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# Morlais Project

## Additional Environmental Information

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## **1 INTRODUCTION**

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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 application, the Applicant has reviewed feedback received on the application, engaged in ongoing consultation with stakeholders and worked to develop mitigation measures where possible.
4. Section 2 of this document outlines changes to the Project Design Envelope since submission of the Environmental Statement (ES), including the incorporation of mitigation as a result of the ongoing consultation.
5. Section 3 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.
6. Appendix 1 provides a complete list of the documents submitted on 27 March 2020.

## **2 PROJECT DESIGN**

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### **2.1 ES Chapter 4 Project Description**

7. ES Chapter 4 was updated in September 2019 immediately following the submission of the ES, to provide greater clarity, particularly in the summary sections. This version of ES Chapter 4 is provided with this submission.
8. The following sections outline the design development and refinements since the ES was submitted. These present an update to the Project Design Envelope which is incorporated in the various supplementary information documents provided in March 2020.
9. These changes will be secured through amendments to the draft Transport and Work Act Order and draft deemed planning condition that will be submitted at an appropriate stage in the determination process.

### **2.2 Offshore Project Design Envelope Refinements**

#### **2.2.1 Lighting and Marking**

10. Post application consultation has been undertaken with Trinity House, recognising that marine safety is a paramount consideration. The outcome of the consultation is that the colouring on the tidal devices and offshore operational hubs can be altered and the lighting requirement can be reduced compared with those included in the ES in order to reduce the visual impacts of the project.
11. Colouring can be altered to minimise the use of yellow. Trinity House require yellow marking at both ends of all tidal devices, noting that the length of the tidal devices could be up to circa 70m in length, to ensure navigation safety in the highly unlikely event that any of the devices broke away. Also, this colour scheme would maintain the marking should any of the devices on the array edge need to be removed for maintenance.
12. For this reason, Menter Môn can commit to marking the ends of each of the tidal devices yellow, or a band 5m high on offshore operational hubs. The extent of the yellow marking would depend on the design of the devices and would comprise a 5m band at the ends of each tidal device. The remainder of the devices would be coloured grey, although the exact colour grey would be agreed with Natural Resources Wales (NRW), in consultation with Isle of Anglesey County Council (IoACC).
13. Through consultation with Trinity House it has also been possible to reduce the navigation lighting requirements compared with the Project Design Envelope assumptions applied in the ES. This would mean that navigational and marker buoys and floating or surface emergent tidal devices can use lights that are limited in visibility.
14. On the inshore side of the MDZ the markers can use 2NM lighting – i.e. visible for 2 nautical miles. On the offshore side they would be 5NM lights. In addition, the tidal devices themselves only need to have identification lighting with a visibility of 150 metres, therefore significantly reducing the range of visual impacts at night.
15. Further information is included in the Seascape Landscape and Visual Impact Assessment response (document no. MOR/SLR/DOC/0001), which includes revised photomontages.

### **2.2.2 Offshore export cable installation**

16. As a result of ongoing consultation with NRW, 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 functioning within the wider system. This is discussed further in the Metocean and Physical Processes ES Supplementary Note (document no. MOR/RHDHV/DOC/0111).

### **2.2.3 Marine Development Zone subzones**

17. Through consultation with shipping stakeholders, 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 reducing the extent of visually prominent tidal devices and increasing their distance from shore.
18. This change is reflected in the updated Figures 4.1 to 4.5 provided in document no. MOR/RHDHV/DOC/0108.

## **2.3 Onshore Project Design Envelope Refinements**

### **2.3.1 Landfall cable installation**

19. In response to ongoing consultation with NRW, the Applicant has refined the approach to trenching of cables at the landfall, should Horizontal Directional Drilling (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.
20. Since the ES was submitted, significant work has been undertaken by Menter Mon to reduce the footprint of works associated with landfall cable trenching and to refine the areas that will be used in order to mitigate effects on the features of the Holy Island Coast Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) and Special Area of Conservation (SAC).
21. The details of these changes and the revised impacts on terrestrial ecology are provided in document no. MOR/RHDHV/DOC/0110.

