

Wylfa Newydd Project

6.2.11 ES Volume B - Introduction to the environmental assessments B11 - Cultural heritage

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11 Cultural heritage

11.1 Introduction

11.1.1 This chapter provides an introduction to the technical basis for the cultural heritage assessment for the Wylfa Newydd Project. It includes a summary of legislation, policy and guidance; key points arising in consultation that have guided the cultural heritage assessment; and assessment methodologies and criteria.

11.1.2 For the purposes of this assessment cultural heritage has been considered under the sub-topics of archaeological remains (both terrestrial and marine), historic buildings, and the historic landscape. The historic landscape has been divided into a number of Historic Landscape Types (HLT) to facilitate assessment. HLT are landscape parcels with a common character such as land use or field pattern. Each of these sub-topics has regard for heritage assets which have been defined by the *Overarching National Policy Statement for Energy (EN-1) [RD1]* as “*...those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest... A heritage asset may be any building, monument, site, place, area or landscape, or any combination of these*”.

11.1.3 The assessment of effects for cultural heritage is included in the following chapters:

- D11 (Application Reference Number: 6.4.11) for the WNDA Development;
- E11 (Application Reference Number: 6.5.11) for the Off-Site Power Station Facilities;
- F11 (Application Reference Number: 6.6.11) for the Park and Ride;
- G11 (Application Reference Number: 6.7.11) for the A5025 Off-line Highway Improvements; and
- H11 (Application Reference Number: 6.8.11) for the Logistics Centre.

11.2 Legislation, policy and guidance

The following legislation, policy and guidance have been used to inform the scope and content of the cultural heritage assessment; assist in the identification of potential effects and mitigation; and influence the design of the Wylfa Newydd Project to reduce the significance of effects.

Key legislation

11.2.2 The relevant legislation and how it relates to the cultural heritage assessment is set out in table B11-1.

Table B11-1 Summary of key legislation

Legislation	Description
Ancient Monuments and Archaeological Areas Act 1979	Under this Act, Scheduled Monuments are, by definition, of national importance and are protected. It is a criminal offence to destroy, damage or alter a Scheduled Monument, and a Scheduled Monument Consent must be obtained from the Secretary of State (SoS) before any works affecting a Scheduled Monument may take place.
Planning (Listed Buildings and Conservation Areas) Act 1990	This Act provides protection for Listed Buildings which are recognised to be of special architectural or historic interest. Planning authorities are required to have special regard to the desirability of preserving a Listed Building, its setting or any features of special architectural or historic interest which it may possess. Designation as a Listed Building provides planning authorities with additional controls over the demolition and alteration of historic buildings through the process of gaining Listed Building Consent. Local Planning Authorities have a duty to designate areas of special architectural or historic interest as Conservation Areas. Designation provides control over demolition of unlisted buildings, limits certain permitted development rights and provides the basis for planning policies to further preserve and enhance the area's special character. Section 1(5) of the Act treats as part of the Listed Building any object or structure within the curtilage of the building which, although not fixed to the building, forms part of the land and has

Legislation	Description
	done so since before 1st July 1948.
Protection of Military Remains Act 1986	This Act protects the remains of UK military aircraft and vessels that have crashed, sunk or been stranded, and associated human remains, from unauthorised disturbance. Such sites are designated as either Protected Places or Controlled Sites. It is an offence to tamper with, move or unearth any such remains without a licence from the SoS.
Protection of Wrecks Act 1973	This Act allows the designation of a restricted area around the site of a vessel lying on or in the seabed in UK territorial waters if the SoS is satisfied, on account of the historical, archaeological or artistic importance of the vessel, or its contents or former contents. It is a criminal offence to undertake certain activities in a designated area without an appropriate licence.
The Hedgerows Regulations 1997	These Regulations provide a definition as to what constitutes an important hedge protected by the Regulations and therefore those hedges for which consent is required to remove them.
The Planning (Listed Buildings and Conservation Areas) (Wales) Regulations 2012 and The Planning (Listed Buildings and Conservation Areas) (Wales) Regulations 2015	These Regulations make procedural provisions for applications relating to Listed Building and Conservation Area Consent, and modification of legislation in relation to enforcement notices for Listed Buildings and unlisted buildings in Conservation Areas.
Well-being of Future Generations (Wales) Act 2015	This Act seeks to improve the economic, social, environmental, and cultural well-being of Wales. Under this Act, public bodies have a duty to carry out sustainable development,

Legislation	Description
	including the identification of well-being objectives and taking reasonable steps to meet these. Public bodies must work towards achieving seven well-being goals identified under the Act and demonstrate progress towards these.
Historic Environment (Wales) Act 2016	This Act amends certain aspects of the law relating to Scheduled Monuments and Listed Buildings. It created a statutory register of historic parks and gardens, requires local authorities to establish a historic environment record relating to their area, and established an Advisory Panel for the Welsh Historic Environment to advise on environment policy and strategy at a national level.

Key policy

11.2.3 The relevant national and local plans and policies, and how these relate to the cultural heritage assessment, are described in table B11-2.

Table B11-2 Summary of key policy

Policy	Description
National Policy	
<i>Overarching National Policy Statement for Energy (EN-1) [RD1]</i>	<p>The National Policy Statement sets out the overarching national policy for delivery of major energy infrastructure projects.</p> <p>Paragraph 5.8.12 requires the significance of affected heritage assets and the value they hold for this and future generations to be taken into account when considering the impact of a proposed development.</p> <p>Paragraph 5.8.14 states that “...<i>there should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be</i>” and</p>

Policy	Description
	<p><i>“Substantial harm to or loss of a grade II listed building park or garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including Scheduled Monuments; registered battlefields; grade I and II* listed buildings; grade I and II* registered parks and gardens; and World Heritage Sites, should be wholly exceptional.”</i></p> <p>Paragraph 5.8.15 states that: harmful impacts on the significance of designated heritage assets should be <i>“...weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss.”</i> It further states that where the application will lead to substantial harm to or total loss of significance of a designated heritage asset consent should be refused unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm.</p> <p>Paragraph 5.8.18 requires that applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, a heritage asset should be treated favourably. For applications that do not do this, the negative effects should be weighted against the wider benefits of the application and that the <i>“...greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval.”</i></p> <p>Under Paragraph 5.8.20, where the loss of the whole or a material part of a heritage asset’s significance is justified, <i>“...the developer is required to record and advance understanding of the significance of the heritage asset before it is lost. The extent of the requirement</i></p>

Policy	Description
	<p><i>should be proportionate to the nature and level of the asset's significance. Developers should be required to publish this evidence and deposit copies of the reports with the relevant Historic Environment Record. They should also be required to deposit the archive generated in a local museum or other public depository willing to receive it."</i></p>
<p><i>National Policy Statement for Nuclear Power Generation (EN-6) [RD2]</i></p>	<p>The National Policy Statement sets out national policy on new Nuclear Power Stations identified as potentially suitable for deployment by 2025.</p> <p>Section 3.10: Nuclear Impact: landscape and visual impacts – recognises that, while the scope for mitigation of visual impacts associated with a new Nuclear Power Station is limited, mitigation should be designed to reduce visual intrusion as far as reasonably practicable.</p>
<p><i>People, Places, Futures: Wales Spatial Plan [RD3]</i></p>	<p>The <i>Wales Spatial Plan</i> sets out high-level policy which recognises the protection and enhancement of cultural heritage to be essential, and the conservation of the heritage of each area within Wales to be important.</p>
<p><i>Technical Advice Note (TAN) 12: Design [RD4]</i></p>	<p>This Technical Advice Note sets out advice on good design, including advice on considering the historic environment in design.</p>
<p><i>Technical Advice Note (TAN) 24: Historic Environment [RD5]</i></p>	<p>This Technical Advice Note provides guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning and Listed Building applications.</p>
<p><i>Planning Policy Wales (Edition 9) [RD6]</i></p>	<p>This document sets out the land use planning policies of the Welsh Government, forming a strategic framework to guide development.</p> <p>Chapter 6: The Historic Environment – sets out the Welsh Government's</p>

Policy	Description
	objectives in relation to the historic environment.
Local Policy	
<i>New Nuclear Build at Wylfa: Supplementary Planning Guidance (SPG) [RD7]</i>	<p>The purpose of this SPG is to provide advice on important local matters relating to the proposed Wylfa Newydd Project and its Associated Developments and to set out the Isle of Anglesey County Council's (IACC's) response to national and local policy and strategies in the context of the Wylfa Newydd Project. The SPG is designed to be consistent with considerations in the Joint Local Development Plan (JLDP) (discussed below). The SPG also highlights some of the readily identifiable potential impacts of the Wylfa Newydd Project and outlines potential mitigation and enhancement measures to ensure that significant adverse effects are avoided or are minimised where possible. Policy GP22 specifies all applications relating to the Wylfa Newydd Project should be accompanied by an assessment of historic environment effects, the scope of which will be agreed with the IACC in advance so as to lead to an appropriate programme of investigation and recording.</p>
<i>Anglesey and Gwynedd Joint Local Development Plan 2011 - 2026 - Written Statement [RD8]</i>	<p>The JLDP covers the local authorities of the IACC and Gwynedd Council and forms the basis for land use planning in these areas. The JLDP covers the period 2011 to 2026.</p> <p>Strategic Policy PS9: Wylfa Newydd and Related Development – this policy sets out the considerations that the Councils will take into consideration in the preparation of a Local Impact Report in relation to Wylfa Newydd and related development. Part 8 states that “<i>...the scheme layout and design and the scale of open spaces, landscaping, planting (including hedging and tree belts), waterways and similar features proposed should avoid, minimize,</i></p>

Policy	Description
	<p><i>mitigate or compensate for visual, landscape and ecological impacts on the local and wider area, as well as on cultural and historic aspects of the landscape, both in the short and longer term”.</i></p> <p>Strategic Policy PS17: Preserving and where appropriate enhancing heritage assets – states that the Local Planning Authorities will preserve and where appropriate enhance its unique heritage assets.</p> <p>Policy AT1 requires any proposal within and/or significant views into and out of World Heritage Sites, Registered Historic Landscapes, Parks and Gardens and Conservation Areas to have regard to relevant character appraisals, management plans, delivery strategies and assessments adopted by the Local Planning Authority.</p> <p>Policy AT3: Locally or regionally significant non-designated heritage assets - states that “<i>...proposals will be required to conserve and seek opportunities to enhance buildings, structures and areas of locally or regionally significant non-designated heritage assets, which create a sense of local character</i>”.</p> <p>Policy AT4: Protection of non-designated archaeological sites and their setting - requires proposals which may have a significant adverse impact on sites that of potential national archaeological importance and their setting or are of acknowledged local heritage importance to be assessed in terms of the intrinsic importance of the site and potential extent of harm. It also requires where appropriate either archaeological assessment for field evaluation prior to determining a planning application.</p>

Key guidance

11.2.4 The cultural heritage assessment has been undertaken in line with a number of key technical guidance documents. These guidance documents are widely used across the UK and represent standard good practice for the assessment for the various consenting regimes. These are summarised in table B11-3.

