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Morlais Project

Welsh National Marine Plan Comparison Note

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Author: Royal HaskoningDHV



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1 Overview

Below is a comparison of the draft Welsh National Marine Plan (WNMP) policies which were relevant to the Environmental Statement (ES) and included within the ES chapters, and the final WNMP policies. Table 1 compares these policies and highlights whether further work to align with the policy is required.

The following chapters have no draft or final WNMP policies which are of relevance to them and are therefore not considered further:

- Infrastructure and Other Users;
- Ground Conditions and Contamination;
- Onshore Ecology;
- Noise and Vibration; and,
- Traffic and Transport.

Table 1 shows that there are no material changes to the policies, and all are addressed in the relevant ES chapters. As such it is considered that no further work is required as the ES aligns with the policies set out in the final WNMP.

Table 2 shows policies within the final WNMP, relevant to the project, which were not specifically mentioned in the ES but are considered inherently within the chapters.

Table 1 Comparison between draft WNMP policies in the ES and the final WNMP policies

Draft Policy Number	Draft WNMP Polices Considered	Chapter	Final Policy Number	Corresponding Final WNMP Policy	Further consideration required?	Justification
SOC_02	Well-being of coastal communities. Proposals that contribute to the well-being of coastal communities are encouraged.	Commercial Fisheries; Shipping and Navigation Socio-Economics	SOC_02	Well-being of coastal communities. Proposals that contribute to the well-being of coastal communities are encouraged.	No	No change to wording
SOC_03	Marine pollution incidents. Proposals should minimise their risk of marine pollution incidents.	Marine and Water Sediment Quality; Shipping and Navigation	SOC_03	Marine pollution incidents. Proposals should demonstrate how they minimise their risk of causing or contributing to marine pollution incidents.	No	Wording changed. However, the ES covers these issues
SOC_05	Historic Assets. Proposals should demonstrate how potential impacts on historic assets and their settings have been taken into consideration at an early stage and should, in order of preference: a) avoid adverse impacts on historic assets and their settings; and/or b) minimise impacts where they cannot be avoided; and/or c) mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be adequately addressed,	Offshore Archaeology and Cultural Heritage Onshore Archaeology and Cultural Heritage Seascape, Landscape and Visual Impact Assessment	SOC_05	Historic assets. Proposals should demonstrate how potential impacts on historic assets and their settings have been taken into consideration and should, in order of preference: a. avoid adverse impacts on historic assets and their settings; and/or b. minimise impacts where they cannot be avoided; and/or c. mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and	No	No change to wording

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	proposals should present a clear and convincing justification for proceeding. Opportunities to enhance historic assets are encouraged.			convincing case for proceeding. Opportunities to enhance historic assets are encouraged.		
SOC_06	Designated Landscapes. Proposals that demonstrate that they are compatible with the purposes and special qualities for which National Parks or Areas of Outstanding Natural Beauty have been designated are encouraged.	Seascape, Landscape and Visual Impact Assessment	SOC_06	Designated landscapes Proposals should demonstrate how potential impacts on the purposes and special qualities for which National Parks or Areas of Outstanding Natural Beauty have been designated have been taken into consideration and should, in order of preference: a. avoid adverse impacts on designated landscapes; and/or b. minimise impacts where they cannot be avoided; and/or c. mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Opportunities to enhance designated landscapes are encouraged.	No	Wording changed. However, the ES covers these issues
SOC_07	Proposals should demonstrate how potential impacts on seascapes have been taken into	Seascape, Landscape and Visual	SOC_07	Seascapes. Proposals should demonstrate how potential impacts on seascapes have	No	No change to wording

