on the place, visually, for the marine wildlife and for the people who live on the tourism in the area. Restaurants, Pubs, hotels, sea kayaking companies, bird watchers, hikers and many more will be affected. The cliffs of South Stack are a very important habitat for seabirds. According to RSPB the Morlais Project will have very bad consequences for the bird population on South Stack. This is not acceptable. The Stacks are one of the most important places for sea kayaking nationally and worldwide. Floating turbines will be dangerous and there will have to be restrictions for access. There is a project which uses the energy of tides in the north of Scotland. The turbines are submerged and there seem to be no major problem for dolphins, seals and other sea animals. If this is the case, couldn't you do it in the same way? If there has to be a Morlais project on Anglesey, please use submerged turbines which do not such an impact on sea animals, birds and the „outstanding natural beauty“ of this amazing place. Thank you for your work and your efforts to produce renewable energy. There must be solutions that don't have such a negative impact on this amazing area. If not then the price for Holy Island and Anglesey is too high.</p>
83	<p>I'm a passionate photographer and i take pride in my work which i do a lot of at South Stack and Holyhead mountain. I think it would be an awful shame if the views were to be destroyed by placing the station on the sea surrounding south stack. I also have heard how much of an effect it will have on the sea birds and other wildlife. This email is to notify you that myself and several acquaintances of mine strongly object to this going ahead.</p>
84	<p>This is to register my disapproval of the planning of this project off the coast of South stack. The sea life and birds will undoubtedly be effected by these plans and we have to look after our ever decreasing wildlife.</p>
85	<p>After recently hearing of plans to produce devices on the ocean to generate green energy, i am writing to inform you that I don't agree its the right area to place the devices, therefore i object. I understand this will be detrimental to the sea life and is unacceptable. I hope to hear soon that plans have been changed to locate the devices at an alternative location.</p>
86	<p>I wish to make known my objection to the granting of a marine license for the Holyhead tidal project proposed to take place off South Stack. This area is incredibly important to me for a wide range of reasons. I enjoy sea kayaking in this area regularly as a member of Snowdonia Canoe Club, and have enjoyed exploring the Sea cliffs here both for personal climbing and through work taking groups coasteering and Kayaking in this area. Part of what makes this area so unique is that it is still a fairly pristine environment that is inhabited by sea birds, seals, porpoises and other marine mammals- exploring this impressive coastline is made all the more enjoyable by the company you keep while out and about. I do not argue against the importance of renewable energy generation, but putting this development here as planned would be akin to covering Snowdon with wind turbines and solar panels. I am deeply concerned about the prospect of intrusive development close inshore to where there is a range of special populations and also due to its popularity to the much wider sea kayak community. The concept of large scale development seems extremely heavy handed, and I am not at all convinced that this project has researched widely enough to gauge accurately its impact. Further investigation of impacts on marine and bird species are necessary as are a more detailed conversation with leisure users of this incredibly significant area. Please do think very carefully before setting in train this version of the project.</p>

87	<p>I'm a resident of Llaingoch, Holyhead, and have been my entire life. I grew up with the beauty of South Stack and so have my children. Although I understand how important green energy is, i am furious that south stack has been the location chosen, i do believe it is one of the most beautiful locations in Wales and would be very disappointed to think my grandchildren won't be able to appreciate it the same way i did. I hope you will reconsider the area chosen for this project.</p>
88	<p>I am objecting to the Planning Application Reference 3234121 made under the Transport and Works Act 1992.</p> <p>I have been a resident of South Stack since 2013 and have converted two ruined barns into upmarket successful self-catering holiday cottages. South Stack is the perfect retreat for peace, solitude, amazing seascape, coastal paths, nature reserves, ancient monuments, an abundance of wildlife and is a designated AONB/SSSI/SPA/SLA. It has one of the most distinctive, varied and attractive heritage coastlines in the UK.</p> <p>For the following reasons I hereby object to the Morlais Tidal Array Project:</p> <p>1) Impact on My Holiday Cottage Business 2) Impact on Tourism 3) Mentor Môn Consultation Process 4) Impact on Ecology 5) Roadworks</p> <p>OBJECTION. 1- IMPACT ON MY HOLIDAY COTTAGE BUSINESS</p> <p>The consent of this planning application would directly affect the quality of my life and cause me great stress and anxiety. I designed the three houses so that the focal point is looking out to the amazing seascape and therefore my guests return year after year to enjoy and experience this spectacular view and the reason future guests will book to stay. I believe if this project goes ahead, the visual impact will have a detrimental impact on my business. The houses would overlook both the concrete substation being planned (just a few fields away) and the array of tidal devices (potentially up to 620) floating out at sea. All current photos of my views would be replaced with an array of yellow tidal devices. Not what any holiday guest would expect nor want to look at in an AONB.</p> <p>The impact from the noise levels of both the construction work and the construction vehicles over a two-year period will shatter the peace and tranquillity here. The roadworks will put off existing guests from returning. My guest reviews for staying at the properties would be negative and deter perspective guests from booking with me; therefore, this project could potentially put me out of business.</p> <p>A decline in the seabird colonies and marine mammals would make South Stack less attractive to guests. One of the highlights on the iconic cliffs are the magical Puffins and the rare chough can be seen swooping along the cliffs all year round.</p> <p>OBJECTION. 2- IMPACT ON TOURISM</p> <p>I chose to relocate from Leicester and live in this incredibly special AONB/SSSI/SPA/SLA location for peace and solitude, with the reassurance that it would be protected and remain unchanged. The jewel in the crown being the rugged, unspoilt and spectacular view that is also enjoyed by millions of tourists who come here from all over the world to visit the most iconic spot on Anglesey. In 2016, Anglesey was named the second-best UK holiday destination. I cannot put into words to you, the reader, just how 'special' this place is. It must be one of the most remarkable coastlines in the UK.</p> <p>South Stack is very much a hotspot for local people to visit. Here, they can escape the hustle and bustle of their challenging and busy lives to make use of our natural environment; which is very fundamental to improving physical and mental wellbeing and living a healthy life. For example, 25% of people will suffer from mental health issues at some point in their lives while almost 60% of people living in Wales aged 16 or over are overweight or obese and the rate is increasing. I refer you to NRW Corporate Plan 2022, Our Well-being Objectives.</p> <p>However, Mentor Môn have given absolutely NO consideration for people to reconnect and enjoy the natural world. Everyone deserves this and it should be encouraged. MM's impact assessment states it will create an "Industrialisation of our seascape". It has the potential to be the biggest tidal energy site in the world.</p> <p>Anglesey County Councils 2018 report (Wylfa) is very critical of the risk to its 2 million annual visitors and clearly highlights all of the risks that large scale energy projects pose to tourism and our natural environment. I am confused as to how this project could even be considered when the South Stack coastal waters are in such a sensitive ecosystem.</p> <p>The impact on the local economy and tourism due to the visual/ physical impact will have a negative effect on multiple local businesses. South Stack is an adventure playground. From places to stay, attractions to visit, cafes, mountaineering, kayaking, diving, sailing, guided bird and wildlife tours, fishing boat tours. Whilst I agree the need for renewable clean energy is indisputable for our future generations, I believe that our natural environment too should be protected so that future generations have the privilege to enjoy, understand and appreciate it. It would be a tragedy to put all this at-risk and for grant this project.</p>