Table B11-3 Summary of key guidance

Guidance	Description
<i>Institute of Historic Building Conservation Code of Conduct [RD9]</i>	The Code of Conduct provides standards of conduct and self-discipline required of a member of the Institute of Historic Building Conservation.
<i>Listed Buildings in Wales. What is Listing? [RD10]</i>	Information that sets out how Cadw compiles lists of buildings of special architectural or historic interest.
<i>Understanding the Archaeology of Landscape: A guide to good recording practice [RD11]</i>	This document sets out good practice guidance, describing and illustrating approaches to archaeological survey, drawing conventions and levels of survey for record creators and users.
<i>Guide to Good Practice on Using the Register of Landscapes of Historic Interest in Wales in the Planning and Development Process [RD12]</i>	This guidance assists decision-making for determination of planning applications affecting landscapes included on the Register, aid the development of proposals which would have the least possible adverse impact on historic landscape areas included on the Register, and provide guidance on the assessment of effects of major development on the historic landscape.
<i>Cemaes Conservation Area Character Appraisal (adopted 11 May 2010) [RD13]; and Llanfechell Conservation Area Character Appraisal (adopted 12 May 2011) [RD14]</i>	These documents provide an appraisal of the historic and architectural significance of the Cemaes and Llanfechell Conservation Areas.
<i>Conservation Principles for the Sustainable Management of the Historic Environment in Wales [RD15]</i>	This document sets out principles to aid the protection and management of the historic environment.
<i>Historic Environment Strategy for Wales [RD16]</i>	This strategy sets out the role of the historic environment in delivering tangible social, economic and environmental benefits for Welsh

Guidance	Description
	<p>communities. It identifies a range of actions under the following themes:</p> <ul style="list-style-type: none"> • heritage protection and sustainable development; • skills and opportunities; • public participation, understanding and enjoyment; • economy; • partnership and delivery; and • Cadw.
<i>Chartered Institute for Archaeologists Code of Conduct</i> [RD17]	<p>The Code of Conduct provides the standards of ethical and responsible behaviour in the conduct of archaeological affairs to which members of the Chartered Institute are expected to adhere.</p>
<i>Standard and guidance for an archaeological watching brief</i> [RD18]; <i>Standard and guidance Archaeological excavation</i> [RD19]; <i>Standard and guidance for the archaeological investigation and recording of standing buildings or structures</i> [RD20]; <i>Standard and guidance for historic environment desk-based assessment</i> [RD21]	<p>These documents provide best practice guidance for carrying out archaeological assessments.</p>
<i>Heritage Impact Assessment in Wales</i> [RD22]	<p>Good practice guidance on the heritage impact assessment process and production of written heritage impact statements.</p>
<i>Managing Change to Registered Historic Parks and Gardens in Wales</i> [RD23]	<p>This document sets out good practice guidance on understanding the implications of impacts on, and managing change to, a Registered Historic Park and Garden.</p>
<i>Managing Historic Character in Wales</i> [RD24]	<p>This document explains the importance of historic character and its use in conservation, regeneration and planning in Wales.</p>

Guidance	Description
<i>Setting of Historic Assets in Wales</i> [RD25]	Good practice guidance on the assessment of setting of heritage assets, its contribution to the value of heritage assets, and assessment of a development's impact upon this.
<i>Guidance for Applicants Undertaking Photographic Survey for Planning Purposes</i> (Gwynedd Archaeological Planning Service (GAPS) [RD26])	This document provides guidance on the requirements of GAPS for photographic surveys.
<i>Understanding Historic Buildings: A Guide to Good Recording Practice</i> [RD27]	This document provides best practice guidance for recording historic buildings.
<i>Design Manual for Roads and Bridges</i> (DMRB), Volume 11, Section 3, Part 2 Cultural Heritage (HA 208/07) [RD28]	This Advice Note provides guidance on the assessment of the impacts that road projects may have on the cultural heritage resource. The cultural heritage resource is sub-divided for the purposes of this guidance into three sub-topics, Archaeological Remains, Historic Buildings and Historic Landscape.

11.3 Consultation

11.3.1 This section provides a topic-specific account of scoping, statutory and non-statutory consultation undertaken to support the assessment. For a full overview of the environmental consultation activities undertaken for the Wylfa Newydd Project, refer to chapter A6 (EIA scoping report and addendum) (Application Reference Number: 6.1.6) and chapter A7 (consultation with environmental stakeholders) (Application Reference Number: 6.1.7).

Planning Inspectorate Scoping Opinion

11.3.2 In March 2016, Horizon submitted an updated Wylfa Newydd Project EIA Scoping Report to the Planning Inspectorate. In May 2017, Horizon submitted an Addendum to the March 2016 Wylfa Newydd Project EIA Scoping Report to the Planning Inspectorate (and to NRW). Following a period of consultation with stakeholders, a further Scoping Opinion was received from the SoS (via the Planning Inspectorate) on 14 June 2017.

11.3.3 The Wylfa Newydd Project EIA Scoping Report, Addendum and the subsequent Scoping Opinions inform the approach to the assessment. Table B11-4 provides an account of how comments raised by stakeholders in the Scoping Opinion have been considered in the cultural heritage assessment.

Table B11-4 Key issues raised through Scoping

Key issue raised	Action taken
<p>“The SoS notes that the study area for terrestrial archaeology, historic buildings and the historic landscape has been defined as a circular area with a 6km radius extending from the centre point of the Existing Power Station. The SoS recommends that the applicant consider the need for bespoke study areas for each of these components of the archaeology and cultural heritage assessments. The defined area in figure 17.1 of the Scoping Report does not account for the proposed Off-Site facilities (although the applicant acknowledges at section 17.2 of the Scoping Report that further archaeological surveys are scheduled for the Off-Site locations). The definition of any such study areas should be agreed with the relevant consultees including GAPS and the IACC”. (Planning Inspectorate)</p>	<p>The 6km study area is for the WNDA Development. Separate, bespoke study areas have been defined for Associated Development and Off-Site Power Station Facilities. These have been agreed with GAPS and are defined in paragraphs 11.4.3 to 11.4.8 of this chapter.</p> <p>A letter detailing the proposed approach to the Off-Site Power Station Facilities and Park and Ride was provided to GAPS on 23 February 2016.</p> <p>As the Off-Site Power Station Facilities are located within the study area for the Wylfa Newydd Project A5025 On-line Highway Improvements and Off-line Highway Improvements, Anglesey: Cultural Heritage Desk-Based</p>

Key issue raised	Action taken
	<p>Survey and Walkover Survey Report (appendix G11-1, Application Reference Number: 6.7.42), no further desk-based study was proposed. It was therefore not required to agree a study area for the Off-Site Power Station Facilities.</p> <p>A study area extending 500m in all directions from the Park and Ride was proposed.</p> <p>In an email of 11 March 2016, GAPS stated that they were content with the approach specified.</p>
<p>“In terms of historic landscapes, the SoS finds no reference within the Scoping Report as to the need for an Assessment of the Significance of the Impact of Development on Historic Landscapes (ASIDOHL2). The need for, and scope of such an assessment, should be agreed with the relevant local authorities and the Gwynedd Archaeological Trust, particularly given the nature and value of the designated heritage assets identified by the Applicant in tables 17.1 and 17.2 of the Scoping Report”.</p> <p>(Planning Inspectorate)</p>	<p>An ASIDOHL2 assessment of the Amlwch and Parys Mountain Registered Landscape of Outstanding Historic Interest in Wales has been undertaken and is presented in appendix D11-7 (Assessment of the Significance of the Impact of Development on the Historic Landscape for the Wylfa Newydd Power Station (ASIDOHL2)) (Application Reference Number: 6.4.78).</p> <p>As no physical effects or effects on the setting of the Registered Historic Landscape are predicted for the Off-Site Power Station Facilities and the Associated Development, an Assessment of the Significance of the Impact of Development on Historic Landscapes has not been undertaken for these.</p>
<p>“Any archaeological mitigation measures and/or management plans should also be cross referred with others including the Landscape and Environmental Management Plan and</p>	<p>Archaeological mitigation measures have been identified in the Wylfa Newydd Code of Construction Practice (CoCP)</p>