### **2.3.2 Traffic**

22. It has been identified by the Applicant that there could be a requirement for additional export of spoil during construction of the landfall substation, resulting in an additional 24 two-way HGV movements per day. A traffic clarification note is provided (document no. MOR/RHDHV/DOC/0109) which demonstrates that this would result in no changes to the conclusions of the ES.
23. Where possible excavated material would be reused at the landfall substation for various earthworks activities and therefore not be exported offsite. This change therefore represents consideration of a worst case scenario.

### 3 COMMENTS ON REPRESENTATIONS

24. The Rule 17 letter from the Planning Inspectorate dated 04 December 2019 identifies key issues raised by NRW (see Table 1) and states that additional information is required to meet Rule 11(c) of the Transport and Work Act (TWA) Applications and Objections Procedure Rules and Regulation 17(4)(d) of the EIA Regulations. In accordance with Regulation 14 of the Marine Works (EIA) Regulations 2007 (as amended), NRW also submitted a further information request dated the 2<sup>nd</sup> March 2020 (ORML1938). The required additional information from the Rule 17 letter is provided with this submission as shown in Table 1.

**Table 1 Applicant responses to key issues referenced in the Rule 17 letter**

Key Issues Referenced in the Rule 17 Letter	Applicant's Response
The lack of reference in the submitted hydrodynamic modelling report to wave modelling or understanding presented of meteorological effects regarding project interactions, and potential near and far-field impacts;	<p>The Applicant 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 addition, the Metocean and Physical Processes Numerical Modelling Supplementary Note (document no. MOR/RHDHV/DOC/0112) provides a review of the metocean and coastal processes impact assessment which has been revisited based on the modelling results.</p>
The submitted hydrodynamic modelling report is aimed at understanding the energy resource available within and between the berths rather than for environmental impact assessment and is considered to be missing key information such as the proposed worst-case scenario of 620 devices and associated infrastructure (Annex 1, A.3).	The HR Wallingford modelling (document no. MOR/HRW/DOC/0001) includes a worst case scenario of 620 devices and associated infrastructure.
The absence of reference to the protected Beddmanarch Bay Shellfish Water area that is in proximity to the site.	A revised Water Framework Directive (WFD) Assessment is provided in document no. MOR/RHDHV/DOC/0126. This includes Beddmanarch Bay Shellfish Water.
There is a significant amount of missing information regarding migratory fish, whilst other water species such as the Freshwater Pearl Mussel have not been screened at all	The Applicant's response to NRW comments regarding migratory fish and pearl mussel is detailed in the Fish and Shellfish Ecology Responses to NRW comments (document no. MOR/RHDHV/DOC/0114).
Noise propagation has not been modelled using the conditions at the MDZ to allow an assessment of the likely range of impact on marine mammals	The Applicant commissioned underwater noise modelling in response to NRW comments. The

Key Issues Referenced in the Rule 17 Letter	Applicant's Response
	underwater noise modelling report is provided in document no. MOR/RHDHV/DOC/0116.
Concerns regarding the adequate assessment of Annex 1 habitats as detailed in the EC Habitats Directive	The Applicant's response to NRW comments regarding Annex 1 habitats is detailed in the Benthic and Intertidal Ecology, Responses to NRW comments (document no. MOR/RHDHV/DOC/0113).
Insufficient information has been provided to conclude that all European designated sites have been adequately screened in to the 'shadow' Habitats Regulation Assessment, and to enable NRW to provide advice.	The HR Wallingford report (document no. MOR/HRW/DOC/0001) supports the zones of influence considered in the ES and therefore the HRA screening remains appropriate.

25. The Applicant has reviewed each of the representations and objections submitted by stakeholders and interested parties in response to the Project.
26. 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 (REP#) or objection (OBJ#) has been assigned a number by the Planning Inspectorate which are reflected below. Each comment received from NRW has been assigned a number by NRW (ML#) which are reflected below.
27. In some cases, where representations from stakeholders provide detailed comments, these are being considered further and discussed through ongoing consultation. These are being addressed separately through Statements of Common Ground (SoCG) which are expected to be updated throughout the consent determination stage. Menter Môn is committed to minimising impacts in order to develop a sustainable project that delivers benefits for the local community. The period to examination will be used by Menter Môn to proactively engage with stakeholders to work through concerns and issues.