Draft Policy Number	Draft WNMP Polices Considered	Chapter	Final Policy Number	Corresponding Final WNMP Policy	Further consideration required?	Justification
	consideration at an early stage and should, in order of preference: a) avoid adverse impacts on seascapes; and/or b) minimise impacts where they cannot be avoided; and/or c) mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be adequately addressed, proposals should present a clear and convincing justification for proceeding. Opportunities to enhance seascapes are encouraged.	Impact Assessment		been taken into consideration and should, in order of preference: a. avoid adverse impacts on seascapes; and/or b. minimise impacts where they cannot be avoided; and/or c. mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Opportunities to enhance seascapes are encouraged.		
SOC_08	Resilience to coastal change and flooding. Proposals should demonstrate how they are resilient to coastal change and flooding over their lifetime.	Metocean Conditions and Coastal Processes Water Resources and Flood Risk	SOC_08	Resilience to coastal change and flooding. Proposals should demonstrate how they are resilient to coastal change and flooding over their lifetime.	No	No change to wording
SOC_09	Effects on coastal change and flooding. Proposals are encouraged that: - Demonstrate that they have no significant adverse impact upon coastal processes; - Minimise the risk of coastal change and flooding; and - Align with the relevant	Metocean Conditions and Coastal Processes	SOC_09	Effects on coastal change and flooding Proposals should demonstrate how they: • avoid significant adverse impacts upon coastal processes; and • minimise the risk of coastal change and flooding; Proposals that align with the relevant Shoreline	No	Very minor change to wording

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	Shoreline Management Plan			Management Plan(s) and its policies are encouraged.		
SOC_11	Resilience to climate change. Proposals should demonstrate that they have considered the impacts of climate change and have incorporated appropriate adaptation measures, taking into account Climate Change Risk Assessments for Wales.	Metocean Conditions and Coastal Processes Water Resources and Flood Risk	SOC_11	Resilience to climate change Proposals should demonstrate that they have considered the impacts of climate change and have incorporated appropriate adaptation measures, taking into account Climate Change Risk Assessments for Wales. Proposals that contribute to climate change adaptation and/or mitigation are encouraged.	No	SOC_11 and 12 have been merged
SOC_12	Support for wider resilience to climate change. Relevant public authorities should support opportunities that contribute towards climate change adaptation and/or mitigation	Policy and Legislation	SOC_11		No	
ENV_01	ENV_01: Resilient marine ecosystems. Proposals should demonstrate how they contribute to the protection, restoration and/or enhancement of marine ecosystems.	Benthic and Intertidal Ecology Fish and Shellfish Ecology	ENV_01	Resilient marine ecosystems Proposals should demonstrate how potential impacts on marine ecosystems have been taken into consideration and should, in order of preference: a. avoid adverse impacts; and/or b. minimise impacts where they cannot be avoided; and/or c. mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must	No	Wording changed. However, the ES covers these issues in the Impact Assessment sections.

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				present a clear and convincing case for proceeding. Proposals that contribute to the protection, restoration and/or enhancement of marine ecosystems are encouraged.		
ENV_02	Marine Protected Areas. Proposals should demonstrate how they: <ul style="list-style-type: none"> - avoid adverse impacts on individual Marine Protected Areas (MPAs) and the coherence of the network as a whole; - have regard to the measures to manage MPAs; and - avoid adverse impacts on non-marine designated sites. 	Benthic and Intertidal Ecology Fish and Shellfish Ecology Marine Ornithology Marine Mammals	ENV_02	Marine Protected Areas Proposals should demonstrate how they: <ul style="list-style-type: none"> • avoid adverse impacts on individual Marine Protected Areas (MPAs) and the coherence of the network as a whole; • have regard to the measures to manage MPAs; and • avoid adverse impacts on designated sites that are not part of the MPA network. 	No	Very minor change to wording
ENV_03	Invasive non-native species. Proposals should include biosecurity measures to reduce the risk of introducing and spreading invasive non-native species.	Benthic and Intertidal Ecology Fish and Shellfish Ecology	ENV_03	Invasive non-native species Proposals should demonstrate how they avoid or minimise the risk of introducing and spreading invasive non-native species. Where appropriate, proposals should include biosecurity measures to reduce the risk of introducing and spreading of invasive non-native species.	No	Wording changed. However, the ES covers these issues
ENV_04	Marine Litter. Proposals should demonstrate that they: avoid the deliberate introduction of litter into the	Marine and Water Sediment Quality	ENV_04	Marine litter Proposals should demonstrate how they: <ul style="list-style-type: none"> • avoid the deliberate introduction of litter into the 	No	Very minor change to wording