Key issue raised	Action taken
<p>Construction Environmental Management Plan such that mitigation measures are complementary and not contradictory". (Planning Inspectorate)</p>	<p>(Application Reference Number: 8.6).</p>
<p>"At Section 17.3.2 of the Scoping Report, the applicant acknowledges that construction activities associated with the breakwater and the MOLF [Marine Off-Loading Facility] have the potential to remove any surviving remains of the wreck of the ship, the 'Mary Sutherland' (as well as other unknown archaeological remains). The SoS would expect to see specific mitigation measures proposed in relation to this feature as part of any wider marine archaeological mitigation plan". (Planning Inspectorate)</p>	<p>Geophysical survey of the Recorded Loss site of the Mary Sutherland was undertaken (please refer to appendix D11-3a Wylfa Newydd Proposed New Nuclear Power Station Marine Archaeology Baseline Report revision 2, Application Reference Number: 6.4.71) as was an archaeological dive survey of this site (please refer to appendix D11-3b Wylfa Newydd Proposed New Nuclear Power Station Marine Archaeological Survey Report, Application Reference Number: 6.4.72). Neither survey identified any trace of a wreck or any archaeological material. As there would be no impact, no specific mitigation is required to be included in any wider marine archaeological mitigation plan.</p>
<p>"The inter-relationship between landscape and visual effect and heritage assets will need to be clearly presented as part of the ES [Environmental Statement], including consideration of cumulative effects". (Planning Inspectorate)</p>	<p>The effects on the historic landscape have been included as part of the assessment and effects on the setting of heritage assets, including potential visual effects, have also been assessed. These effects are described in section 11.5 of chapters D11 Application Reference Number: 6.4.11), E11 (Application Reference Number: 6.5.11), F11 (Application Reference Number: 6.6.11), G11 (Application Reference Number: 6.7.11) and H11 (Application Reference</p>

Key issue raised	Action taken
	Number: 6.8.11) of this Environmental Statement. An assessment of cumulative effects is presented in chapters I4 (Application Reference Number: 6.9.4) and I5 (Application Reference Numbers: 6.9.5) of this Environmental Statement.
<p>“The SoS understands from section 17.4.2 of the Scoping Report that the potential for direct impacts to archaeological remains within the Wylfa Newydd site will have been identified and mitigated under the site preparation and clearance works and therefore prior to commencement of works under the Development Consent Order (DCO). The archaeological aspects of the site preparation and clearance works as ‘enabling works’ in advance of any works authorised under the DCO should be clearly explained as part of the ES for the proposed development and their bearing on the assessment of effects made clear”.</p> <p>(Planning Inspectorate)</p>	Since publication of the Scoping Report, the scope of site preparation and clearance has changed. The potential for direct impacts on archaeological remains within the Wylfa Newydd Development Area and mitigation of these impacts would now occur principally as a result of works undertaken under the DCO application. This is clearly identified in chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement.
<p>“The Council recognises that due to recent archaeological survey and evaluation, much of the archaeological baseline referenced within the chapter requires updating. Similarly, in light of a recent evaluation it may be appropriate to re-evaluate the significance of some of the buried archaeological remains (in particular those mentioned in 17.2.1.1). Furthermore, other sites previously recorded but not investigated may have been reassessed as being of far greater importance since the data was gathered to inform the scoping report. For example, the recently discovered Roman Fort at Cemlyn (PRN37976) was previously recorded as a late prehistoric enclosure just to the west of the development area but is now being considered for scheduling as a legally</p>	The baseline for archaeological remains has been updated based on the results of the recent archaeological investigations and publically accessible information. The value of the Roman fortlet at Cemlyn (Asset 289) has been reassessed in consideration of the results of recent investigation of the site. This information is presented in chapter D11 (Application Reference Number: 6.4.11), and appendix D11-1 (Wylfa Newydd Proposed New Nuclear Power Station Cultural Heritage Baseline Report) (Application Reference

Key issue raised	Action taken
<p>protected Ancient Monument, meaning that impacts on its setting need to be considered more carefully than had previously been thought".</p> <p>(Planning Inspectorate)</p>	<p>Number: 6.4.68), of this Environmental Statement.</p>
<p>"It is likely that Cestyll Garden may benefit from a statutory designation under the <i>Historic Environment (Wales) Bill</i> which is awaiting Royal Assent. The applicant should consider whether it is appropriate to liaise with and seek early sight of emerging guidance on the assessment of setting from CADW, or whether to adopt current English guidance. Horizon should also satisfy itself that its assessment includes for a possible change in status of Historic Parks and Gardens in Wales, any possible changes to the grading of other assets and greater value given to Historic Environment Records".</p> <p>(Planning Inspectorate)</p>	<p>Along with its statutory designation, the value of Cestyll Garden has also been assessed based on its evidential, aesthetic, historical and communal value in accordance with the agreed project design and the method identified in section 11.4 of this chapter. Please refer to appendix D11-4 (Wylfa Newydd Proposed New Nuclear Power Station Assessment of the significance of Cestyll (Grade II) Registered Historic Park and Gardens Final Report) (Application Reference Number: 6.4.75) for more information.</p>
	<p>Cadw's guidance document on setting, <i>Setting of Historic Assets in Wales</i> [RD25] has been used to inform this assessment.</p> <p>The method for the assessment of all heritage assets is identified in section 11.4 of this chapter. As inclusion on a Historic Environment Record does not in itself confirm a statutory designation, it is not one of the criteria on which the assessment of value is based.</p>
<p>"It is suggested that the mitigation measures set out in 17.3.3 include for publication and wider dissemination of archaeological results (for example through publication of discoveries and/or on site interpretation/visitor centre)".</p>	<p>As identified in section 11.6 in chapters D11 (Application Reference Number: 6.4.11), E11 (Application Reference Number: 6.5.11), F11 (Application Reference Number: 6.6.11), G11</p>

Key issue raised	Action taken
(Planning Inspectorate)	<p>(Application Reference Number: 6.7.11) and H11 (Application Reference Number: 6.8.11) of this Environmental Statement, the publication of results of archaeological mitigation will be undertaken at a level commensurate with the significance of those results and potentially could include publication and other means of dissemination. Horizon has agreed, in liaison with GAPS and IACC, a communications plan in relation to the archaeological investigations which commenced in 2017. There has been public participation in excavations, in which over 80 individuals participated many on multiple days, and five open days for archaeology have also been held. This included two days exclusively for local schools.</p>
<p>“Use should be made of all five aspects of LANDMAP including the Historic landscape layer which should be used to identify the potential for significant effects upon the historic landscape as defined by LANDMAP and the historic landscape description contained within the LCA. NPS EN-6 Volume II, with reference to Wylfa recognises LANDMAP to be a valuable resource (paragraph C9.73).”</p> <p>(Planning Inspectorate)</p>	<p>The historic landscape layer in LANDMAP has formed the basis for identifying the potential for significant effects upon the historic landscape which are discussed in section 11.5 of chapters D11 (Application Reference Number: 6.4.11), E11 (Application Reference Number: 6.5.11), F11 (Application Reference Number: 6.6.11), G11 (Application Reference Number: 6.7.11) and H11 (Application Reference Number: 6.8.11) of this Environmental Statement.</p>
For the A5025 Highway Improvements Cadw identified potential impacts on the setting of the Scheduled Monument	The setting of these cultural heritage assets has been assessed in accordance with

Key issue raised	Action taken
<p>known as Capel Soar (AN083) during construction and operation, and that these effects should be considered. (Cadw)</p>	<p>Setting of Historic Assets in Wales and descriptions have been included in the relevant gazetteer of heritage assets.</p> <p>The assessment of the impact on the setting of Capel Soar (a Scheduled Monument; AN083) and any other designated heritage assets have been considered as part of the assessment presented in chapter G11 (Application Reference Number: 6.7.11) of this Environmental Statement.</p>
<p>For the A5025 Highway Improvements GAPS indicated that there is a good archaeological potential particularly for prehistoric activity around Llanfaethlu and that trial trenching would be required. (GAPS)</p>	<p>Archaeological trial trenching has been undertaken at Llanfaethlu and elsewhere to inform the cultural heritage baseline and inform appropriate mitigation. A Written Scheme of Investigation (WSI) for this work was agreed with GAPS [RD29]. The results of this investigation are provided in appendix G11-3 (Wylfa Newydd: A5025 Highway Improvements, Isle of Anglesey: Evaluation Report) (Application Reference Number: 6.7.44).</p>
<p>“The SoS suggests that the Applicant considers whether it may be helpful to specify a study area extending from, for example, the boundary of the proposed power station site. This comment applies equally to the study areas specified in Section 17.2.1 for the proposed associated development”. (Planning Inspectorate)</p>	<p>The extent of study areas for the WNDA Development, Off-Site Power Station Facilities and Associated Developments are defined in section 11.4 of this chapter and in chapters D11 (Application Reference Number: 6.4.11), E11 (Application Reference Number: 6.5.11), F11 (Application Reference Number: 6.6.11), G11 (Application Reference Number: 6.7.11) and H11 (Application Reference Number: 6.8.11).</p>

Key issue raised	Action taken
<p>“Table 17.2 of the Scoping Report addendum 3.87 provides a summary of the archaeological baseline information for the study area. The study area has not been clearly defined and it is therefore unclear whether the features identified are within or outside the application site and they have not been identified on the constraints plans. The locations of all features described within the ES should be easily identifiable”. (Planning Inspectorate)</p>	<p>The location of all cultural heritage assets and the application sites are identifiable on the figures associated with each cultural heritage chapter of this Environmental Statement (please refer to figures D11-1 to D11-21, Application Reference Number: 6.4.101; E11-1, Application Reference Number: 6.5.27; F11-1, Application Reference Number: 6.6.38; G11-1 to G11-11, Application Reference Number: 6.7.48; and H11-1, Application Reference Number: 6.8.29).</p>
<p>“The Applicant’s attention is drawn to the comments of the IACC regarding the availability of new baseline information on land identified for Off-Site Power Station Facilities at Llanfaethlu which shows significant archaeological potential in the southern part of the proposed development area. This information should be taken into account in undertaking the assessment”. (Planning Inspectorate)</p>	<p>The archaeological remains already identified as part of the baseline for the WNDA Development, Off-Site Power Station Facilities and A5025 Off-line Highway Improvements has been supplemented by more recent publicly accessible information. This has also been considered as part of the assessment presented in chapters D11 (Application Reference Number: 6.4.11), E11 (Application Reference Number: 6.5.11) and G11 (Application Reference Number: 6.7.11) of this Environmental Statement.</p>
<p>“Section 17.1 of the Scoping Report states that the proposed raising of platform and crane heights may affect the setting of ‘some of the heritage assets’. This would apply to assets previously identified in the 2016 Scoping Report. The SoS advises that consideration should be given to whether impacts on any additional heritage assets not previously identified</p>	<p>Effects on the setting of heritage assets, including visual effects resulting from the revised platform and crane heights have been assessed in chapter D11, section 11.4 (Application Reference Number: 6.4.11) of this Environmental Statement.</p>