	<p>OBJECTION. 3- MENTOR MÔN CONSULTATION PROCESS It was a local neighbour who in August this year informed me of the Morlais project and to date, I have received no correspondence from Mentor Mon at all. I emailed their solicitor Baileys and Partners on the 16 August 2019 to introduce myself and to ensure that I was informed of any further consultations that I had not been previously invited to. I do not believe that the consultation process has been effective or transparent. Mentor Mon have been careful not to openly communicate the use of floating devices, are not actively discussing it with the public and are using misleading posters at the public information days to prevent any local concern. I have been to one consultation meeting with MM where very little information was exchanged. They do not like to discuss floating devices. The few people I have spoken to who are aware of this project are under the impression that the devices will be attached to the seabed, hence NO visual impact on the seascape. This, of course, is not true. I sent an email to Gerallt Jones, MM Managing Director, on the 22nd October 2019 asking him to provide me and the public with a complete set of clear, concise and relevant details but I am yet to hear a response.</p> <p>OBJECTION. 4- IMPACT ON ECOLOGY (Marine mammals, marine ecosystem, seabirds) South Stack is home to endangered wildlife species, in particular, grey seals, harbour porpoise and bottle-nosed dolphins. There is a clear lack of data as to what risks pose to these marine mammals with both the effects of acoustic and potential mortality from the impact. We are regularly blessed with the sight of seals and their seal pups. Back in June 2018, two Orca whales were spotted off South Stack and so it goes to show just how special our waters are here.</p> <p>This planning application shows a lack of data, lack of mitigation and lack of monitoring the risks to all marine mammals, where the coastal waters in South Stack are in a sensitive ecosystem. There is no plan to develop any acoustic signature data and so the impact assessment cannot estimate the nature of the impact let alone the magnitude of the effects it will have. There are no proposals on how these actual impacts will be monitored, merely vague statements about “adaptive management”. In order to assess this, there needs to be concise data hence a monitoring plan put in place or there is no obvious way of knowing what level the impact will have.</p> <p>Seabird mortality for guillemots and razorbills in the modelling studies is very high and not shown in the summary/conclusions. There is little information about the effects on the food chain from the nutrients up the food chain to the fish that the sea birds and marine mammals feed on. I am aware that the RSPB, who too are objecting to this planning application are very concerned over the effects the project will have on other species including red-throated diver, shag, Manx shearwater and gannets. I have also noted that the mitigation and monitoring of seabirds is weak.</p> <p>OBJECTION. 5- ROADWORKS The roads here are narrow and remarkably busy throughout the year, not just in the summer. Coaches, cars, cyclists, walkers. Already we have problems with cars parking either side of the road at South Stack which makes it dangerous to manoeuvre and, on several occasions, I have reported my concerns to Anglesey Council. The planned roadworks will be hugely disruptive to locals, with the increase of pressure from both the construction workers vehicles and the construction vehicles on the roads. There has been no consultation process or impact assessment carried out for the infrastructure to cope with this.</p> <p>This application has been poorly thought out and delivered and will have a devastating impact on our natural environment, and it is NRW’s responsibility and priority now to safeguard and protect it.</p>
89	<p>After hearing about the proposal to build a large amount of green energy stations i massively object to it going ahead. I am not local to the area and live in Sheffield but my wife and I own a holiday home in Treaddur Bay and often enjoy a walk around South Stack, taking in the views and appreciating the wild life. A project as large as this is just unacceptable and I'm sure there are a number of others who would agree with me. I have already heard there are massive concerns for the breeding and sea life.</p>
90	<p>I've been a resident of Anglesey my entire life, and have had family links to south stack for over a century. I am deeply concerned for the wellbeing of the wildlife this may have a massive impact on as there are several species in the area that are known for breeding. I think there are a number of other locations that could be considered for the energy project to be placed, before somewhere such as south stack.</p>
91	<p>I am very concerned about the proposal to site so many turbines in the sensitive waters off South Stack. I have am MSc in Rural Resource Management and worked at RSPB South Stack as Visitor Officer for many years. It is essential that the seabirds which breed at South Stack are not impacted in any way by the proposed development. Nationally populations of auks are declining and face threats from climate change and plastic pollution. They are already vulnerable and do not need any more threats to their survival. In terms of visitors coming to see the seabird spectacle South Stack is essential for the tourist economy. The development must not be allowed to threaten this amazing marine ecosystem.</p>
92	<p>I'm writing to object to the energy project proposal. I strongly believe this will have a detrimental effect on the local sea birds which already rare. I feel this is their territory and should not be used for such a big project. I also</p>

