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Morlais Project

Cumulative and In-Combination Impact Assessment Addendum

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1. INTRODUCTION

1. Natural Resources Wales (NRW) have requested further information on the Cumulative and In-combination Assessment (CIA) (Chapter 26 of the Environmental Statement (ES)) for the Morlais Tidal Array project following the additional assessments undertaken on the project post submission, in order to clearly state whether the updates have changed the CIA.
2. The following sections provide updates to the relevant topic chapters of the ES following the additional work undertaken on the project in consultation with NRW and other statutory consultees and identifies whether the results change the conclusions drawn within the CIA.

2. CIA ADDENDUM

2.1. CHAPTER 7: METOCEAN AND COASTAL PROCESSES

3. Following the submission of the ES, numerical modelling has been undertaken to provide further evidence to support the assessment. The modelling report was submitted on the 27th March (document reference MOR-HRW-DOC-0001). The modelling results were assessed in relation to the original assessment and the conclusions are presented in a supplementary note, also submitted on 27th March (document reference MOR-RHDHV-DOC-0112). The modelling results support the assessment presented within the ES and as such the conclusions of the ES have not changed, the effects of the project on coastal processes are predicted to be small scale, localised and temporary.
4. In addition, the Applicant has committed to routing cables to avoid the South Stack sand bank feature in order to ensure there will be no impact on its function as part of the coastal processes system. This is discussed further in the Metocean and Physical Processes ES Supplementary Note (document no. MOR/RHDHV/DOC/0111) submitted on 27th March 2020.
5. This additional information does not change the conclusions of the ES and therefore there are no changes to the CIA and the CIA presented in ES Chapter 7 is still valid.

2.1. CHAPTER 8: MARINE WATER AND SEDIMENT QUALITY

6. There have been no changes or additional information that would alter the CIA for this receptor, therefore the CIA presented in ES Chapter 8 is still valid.

2.2. CHAPTER 9: BENTHIC AND INTERTIDAL ECOLOGY

7. Further information was provided on the benthic and intertidal ecology assessment (MOR-RHDHV-DOC-0113) in response to comments from NRW on the ES. As part of this, the rationale behind screening Wylfa Newydd and the Holyhead Port Expansion projects out of the CIA was provided: *“As observed within Chapter 9, Benthic and Intertidal Ecology, the majority of impacts which are associated with benthic ecology are restricted to the immediate footprint of the Project. Therefore, it is only projects that will affect the same area of seabed, or more generally, the same local resource of benthic habitats that require consideration. Therefore, the only identified project is Minesto’s Holyhead Deep project”*. The further information provided

does not change the conclusions of the CIA and therefore the CIA presented in ES Chapter 9 is still valid.

2.3. CHAPTER 10: FISH AND SHELLFISH ECOLOGY

8. Further information was provided in response to comments received from NRW (MOR-RHDHV-DOC-0114), however this does not change the conclusions of the ES and therefore the CIA presented in ES Chapter 10 is still valid.

2.4. CHAPTER 11: MARINE ORNITHOLOGY

9. In order to mitigate potential impacts to marine ornithology, further work on the phased approach to installation has been undertaken since the submission of the ES, including updated collision risk modelling to show the impact of a smaller initial phase of deployment on marine bird species. This is presented in supplementary note MOR-RHDHV-DOC-0115. The first phase shall install a number of devices at which no significant impact to species is predicted and is based on the additional collision risk modelling undertaken for marine mammals (discussed below). The results show that the impacts of this initial phase are reduced to have no significant impact on marine bird species and will give the opportunity to monitor and collect data to better inform the potential impact of subsequent phase deployments. As this smaller initial phase is determined to have no significant impact on marine birds and serves to reduce the impacts, the CIA presented in Chapter 11 represents a conservative worst case scenario.

2.5. CHAPTER 12: MARINE MAMMALS

10. Following the submission of the ES, underwater noise modelling has been undertaken (document MOR/RHDHV/DOC/0116) to further inform the assessment on potential impacts to marine mammals. This assessment is presented in supplementary note MOR-RHDHV-DOC-0117. The findings of the modelling assessment on construction and operational noise sources support the findings of the assessment within the ES with the impacts assessed as negligible/low risk for all species. There were also no changes identified to the CIA and the assessments in the Habitats Regulations Assessment, including the in-combination assessments with other projects.
11. Additional collision risk modelling was also undertaken and is presented in supplementary note MOR-RHDHV-DOC-0118. As with Marine Ornithology, this presents further assessment of the collision risk associated with a smaller initial deployment phase, determining the deployment which would impact less than 0.7 bottlenose dolphin per year, and updated the modelling for all species to take into account a possible scenario of 620 devices. The collision risk model concluded that in order to impact less than 0.7 bottlenose dolphin the first phase would have a maximum output of 12MW or comprise a maximum of 28 devices. The assessment of a 620-device scenario shows that the impact on marine mammals is the same as for the maximum 240MW scenario presented in the ES. An updated CIA is presented within the supplementary note which confirms that the potential cumulative impacts remain the same as that presented in the ES, i.e. not significant.