### 3.1 Project Design Envelope

**Table 2 Applicant responses to Relevant Representations in relation to the Project Design Envelope**

Representation Number	Applicant's Response
REP005; REP007; ML015	<p>The Applicant is engaging with NRW and the IoACC to provide further clarity regarding the Project Design Envelope (PDE) in response to their comments.</p> <p>The Project adopts a Rochdale Envelope approach, as discussed in ES Chapter 2 Policy and Legislation. This approach considers a range of design parameters and identifies the likely worst-case of each</p>

Representation Number	Applicant's Response
	<p>parameter, for each specific receptor and impact. The detailed design of the project will be developed post-consent. This process will include further consultation with NRW and the Isle of Anglesey Council.</p> <p>ES Chapter 4 was updated in September 2019 immediately following the submission of the ES, to provide greater clarity, particularly in the summary sections. This version of ES Chapter 4 is provided with this submission.</p>

### 3.2 Policy and Legislation

**Table 3 Applicant responses to Relevant Representations in relation to Policy and Legislation**

Representation Number	Applicant's Response
NRW Request for Information	<p>A review of the revised Welsh National Marine Plan (WNMP) has been undertaken by the Applicant. document no. MOR/RHDHV/DOC/0128 provides an overview of the relevant changes in relation to the Morlais ES and demonstrates that the policies in the final WNMP have been addressed by the ES.</p>

### 3.3 Metocean Conditions and Coastal Processes

**Table 4 Applicant responses to Relevant Representations in relation to Metocean Conditions and Coastal Processes**

Representation Number	Applicant's Response
REP005; ML015	<p>In response to the feedback on the ES, the Applicant has 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>The Metocean and Physical Processes Numerical Modelling Supplementary Note (document no. MOR/RHDHV/DOC/0112 provides a review of the metocean and coastal processes impact assessment which has been undertaken based on the modelling results. The modelling and further assessment work confirm the findings of the assessment presented in the ES.</p> <p>The Metocean and Physical Processes ES Supplementary Note (document no. MOR/RHDHV/DOC/0111) provides further responses to feedback on Metocean Conditions and Coastal Processes.</p>

### 3.4 Water Framework Directive Compliance Assessment

**Table 5 Applicant responses to Relevant Representations in relation to Water Framework Directive Compliance Assessment**

Representation Number	Applicant's Response
REP005; ML015	<p>A revised Water Framework Directive (WFD) Assessment is provided in document no. MOR/RHDHV/DOC/0126. This reflects the HR Wallingford modelling and takes into account comments from NRW.</p> <p>The WFD assessment concludes that construction, operation and decommissioning works associated with the Project are considered to be compliant with WFD requirements.</p>

### 3.5 Benthic and Intertidal Ecology

**Table 6 Applicant responses to Relevant Representations in relation to Benthic and Intertidal Ecology**

Representation Number	Applicant's Response
REP005; ML015	<p>A response to comments on ES Chapter 9 Benthic and Intertidal Ecology is provided in document no. MOR/RHDHV/DOC/0113.</p> <p>In summary, the assessment has been carried out using a conservative worst-case scenario and appropriate mitigation measures such as micro-siting will be implemented alongside pre-construction surveys, as detailed in the ES and therefore the Applicant is confident that the overall assessment of impacts on benthic and intertidal ecological features is appropriate.</p>

### 3.6 Fish and Shellfish Ecology

**Table 7 Applicant responses to Relevant Representations in relation to Fish and Shellfish Ecology**

Representation Number	Applicant's Response
REP005; ML008; ML015	<p>A response to comments on ES Chapter 10 Fish and Shellfish Ecology is provided in document no. MOR/RHDHV/DOC/0114.</p> <p>In summary, the Applicant is confident that the overall assessment of impacts on fish and shellfish presented in the ES is appropriate.</p>