	have concerns for the other sea life which includes dolphins, porpoise and especially seals which are well known for breeding around south stack. I hope these concerns are taken into consideration,
93	Please note I as a local member of the community object to the location of your project named Morlais Demonstration Zone at South Stack owing to the threat to sea birds (in particular diving seabirds) and other marine life. Please note I do support your project. It is the location I am objecting to.
94	I did read about the Morlais Project here in Switzerland. I do appreciate the efforts to find a way to get clean, renewable energy. Using tides sounds good. But i'm highly concerned about the project. Anglesey is an area of „outstanding natural beauty“. South Stack is one of the most amazing places i know. Its cliffs, the view of the lighthouse from land and from sea are just incredibly beautiful. If the Morlais project is visible on the sea this amazing beautiful place will be destroyed. This may also have effects for tourism and therefore for the whole economy (Restaurants, Pubs, hotels, sea kayaking companies and so on) of Anglesey or at least Holyhead. The cliffs of South Stack are an important place for Birds. According to RSPB the Morlais Project will probably have very bad consequences for the bird population on South Stack. This is not acceptable. Besides this, the South Stack area is one of the most important places for sea kayaking. Floating turbines will be dangerous and there will have to be restrictions for access. There is a project which uses the energy of tides in the north of scotland. The turbines are submerged and there seem to be no major problem for dolphins, seals and other sea animals. If this is the case, couldn't you do it in the same way? So: If there has to be a Morlais project on Anglesey, please use submerged turbines which do not have bad effects on sea animals, birds and the „outstanding natural beauty“ of this amazing place.
95	I'm local to south stack as i have lived in Holyhead my entire life. I have some major concerns about the marine energy project which has been proposed. I believe there will be a massive impact to the wildlife here affecting the breeding / migratory birds, dolphins, porpoise and a number of other species. I am objecting to this project continuing to go any further as i feel there are several other locations the energy project could be placed at.
96	I am really concerned that the project is being set up in this particular area, as it is an area richly populated with breeding seabirds, and rich sea life which may be under threat by the plans.
97	I was horrified to understand that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead marina around the iconic south stack lighthouse to Trearddur Bay. I am aware that more renewable energy is a crucial part of tackling climate change, but developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. Trading protected and environmentally sensitive habitats and iconic seascape and landscapes for low efficiency renewable energy projects must at best be fundamentally wrong. Surely such projects should seek areas of very low sensitivity and utilise high efficient devices? I have been made aware that Morlais have submitted a planning application which proposes installations for turbines that harness tidal currents and that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others 'painted orange and/or yellow' would be floating on the surface. The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high. I am concerned that Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area. At a time where wildlife is in trouble I simply can't see why we would risk losing this iconic area. Over many years I have enjoyed walking this area of the coast watching the Guillemots, Razorbills, Puffins, Chough, Seals, Dolphins, Orcas and many more species at South Stack. Please do not allow Mentor Môn to put this area at risk.

98

I am a resident of Ynys Gybi, Anglesey and owner of an outdoor activity company - XXXXXXXXX. My company specialises in offering kayaking, sea kayaking and coasteering courses on the North West coast of Anglesey from Rhoscolyn and Trearddur Bay. I am also a GeoMon Geology Guide with particular expertise in the rocks and landscape of Ynys Gybi including the area of coastline along the MDZ. I am a strong supporter of renewable energy and an early adopter of renewable technologies both at home and within my businesses. Whilst I support the principle of tidal energy generation off the Anglesey coast, this particular project causes me some significant concern. These concerns fall under the following headings: 1. impacts on sea kayaking and sea kayakers including the loss of access to an internationally important sea kayaking destination 2. impacts on breeding bird colonies 3. impacts on marine cetaceans 4. impacts on the visual landscape of a World Heritage designated GeoPark. My primary concern however is that the marine licensing application is being considered as a whole up front rather than for an initial small-scale pilot. The application is for a unique project within a highly sensitive and important environment. It's development will inevitably follow a number of iterative development stages, however the permissions are being sought in advance for a project that is yet to be fully designed and is little understood. As the NRW notes in it's own response to the initial consultation, it is impossible to quantify the potential impacts of the development as too little is known about the final shape of the project, the specific technologies that will be utilised, and the real world impacts of these technologies in the specific location of the MDZ. I feel that granting the application in it's current form would entail a massive gamble with the ecology of the area, and that the technologies proposed in the numbers envisaged would have a detrimental effect on the local area. Had the application been for a small scale initial development in a clear area with intense monitoring of the impacts over time, I would have been generally supportive, however the current scale and lack of knowledge about the impacts mean that I cannot support the project as currently presented.

Specific Concerns:

1. Sea Kayaking Anglesey is an internationally renowned sea kayaking destination and the preeminent UK destination for sea kayakers. Over the last 20 years Anglesey has led the world in the development of sea kayaking as a sport and leisure activity. The sport is hugely popular with numerous clubs within a two and a half hour drive of the Island. On any weekend throughout the year you will find many sea kayakers heading across the A55 to launch on the Island. The sea kayaking trip around the 'Stacks' has international renown as a route for moderate and advanced kayakers. The tidal races at Penrhyn Mawr, North Stack and South Stack are the primary advanced water kayak destinations for training and skill development. For this reason, Porth Dafarch (the closest launch point to the MDZ) is one of the most important and well used sea kayak launch points on the Island. The outdoor centre on Porth Dafarch Road hosts 3 annual International Sea Kayak Symposia attended by paddlers from all over Europe. North Wales is home to at least 10 specialist sea kayaking activity providers in addition to generalist providers. For all of us, the coastline of North West Anglesey is a hugely important part of the business offer we have to customers. My business alone puts over 1000 kayakers on the water off Ynys Gybi each year. In addition the Outdoor Centre in Rhoscolyn where I am based, hosts several hundred sea kayakers each year who visit either as clubs or as families and individuals. My specific concerns with the Morlais project with regard to kayaking are: it's proximity to the shore; the size of the area to be covered; and the risks associated with having fixed objects in the middle of a dynamic and hugely powerful tidal flow. The area within 1-1.5km from the shore is the area most frequently used by kayakers. The current coastal exclusion zone is in my view too narrow and as such will have a major impact on the ability of kayakers to enjoy their current access to the area. The size of the area to be covered and the specific choice of technologies that are based on floating rafts mean that the current 'wild' nature of the environment will be lost. Anglesey is one of the last places in the southern UK to have a unique wild feel and the scale of the development that will be visible on the surface has the potential to industrialise a precious place. The sheer number of kayakers using the area in and around the MDZ means that kayakers will inevitably be restricted by it's presence. I am however concerned that the potential for safety issues for kayakers has not been considered. Any group kayaking 'up-stream' of the project will have the potential to be washed into the area by the tide if an incident was to occur. To avoid this an exclusion zone would need to be adopted that was so large as to have an extremely serious impact on the ability of kayakers to utilise the area North of Porth Dafarch.
2. Impacts on breeding Birds I have read the submission from the RSPB and the project's own analysis. I am extremely concerned about the potential severe impact on the Razorbill population and the significant impact on the Guillemot population. I am also concerned about the on land impacts to the breeding Chough near South Stack. I don't believe that a development of this scale should be approved until the specific technologies to be adopted at scale have been fully assessed for their impact on these colonies. They are signature birds for the Island and draw huge numbers of visitors and are an important part of the local economy as well as important to the eco-system. Whilst a pilot could be acceptable the scale of this project is of great concern.
3. Impacts on Cetaceans I have read NRW's submission and the project's own analysis. I fail to see how the project can be quite so certain about the risks of such a large project to seals, dolphins and porpoise when so little is known and understood about both their movements in the area, the impact of the turbines on fish behaviour, and the effectiveness of the deterrance. I would like to see a smaller scale pilot approved so that these things can be better understood.
4. Impacts on the visual landscape I am concerned by the number of 'yellow' floating barges projected for the project in full view of an AONB and one of the signature views of the Isle of Anglesey coastal path and the GeoPark. The choice of the barge based technology as the primary technology to be developed seems ill-suited to the specific location, especially given the number of barges envisaged in the application. Their

	<p>number, proximity to the shore and tight alignment mean this will amount to an industrialisation of the seascape. As someone who regularly leads walking groups along the coastal path at South Stack to view the geology I believe the scale and nature of the development will have a negative impact on our enjoyment of the view. Thank you for the opportunity to make my thoughts know. I look forward to receiving feedback on the application in due course.</p>
99	<p>I wish to register my objection to the above Scheme and my reasons are detailed below:</p> <p>Anglesey can be described as a world class sea kayaking venue and attracts Sea Kayakers from all over the globe. I personally have coached paddlers from the USA, Canada, Australia, New Zealand, Germany, France, Spain, Greece, Italy, Holland, Israel, Ireland and from all over the United Kingdom. It has been a very important venue for many years now and having the freedom of access and safe navigation should be allowed to continue unhindered. The impact on not only the environment but also on the local sea kayaking businesses and tourism would be enormously affected.</p> <p>The 'jewel' in the Anglesey crown and one of the most important areas for sea kayaking is an area known world wide as 'The Stacks', an area ranging from Soldier's Point on the western side of Holyhead breakwater to Porthdafarch. The proposal has a passage which appears to quote from the Welsh Sea Kayaking Guide: "The area of sea around Holy Island including the MDZ is particularly challenging in nature and generally only recommended for experienced kayakers (Krawiecki and Biggs, 2013)". I feel this misrepresents both the information in the book and the premise of the Stacks as being solely a venue for the experienced kayaker.</p> <p>Between February 2016 and October 2019 I have logged 48 journeys in this specific area (I am currently unable to download these tracks but can make them available for inspection, I have however included some typical map examples for information). Please bear in mind that I do not record all trips and use tracks to give clients a memento of their paddling experience so the overall number of journeys is likely to be significantly higher. Many of these journeys have included intermediate kayakers under my guidance as an experienced and qualified advanced water leader, guide and coach, thus the idea that only experienced kayakers can paddle in these waters is preposterous and misleading.</p> <p>Paddling in this area goes beyond the exciting sea conditions, tide races, overfalls, tidal flow and spectacular scenery. It is also a treasure trove of wildlife, with varied and extensive marine bird life, Cetacea and seals being a major draw for visitors. I will not include further details on this issue as I assume there are others more qualified to comment. My comments are purely to demonstrate the importance to the Sea Kayaking community.</p> <p>The potential hazard presented by any infrastructure coming above the water or just below the surface in areas of fast tidal flows is underplayed and has not been properly assessed for kayaks and other small vessels e.g. small sailing boats which have limited power and steerage. Such boats, in an emergency, are largely at the mercy of the tides and weather and the risk of being swept into the arrays and colliding with barges, buoys and inspection platforms etc. is considerable.</p> <p>The Anglesey coastal path is something that Wales can be justifiably proud of and the area to the west of Holyhead Mountain is one of the most important and most spectacular areas of this exceptional resource. The potential impact of the scheme on tourism has not been appropriately addressed. I am fully aware of the potential and importance of the development of tidal energy sources but feel strongly that such schemes could be located in less sensitive and important areas.</p> <p>Many thanks for your consideration.</p>
100	<p>I am extremely worried about the impact on the marine life of South Stack if this tidal energy project goes ahead. I am objecting to this proposal being located in an area of such high ecological importance.</p>
101	<p>I am writing to highlight my concerns about the proposed tidal turbine project off South Stack. I am objecting to this proposal because of my grave concerns about the impact on the marine life of this area. A project of this size is without doubt going to have a negative impact of this highly important area for seabirds and sea mammals for which it is an AONB and SPA so to locate a project of this size in this location is unacceptable.</p>