Key issue raised	Action taken
<p>may need to be included in the assessment as a result of the proposed changes. The Applicant's attention is drawn to the comments of the IACC regarding the effects on the setting of assets across the entirety of the Proposed Development". (Planning Inspectorate)</p>	
<p>"It is stated that professional judgement has been used to identify designated heritage assets for inclusion in the baseline that are outside the study areas for the associated development, but for which it is considered that their setting may be affected by the Proposed Development. The ES should include an explanation of the qualitative approach taken to identifying features for inclusion in the assessment that fall outside the defined study areas". (Planning Inspectorate)</p>	<p>Designated assets that are located outside the study areas for the associated development, but where an impact on setting is predicted, were identified using professional judgement, informed by the Zone of Theoretical Visibility (ZTV) (please refer to figure E10-1, Application Reference Number: 6.5.27 for the extent of the ZTV for the Off-Site Power Station Facilities and figure F10-1, Application Reference Number: 6.6.38 for the extent of the ZTV for the Park and Ride).</p>
<p>"Table 17.2 characterises the baseline for the logistics centre study area. However, it is not clear on what this information is based, as Table 17.1 suggests that, other than site walkovers currently being undertaken, surveys and archaeological investigations will not be undertaken to inform the EIA, but will be undertaken prior to or during the construction phase. It is not explained why this approach is proposed, particularly when Section 17.2.2 identifies potential impacts of the logistics centre on historic assets. The approach also differs to that taken to the assessments for the park and ride facility and the A5025 off-line highways improvements. The Applicant must ensure that the research undertaken to establish the baseline is sufficient to</p>	<p>The baseline for the Logistics Centre has been established through consultation of existing desk-based sources and a walk-over survey. The desk-based sources consulted included the results of extensive archaeological investigations undertaken for Parc Cybi, which apart from two small areas, included the Logistics Centre. These have provided a robust understanding of the potential of the Logistics Centre for unknown archaeological remains, and the potential effects on them. No further investigations are therefore required.</p>

Key issue raised	Action taken
allow a comprehensive assessment". (Planning Inspectorate)	
<p>"It is stated that temporary effects during construction on the settings of archaeological remains and historic buildings would be mitigated by adherence to good practice measures designed to reduce noise during construction such as, for example, noise barriers and use of low noise equipment. The Applicant should ensure that these measures are specified in the [Environmental Statement] and secured in the DCO". (Planning Inspectorate)</p>	<p>While no good practice mitigation has been identified specifically for effects on cultural heritage assets, good practice mitigation for other topics that would help mitigate potential effects on cultural heritage assets have been included will be identified in and secured via the Wylfa Newydd CoCP (Application Reference Number: 8.6) and supporting sub-CoCPs for the Main Power Station Site (Application Reference Number: 8.7), Marine Works (Application Reference Number: 8.8), Off-Site Power Station Facilities (Application Reference Number: 8.9), Park and Ride (Application Reference Number: 8.10), Logistics Centre (Application Reference Number: 8.11) and A5025 Off-line Highways Improvements (Application Reference Number: 8.12).</p>
<p>"Section 17.2.2 states that the layout of the logistics centre would be designed to minimise the intrusion of its buildings on the setting of the identified heritage assets. The SoS would expect the ES to identify the design features of the centre proposed to mitigate its effects". (Planning Inspectorate)</p>	<p>Embedded mitigation measures to minimise intrusion into the setting of the cultural heritage assets identified as part of the baseline for the Logistics Centre have been described in chapter H11, paragraph 11.4.7 (Application Reference Number: 6.8.11) of this Environmental Statement.</p>
<p>"In relation to the A5025 off-line highways improvements, paragraph 20 of this topic chapter states that neither the construction activities nor the operational road would be visible within the 'Significant Views' of the Carreglwyd Grade II* Registered Park and Garden,</p>	<p>Information on Carreglwyd Grade II* Registered Park and Garden, including its Significant Views, are identified in chapter G11 (Application Reference Number: 6.7.11) of this Environmental Statement.</p>

Key issue raised	Action taken
<p>and that currently no significant effect is predicted during construction or operation. The area that would be encompassed within 'Significant Views' is not explained, nor the conclusion on potential effects justified. The SoS would expect such information to be provided in the ES". (Planning Inspectorate)</p>	
<p>"The SoS notes that during operation of the A5025 off-line highways improvements, landscape screening is proposed to mitigate potential visual effects on the setting of archaeological remains and historic buildings. Any proposed archaeological/historic asset mitigation measures should be cross-referenced to relevant landscape and visual mitigation measures, such as, for example, the Landscape and Environmental Masterplan. The inter-relationships between the landscape and visual and the archaeology and cultural heritage assessments should be considered in the ES". (Planning Inspectorate)</p>	<p>Relevant embedded mitigation measures for operation are described in chapter G11, paragraph 11.4.7 (Application Reference Number: 6.7.11) of this Environmental Statement</p>
<p>"The Council recognises that the optimisation process has led to proposals to increase the height of the power station and will require sufficient information within the [Environmental Statement] to enable it to consider the potential for effects upon the settings of heritage assets and whether the alterations to the design will have an increased impact on Cestyll Garden in particular. It is presently unclear to the Council whether the increased height of the MOLF will lead to an increased impact on the 'significant views' out from Cestyll and information sufficient to demonstrate potential effects arising from this structure will also be required". (IACC)</p>	<p>The increased height of the MOLF has been considered in the assessment presented in section 11.4 of chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement. A cross-reference to photomontages showing the breakwater within this Significant View has been included (please refer to appendix D10-8 Photomontage Viewpoint 15 and appendix D10-8 WNDA Development Photomontage Viewpoint K, Application Reference Number: 6.4.65).</p>
<p>"Section 17.1 sets out changes to the scope. In addition to changes resulting</p>	<p>The archaeological remains already identified as part of the</p>

Key issue raised	Action taken
<p>from the process of optimisation, Horizon should recognise that new baseline information has come to light as part of a recent Dŵr Cymru Welsh Water (DCWW) scheme on land identified for Off-Site Power Station Facilities at Llanfaethlu which has shown there to be significant archaeological potential in the southern part of the proposed development area, including later prehistoric (possibly Neolithic) settlement activity. Such information may also influence the scope of the assessments". (IACC)</p>	<p>baseline for the WNDA Development, Off-Site Power Station Facilities and A5025 Off-line Highway Improvements has been supplemented with publically accessible information for this area (please refer to appendix E11-1 gazetteer of heritage assets, Application Reference Number: 6.5.24). This has also been considered as part of the assessment presented in chapters D11 (Application Reference Numbers: 6.4.11), E11 (Application Reference Numbers: 6.5.11) and G11 (Application Reference Numbers: 6.7.11) of this Environmental Statement.</p>
<p>"Policy guidance has also been updated, or is in the process of being updated since the 2016 Scoping Report and the reassessment of the settings of heritage assets due to the changes in platform height must utilise the forthcoming Cadw guidance Annex 6: Setting of Historic Assets in Wales which will be finalised at the end of May 2017, not the method previously presented". (IACC)</p>	<p>Reassessment of setting, where necessary, due to the changes in platform height has been undertaken using the guidance provided in <i>Setting of Historic Assets in Wales</i> [RD25].</p>
<p>"The Council considers that the requirements for the Parc Cybi Logistics Centre as set out within Table 17.1 are more nuanced than as presented. Rather than the below ground archaeological potential being a significant consideration, the potential impacts on the settings of heritage assets are a significant consideration in this instance. This is because the proposed development area lies immediately adjacent to Trefignath Burial Chamber and has the potential to impact on the setting of this monument as well as the important views between this monument, Ty Mawr Standing</p>	<p>Effects on the setting on the Trefignath Burial Chamber and Ty Mawr Standing Stone, Holyhead resulting from construction and operation of the Logistics Centre have been considered in chapter H11 (Application Reference Number: 6.8.11) of this Environmental Statement.</p> <p>Embedded mitigation to reduce these effects during operation have been proposed, including the location of buildings, planting and retention of existing landscape features</p>

Key issue raised	Action taken
<p>Stone and Holyhead Mountain, all of which are recognised as contributing significantly to the setting of the monument. Developments on the Parc Cybi site may compromise the settings of these monuments but any impacts need to be assessed on a case by case basis and measures such as design, landscaping, planting, screening, interpretation, access and other enhancement measures need to be considered to reduce any impacts as much as possible. This is particularly important where operational impacts (construction phase) such as the movement of Heavy goods vehicles (HGVs) will significantly increase the impacts on setting". (IACC)</p>	<p>(please refer to chapter H11, paragraph 11.4.7, Application Reference Number: 6.8.11).</p>
<p>"With reference to paragraphs 17 and 21, the Council would request that consideration to be given to potential enhancements such as interpretation, access, conservation and management to help offset any residual impacts on settings of Trefignath from the Parc Cybi Logistics Centre as well as on Capel Soar from the A5025 off-line improvements. This should be informed by a formal assessment of setting in accordance with new Welsh Guidance (see above) and should complement any mitigation measures such as design or landscaping. Again, these assessments will need to consider impacts such as HGV traffic". (IACC)</p>	<p>The setting of these cultural heritage assets has been assessed, in accordance with <i>Setting of Historic Assets in Wales</i> [RD25], and descriptions have been included in the relevant gazetteer of heritage assets (please refer to appendix G11-4 for Capel Soar, Application Reference Number: 6.7.45 and appendix H11-1 for Trefignath Burial Chamber, Application Reference Number: 6.8.26). Setting has been considered in the cultural heritage assessments throughout this Environmental Statement and the development of scheme proposals. Where practicable, effects on the setting of heritage assets have been mitigated through good practice mitigation, design and landscaping.</p>
<p>"We note section 17.2.1 which states that the "...Amlwch and Parys Mountain Registered Landscape of Outstanding Historic Interest in Wales (HLT16) is</p>	<p>The assessment of the impact on Amlwch and Parys Mountain Registered Landscape of Outstanding</p>