### 3.7 Ornithology

**Table 8 Applicant responses to Relevant Representations in relation to Ornithology**

Representation Number	Applicant's Response
REP005; ML012; ML015; OBJ060; OBJ059; OBJ084; OBJ037; OBJ056; OBJ044; OBJ078; OBJ089; OBJ058; OBJ085; OBJ074; OBJ072; OBJ075; OBJ092; OBJ071; OBJ077; OBJ069; OBJ093; OBJ090; OBJ066; OBJ070; OBJ091; OBJ087; OBJ062; OBJ085; OBJ067; OBJ073; OBJ058; OBJ055; OBJ047; OBJ051; OBJ048; OBJ049; OBJ054; OBJ050; OBJ052; OBJ053; OBJ029; OBJ027; OBJ045; OBJ039; OBJ057; OBJ035; OBJ030; OBJ043; OBJ032; OBJ031; OBJ028; OBJ033; OBJ042; OBJ041; OBJ017; OBJ016; OBJ019; OBJ015; OBJ018; OBJ013; OBJ014; OBJ012; OBJ023; OBJ022; OBJ024; OBJ011; OBJ011; OBJ010; OBJ008; OBJ004; OBJ006; OBJ007; OBJ005	<p><b><u>Marine Ornithology</u></b></p> <p>In consultation with NRW and in parallel with the assessment of marine mammals (discussed in Section 3.9), 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> <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</p> <p><b><u>Onshore Ornithology</u></b></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>

### 3.8 Underwater Noise

**Table 9 Applicant responses to Relevant Representations in relation to Underwater Noise**

Representation Number	Applicant's Response
REP005; ML002; ML015	<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>

### 3.9 Marine Mammals

**Table 10 Applicant responses to Relevant Representations in relation to Marine Mammals**

Representation Number	Applicant's Response
REP005; ML001; ML002; ML005; ML015; OBJ060; OBJ059; OBJ084; OBJ044; OBJ078; OBJ089; OBJ058; OBJ085; OBJ080; OBJ074; OBJ072; OBJ075; OBJ092; OBJ071; OBJ077; OBJ069; OBJ090; OBJ066; OBJ070; OBJ087; OBJ062; OBJ088; OBJ067; OBJ073; OBJ058; OBJ055; OBJ047; OBJ051; OBJ048; OBJ046; OBJ049; OBJ054; OBJ050; OBJ052; OBJ053; OBJ029; OBJ027; OBJ045; OBJ039; OBJ057; OBJ035; OBJ030; OBJ043; OBJ028; OBJ033; OBJ042; OBJ041; OBJ017; OBJ016; OBJ019; OBJ015; OBJ018; OBJ013; OBJ014; OBJ012; OBJ022; OBJ024; OBJ011; OBJ011; OBJ010; OBJ008; OBJ004; OBJ006; OBJ007; OBJ005	<p>In consultation with NRW and in parallel with marine ornithology (discussed in Section 3.7), 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>

### 3.10 Shipping and Navigation

**Table 11 Applicant responses to Relevant Representations in relation to Shipping and Navigation**

Representation Number	Applicant's Response
REP007; ML014; OBJ080; ML008; OBJ076; OBJ083; OBJ011; OBJ001	<p>In response to stakeholder comments and following further consultation with shipping stakeholders, 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. 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"> <li>• Supplementary Tourism and Recreation Assessment (document no. MOR/BAU/DOC/0001)</li> <li>• Supplementary Socio-economics Assessment (document no. MOR/BAU/DOC/0002)</li> </ul> <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>

### 3.11 Socio-economics, Tourism and Recreation

**Table 12 Applicant responses to Relevant Representations in relation to Socio-economics, Tourism and Recreation**

Representation Number	Applicant's Response
REP007; OBJ044; OBJ078; OBJ089; OBJ058; OBJ085; OBJ080; OBJ074; OBJ075; OBJ077; OBJ069; OBJ070; OBJ091; OBJ087; OBJ062; OBJ067; OBJ063 OBJ058; OBJ055; OBJ047; OBJ051; OBJ049; OBJ054; OBJ052; OBJ053; OBJ035; OBJ031; OBJ033; OBJ041; OBJ017; OBJ016; OBJ019; OBJ015; OBJ018; OBJ014; OBJ012; OBJ021; OBJ010; OBJ008; OBJ004	<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"> <li>• Supplementary Tourism and Recreation Assessment (document no. MOR/BAU/DOC/0001)</li> <li>• Supplementary Socio-economics Assessment (document no. MOR/BAU/DOC/0002)</li> <li>• Outline Skills and Training Action Plan (document no. MOR/BAU/DOC/0003) and</li> <li>• Outline Tourism and Recreation Monitoring Strategy (document no. MOR/BAU/DOC/0004).</li> </ul> <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</p>

Representation Number	Applicant's Response
	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.

