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Morlais Project

Onshore Archaeology Supplementary Note

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1 Background

The Isle of Anglesey County Council (IoACC) Representation to the draft order made by Menter Môn Morlais Ltd. (under the Transport and Works Act Order - TWAO - 1992) for the Morlais Demonstration Zone (IoACC Energy Island Project Management Office, Regulation and Economic Development, October 2019), included within Section 8 comments on Onshore Archaeology and Cultural Heritage.

Comments included:

- Some initial upfront (general) comments
- Archaeological Potential of the project
- Setting [predominantly related to offshore infrastructure]
- Appendix 20.1 Desk-Based Assessment – Terrestrial Archaeology and walkover Survey (for which further detailed comments were provided in Annex 1)
- Outline Code of Construction Practice (CoCP)

The most detailed and material comments from IoACC relate to the impact on the heritage significance of coastal heritage assets as a result of a change in their setting from the presence of offshore infrastructure. Response to which is considered elsewhere by further work being undertaken by Royal HaskoningDHV in respect of heritage setting and offshore project infrastructure.

In addition to the IoACC Representation (October 2019), Gwynedd Archaeological Planning Services (GAPS), as archaeological advisers to IoACC, also reiterated their comments from the IoACC representation, particularly in respect to offshore setting impacts and effects, within their response to Natural Resources Wales (January 2020) with reference to the Marine Licence.

GAPS have advised that decisions on both the TWAO/Deemed Planning Consent and Marine Licence should not be made until a suitable assessment of impact on the setting [of heritage assets as a result of the offshore infrastructure] has been provided to “*demonstrate acceptability or otherwise of the principle of the proposed scheme*”.

Cadw’s response to the marine licence for the Morlais Tidal Array stated:

“The application is accompanied by an environmental statement which includes chapter 13 Offshore Archaeology and Cultural Heritage and chapter 20 Onshore Archaeology and Cultural Heritage. This information concludes that there will be no direct impact on any designated heritage assets: There will be some negligible and minor impacts on the settings of a number of designated heritage assets during the construction phase of the development but these will be temporary. However, the proposed development will have a permanent minor to moderate adverse impact on the settings of Listed Buildings 5713 Ellins Tower, 5284 South Stack Lighthouse and a minor adverse impact on Listed Building 20081 Tany-y-Cytiau. It will also have permanent minor adverse impact on the setting of scheduled monument AN016 Holyhead Mountain Hut Circles. None of these adverse impacts will be significant. We concur with these conclusions.”

As noted above, see separate Wessex Archaeology report/supplementary note forthcoming for further consideration of the primary concern raised by GAPS in relation to impacts on setting from offshore

infrastructure, as per their comments within paras 8.10 (latter part), 8.11, 8.12, 8.14 of the IoACC Representation (October, 2019).

Other GAPS comments associated with required archaeological surveys onshore, and the flow of information and discussion of results from these surveys are also **not** specifically dealt with here, other than to note that Menter Môn have commissioned the services of Gwynedd Archaeological Trust (GAT) to undertake Archaeological Geophysical Survey (onshore), and a Written Scheme of Investigation has now been approved by GAPS for this work, which is due to commence in March 2020. There is now an ongoing line of communication between GAT (as archaeological contractor to Menter Môn) and GAPS (as archaeological adviser to IoACC). Subsequent trial trenching will be discussed, and any requirements agreed between Menter Môn, GAT and GAPS depending on the findings from the geophysical survey.

The GAPS comments relating to the Wessex Archaeology DBA are being addressed directly by Wessex Archaeology in collaboration with Menter Môn.

Finally in terms of addressing of comments that fall out with the scope of this supplementary note, the GAPS comments on the archaeological section/text included in the Outline CoCP are proposed to be addressed in the early post-consent stages of the project, as part of a more project-wide update to the CoCP to be consulted on and agreed with IoACC at that stage.