Key issue raised	Action taken
<p><i>located outside the study area for terrestrial archaeology and cultural heritage, however, due to the potential for effects on its setting it has been included in the terrestrial archaeology and cultural heritage baseline". We also note section 17.2.1.3 which states that "due to its height above sea level the landscape has been included as there is the potential for distant views of the Wylfa Newydd Development Area from Parys Mountain". We therefore advise that impacts on this receptor are assessed in the [Environmental Statement]".</i> (Natural Resources Wales) (NRW)</p>	<p>Historic Interest in Wales has been considered as part of the assessment presented in chapter D11, section 11.4 (Application Reference Number: 6.4.11) of this Environmental Statement.</p>
<p>"One issue raised in the adopted scoping opinion but not included in this scoping report addendum is the need or not for the impact of the proposed development on the Registered Historic Landscape of Amlwch and Parys Mountain to be considered. Welsh Ministers are the consultees on this issue, and in our opinion, given the distance between the proposed development and the boundary of the registered historic landscape, this impact is unlikely to be significant. Consequently, we do not consider that an Assessment of the Impact of Development on the Registered Historic Landscape is required to be produced as part of this EIA". (Welsh Government)</p>	<p>Effects on the Amlwch and Parys Mountain Registered Landscape of Outstanding Historic Interest in Wales has been considered as part of the assessment presented in chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement.</p> <p>An ASIDOHL2 assessment was undertaken for Amlwch and Parys Mountain Registered Historic Landscape (please refer to appendix D11-7, Application Reference Number: 6.4.78) to inform this assessment.</p>

Statutory consultation

Pre-Application Consultation Stage One

11.3.4 The aim of Pre-Application Consultation Stage One, undertaken in late 2014, was to share information available at the time with Horizon's key consultees and stakeholders, in order to consider feedback in ongoing design development. Table B11-5 outlines how key issues raised during Pre-Application Consultation Stage One have been considered in the assessment.

Table B11-5 Key issues raised during Pre-Application Consultation Stage One

Key issue raised	Action taken
<p>The proposed breakwater will be in line with the significant view from Cestyll Gardens and has a justification linked to creating a calm water environment for cooling water intake. No evidence provided to suggest that this could be achieved.</p> <p>(IACC)</p>	<p>The potential effects on Cestyll Garden, including the significant views from the garden, have been assessed and are presented in section 11.5 of chapter D11 (Application Reference Number: 6.4.11) and appendix D11-4 (Application Reference Numbers: 6.4.75).</p> <p>Additional mitigation is presented in section 11.6 of chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement.</p>
<p>Enabling Work Stage: the uncertainty of site clearance and the use of certain areas for certain activities are of concern due to the potential for impact on the closest heritage assets. They recognise that there is insufficient space within the Wylfa Newydd Development Area. Further evidence is required to support future assessments.</p> <p>(IACC)</p>	<p>The potential effects on heritage assets arising from Enabling Works have been assessed and are presented in section 11.5 of chapter D11 and appendix D11-6 (effects on cultural heritage) (Application Reference Numbers: 6.4.11; 6.4.77).</p> <p>Additional mitigation is presented in section 11.6 of chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement.</p>
<p>Likely Environmental Effects: disturbance to the Historic Environment through removal of known and unknown archaeological remains and deposits is of concern as well as perceivable changes to the views to and from heritage assets specifically those closest to the Wylfa Newydd Development Area. Further evidence is required to support future assessments.</p> <p>(IACC)</p>	<p>Desk-based surveys and walkover surveys, and non-invasive and invasive investigations have been undertaken to identify heritage assets which could be affected.</p> <p>The potential effects on heritage assets have been assessed and are presented in section 11.5 of chapter D11 (Application Reference Numbers: 6.4.11) and appendix D11-6 (Application Reference Numbers: 6.4.77) of this Environmental Statement.</p>

Key issue raised	Action taken
	Additional mitigation is presented in section 11.6 of chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement.
<p>Key Activities: there is a clear threat of construction activities impacting on heritage assets day and night. Further evidence is required to support future assessments.</p> <p>(IACC)</p>	The potential effects on heritage assets arising from construction have been assessed and are presented in section 11.5 of chapter D11 (Application Reference Number: 6.4.11) and appendix D11-6 (Application Reference Number: 6.4.77) of this Environmental Statement. Additional mitigation is presented in section 11.6 of chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement.
<p>It is claimed that once operational, the most likely environmental effect would be the discharges of emissions and wastes (and a new source of noise and vibration). This could pose a potential risk to Cestyll Gardens. Further evidence is required to support future assessments.</p> <p>(IACC)</p>	Changes in air quality and noise and vibration have been assessed (please refer to chapters D5 air quality, Application Reference Number: 6.4.5 and D6 noise and vibration, Application Reference Number: 6.4.6). The results of these assessments have been used to inform the assessment of effects for Cestyll Garden presented in section 11.5 of chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement.
<p>Any potential impact on the existing watercourse may have an adverse impact on the health of Cestyll Gardens. Further evidence is required to support future assessments.</p> <p>(IACC)</p>	Changes in surface water and ground water have been assessed (please refer to chapter D8 (surface water and groundwater) (Application Reference Number: 6.4.8). The results of this assessment have been used to inform the assessment of effects for Cestyll Garden presented in

Key issue raised	Action taken
	section 11.5 of chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement.
<p>The planned breakwater structure north-west of Porth-y-pistyll, with a second and smaller breakwater to the north-east and the MOLF and its activities will have an adverse impact on the significant views from Cestyll Gardens as well as on the settings of the Listed Buildings adjacent to Cestyll Gardens. Further detail is required on potential impacts and mitigation.</p> <p>(IACC)</p>	<p>The potential effects on Cestyll Garden, including the significant views from the garden, have been assessed and are presented in section 11.5 of chapter D11 (Application Reference Number: 6.4.11) and appendix D11-4 (Application Reference Number: 6.4.75) of this Environmental Statement.</p> <p>Additional mitigation is presented in section 11.6 of chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement.</p>
<p>There is an intention to further develop proposals for landscape mitigation and the use of land within the Wylfa Newydd Development Area subject to phased decommissioning and reviewing the way in which proposals may interact with the impact on heritage receptors. Concern that this may be reactive and not pre-planned.</p> <p>(IACC)</p>	<p>The potential effects on heritage assets resulting from decommissioning have been assessed and are presented in section 11.5 of chapter D11 (Application Reference Number: 6.4.11) and appendix D11-6 (Application Reference Number: 6.4.77).</p> <p>Additional mitigation is presented in section 11.6 of chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement.</p>
<p>The IACC have reservations that it is proposed that all mitigation measures will be discussed with Cadw and or GAPS without the inclusion of the Authority's own in-house experts.</p> <p>(IACC)</p>	<p>The IACC have been included in consultation in relation to potential effects and mitigation on the setting of Conservation Areas and Listed Buildings.</p>
<p>The proposed landscape mound and screen planting depicted in the photomontages has a far greater adverse impact on the significant views in and out of Cemaes</p>	<p>The design of the new mounding would reflect the character of existing drumlins, so would be consistent with existing landscape character.</p>

Key issue raised	Action taken
<p>Conservation Area than the photomontage of the proposed WNDA Development absent of proposed landscape mound and screen planting. Any proposed landscape mounds in this vicinity should resemble the landscape character referenced in the Conservation Character Appraisal SPGs for Cemaes and Llanfechell as being defined by the dominance of a drumlin field.</p> <p>(IACC)</p>	
<p>There is anticipation of a small number of emergency and other facilities outside the Wylfa Newydd Development Area. This could pose a potential threat to heritage receptors bounding the Wylfa Newydd Development Area. Further evidence is required to support future assessments.</p> <p>(IACC)</p>	<p>The assessment of potential effects of the proposed development on heritage assets is presented in chapters D11 Application Reference Number: 6.4.11), E11 (Application Reference Number: 6.5.11), F11 (Application Reference Number: 6.6.11), G11 (Application Reference Number: 6.7.11) and H11 (Application Reference Number: 6.8.11) of this Environmental Statement. The assessments for the Off-Site Power Station Facilities and Associated Development have been informed by a desk-based survey, walkover survey and site inspections, with archaeological geophysical survey and trial trenching undertaken for the Park and Ride and the A5025 Off-line Highway Improvements.</p>

Pre-Application Consultation Stage Two

11.3.5 In September 2016, Horizon shared a Preliminary Environmental Information Report as part of Pre-Application Consultation Stage Two. This presented preliminary details of the predicted environmental effects and mitigation measures for any adverse effects identified. Table B11-6 outlines how key issues raised during Pre-Application Consultation Stage Two have been considered in the assessment.