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	marine plan area; and minimise the risk of accidental release.			marine plan area; and • minimise the risk of accidental release of litter.		
ENV_05	Underwater noise. Proposals should demonstrate that they have considered man-made noise impacts on the marine environment and, in order of preference: a) avoid adverse impacts; and/or b) minimise impacts where they cannot be avoided; and/or c) mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be adequately addressed, proposals should present a clear and convincing justification for proceeding	Benthic and Intertidal Ecology Fish and Shellfish Ecology Marine Mammals Commercial Fisheries	ENV_05	Underwater noise Proposals should demonstrate that they have considered man-made noise impacts on the marine environment and, in order of preference: a. avoid adverse impacts; and/or b. minimise impacts where they cannot be avoided; and/or c. mitigate impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.	No	No change to wording

Draft Policy Number	Draft WNMP Polices Considered	Chapter	Final Policy Number	Corresponding Final WNMP Policy	Further consideration required?	Justification
ENV_06	ENV_06: Air and water quality. Proposals should demonstrate that they have considered their potential air and water quality impacts and should, in order of preference: a) avoid adverse impacts; and/or b) minimise adverse impacts where they cannot be avoided; and/or c) mitigate adverse impacts where they cannot be minimised. If significant adverse impacts cannot be adequately addressed, proposals should present a clear and convincing justification for proceeding.	Marine and Water Sediment Quality Air Quality	ENV_06	Air and water quality Proposals should demonstrate that they have considered their potential air and water quality impacts and should, in order of preference: a. avoid adverse impacts; and/or b. minimise adverse impacts where they cannot be avoided; and/or c. mitigate adverse impacts where they cannot be minimised. If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.	No	No change to wording
ECON_02	Coexistence. Proposals that consider opportunities for coexistence with other compatible sectors are encouraged in order to optimise the value and use of the marine area and marine natural resources	Commercial Fisheries; Shipping and Navigation	ECON_02	Coexistence Proposals should demonstrate how they have considered opportunities for coexistence with other compatible sectors in order to optimise the value and use of the marine area and marine natural resources.	No	No change to wording
Objective 10	“to maintain and enhance the resilience of marine ecosystems and the benefits they provide in order to meet the needs of present and future generations	Socio-Economics	Objective 11	“to maintain and enhance the resilience of marine ecosystems and the benefits they provide in order to meet the needs of present and future generations	No	No change to wording

Draft Policy Number	Draft WNMP Polices Considered	Chapter	Final Policy Number	Corresponding Final WNMP Policy	Further consideration required?	Justification
GOV_01	<p>Cumulative effects. Proposals should demonstrate that they have assessed potential cumulative effects and, in order of preference:</p> <p>a) Avoid adverse effects; and/or</p> <p>b) Minimise effects where they cannot be avoided; and/or</p> <p>c) Mitigate effects where they cannot be minimised. If significant adverse effects cannot be adequately addressed, proposals should present a clear and convincing justification for proceeding. Proposals that contribute to positive cumulative effects are encouraged.</p>	All Chapters	GOV_01	<p>Cumulative effects Proposals should demonstrate that they have assessed potential cumulative effects and should, in order of preference:</p> <p>a. avoid adverse effects; and/or</p> <p>b. minimise effects where they cannot be avoided; and/or</p> <p>c. mitigate effects where they cannot be minimised. If significant adverse effects cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding. Proposals that contribute to positive cumulative effects are encouraged.</p>	No	No change to wording
ELC_01	<p>Proposals for all types of marine renewable energy generation (wind, tidal and wave energy) and associated infrastructure are strongly encouraged, especially: a) in corresponding wave, tidal stream and any other defined renewable energy technology test and demonstration zones; and b) in corresponding wave, tidal stream and tidal lagoon Strategic Resource Areas.</p>	Policy and Legislation	ELC_03 a	<p>Proposals for tidal stream energy generation will be supported where they contribute to the objectives of this plan. Proposals should comply with the relevant general policies and sector safeguarding policies of this plan and any other relevant considerations. Relevant public authorities should make appropriate evidence available to support planning and decision making in order to support the</p>	No	ELC_01 has been split to consider each renewable energy source individually