Further discussion, as required, can be picked up between IoACC, their archaeological adviser GAPS, and Menter Môn at the request of the Council. However, it is currently envisaged that additional consultation and dialogue will be undertaken during the formal determination period of the project.

This leaves the following three comments that are subject to further consideration below as part of this Royal HaskoningDHV supplementary note:

Para 8.9	It is considered that the significance of the archaeology at Parc Cybi (RHDHV ref. 38) has been under-valued (Table 20-11). The site is of acknowledged national and international significance and should therefore be regarded as of high significance.
Para 8.10	As Table 20-15 is based on identified key assets, it overlooks Construction Impact 1: Direct impact to potential buried remains that are not associated with any currently known site.
Para 8.13	Chapter 20 has not identified that physical impact on buried archaeology associated with Porth Dafarch hut circles (scheduled monument AN034) and Ty Mawr standing stone (scheduled monument AN012) would constitute a direct impact on their setting. This also affects Table 20-14, where there is a potential interaction between 'direct impact to potential buried remains' and 'indirect impact upon the setting of designated heritage assets'.

2 Response to Comment - Para 8.9

The Wessex Archaeology DBA (Appendix 20.1 to ES Chapter 20) includes the following in respect to the archaeological remains at Parc Cybi (RHDHV ref. 38):

"Parts of the northern and eastern areas of the proposed cable route lie within or directly adjacent to areas which have been subject to previous archaeological work. Some of that work has produced highly significant remains, particularly from the prehistoric periods. However, some areas within Parc Cybi have been fully excavated and so would be unlikely to require further investigation. The areas which have not been previously investigated, however, do have a moderate to high potential for buried archaeological remains where later development has not damaged or disturbed it. The area within the Orthios site to the

north of the A55 has seen significant modern disturbance associated with the Anglesey Aluminium plant and the associated infrastructure. Although there is some potential for archaeological remains to be present, they are likely to be highly fragmented or damaged if they still survive.”

In ES Chapter 20, Table 20-15: Summary of Impacts by key asset, construction impacts to Parc Cybi archaeological remains are assessed as follows:

RHDHV No.	Name	Heritage Value	Impacts Summary	Magnitude of impact	Significance of effect	Mitigation	Residual effect (post-mitigation)
38	Parc Cybi archaeological remains	Medium	Construction Impact 1: Direct impact to potential buried archaeological remains associated with known (recorded) archaeological remains during installation of onshore cable and switchgear building.	High	Major	See ES Chapter 20, Section 20.6.5.1.1 'Mitigation', including predicted phases of archaeological evaluation and subsequent mitigation measures. Sections 20.6.11 and 20.7 are also relevant. Mitigation includes the principles of seeking to minimise, reduce and/or offset any potential significant adverse effects identified.	Non-significant

The project acknowledges the national (and potential international) significance of the Parc Cybi area in terms of certain previously excavated, recorded, assessed and analysed archaeological remains (particularly from the prehistoric periods) , and as such RHDHV Ref. 38 'Parc Cybi archaeological remains' within Table 20-11 should be regarded as being of High Heritage Significance (as the maximum likely level of importance of the asset grouping).

If the Heritage Importance (Value) of the asset was increased to High, the Significance of effect would still, however, come out as Major adverse (prior to mitigation) and the Residual effect remains as the predicted non-significance in EIA terms (post-mitigation) by following the proposed approaches as outlined in Sections 20.6.5.1.1 'Mitigation' and 20.6.5.1.2 'Residual Impact' of ES Chapter 20, including the principles of seeking to minimise, reduce and/or offset any potential significant adverse effects identified.