10 2	I was horrified to understand that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead marina around the iconic south stack lighthouse to Trearddur Bay. I am aware that more renewable energy is a crucial part of tackling climate change, but developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. Trading protected and environmentally sensitive habitats and iconic seascape and landscapes for low efficiency renewable energy projects must at best be fundamentally wrong. Surely such projects should seek areas of very low sensitivity and utilise high efficient devices? I have been made aware that Morlais have submitted a planning application which proposes installations for turbines that harness tidal currents and that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others 'painted orange and/or yellow' would be floating on the surface. The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high. I am concerned that Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area. At a time where wildlife is in trouble I simply can't see why we would risk losing this iconic area. Over many years I have enjoyed walking this area of the coast watching the Guillemots, Razorbills, Puffins, Chough, Seals, Dolphins, Orcas and many more species at South Stack. Please do not allow Mentor Môn to put this area at risk.
10 3	I was horrified to understand that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead marina around the iconic south stack lighthouse to Trearddur Bay. I am aware that more renewable energy is a crucial part of tackling climate change, but developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. Trading protected and environmentally sensitive habitats and iconic seascape and landscapes for low efficiency renewable energy projects must at best be fundamentally wrong. Surely such projects should seek areas of very low sensitivity and utilise high efficient devices? I have been made aware that Morlais have submitted a planning application which proposes installations for turbines that harness tidal currents and that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others 'painted orange and/or yellow' would be floating on the surface. The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high. I am concerned that Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area. At a time where wildlife is in trouble I simply can't see why we would risk losing this iconic area. Over many years I have enjoyed walking this area of the coast watching the Guillemots, Razorbills, Puffins, Chough, Seals, Dolphins, Orcas and many more species at South Stack. Please do not allow Mentor Môn to put this area at risk.
10 4	I am extremely concerned about the proposed power generation scheme off South Stack. This area is an area of outstanding natural beauty and also an RSPB reserve as you will be aware. One of the main attractions of the area is for people to enjoy the natural beauty of an uncluttered environment and for wildlife to enjoy same. Industrialising this landscape will be an appalling insult to all those who work hard to maintain the balance between man and nature.
10 5	I am strongly objecting to the proposed marine energy project proposal by morlais. My main concern is the location of all these devices within an area known to be so important for seabirds and sea mammals and the long term effect on the ecosystem there. I am also concerned that South Stack will no longer have the attraction and iconic status for its beauty and wildness will be lost forever. Having lived here all my life with a strong family connection to South Stack this proposal is deeply concerning.
10 6	1)I understand there are actions afoot re the beautiful RSPB South Stack reserve. If this is detrimental to the auks , gulls & petrels plus other marine life, it means that I'm totally against it. This reserve is totally unique and should remain so, plus it has been awarded ANOB status. 2)I'd be so gutted, nay, devastated if this sea energy project went ahead. I cant stress enough how much this means to me. It will probably lead to more industrialisation of this precious area. 3)I strongly object to the Morlais marine energy project off the coast of South Stack. My main concern is of the terrible & hugely negative impact it will have on the marine life eg seals, & the wonderful breeding seabirds that this area is so important for - puffins, fulmars, all types of gulls, peregrine falcons, rock pipits, meadow pipits, whitethroats, stonechats, gannets off shore: swallows, swifts, greenfinches, brown hares, butterflies & moths, hummingbird hawkmoths, badgers, rabbits, an iron age settlement...
10 7	I am objecting to the proposed tidal energy project off South Stack. I find the location and scale of this project extremely worrying because of the areas great importance to marine mammals and seabirds and the long term negative impacts it will have on the ecosystem.

10 8	<p>I wish to alert you to the encyclical from Pope Francis on the importance of biodiversity and for you to choose not to grant a license for the production of energy for GREEDY humans whilst the biodiversity of a sensitive ecological area will be destroyed. I quote from Laudato Si: III. LOSS OF BIODIVERSITY 32. The earth’s resources are also being plundered because of short-sighted approaches to the economy, commerce and production. The loss of forests and woodlands entails the loss of species which may constitute extremely important resources in the future, not only for food but also for curing disease and other uses. Different species contain genes which could be key resources in years ahead for meeting human needs and regulating environmental problems. 33. It is not enough, however, to think of different species merely as potential “resources” to be exploited, while overlooking the fact that they have value in themselves. Each year sees the disappearance of thousands of plant and animal species which we will never know, which our children will never see, because they have been lost for ever. The great majority become extinct for reasons related to human activity. Because of us, thousands of species will no longer give glory to God by their very existence, nor convey their message to us. We have no such right. 34. It may well disturb us to learn of the extinction of mammals or birds, since they are more visible. But the good functioning of ecosystems also requires fungi, algae, worms, insects, reptiles and an innumerable variety of microorganisms. Some less numerous species, although generally unseen, nonetheless play a critical role in maintaining the equilibrium of a particular place. Human beings must intervene when a geosystem reaches a critical state. But nowadays, such intervention in nature has become more and more frequent. As a consequence, serious problems arise, leading to further interventions; human activity becomes ubiquitous, with all the risks which this entails. Often a vicious circle results, as human intervention to resolve a problem further aggravates the situation. For example, many birds and insects which disappear due to synthetic agrotoxins are helpful for agriculture: their disappearance will have to be compensated for by yet other techniques which may well prove harmful. We must be grateful for the praiseworthy efforts being made by scientists and engineers dedicated to finding solutions to man-made problems. But a sober look at our world shows that the degree of human intervention, often in the service of business interests and consumerism, is actually making our earth less rich and beautiful, ever more limited and grey, even as technological advances and consumer goods continue to abound limitlessly. We seem to think that we can substitute an irreplaceable and irretrievable beauty with something which we have created ourselves. 35. In assessing the environmental impact of any project, concern is usually shown for its effects on soil, water and air, yet few careful studies are made of its impact on biodiversity, as if the loss of species or animals and plant groups were of little importance. Highways, new plantations, the fencing-off of certain areas, the damming of water sources, and similar developments, crowd out natural habitats and, at times, break them up in such a way that animal populations can no longer migrate or roam freely. As a result, some species face extinction. Alternatives exist which at least lessen the impact of these projects, like the creation of biological corridors, but few countries demonstrate such concern and foresight. Frequently, when certain species are exploited commercially, little attention is paid to studying their reproductive patterns in order to prevent their depletion and the consequent imbalance of the ecosystem. 36. Caring for ecosystems demands far-sightedness, since no one looking for quick and easy profit is truly interested in their preservation. But the cost of the damage caused by such selfish lack of concern is much greater than the economic benefits to be obtained. Where certain species are destroyed or seriously harmed, the values involved are incalculable. We can be silent witnesses to terrible injustices if we think that we can obtain significant benefits by making the rest of humanity, present and future, pay the extremely high costs of environmental deterioration. Tidal energy projects need to be instigated in places where there is much less of a risk of damaging the natural environment for us greedy humans</p>
10 9	<p>I wish to object to the granting of the Marine license for the Morlais Demonstration Zone, for the following reasons: Safety: small boats & kayaks that have capsized or engine failure potentially will be taken by the fast flowing current into the exclusion zone with significant risk to life from the generating infrastructure & associated blades. Rescue by RNLI/Coastguard helicopter may not be possible in the limited time available. Major environmental impact during construction and operation. Significant impact on the tourism viability of the area.</p>
11 0	<p>I am writing to object to Planning Application reference ORML 1938 Marine License Application. My name is XXXXXXXXXX</p>
11 1	<p>I am writing to express my deep concerns and objection to the proposed Morlais marine energy project. Although producing green energy is of great importance the location of such projects should be carefully considered, the seas off South Stack is such an important feeding ground for breeding and passage seabirds, cetaceans and resident seals and it is the huge scale and close proximity to the coast there that I strongly object to.</p>