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	Relevant public authorities should, in liaison with the sector and other interested parties, collaborate to understand opportunities for the sustainable use of: a) renewable energy Strategic Resource Areas; and b) wider natural resources that provide renewable energy potential in order to support the sustainable growth of the renewable energy sector through marine planning".			sustainable development of the sector through marine planning, where it is appropriate to do so.		
ECON_01	Blue growth Proposals for economically sustainable activities are encouraged, particularly where they contribute to: - a more resilient economy; - employment opportunities particularly for coastal communities; - generating wealth; - allowing people to take advantage of the wealth; - protecting and creating employment at all skill levels; - maintaining communities with a high-density of Welsh speakers; - tackling poverty by supporting deprived coastal communities; and / or - the sustainable	Introduction; Socioeconomics, Tourism and Recreation	ECON_01	Sustainable economic growth Proposals for economically sustainable activities are encouraged, particularly where they contribute to: • the sustainable management of natural resources thereby supporting ecosystem resilience; • a more resilient economy; • employment opportunities particularly for coastal communities; • protecting and creating employment at all skill levels; • maintaining communities with a high-density of Welsh speakers; and/or • tackling poverty by supporting deprived coastal communities	No	No change to wording

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	management of natural resources thereby supporting ecosystem resilience.					

Table 2 Other WNMP Policies relevant to the ES

Policy Number	Policy Description	Further consideration required?	Justification
GEN_01	<p>Planning Policy</p> <p>There is a presumption in favour of the sustainable development of the plan area in order to contribute to Wales' well-being goals.</p>	No	Wales' Well-being Goals are considered within the Policy and Legislation chapter of the ES (Chapter 2).
GEN_02	<p>Planning Policy</p> <p>Relevant public authorities should take a proportionate, risk-based approach to application of relevant marine planning policies in decision making</p>	No	This is a policy directed towards public authorities to encourage a proportionate and risk-based approach to decision making and is therefore not applicable to the ES.
SOC_01	<p>Access to the marine environment</p> <p>Proposals that maintain or enhance access to the marine environment are encouraged.</p>	No	It is considered that the project will maintain access to the marine environment. The update to the navigation chapter provided in March (ref: MOR_RHDHV_DOC_0124) discusses recreational users in the vicinity of the project.
SOC_04	<p>Welsh language and culture</p> <p>Proposals that contribute to the promotion and facilitation of the use of the Welsh language and culture are encouraged</p>	No	<p>Menter Mon are a Welsh not-for-profit company committed to providing solutions to the challenges facing rural Wales.</p> <p>Menter Môn's objectives for the Project are detailed in the Introduction chapter of the ES. Key is local economic growth, including the potential for job creation. The design of much of the Project infrastructure will be undertaken with a view to maximising local content and developing locally based skills, with social value (including sub-contracts) an important consideration in the procurement strategy. During development of the procurement strategy, efforts will be made to identify local suppliers and contractors who could undertake each contract.</p>
SOC_10	<p>Minimising climate change</p> <p>Proposals should demonstrate how they, in order of preference:</p> <ol style="list-style-type: none"> avoid the emission of greenhouse gases; and/or minimise them where they cannot be avoided; and/or mitigate them where they cannot be minimised. 	No	The Project, allowing long-term commercial demonstration of different technologies and small arrays of tidal devices, is an important step in developing the tidal energy industry within the UK and internationally, contributing towards the reduction of greenhouse gas emissions by providing clean, renewable energy.

Policy Number	Policy Description	Further consideration required?	Justification
	Where significant emission of greenhouse gases cannot be avoided, minimised or mitigated, proposals for regulated activities must present a clear and convincing case for proceeding.		
ENV_07	<p>Fish Species and Habitats</p> <p>Proposals potentially affecting important feeding, breeding (including spawning & nursery) and migration areas or habitats for key fish and shellfish species of commercial or ecological importance should demonstrate how they, in order of preference:</p> <p>a) avoid adverse impacts on those areas; and/or</p> <p>b) minimise adverse impacts where they cannot be avoided; and/or</p> <p>c) mitigate adverse impacts where they cannot be minimised.</p> <p>If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.</p>	No	The Fish and Shellfish Ecology chapter considers these issues within the Impact Assessment section and therefore no further work is required to align with the policy.
SCI_01	<p>Risk-based decision making</p> <p>Relevant public authorities should make decisions using sound evidence and a risk-based, proportionate approach. Where appropriate they should apply the precautionary principle and consider opportunities to apply adaptive management.</p>	No	In developing this ES we have made use of the best available evidence. New evidence has been collected to support the assessments to ensure that risks are identified, and mitigation required is proportionate. The EIA was based on worst case scenarios in order to provide precautionary conclusions.