Table B11-6 Key issues raised during Pre-Application Consultation Stage Two

Key issue raised	Action taken
<p>Wylfa Newydd Development Area decommissioning: While noise and visual intrusion during decommissioning has been assessed for the essential setting of Cestyll Garden Grade II Registered Historic Park and Garden, dust, dirt, contamination and the cumulative effects do need to be taken into account. (IACC)</p>	<p>Potential effects on air quality (please refer to chapter D5 air quality, Application Reference Number: 6.45), including potential effects from dust, were taken into account in the assessment of effect on Cestyll Garden Grade II Registered Historic Park and Garden. However, no effects from dust were predicted for construction or decommissioning. In addition, as no effects from air quality, including potential effects from dust, are predicted, no combined topic effects (effects which can occur when a single receptor is affected in more than one way by the same development), are predicted for this receptor. Where combined topic effects are identified these are presented in chapters D16 (Application Reference Number: 6.4.16), E12 (Application Reference Number: 6.5.12), F12 (Application Reference Number: 6.6.12), G12 (Application Reference Number: 6.7.12) and H12 (Application Reference Number: 6.8.12) of this Environmental Statement.</p>
<p>Wylfa Newydd Development Area: No proposals to mitigate the effects on the setting of Felin Gafan Corn Mill (Grade II* Listed Building) and only making an existing survey and record of the setting of Cestyll Garden Grade II Registered Historic Park and Garden. (IACC)</p>	<p>Based on the response received recording of the setting is now proposed. Details of this recording are provided in section 11.6 of chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement.</p>
<p>WNDA Development: The significance of effect on Cestyll Garden Grade II Registered Historic Park and Garden has been assessed</p>	<p>While any proposed mitigation may offset the effect on Cestyll Garden, the conflict with Policy GP22 of the Wylfa SPG would</p>

Key issue raised	Action taken
<p>to be major. This directly conflicts with Policy GP22 of [the Wylfa SPG]. Direct impacts on designated assets should be avoided. Designated assets and their settings must be conserved and enhanced.</p> <p>(IACC)</p>	<p>remain. While NPS EN-1 does not explicitly rule out such effects, it does state that such effects should be exceptional and weighed against the wider benefits of the project [RD1].</p> <p>The assessment of effects on Cestyll Garden is presented in section 11-5 in chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement.</p>
<p>Wylfa Newydd Development Area: Some level of palaeoenvironmental assessment should be undertaken to establish the significance of the peat deposits identified.</p> <p>(IACC)</p>	<p>The results of the trial trenching have allowed the value of this heritage asset to be assessed. Palaeoenvironmental assessment would be undertaken pre-construction to confirm the level of palaeoenvironmental analysis required.</p>
<p>Ensuring that the programme of archaeological work provides opportunities for the public to engage with their culture through public access to the excavations and even participation is essential.</p> <p>(IACC)</p>	<p>There has been public participation in excavations, in which over 80 individuals participated many on multiple days, and five open days for archaeology have also been held. This included two days exclusively for local schools.</p>
<p>A5025 Off-line Highway Improvements: The setting of Capel Soar standing stone (AN083) will be affected during construction. Whilst the impacts can be considered moderate adverse the proposed mitigation will not necessarily reduce the residual effect and planting or other landscaping which obscures views to and from the asset could increase the impact on its setting.</p> <p>(IACC)</p>	<p>Potential effects on Capel Soar standing stone (AN083) are presented in section 11.5 while mitigation that would be undertaken to reduce these effects are presented in sections 11.4 and 11.6 of chapter G11 (Application Reference Number: 6.7.11) this Environmental Statement.</p>
<p>Logistics Centre: The setting of Trefignath Burial Chamber and Ty Mawr standing stone are already compromised by the construction of the Parc Cybi complex. However, the</p>	<p>Potential effects on the setting of the Trefignath Burial Chamber and Ty-mawr Standing Stone are presented in section 11.5 of chapter H11 (Application</p>

Key issue raised	Action taken
<p>setting will be further impacted by the Logistics Centre which could obscure views between the two monuments and would represent an obtrusive element within the setting of both assets. (IACC)</p>	<p>Reference Number: 6.8.11) while mitigation that would be undertaken to reduce these effects are presented in sections 11.4 and 11.6 of chapter H11 (Application Reference Number: 6.8.11) of this Environmental Statement.</p>
<p>Wylfa Newydd Development Area: Cestyll Garden Conservation Statement should be expanded to include Felin Gafnan. (National Trust)</p>	<p>While an effect on the setting of Felin Gafnan is acknowledged, and presented in section 11.5 of chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement, extending the Conservation Statement for Cestyll Garden to include Felin Gafnan would not be appropriate as it is located outside land owned by Horizon.</p>
<p>Assessment criteria given in appendix 2 section 12 Archaeology and Cultural Heritage erroneously assumes that registered historic landscapes of outstanding interest are of more value than those of special interest. While this does not alter the results of the assessment, it is important to note that historic landscapes of outstanding and special interest have the same level of importance and both should be in the high category. (Cadw)</p>	<p>The method for the assessment of the value of historic landscape has been amended to reflect the Supplementary Introduction to Part 2.2 of the Register (page xvii) and consequently all landscapes included on the Register of Landscapes of Outstanding Historic Interest in Wales have been assessed to be of high value. Please see table B11-10 of this chapter of this Environmental Statement.</p>
<p>Landscape value of Dame Sylvia Crowe's landscape design needs to be more clearly defined. (Cadw)</p>	<p>An Assessment of Significance has been prepared for Dame Sylvia Crowe's landscape design, which has informed assessment of its value. This is presented in appendix D11-5 (Assessment of Significance of Dame Sylvia Crowe's Landscape Design at the Existing Power Station) (Application Reference Number: 6.4.76) of this Environmental Statement.</p>

Pre-Application Consultation Stage Three

11.3.6 Table B11-7 outlines how key issues raised during Pre-Application Consultation Stage Three have been considered in the assessment.

Table B11-7 Key issues raised during Pre-Application Consultation Stage Three

Key issue raised	Action taken
<p>The impact of the changes to the design of the MOLF on the significant views from the Registered Cestyll Historic Park and Garden have not been addressed in the Cultural Heritage Assessments for construction or operational phases.</p> <p>(Cadw)</p>	<p>The effect on Cestyll Garden and its setting was consulted at Pre-Application Stage Two Preliminary Environmental Information Report. As part of the optimisation and changes to the design for Pre-Application Consultation Stage Three, it was deemed there was no material change to the significance of the effects identified at Stage Two.</p>
<p>Cadw have previously recommended that a commitment by the developer to fund the long-term management of the remaining parts of the Cestyll Garden in accordance with the Conservation Statement would be a further appropriate measure that would provide a significant benefit to counter balance the destruction of the kitchen garden and changes to the identified significant view of the Registered Cestyll Historic Park and Garden. There is no mention of such a commitment being made or considered in Stage Three PAC.</p> <p>(Cadw)</p>	<p>As identified in chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement Horizon will undertake discussions with the landowners and other interested parties to consider appropriate enhancement measures such as greater interpretation including on-site interpretation boards at the valley garden, enhanced public access to the valley garden, regular maintenance and restoration of the valley garden.</p>
<p>The power island is closer to Cestyll Registered Historic Park and Garden, and impacts on Cestyll need to be further assessed, and mitigation and enhancement measures need to be agreed through the production and implementation of a Conservation Management Plan. Enhancement measures need to be embedded in the Landscape Scheme.</p> <p>(IACC)</p>	<p>Effects on Cestyll Garden and measure to mitigate these effects are identified in section 11.5 of chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement.</p>

Key issue raised	Action taken
<p>A reassessment of the impacts of the Wylfa Newydd Development Area on Historic Assets is required in light of the increase in on-site campus accommodation.</p> <p>(IACC)</p>	<p>Effects resulting from the Site Campus and proposed mitigation are presented in section 11.5 of chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement.</p>
<p>Off-Site Power Station Facilities: The area designated for landscaping and overflow parking to the south of the buildings is known to contain prehistoric settlement remains and a full excavation of all archaeological remains in this area will be required in advance of any proposed development on this site.</p> <p>(IACC)</p>	<p>Mitigation for effects on archaeological remains is identified in section 11.5 of chapter E11 (Application Reference Number: 6.5.11) of this Environmental Statement.</p>
<p>The breakwater has moved approximately 20 metres to the west (further out to sea) and has also increased in its scale and massing. It is unclear what effect the changes to the breakwater might have on the 'significant views' out from Cestyll Registered Historic Park and Garden (valley and kitchen gardens) or on the settings of Cestyll Registered Historic Park and Garden and neighbouring Listed Buildings. These adverse effects should be considered.</p> <p>(IACC)</p>	<p>Potential effects from Marine Works, including effects resulting from the breakwater on Significant Views from Cestyll Garden, and Cestyll Registered Historic Park and Garden and neighbouring Listed Buildings, are presented in section 11.5 of chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement.</p>
<p>With regards to the MOLF, the potentially adverse effects on the Cestyll Registered Historic Park and Garden and the significant seaward views should also be considered.</p> <p>(IACC)</p>	<p>Potential effects from Marine Works, including effects resulting from the breakwater on Significant Views from Cestyll Garden, and Cestyll Registered Historic Park and Garden and neighbouring Listed Buildings, are presented in section 11.5 of chapter D11 (Application Reference Number: 6.4.11) of this Environmental Statement.</p>
<p>From an Archaeology and Cultural Heritage perspective, setting impacts</p>	<p>The Cadw guidance on setting has been used to inform the</p>

Key issue raised	Action taken
<p>have not been adequately considered. Setting is not simply a visual amenity (although this is an important aspect of setting - particularly the views between the monuments in this case). The impact of the Logistics Centre, including HGV movements, lighting, etc., on the settings of the burial chamber and Ty Mawr standing stone, and also on the important line of sight between these two Heritage Assets, needs to be properly considered.</p> <p>The impacts on historic assets should be reassessed in line with new Cadw guidance.</p> <p>(IACC)</p>	<p>assessment of setting on heritage assets. In addition to potential visual effects, potential effects from other sources such as noise have been included. Potential effects of the construction, operation and decommissioning on the settings of Trefignath Burial Chamber and Ty Mawr standing stone, including the line of sight between them, have been assessed in section 11.5 of chapter H11 (Application Reference Number: 6.8.11) of this Environmental Statement. Measures to mitigate reduce or mitigate potential effects are also presented in this chapter.</p>
<p>Horizon has a unique opportunity to work in conjunction with the other landowners of the Registered Historic Park and Garden to fund and promote the successful conservation and management of the now statutory Cestyll Registered Historic Park and Garden for the public's present and future appreciation/enjoyment.</p> <p>(IACC)</p>	<p>Horizon will undertake discussions with the landowners and other interested parties to consider appropriate enhancement measures such as greater interpretation including on-site interpretation boards at the valley garden, enhanced public access to the valley garden, regular maintenance and restoration of the valley garden.</p>
<p>We have previously recommended that a commitment by the developer to fund the long-term management of the remaining parts of the Cestyll Garden in accordance with the Conservation Statement would be a further appropriate measure that would provide a significant benefit to counter balance the destruction of the kitchen garden and the changes to the identified significant view of the Registered Cestyll Historic Park and Garden. There is no mention of such a commitment being made or considered in Stage Three PAC.</p> <p>(IACC)</p>	<p>Horizon will undertake discussions with the landowners and other interested parties to consider appropriate enhancement measures such as greater interpretation including on-site interpretation boards at the valley garden, enhanced public access to the valley garden, regular maintenance and restoration of the valley garden.</p>