11 2	<p>I was horrified to understand that a developer (Menter Môn- Morlais), has applied to Natural Resources Wales (NRW) for a Marine Licence to develop a marine renewable energy project off the Anglesey Heritage coast from Holyhead marina around the iconic south stack lighthouse to Trearddur Bay. I am aware that more renewable energy is a crucial part of tackling climate change, but developments need to be sited and planned in ways that avoid adding to our current and equally disturbing nature crisis. Trading protected and environmentally sensitive habitats and iconic seascape and landscapes for low efficiency renewable energy projects must at best be fundamentally wrong. Surely such projects should seek areas of very low sensitivity and utilise high efficient devices? I have been made aware that Morlais have submitted a planning application which proposes installations for turbines that harness tidal currents and that if fully developed could result in the construction and deployment of up to 620 devices over 35 square kilometres of sea to generate only around 240MW of renewable electricity. Some of the turbines would be fixed to the seabed and others ‘painted orange and/or yellow’ would be floating on the surface. The floating turbines could be as close as 500m to the seashore and be as large as 65m long and 3m high. I am concerned that Morlais will significantly harm the wildlife and habitats of this unspoilt, natural and rugged area. At a time where wildlife is in trouble I simply can’t see why we would risk losing this iconic area. Over many years I have enjoyed walking this area of the coast watching the Guillemots, Razorbills, Puffins, Chough, Seals, Dolphins, Orcas and many more species at South Stack. Please do not allow Mentor Môn to put this area at risk.</p>
11 3	<p>Dear Licencing team, As someone with an interest in the Morlais proposal I was watching for the publication of public notices regarding the consultation on the Marine license application. I became aware that the consultation had opened on the 28th November when I was alerted by a friend. I checked the Morlais webpage to find nothing posted there and searches of local papers, inyourarea.co.uk and Morlais/Menter Mon Facebook and twitter feeds also made no mention of the open consultation. Repeated checks up to Christmas also drew a blank. Imagine my surprise when a notice finally appeared on the Morlais webpage in early January backdated to the 27 November 2019 https://www.morlaisenergy.com/notices/marine-and-coastal-access-act-2009/ This was echoed in the appearance of a notice on the inyourarea.co.uk pages but this notice gave the consultation period of 35 days commencing the 27 November rather than 42 days as indicated on the NRW website. This notice has since disappeared. Although I didn’t catch it at the time it seems the Gazette notice related to the marine license was published on 4 December 2019 https://www.thegazette.co.uk/notice/3443109 though this is hardly something that will catch people’s attention. I was expecting notices to be more easily accessible and timely than this.</p>
11 4	<p>I wish to make representation/ comments in relation to the Marine Licence application submitted by Morlais. Whilst being generally in favour of renewable energy I have severe concerns over the impact of these proposals to the local and national community of sea kayakers who regularly use this area for challenging paddling and training. It would appear that there has been little consultation with the kayaking community and its impacts are poorly explored. I have used the area from Porth Daffach around to south and north stack over the last 15 years and like others value its remote and wild location and lively seas, as well as marvellous wildlife. I am concerned about likely changes in flow rates as the apparatus slows the tide and how this will degrade a fantastic sea kayaking environment . This will in turn affect local kayaking businesses and sports tourism. It is unclear if the equipment will pose risks to kayakers . Indeed recreational usage of local waters were only surveyed on 2 weeks in summer and 2 in winter according to point 152 in the non -technical summary. No mention is made as to whether tides were spring or neap. This seems a totally inadequate survey. The summary also identifies a major adverse landscape impact at Abrahams Bosom which must impact on the special landscape character of the Anglesey coast . No mitigation is mentioned. I would ask that you refuse the application . These aspects need proper survey , analysis , consideration and mitigation and without them refusal.</p>
11 5	<p>Snowdonia Canoe Club (SCC) is a club affiliated to Canoe Wales which has around 100 members of all ages and experiences based in North Wales. As a club of sea kayakers who make regular use of the sea and headlands in the vicinity of the Morlais Demonstration Zone (MDZ) we wish to draw the attention of Natural Resources Wales to significant shortcomings in the Environmental statement submitted by Morlais related to the potential impact of the proposed development on sea kayaking. Until these are addressed SCC objects to the granting of a marine license for the Morlais project.</p> <p>This representation is in two sections; the first of these outlines the main issues we wish to bring to your attention. The second provides a collation of evidence to support our contention that sea kayaking is a significant activity which will be impacted by the Morlais project.</p> <p>Section 1: SCC representation</p> <p>The MDZ lies close offshore of the west coast of Holy Island an area extending from the Penrhyn Mawr headland to North Stack which collectively is known to kayakers as ‘The Stacks’. In spring tides it provides a challenge to advanced kayakers, while remaining accessible for intermediate kayakers in calm weather at neap tides. The Stacks are the jewel in the crown of sea kayaking around Anglesey which and is generally considered to be one of the best locations for accessible and challenging sea kayaking in Europe. Anglesey is the ideal location for sea kayak skills training which supports one of the highest densities of top sea kayak coaches in the world. In addition, the Stacks are an essential component of longer trips such as the circumnavigation of Holy Island and</p>

