

Declan Keiley
Head of Business Development, UK and
Ireland
Lightsource bp

maenhir@lightsourcebp.com

Eich cyfeirnod Your reference	EN010156
Ein cyfeirnod Our reference	
Dyddiad Date	12 Nov. 24
Llinell uniongyrchol Direct line	

Dear Declan

Prosiect Maen Hir

Thank you for your consultation of 30 September asking for Cadw's comments on the above.

Cadw, as the Welsh Government's historic environment service, has assessed the characteristics of this proposed development and its location within the historic environment. In particular, the likely impact on designated or registered historic assets of national importance. In assessing if the likely impact of the development is significant Cadw has considered the extent to which the proposals affect those nationally important historic assets that form the historic environment, including scheduled ancient monuments, listed buildings, registered historic parks, gardens and landscapes.

These views are provided without prejudice to the Welsh Government's consideration of the matter, should it come before it formally for determination.

Advice

This advice is given in response to scoping opinion as to the contents of an This advice is given in response to the Preliminary Environmental Information Report (PEIR) review for the Prosiect Maen Hir on Anglesey.

The PEIR considers the information currently available about the likely significant environmental effects of the Project.

Assessment

Chapter 4 of the PIER considers the reasonable alternatives to the project and explains the evolution of the design of the proposed development. Whilst we understand the rationale that has been used for this section, we disagree with the assessment of the majority of fields as green for cultural heritage under the BRAG

analysis on the basis of availability of mitigation by design options (para. 4.2.65). The need for further field investigation is fully acknowledged throughout the reports, and the outcomes of this will inform design, and may identify challenges (e.g. in the discovery of nationally important archaeology), all of which will require stakeholder agreement. The majority of fields should therefore be assessed as amber, with the potential to be revised to either green or red subject to further work.

Chapter 8 of the PIER considers in more detail the impact of the proposed development on the Cultural Heritage based on a Historic environment Desk-Based Assessment (HEDBA) produced by Cotswold Archaeology included as Appendix 8 of the PIER.

Cadw agree with the study areas that have been used for the PIER, 5km for designated historic assets and 1km for archaeological potential.

In Cadw's opinion the PIER has considered all the appropriate sources for information on the potential archaeology in the study area. In general, we agree with the assessment but have concerns that the nature of the available information relies on archaeological features that have a physical presence in the landscape, along with previous archaeological investigations and, that in particular sites of earlier prehistoric periods are unlikely to be fully represented in the known archaeological record.

It is clear, and this is acknowledged in the PIER, that there is need for considerably more investigation of the archaeological resource in the study area in form of geophysical surveys and archaeological evaluation trenching. Until this work is completed it will not be possible to understand the extent and importance of the archaeological resource in the study area, determine the impact of the proposed development on it and produce appropriate mitigation measures to reduce this effect. The geophysical surveys and archaeological evaluation will therefore need to be completed before the environmental statement is produced.

The PIER also included the initial stages of the assessment of the impact of the proposed development on the settings of designated historic assets. We concur with the results of the stage 1 assessment carried out, so far, to identify the designated historic assets whose settings will be affected by the proposed development but note that due to changes to the highway works this stage of the assessment has not been completed. The stage 1 assessment of these designated historic assets will need to be completed, and it is recommended that Cadw are consulted on the completed stage 1 assessment to ensure that all affected designated historic assets are included in the stage 2 and 3 assessments.

Chapter 5 of the HEDBA includes stage 2 assessments of the designated historic assets identified, so far, in the stage 1 assessment as likely to have their settings affected by the proposed development. In general, we agree with these assessments, but it should be noted that lack of public access to a historic asset does not affect the importance of its setting. These assessments may need to be revised after the geophysical surveys and archaeological evaluations have been completed, as the discovery of new archaeological sites, potentially linked to the designated historic assets, could significantly alter the current understanding of their settings.

Sections 8.2.52 and 8.2.53 of the PIER discusses the impact of the proposed development on the registered Amlwch and Parys Mountain landscape of outstanding historic interest. We agree that the likely scale of the proposed highway improvements inside the registered historic landscape are not sufficient to require an Assessment of

the Significance of the Impact of Development on Historic Landscape (ASIDOHL) 2 Assessment to be produced.

Finally, we note that sections 8.3.10 and 8.3.11 of the PIER discusses the historic environment legislation that will need to be considered in the determination of the application for Prosiect Maen Hir. The Historic Environment (Wales) Act 2023 was enacted on the 4th November 2024. This Act replaces The Ancient Monuments and Archaeological Areas Act 1979; The Historic Environment (Wales) Act 2016 and The Planning (Listed Building and Conservation Areas) Act 1990. It should also be noted that following the enactment of the Act there will be revisions to Technical Advice Note 24: The Historic Environment 2017 and other Welsh Government guidance notes.

The request for a scoping direction is accompanied by a scoping report with section 7.4 considering Cultural Heritage, with more details being provided by a written scheme of investigation prepared by Cotswold Archaeology included as an appendix.

In general, we agree with the methodologies outlined in these documents that will be used to provide information for the compilation of the Cultural Heritage chapter in the environmental statement. However, we disagree with the 2km proposed study area to consider the potential effect of the proposed development upon the setting of designated historic assets.

Whilst we note the comments in section 7.4.17 of the scoping report, in regard to how solar panels are seen at distance, the study area proposed for the Landscape and Visual Impact Assessment is 3km and the Zone of Theoretical Impact maps have also been prepared for 3km. Consequently, in our opinion and for internal consistency in the EIA process, the study area to consider potential effect of the proposed development upon the setting of designated historic assets should be 3km not 2km.

Yours sincerely

Historic Environment Branch