Key issue raised	Action taken
<p>From an archaeology and cultural heritage perspective these setting impacts have not been adequately considered. Setting is not simply a visual amenity (although this is an important aspect of setting - particularly the views between the monuments in this case). The impact of the Logistics Centre, including HGV movements, lighting, etc., on the settings of the burial chamber and Ty Mawr standing stone, and also on the important line of sight between these two Heritage Assets, needs to be properly considered.</p> <p>This reassessment of the impacts of the Logistics Centre on the settings of Historic Assets should be undertaken in accordance with new Cadw guidance and measures to mitigate and enhance the settings of these monuments need to be embedded in future design and mitigation plans.</p> <p>(IACC)</p>	<p>The Cadw guidance on setting has been used to inform the assessment of setting on heritage assets. In addition to potential visual effects, potential effects from other sources such as noise have been included. Potential effects of the construction, operation and decommissioning on the settings of Trefignath Burial Chamber and Ty Mawr standing stone, including the line of sight between them, have been assessed in section 11.5 of chapter H11 (Application Reference Number: 6.8.11) of this Environmental Statement. Measures to mitigate reduce or mitigate potential effects are also presented in this chapter.</p>

Consultation on Additional Land

11.3.7 In February 2018, Horizon undertook consultation on additional land that had not been consulted on previously. The additional land was required to:

- accommodate proposals to create or enhance wetland sites across Anglesey;
- create two new ecological mitigation areas, and minor changes to the connection to the national grid at the Wylfa Newydd Development Area; and
- update the order limits for the A5025 Off-Line Highway Improvements, and minor refinements to the boundaries of the Off-Site Power Station Facilities and Logistics Centre.

11.3.8 The feedback from the consultation has been reviewed and there were no cultural heritage issues raised. Welsh Government (CADW) advised that none of the proposed Ecological Compensation Sites or ecological mitigation areas will have a direct impact on any scheduled monument or Registered Historic Park and Garden. Some of them may be visible from scheduled monuments or Registered Historic Parks and Gardens but the proposed works are unlikely to have any impact on the settings of these designated historic assets.

Non-statutory consultation

EIA Progress Report

11.3.9 An EIA Progress Report was provided to the IACC and NRW in 2016 with updated information on the design development and associated environmental assessment. No issues were raised in feedback from these stakeholders in relation to cultural heritage.

Draft Environmental Statement

11.3.10 During September 2017, draft Environmental Statement chapters were provided to statutory and key non-statutory stakeholders. Table B11-8 outlines key issues raised and how these have been addressed within the Environmental Statement.

Table B11-8 Key issues raised in response to the Draft Environmental Statement

Key issue raised	Action taken
<p>It would be beneficial to separate construction, operation and decommissioning assessments into separate tables for each asset type. (IACC)</p>	<p>Potential effects from construction, operation and decommissioning are presented separately in tables for each sub-topic in chapters D11 (Application Reference Number: 6.4.11), E11 (Application Reference Number: 6.5.11), F11 (Application Reference Number: 6.6.11), G11 (Application Reference Number: 6.7.11) and H11 (Application Reference Number: 6.8.11) and appendices covering effects on heritage assets including D11-6 (Application Reference Number: 6.4.77), E11-2 (Application Reference Number: 6.5.25), F11-5 Application Reference Number: 6.6.36), G11-4 (Application Reference Number: 6.7.46) and H11-2 (Application Reference Number: 6.8.27) of this Environmental Statement.</p>
<p>Further detail regarding mitigation proposals requires to be included in the assessment document. Mitigation proposals should include a photographic survey in spring, summer, autumn and winter, a full survey of Cestyll Garden to identify the plants that are present and their condition, and a mapped</p>	<p>Proposed mitigation including measures to reduce the effects on Cestyll Garden (HLT2) are presented in chapter D11 (Application Reference Number: 6.4.11) and appendix D11-6 (Application Reference Number: 6.4.77) of this Environmental Statement.</p> <p>A full survey of plants that are present in Cestyll Garden is presented in the</p>

Key issue raised	Action taken
record/register of field names where removal of field boundaries is proposed. (IACC)	Assessment of the significance of Cestyll (Grade II) Registered Historic Park and Gardens Final Report (appendix D11-4, Application Reference Number: 6.4.75) of this Environmental Statement.

Topic-specific stakeholder engagement

11.3.11 In addition to the three formal stages of consultation outlined above, topic-specific consultation has been undertaken with relevant stakeholders. Table B11-9 summarises the details of the consultation that has taken place with respect to the cultural heritage assessment.

Table B11-9 Summary of topic-specific consultation

Date	Stakeholder	Title and format	Issues Arising	Action taken
30 January 2014	GAPS	Archaeological Evaluation Strategy Meeting	Discussions about the approach to the Archaeological Evaluation Strategy for the Wylfa Newydd Development Area. Discussions regarding archaeological zones of potential.	The Archaeological Evaluation Strategy [RD30] was revised in line with comments received.
21 August 2014	GAPS and Cadw	Archaeological Evaluation Strategy Meeting	Discussions about the approach to the Archaeological Evaluation Strategy [RD30] for the Wylfa Newydd Development Area. Discussions regarding the approach to the assessment of significance for Cestyll Garden.	Project Design for the assessment of the significance for Cestyll Garden [RD31] was updated in line with comments received. Approach to archaeological evaluation developed in line with comments received.
6 February 2015	GAPS	Approach to Archaeological Trial Trenching and Mitigation Excavation Meeting.	Discussion regarding the archaeological trial trenching, and the outline approach to mitigation excavation in the Wylfa Newydd Development Area. Agreed that where possible a 12% by area sample of each field would be trial trenched.	The WSI [RD32] was developed, and the trial trenching was undertaken, in line with this approach.
21 April 2015	GAPS	Archaeological Trial Trenching and Mitigation Meeting	Discussion regarding the Written Scheme of Investigation for Archaeological Trial Trenching and Mitigation [RD32], the Project Design for the assessment of the significance for Cestyll Garden [RD31], the approach to the archaeological monitoring of geotechnical works.	The WSI [RD32] for archaeological remains was revised and amended in line with comments received. GAPS accepted the Project Design [RD31]. The agreed approach for the archaeological

Date	Stakeholder	Title and format	Issues Arising	Action taken
				monitoring of geotechnical works was implemented.
February 2016	GAPS	Proposed Approach to the Cultural Heritage Assessment	A letter setting out the proposed approach to the cultural heritage assessment of the Off-Site Power Station Facilities and the Park and Ride was issued to GAPS on the 23 February 2016. In an email of 11 March 2016 GAPS responded stating that they were content with the approach proposed.	Approach set out in the letter and agreed with GAPS has been implemented.
February 2016	GAPS	Proposed Approach to the Cultural Heritage Assessment at the Park and Ride	A consultation meeting to discuss and agree the proposed approach to the cultural heritage assessment which identified the need for geophysical survey and trial trenching.	The geophysical survey and the trial trenching has been undertaken.
15 April 2016	GAPS	Archaeological Mitigation Strategy Meeting	Discussion regarding the mitigation requirements for the Wylfa Newydd Development Area.	The evaluation discussed with GAPS has been implemented and additional mitigation agreed has been included in sections 11.6 of chapters D11 (Application Reference Number: 6.4.11), E11 (Application Reference Number: 6.5.11), F11 (Application Reference Number: 6.6.11) and G11 (Application Reference Number: 6.7.11) of this Environmental Statement.

Date	Stakeholder	Title and format	Issues Arising	Action taken
9 September 2016	GAPS	Meeting to Discuss Archaeological Trial Trenching	GAPS confirmed that the results of archaeological trial trenching at the Park and Ride would be required prior to the determination of the planning application.	Trial trenching has been undertaken at the Park and Ride and reports on the results of trial trenching have been provided to GAPS (see appendix F11-3: Application Reference Number: 6.6.33).
16 November 2016	GAPS	Meeting to Discuss Wylfa Newydd Archaeological Evaluation and Mitigation	A consultation meeting to discuss the results of archaeological evaluation and mitigation for the Wylfa Newydd Development Area, the Off-Site Power Station Facilities and the Associated Development, with the exception of the Logistics Centre.	The additional mitigation agreed with GAPS the meeting has been included in sections 11.6 of chapters D11 (Application Reference Number: 6.4.11), E11 (Application Reference Number: 6.5.11), F11 (Application Reference Number: 6.6.11) and G11 (Application Reference Number: 6.7.11) of this Environmental Statement.
8 March 2017	GAPS, IACC, Cadw and Welsh Historic Gardens Trust	Meeting to Discuss the Results of the Assessment of Significance of Cestyll Garden	The purpose was to review the results of the assessment of significance of Cestyll Garden. Effects on Cestyll Garden raised as a key concern.	Comments made by consultees on the Assessment of the Significance of Cestyll Registered Historic Park and Garden (G2096) (see appendix D11-4, Application Reference Number: 6.4.75) have been incorporated.
22 March 2017	GAPS and Royal Commission	Meeting to Discuss the Results of the	A consultation meeting to discuss the results of the marine archaeological investigations	It was agreed with GAPS and the Royal Commission on the Ancient and Historical