It is noted that the onshore archaeological geophysical survey (currently being planned and undertaken by GAT) under a GAPS approved WSI, has not identified any areas within the Parc Cybi site as requiring geophysical survey specific to the Morlais Demonstration Zone Project. Specifically:

- **Area 35** - Within Parc Cybi Business Park. Area already surveyed and entire area subject to archaeological strip map and sample excavation prior to the construction of the park. GAT project area G1701; geophysical survey not required by GAPS.
- **Area 36** - Tarmac road, footpath and grass verge alongside modern roundabout – not suitable for survey; geophysical survey not required by GAPS.
- **Areas 37 / 38 / 38A** – [All] Within Parc Cybi Business Park. Area already surveyed and entire area subject to archaeological strip map and sample excavation prior to the construction of the park. GAT project area G1701; geophysical survey not required by GAPS.

Parc Cybi archaeological remains (RHDHV Ref. 38) will be considered further as part of the subsequent archaeological trial trenching strategy (possibly pre-determination depending on the results of the geophysical survey and further discussion and agreements with GAPS) and/or later mitigation (as required) again to be discussed and agreed with GAPS by GAT and Menter Môn following completion of the current programme of onshore archaeological geophysical survey.

3 Response to Comment - Para 8.10

This comment is noted and acknowledged. As Table 20-15 in ES Chapter 20 is based on identified key assets, it does not include Construction Impact 1: Direct impact to potential buried remains that are not associated with any currently known site.

The potential for currently unknown sub-surface archaeological remains to be present and impacted within the onshore elements of the project's footprint is, however, included within ES Chapter 20 – e.g. Section 20.6 Impact Assessment, sub-section 20.6.2 Overview of Potential Impacts includes 'Direct Impact to potential buried archaeological remains', including the following text:

"The direct impact to potential buried archaeological remains may occur during the excavation of any open-cut trenches to lay the onshore cable (including within the footprint of existing roads), excavation of transition pits at landfall (from the HDD to open cut trench to the landfall substation), during construction of the landfall substation, switchgear building and grid connection substation, or during the construction of any temporary works areas or associated infrastructure related to the Project."

ES Chapter 20, Section 20.6.5 Potential Impacts During Construction, sub-section 20.6.5.1 Construction Impact 1: Direct Impact to Potential Archaeological Remains, includes detailed assessment of direct impact to archaeological remains and relates to any potential remains within the Project footprint which are yet to be revealed or recorded (paras 95 to 102). Mitigation (sub-section 20.6.5.1.1) and Residual Impact (20.6.5.1.2) are also outlined and discussed.

The phased approach to archaeological evaluation and mitigation for the Project is now underway with the onshore archaeological geophysical survey (currently being planned and undertaken by GAT) for which GAPS have approved the WSI produced by GAT.

4 Response to Comment - 8.13

Porth Dafarch hut circles (scheduled monument AN034) and Ty Mawr standing stone (scheduled monument AN012) are considered within ES Chapter 20 and Appendix 20.1 (Wessex Archaeology's DBA).

Within sections 20.5.7, 20.6.5.1, 20.6.5.2, 20.6.5.3.3, 20.6.5.3.4, 20.6.11 and Table 20-15, it is acknowledged that both monuments could be subject to temporary impacts and associated effects during construction as a result of change in the setting of the assets, and that both monuments could also have associated subsurface archaeological remains (outside of the Scheduled areas) that may be subject to permanent direct physical impacts and associated effects as a result of physical change during construction. Porth Dafarch hut circles are also considered under 'direct impact to designated archaeological remains due to [potential] hydrological changes or vibration'. The latter two impacts being the primary concerns identified. Neither monument is considered to be subject to significant (in EIA terms) residual effects into the operational phase of the project.