Anglesey. This means the area impacted by Morlais is one of the busiest sea kayak locations in the UK. - We submit that sea kayakers have enjoyed the use of the MDZ as a venue for many years and sea kayaking is an established activity and thus safeguarded under Policy SAF_01b of the Welsh National Marine Plan (2019)¹

- The Morlais Environmental statement (Chapter 6) does not include any meaningful consultation with the sea kayak community which we contend is a significant stakeholder in consideration of the impacts of the project on navigation and seascape within and adjacent to the MDZ

- The data used to determine levels and areas of the MDZ accessed by recreational vessels is based on radar data which will not pick up small glass fibre and plastic boats – sea kayaks are therefore not represented in any way within the impact analysis

- Kayaks and other human-powered vessels have limited speeds and duration and are sensitive to small changes in current rates² – the modelling presented in Chapter 7 of the Environmental statement indicates changes in flow regimes and rates within and adjacent to the MDZ which are large enough to compromise the safe enjoyment of the area by kayakers. However, the modelling provided by Morlais is insufficiently detailed to be able to properly assess the scale and significance of these impacts on navigation by kayaks and other craft such as stand up paddleboards.

- SCC suggests that the risk to kayaks of collision or other interaction with emergent infrastructure and the moored barges in particular is higher than indicated in the impact report. It is not possible to mitigate this risk with an exclusion zone as suggested in the Environmental statement as kayaks and other craft with low or no power will be at the mercy of the tide.

- The 500 m Safety zone proposed during the extend construction period would appear to prevent passage across Abraham’s Bosom and around South Stack. This would effectively sterilise at least four well-established and popular sea kayak trips³.

- The seascape data presented in Chapter 24 includes only two viewpoints from the sea with only one for recreational vessels which is 2.4 km off the southern boundary of the MDZ. There is no consideration of the impact of emergent infrastructure on seascape as experienced from kayaks or other small craft passing through or adjacent to the MDZ and these impacts have been ignored in the impact assessment.⁴ The whole coast is designated as the Holyhead Mountain Heritage Coast for its natural beauty and undeveloped character. We suggest there is no mitigation possible for the degradation of this pristine and wild seascape of the introduction of floating and emergent structures painted yellow and lit at night.

- Sea kayaking is a significant contributor to the local economy in the form of guides, training providers, accommodation, hospitality, shops and kayak manufacturing. Anglesey hosts the highest density of advanced level sea kayak guides in the world as well as two kayak manufacturers which provide high quality skilled jobs in Holyhead. None of these are represented in the impact assessment and we suggest this is a significant omission of a potential negative impact on local employment and economy.

- As kayakers we are very aware of wildlife in the sea, caves and on the cliffs and encountering seals, dolphins and seabirds is an important part of the experience of a trip around the Stacks. We are very much concerned about impacts of the project on local biodiversity and would not wish to see this degraded in any way.

Section 2: Evidence 2.1 Use of area by kayaks

The following tracks provided by local paddlers illustrate typical use of the MDZ by sea kayaks. Although use is highest in the summer months activity of all types e.g. recreational trips, training, assessment, coaching and guided trips take place year-round.

Exert of log of SCC member

Several years of tracks by a local elite paddler

Routes in 2018-19 by SCC member

These are just a few examples of the use made of the area by kayaks – note that many of these would fall into the MDZ and pass within the proposed array.

2.2 Brief description of classic kayak routes

The Stacks – from Porth Dafach to Soldiers Point – can be done as a one-way trip on the tide or timed as a round trip around slack. Includes ‘play’ in the races at Penrhyn Mawr, South Stack and North Stack. Very popular for advanced training and as a guided trip.