2.6. CHAPTER 13: OFFSHORE ARCHAEOLOGY AND CULTURAL HERITAGE

12. There have been no changes or additional information that would alter the CIA for this receptor, therefore the CIA presented in ES Chapter 13 is still valid.

2.7. CHAPTER 14: COMMERCIAL FISHERIES

13. There have been no changes or additional information that would alter the CIA for this receptor, therefore the CIA presented in ES Chapter 14 is still valid.

2.8. CHAPTER 15: SHIPPING AND NAVIGATION

14. As discussed in Section **Error! Reference source not found.**, the area where only submerged tidal devices with a minimum under keel clearance (UKC) of 8m can be deployed has been revised, thereby increasing the area available for passage for small vessels. This change is reflected in the updated ES Volume II Chapter 4 Figures (Figures 4.1 to 4.5) submitted on 27 March 2020. There is no change to the overall boundary of the MDZ and therefore this does not alter the CIA presented in ES Chapter 15.

2.9. CHAPTER 16: MARINE INFRASTRUCTURE AND OTHER USERS

15. There have been no changes or additional information that would alter the CIA for this receptor, therefore the CIA presented in ES Chapter 16 is still valid.

2.10. CHAPTER 17: WATER RESOURCES AND FLOOD RISK

16. There have been no changes or additional information that would alter the CIA for this receptor, therefore the CIA presented in ES Chapter 17 is still valid.

2.11. CHAPTER 18: GROUND CONDITIONS AND CONTAMINATION

17. There have been no changes or additional information that would alter the CIA for this receptor, therefore the CIA presented in ES Chapter 18 is still valid.

2.12. CHAPTER 19: ONSHORE ECOLOGY

18. Since the submission of the ES further clarification has been provided on the potential construction methodologies for the cable landfall and installation and the potential impacts on terrestrial ecology. This is presented in supplementary note MOR-RHDHV-DOC-0110. The preferred option, HDD, is assessed to have no significant impact on designated terrestrial habitats during construction, operation or decommissioning activities, however additional mitigation is presented to further protect sensitive habitats. The secondary option of trenching is also assessed and, with mitigation, is concluded to have no significant effect on designated habitats. It is also concluded that an adverse effect on site integrity of the Glannau Ynys Gybi/Holy Island Coast SAC can be ruled out with mitigation. As this mitigation serves to reduce the impacts, the CIA presented in Chapter 19 represents a conservative worst case scenario.

19. Further information was also provided for onshore ornithology in response to comments received from NRW on the ES. The further assessment did not change the conclusions of the ES and therefore there is no change to the CIA with regards to onshore ornithology.

2.13. CHAPTER 20: ONSHORE ARCHAEOLOGY

20. Additional assessment was undertaken on the potential impact of the offshore development on the onshore archaeological assets (MOR-RHDHV-DOC-0125) as well as the provision of further information (MOR-RHDHV-DOC-0122) in response to comments received from NRW. Further information provided does not change the conclusions of the ES and therefore the findings of the CIA still stand. With regards to the updated settings assessment it is considered that no projects are identified within the vicinity of the offshore development that would give rise to a cumulative impact on setting.

2.14. CHAPTER 21: NOISE AND VIBRATION

21. Further information was provided in document MOR-RHDHV-DOC-0109 in order to assess the potential impact of an additional 24 two-way HGV movements per day to the landfall substation during construction. The assessment concluded that these additional movements would not change the conclusions of the Noise and Vibration assessment and therefore there is also no change to the conclusions of the CIA.

2.15. CHAPTER 22: AIR QUALITY

22. As above, document MOR-RHDHV-DOC-0109 considers the potential impact of an additional 24 two-way HGV movements per day to the landfall substation during construction. The assessment concluded that these additional movements would not change the conclusions of the Air Quality assessment and therefore there is also no change to the conclusions of the CIA.

2.16. CHAPTER 23: TRAFFIC AND TRANSPORT

23. As above, document MOR-RHDHV-DOC-0109 considers the potential impact of an additional 24 two-way HGV movements per day to the landfall substation during construction. The assessment concluded that these additional movements would not change the conclusions of the Traffic and Transport assessment and therefore there is also no change to the conclusions of the CIA.

2.17. CHAPTER 24: SEASCAPE, LANDSCAPE AND VISUAL IMPACT

24. The Applicant has committed to additional mitigation in order to reduce visual impacts, outlined in document no. MOR/SLR/DOC/0001. As this mitigation serves to reduce the impacts, the CIA presented in Chapter 19 represents a conservative worst case scenario.

2.18. CHAPTER 25: SOCIO-ECONOMICS, TOURISM AND RECREATION

25. There have been no changes or additional information that would alter the CIA for this receptor, therefore the CIA presented in ES Chapter 25 is still valid.

3. SUMMARY

26. This document provides a summary of the implications on the Morlais CIA of additional information provided since the submission of the ES. Full details of the CIAs for each topic are presented in the relevant chapters of the ES (7 to 25).