In ES Chapter 20, Table 20-15: Summary of Impacts by key asset, impacts to Porth Dafarch hut circles and Ty Mawr standing stone are assessed as follows:

RHDHV No. / Cadw Ref	Name	Heritage Value	Impacts Summary	Magnitude of impact	Significance of effect	Mitigation (includes the principles of seeking to minimise, reduce and/or offset any potential significant adverse effects identified). Summarised in Sections 20.6.11 and 20.7.	Residual effect (post- mitigation)
4 / Scheduled Monument AN034	Porth Dafarch Hut Circles	High	Construction Impact 3: Indirect impact to setting of designated assets during installation of landfall cable.	Negligible	Minor	No mitigation measures are recommended.	Minor
			Construction Impact 2: Direct impact to designated archaeological remains due to hydrological changes or vibration	High	Major	See ES Chapter 20, Section 20.6.5.2.1.	Minor
			Construction Impact 1: Direct impact to non- designated buried remains associated with (but outside of) the scheduled area.	High	Major	See ES Chapter 20, Section 20.6.5.1.1, including predicted phases of archaeological evaluation and subsequent mitigation measures.	Non- significant
			Operation: No Impact	N/A	N/A	-	N/A
5 / Scheduled Monument AN012	Ty-Mawr Standing Stone	High	Construction Impact 3: Indirect impact to setting of assets during	Negligible	Minor	No mitigation measures are recommended.	Minor

RHDHV No. / Cadw Ref	Name	Heritage Value	Impacts Summary	Magnitude of impact	Significance of effect	Mitigation (includes the principles of seeking to minimise, reduce and/or offset any potential significant adverse effects identified). Summarised in Sections 20.6.11 and 20.7.	Residual effect (post- mitigation)
			installation of onshore cable.				
			Construction Impact 1: Direct impact to non- designated buried remains associated with (but outside of) the scheduled area.	High	Major	See ES Chapter 20, Section 20.6.5.1.1, including predicted phases of archaeological evaluation and subsequent mitigation measures.	Non- significant
			Operation Impact 3: Indirect impact to setting of assets from landfall substation	Negligible	Minor	See ES Chapter 20, Section 20.6.6.2.2.1. and 20.6.6.2.4.1.	Minor

It is acknowledged that Table 20-14 in ES Chapter 20 does not explicitly state or identify a potential interaction between direct impact to potential buried remains (as a result of construction) and indirect impact upon the setting of designated heritage assets (during construction).

It is also acknowledged that Section 4.3 'Stage 3: Evaluate the Potential Impact of Change or Development' of the Cadw guidance 'Setting of Historic Assets in Wales' (Cadw/Welsh Government, May 2017), includes the following as one of the factors to be considered when assessing the impact of a proposed change or development within the setting of a historic asset:

- *"whether the proposed change or development would dominate the historic asset or detract from our ability to understand and appreciate it - for example, its functional or physical relationship with the surrounding landscape and associated structures and/ or buried remains."*

However, it is considered that Chapter 20 of the ES has captured the primary concerns associated with the project and these highly designated assets (Porth Dafarch hut circles and Ty Mawr standing stone). ES Chapter 20 is reliant on Appendix 20.1 (Wessex Archaeology's DBA) as the main supporting source of technical information, and this is also where the primary setting assessment work was undertaken, which has included Statements of Significance for the two monuments.

The assets are also comprehensively referenced within the ES Chapter, Section 20.6 Impact Assessment, at paras 97, 100, 108 to 113, 131, 132, 136 to 138, 166,167, 182 and Table 20-15.

In terms of mitigation of impacts and associated effects, the two monuments and any associated buried remains (if present within the Project's footprint) will evidently need to be part of and subject to further

detailed discussion, and agreement in respect to the best archaeological approaches and responses, with GAPS in the post-consent stages of the project (if/when consent is granted).

Any on-site archaeological works and resulting post-excavation works undertaken as part of the Project would be set out within a Written Scheme of Investigation (WSI), in the post-consent stages, which would detail the requirements and be subject to approval by the relevant stakeholders, and then strictly adhered to by the archaeological and principal contractors on-site. This requirement (commitment) on the Project is expected to be directly linked with a condition / requirement to be set out within the Deemed Planning Consent and Marine Licence. It is understood that GAPS have or would be able to provide suggested wording to the determining authorities in this regard.