<p>Holy Island circumnavigation – can be done as a challenge but mostly as a long day trip https://performanceseakayak.co.uk/Pages/Records/Circ/RecordsCircHolyIsland.php Skerries - from Porth Dafach – long route around Holyhead past Langdon Bank to the Skerries on the tide passing through the MDZ.</p> <p>Anglesey circumnavigation – can be done in one day as a speed challenge https://performanceseakayak.co.uk/Pages/Records/Circ/RecordsCircAnglesey.php but more often as a very popular multi-day trip (e.g. https://www.liverpoolcanoecub.co.uk/news/?p=4305).</p> <p>2.3 Anglesey Sea Symposium May bank holiday every year since 1982 https://www.angleseyseakayaksymposium.co.uk/ Draws in 100-150 paddlers from across the globe. A week of training, assessments and other events based at Anglesey Outdoors in Holyhead. This is the longest running sea kayak symposium in the world and set the model for many other sea symposia and retains links with similar events in Spain and Iceland. There have also been similar events organised around Holyhead such as the Storm Gathering – 2011 and the Anglesey Sea Kayak Festival.</p> <p>2.4 Visitors from outside local area Many canoe clubs regularly visit Anglesey and often include a visit to the Stacks to play in the races or as part of the Anglesey circumnavigation.</p> <ul style="list-style-type: none"> • Information provided by a member of canoe club based in Yorkshire indicate that 10 paddlers made an average of 4 trips each to Anglesey spending 130 days on the water of which 72% were led by a local kayak guide and that each spent over £700 a year on Anglesey. • The Liverpool Canoe Club made 10 weekend (1 or 2 days) visits to Anglesey in 2019 <p>2.5 Local employment There are at least 15 companies employing more than 30 qualified guides/coaches making use of the seas around Anglesey including Holyhead. Many of these are full time and active throughout the year (see for example https://www.coastalspirit.com/events and https://seakayakingwales.com/bookings-page/).</p> <p>Manufacturing – three companies making hand-built sea kayaks and paddles. Between them they are estimated to provide around 25 jobs. One of the companies hosts regular events for dealers from across the world who come to Anglesey to try out boats in the Holyhead races. Many boats are be-spoke and involve visits to the factory. The boats are all designed and tested in Anglesey waters and are generally considered to be some of the finest available and are exported around the world.</p> <p>Hospitality – sea kayaking is a year-round activity. There are several providers of group accommodation specialising in outdoor pursuits on Holy Island which are frequented by sea kayakers.</p> <p>Shop – there is an independent shop selling kayak equipment alongside cycling and camping and other outdoor equipment in Holyhead.</p> <p>2.6 Modelled impacts of other tidal stream schemes There are few readily available reports of hydrodynamic impacts of tidal arrays to compare with the Morlais project. However, it is suggested by modelling of other proposed schemes that environmental impacts, mostly taken as sediment movements can be significant and can be used to set limits on the generation capacity in an array.</p> <p>Two modelling studies have been reported for the Skerries. Serhadioglu S. et al (2013)⁵ looked at the impact of blocking the tide and connecting arrays in parallel or in series. They concluded that connection in parallel was preferred and that large-scale changes would be expected but that “This complex mixing process cannot be modelled accurately with a depth-integrated model”.</p> <p>Robins et al (2014)⁶ modelled an array in the Skerries sound and concluded that a 50 MW array would have impacts on sediment movement within the bounds of natural variability and so would be acceptable and an array of up to 300 MW would not change local sand banks.</p> <p>Haverson et al (2016)⁷ modelling of a 10MW array at St David’s Head showed far field effects (changes of more than 5% of flow rates) interfered with eddy propagation in an area extending 24 km south-west and 19 km north east of the array. They also adopted the ‘Significant Impact Factor’ threshold of maximum extraction of 20% of total kinetic energy at a site to restrict significant economic or environmental impacts which meant not more than 10 MW could be extracted from this site. They also concluded that “Depth-averaged modelling can be a useful tool to provide first stage investigations into the likely performance of a tidal array and its potential impact, identifying areas of greatest risk to changes. These can then be further investigated through the use of more complex 3D modelling.”</p> <p>These observations raise several questions regarding the Morlais proposal. The depth-integrated model used in Chapter 9 is depth-integrated and optimised to consider within array effects – it is not suitable for impact assessment which should ideally utilise a 3-D model. Has the 240 MW generation capacity been assessed as falling within the Significant Impact Factor? How far might we expect the far field effects on eddy propagation to extend?</p> <p>We might also taking a lead from Surfers against Sewage (2009)⁸ to request modelling of impacts on wave height and climate and the adoption of criteria for assessing whether an impact can be considered insignificant which</p>

	are negotiated with the kayaking community. If the far field is found to be extensive then there may also be impacts on surf at Rhosneigr.
11 6	<p>As a local sea kayaker and member of Snowdonia Canoe Club, I have paddled the coastline between Porth Dafarch and North Stack, Holy Island, Anglesey on a number of occasions. Please see below an extract from my paddling log over the years, advising the date, number in the group and the journey travelled. For 3 of these journeys, I was using a GPS – tracks are shown on the accompanying map. In my opinion, this is the best stretch of water for sea kayaking on the Anglesey coastline. This stretch will be significantly affected by the proposal. Looking forward to future journeys around this piece of pristine Anglesey coastline, I object to the proposal on the following grounds:</p> <p>1) Loss of amenity – there will be significant periods when access will not be possible due to construction activities associated with the proposal. 2) Loss of amenity – this coastline is particularly spectacular, bordered by the cliffs & caves of Gogarth Bay – see attached pictures from some of the trips mentioned in the log extract. An industrial facility will significantly reduce this natural amenity. 3) Loss of amenity – the impact on tidal flows caused by the proposed facility will be significant with respect to a journey by sea kayak –typical kayak speed is 6km/hour (~1.7m/s). Hence even a 1km/hr (~0.3m/s) increase in tidal flow as the tide is squeezed between the facility and the coastline could prevent/disrupt passage at times. 4) Safety – in the event of a capsize upstream of the facility, or an inability to paddle against the tide during a journey, then the proposed facility present a significant threat to life if swimmers or boats are swept by the tide onto the facility.</p>
11 7	<p>North Wales Wildlife Trust would like to express our serious concerns regarding the Morlais Demonstration Zone Development and its potential effect on wildlife.</p> <p>Further to this, I can confirm that we have seen and support the RSPB’s Objection to the Marine License application.</p>
11 8	<p>I am writing to express concern about the proposed demonstration zone off the west coast of Anglesey. The proposed development could have devastating impacts on the seabird colonies that use the cliffs at South Stack. I urge you to ensure that the scheme, if licenced, takes full account of the risks to seabirds, as well as cetaceans and other wildlife, and a precautionary, adaptive approach is applied so that risks are minimised and impacts are acted upon (including by stopping development or removing installed turbines if required).</p>