### 3.12 Archaeology and Cultural Heritage

**Table 13 Applicant responses to Relevant Representations in relation to Archaeology and Cultural Heritage**

Representation Number	Applicant's Response
REP007; ML004; OBJ079; OBJ081; OBJ011	<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 7, 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>

### 3.13 Onshore Ecology

**Table 14 Applicant responses to Relevant Representations in relation to Onshore Ecology**

Representation Number	Applicant's Response
REP005; REP007; ML015	As discussed in Section 2.3, 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

Representation Number	Applicant's Response
	there will be no adverse effects on site integrity. This is detailed in document no. MOR/RHDHV/DOC/0110.

### 3.14 Waste

**Table 15 Applicant responses to Relevant Representations in relation to Waste**

Representation Number	Applicant's Response
REP007	<p>Comments were raised with regards to the assessment of waste, noting that there is minimal reference to Appendix 18.2 Outline Waste Assessment Report in Chapter 18 Ground Conditions and Contaminated Land.</p> <p>Waste and Materials Management are discussed in Sections 6.2 and 7.2 of Appendix 18.2 of the ES. It is considered more suitable to have waste and material management presented within the waste assessment, as the appended report provides an assessment of waste arisings and how the waste is likely to be dealt with, whereas the assessment in Chapter 18 of the ES focusses on the potential presence of contamination and pollutant linkages to sensitive receptors.</p> <p>The detailed approach to waste management will be developed post consent through the site and excavated waste plan as committed to through the COCP. This will enable the Applicant to take account of the final design of the Project.</p>

### 3.15 Seascape, Landscape and Visual Impacts

**Table 16 Applicant responses to Relevant Representations in relation to Seascape and Landscape Visual Impact**

Representation Number	Applicant's Response
REP007; OBJ060; OBJ089; OBJ058; OBJ080; OBJ072; OBJ075; OBJ071; OBJ077; OBJ069; OBJ090; OBJ062; OBJ067; OBJ063; OBJ058; OBJ047; OBJ049; OBJ054; OBJ050; OBJ053; OBJ027; OBJ039; OBJ035; OBJ030; OBJ032; OBJ033; OBJ017; OBJ016; OBJ019; OBJ015; OBJ018; OBJ012; OBJ021; OBJ008; OBJ004; OBJ007; OBJ005; OBJ078; OBJ085; OBJ051;	<p>As discussed in Section 2.2.1, 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>

Representation Number	Applicant's Response
OBJ046; OBJ029; OBJ045; OBJ011; OBJ009	

### 3.16 Habitats Regulations Assessment

**Table 17 Applicant responses to Relevant Representations in relation to Habitats Regulations Assessment**

Representation Number	Applicant's Response
REP005; REP007	<p>The Applicant maintains the position that there will be either be no likely significant effects or where such effects cannot be ruled out, that the conclusions of appropriate assessment should be that no adverse effects on the integrity of Natura 2000 sites will result as presented in the Information to support Habitats Regulations Assessment (HRA) (document MOR/RHDHV/DOC/0067) submitted with the application.</p> <p>This position is supported by the following documents provided with this submission:</p> <ul style="list-style-type: none"> <li>• The HR Wallingford report (document no. MOR/HRW/DOC/0001) supports the zones of influence considered in the ES and therefore the HRA screening remains appropriate.</li> <li>• Updated assessments for terrestrial ecology (document no. MOR/RHDHV/DOC/0110)</li> <li>• Updated assessments for chough (document no. MOR/RHDHV/DOC/0120)</li> <li>• Marine Ornithology collision risk of phased deployment (document no. MOR/RHDHV/DOC/0115)</li> <li>• Underwater noise modelling (document no. MOR/RHDHV/DOC/0116)</li> <li>• Marine Mammal Underwater Noise assessment (document no. MOR/RHDHV/DOC/0117)</li> <li>• Marine mammal collision risk of phased deployment (document no. MOR/RHDHV/DOC/0118)</li> </ul> <p>An 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 in order to ensure there will be no adverse effects on marine mammals and ornithology.</p>

### 3.17 Consultation

**Table 18 Applicant responses to Relevant Representations in relation to Consultation**

Representation Number	Applicant's Response
<p>TWAO responses:</p> <p>OBJ058; OBJ072; OBJ087; OBJ083; OBJ063; OBJ058; OBJ049; OBJ038; OBJ040; OBJ020;</p> <p>NRW Request for Information</p>	<p>The Applicant will continue to engage with consultees including the following, many of which the Applicant has consulted with to inform this submission:</p> <ul style="list-style-type: none"> <li>• IoACC</li> <li>• NRW</li> <li>• RSPB</li> <li>• MCA</li> <li>• RYA</li> <li>• Trinity House</li> <li>• Welsh Archaeological Trust</li> <li>• BEIS</li> <li>• Snowdonia Canoe Club</li> <li>• Canoe Wales</li> </ul>

## 4 APPENDIX 1

	Title	Document no.
01	Additional Environmental Information (this document)	MOR/RHDHV/DOC/0107
02	ES Chapter 4 Project Description	MOR/RHDHV/DOC/0004
03	ES Volume II Chapter 4 Figures	MOR/RHDHV/DOC/0108
04	Welsh National Marine Plan Comparison Note	MOR/RHDHV/DOC/0128
05	Traffic Clarification Note	MOR/RHDHV/DOC/0109
06	HR Wallingford Coastal processes modelling report	MOR/HRW/DOC/0001
07	Metocean and Physical Processes Numerical Modelling Supplementary Note	MOR/RHDHV/DOC/0112
08	Metocean and Physical Processes ES Supplementary Note	MOR/RHDHV/DOC/0111
09	Water Framework Directive Compliance Assessment	MOR/RHDHV/DOC/0126
10	ES Volume II WFD Figures	MOR/RHDHV/DOC/0126
11	Benthic and Intertidal Ecology Issues Responses to NRW comments	MOR/RHDHV/DOC/0113
12	Fish Ecology Issues Responses to NRW comments	MOR/RHDHV/DOC/0114
13	Marine Ornithology Collision Risk Modelling	MOR/RHDHV/DOC/0115
14	Outline Environmental Mitigation and Monitoring Plan	MOR/AEC/DOC/0001
15	Onshore Ornithology Response to Comments on Chough	MOR/RHDHV/DOC/0120
16	Underwater Noise Modelling Report	MOR/RHDHV/DOC/0116
17	Marine Mammals Underwater Noise Modelling Note	MOR/RHDHV/DOC/0117
18	Marine Mammals Addition Collision Risk Modelling	MOR/RHDHV/DOC/0118
19	Marine Mammals Monitoring and Mitigation Options	MOR/RHDHV/DOC/0119.
20	Navigation and Shipping Responses	MOR/RHDHV/DOC/0124
21	Navigation Risk Assessment - Morlais Tidal Demonstration Zone	18UK1479-RN-MM-NRA-20_03
22	Supplementary Tourism and Recreation Assessment	MOR/BAU/DOC/0001
23	Supplementary Socio-economics Assessment	MOR/BAU/DOC/0002
24	Outline Skills and Training Action Plan	MOR/BAU/DOC/0003
25	Outline Tourism and Recreation Monitoring Strategy	MOR/BAU/DOC/0004
26	Desk-Based Assessment – Terrestrial Archaeology and Walkover Survey	MOR/WES/DOC/0001
27	Onshore Archaeology Settings Assessment for Offshore Infrastructure	MOR/RHDHV/DOC/0125
28	Onshore Archaeology Supplementary Note	MOR/RHDHV/DOC/0122
29	Terrestrial Ecology Assessment Update	MOR/RHDHV/DOC/0110
30	Seascape Landscape and Visual Impact Assessment response	MOR/SLR/DOC/0001
31	Outline Landscape Management Plan	MOR/SLR/DOC/0002