Date	Stakeholder	Title and format	Issues Arising	Action taken
	on the Ancient and Historical Monuments of Wales	Marine Archaeological Investigations	and to identify potential mitigation for the WNDA Development.	Monuments of Wales that apart from the implementation of a Protocol for Archaeological Discoveries (PAD) no further mitigation would be required.
19 April 2017	GAPS	Letter detailing the approach to A5025 Off-line Highway Improvements: Valley Realignment	A consultation letter setting out in detail the approach to the cultural heritage inputs to the A5025 Off-line Highway Improvements: Valley Realignment.	GAPS accepted that additional archaeological evaluation of the A5025 Off-line Highway Improvements: Valley Realignment was not required.
21 June 2017	GAPS, IACC, Cadw National Trust,	Wylfa Newydd Natural and Historic Environment Forum (WNNHEF)	<p>Requirement to revise the Assessment of the Significance of Cestyll Registered Historic Park and Garden (G2096) (see appendix D11-4 (Application Reference Number: 6.4.75) of this Environmental Statement) in response comments received from consultees in the meeting of 8 March 2017.</p> <p>Attendees requested information on effects on Cestyll Garden (both physical and visual) are likely to be so that mitigation, enhancement, conservation and management can be discussed.</p>	<p>Comments made by consultees on the Assessment of the Significance of Cestyll Registered Historic Park and Garden (G2096) (see appendix D11-4, Application Reference Number: 6.4.75) of this Environmental Statement have been incorporated.</p> <p>Effects on heritage assets, including Cestyll Garden, were presented to the WNNHEF on 3rd October 2017.</p>

Date	Stakeholder	Title and format	Issues Arising	Action taken
			<p>Welsh Historic Gardens Trust to be included as part of the WNNHEF.</p> <p>Effects on Cestyll Garden raised as a key concern.</p> <p>The effect of proposed revisions to the designated boundary of the of Cestyll Registered Historic Park and Garden (G2096).</p>	<p>Welsh Historic Gardens Trust have been included as part of the WNNHEF.</p> <p>Measures to mitigate the effects on Cestyll Garden including the commitment to agree the design of landscape measures to restore and/or enhance the former location of kitchen garden with relevant stakeholders, are presented in chapter D11 (Application Reference Numbers: 6.4.11).</p> <p>A figure showing a draft of the proposed revisions to the designated boundary of the of Cestyll Registered Historic Park and Garden (G2096) was provided by Cadw. As this boundary has not been formally adopted by Cadw and could be subject to change the existing boundary has been used for assessment purposes.</p>
3 October 2017	GAPS, IACC, Cadw National	Wylfa Newydd Natural and Historic	Clarification was sought on mitigation for Cestyll Garden, equipment lay down areas,	Clarifications provided to the consultees through the WNNHEF.

Date	Stakeholder	Title and format	Issues Arising	Action taken
	Trust, and Welsh Historic Gardens Trust	Environment Forum (WNNHEF) - Overview of impact and mitigation of historic environment	replacement on drystone walls and vibration monitoring	
29 November	GAPS, IACC, Cadw National Trust, and Welsh Historic Gardens Trust	Landscape, Visual, and Cultural Heritage Issues at National Trust Properties	<p>Effects on Cestyll Garden raised as a key concern.</p> <p>Purpose of the landscaping of the former location of the kitchen garden of Cestyll Garden.</p> <p>Justification for the land take from Cestyll Garden requested.</p> <p>Further information on the mitigation proposed for Cestyll Garden was requested.</p>	<p>Measures to mitigate the effects on Cestyll Garden including the commitment to agree the design of landscape measures to restore and/or enhance the former location of kitchen garden with relevant stakeholders, are presented in chapter D11 (Application Reference Numbers: 6.4.11).</p> <p>Justification and further information was provided to the consultees.</p>

11.3.12 Written Schemes of Investigation or Project Designs for archaeological fieldwork undertaken as part of the Wylfa Newydd Project have been agreed with GAPS [RD29; RD31; RD32; RD33; RD34; RD35; RD36; RD37; RD38; RD39; RD40; RD41] who have also undertaken monitoring of the archaeological fieldwork and reviewed draft reports on the results of fieldwork. While the results of the archaeological fieldwork are presented as appendices to chapters D11 (Application Reference Number: 6.4.11), E11 (Application Reference Number: 6.5.11), F11 (Application Reference Number: 6.6.11) and G11 (Application Reference Number: 6.7.11) of this Environmental Statement, the Written Schemes of Investigation and Project Designs identified above are not as these have been previously submitted to GAPS.

11.4 Topic-specific methodologies and assessment criteria

Introduction

11.4.1 The overarching approach to the EIA, including the approach to the assessment of cumulative effects, is provided in chapter B1 (Application Reference Number: 6.2.1) of this Environmental Statement. This section outlines the specific methodology used to assess the effects of the Wylfa Newydd Project on cultural heritage. It outlines the methods and criteria used to:

- define the study area and identify topic receptors;
- establish the environmental baseline for topic receptors; and
- determine the value/sensitivity of receptors, the magnitude of change and significance of effect.

Assessment of parameters

11.4.2 As outlined in chapter B1 (Application Reference Number: 6.2.1), the approach adopted for the design of the WNDA Development, Off-Site Power Station Facilities and Associated Development is to set parameters, where necessary, for the extent of the development and key aspects of that development. The final design and construction methodology would be limited to these parameters and limits of deviation. As these parameters and limits of deviation vary between the various developments in the Wylfa Newydd Project they are considered on a site specific basis in chapter 11 within volumes D (Application Reference Number: 6.4.11), E (Application Reference Number: 6.5.11), F (Application Reference Number: 6.6.11), G (Application Reference Number: 6.7.11) and H (Application Reference Number: 6.8.11).

Identification of study areas

11.4.3 The study area for terrestrial archaeological remains, historic buildings and the historic landscape for the WNDA Development has been defined as a 6km buffer around the Wylfa Newydd Development Area (see figures D11-1 to D11-16 and figures D11-19 to D11-20, Application Reference Number: 6.4.101) of this Environmental Statement. The size of this study area has

been based on the ZTV (for the extent of which see figure D10-1 (Application Reference Number: 6.4.101) of this Environmental Statement). While the ZTV extends beyond 6km, theoretical visibility is concentrated within this area and there is the greatest potential for significant effects on the setting of heritage assets within it. Section 4.3 of the *Setting of Historic Assets in Wales* [RD25] advocates that “*...assessment and evaluation should be proportionate to the likely impact of the proposal*”; the likelihood of significant visual effects diminishes with increasing distance from a proposed development. Whilst the ZTV for the tallest cranes extends beyond 6km, visibility of the cranes beyond 6km is unlikely to affect the contribution of setting to the significance of heritage assets, therefore significant effects on heritage assets over 6km from the WNDA Development are considered unlikely.

- 11.4.4 Assessment of potential effects on the setting of heritage assets was informed not only by the ZTV, but also by the area modelled for potential noise effects (refer to chapter D6 noise and vibration, Application Reference Number: 6.4.6).
- 11.4.5 The study area for marine archaeological remains extends from the Mean High Water and covers an offshore area that extends 1.2km north of Wylfa Head, bounded to the west by the western side of Cemlyn Bay and to the east by the eastern side of Cemaes Bay. The size of study area was defined to put any marine archaeological remains identified within the WNDA in their context. For the Disposal Site, a study area comprising the existing Holyhead Deep Disposal Area and a 1km buffer around it was used (see figures D11-17 to D11-18, Application Reference Number: 6.4.101). The size of study area was defined to put any marine archaeological remains identified in their context.
- 11.4.6 For the Off-Site Power Station Facilities, the study area for archaeological remains, historic buildings and the historic landscape was defined as the proposed development area and an area 200m extending in all directions from this (see figure E11-1, Application Reference Number: 6.5.27, of this Environmental Statement). The size of study area was defined to put any heritage asset identified within the proposed development area in their context.
- 11.4.7 The study areas for archaeological remains, historic buildings, and the historic landscape for the Park and Ride and the Logistics Centre were defined as the proposed development area and an area extending 500m in all directions from the site boundary (see figures F11-1, Application Reference Number: 6.6.8; and H11-1, Application Reference Numbers: 6.8.29). The study areas for the Park and Ride and the Logistics Centre were based on professional judgement and informed by the archaeological baseline assessment (please refer to appendix F11-1 Dalar Hir, Ynys Mon Archaeological Baseline Assessment, Application Reference Number: 6.6.32) and previous archaeological investigations on adjacent land. These study areas are considered sufficient for the purposes of these assessments as they provide a proportionate understanding of the baseline conditions enabling an informed assessment of potential impacts on cultural heritage.
- 11.4.8 Based on the guidance provided by Volume 11, Section 3, Part 2 ‘Cultural Heritage’ (HA 208/07) of DMRB [RD28], the study area for cultural heritage for

the A5025 Off-line Highway Improvements was defined as the footprint of the proposed scheme and an area extending 200m in all directions from it. The location of the study area is shown on figures G11-1 to G11-11 (Application Reference Number: 6.7.48) of this Environmental Statement.

Identification of receptors

11.4.9 The receptors for cultural heritage have been considered under three sub-topics comprising archaeological remains (both terrestrial and marine), historic buildings, and the historic landscape; see section 11.1.2 of this chapter.

Identification of baseline conditions

11.4.10 The cultural heritage baseline has been established through desk-based surveys and walkover surveys, non-invasive investigations and invasive investigations. A summary of data collection is presented in table B11-10 below. Geophysical survey of all suitable areas within the Wylfa Newydd Development Area, the Park and Ride and the A5025 Off-line Highway Improvements has been undertaken. Trial trenching of fields within the Wylfa Newydd Development Area was undertaken where this was proposed in the WSI [RD32] and where the lack of constraints, such as the presence of housing, made this feasible. Depending on land access, ownership and condition, between 4% and 12% of each field was trenched. Trial trenching was also undertaken for the whole of the Park and Ride development area amounting to a 4% sample, while for the A5025 Off-line Highway Improvements trial trenching targeted potential buried archaeological remains identified by geophysical survey and tested blank areas. The approach to the archaeological trial trenching has been agreed with GAPS [RD29; RD32; RD41], who also monitored the works. Please refer to appendices for the cultural heritage chapters in volume D (Application Reference Numbers: 6.4.68 to 6.4.79), E (Application Reference Numbers: 6.5.24 to 6.5.25), F (Application Reference Numbers: 6.6.32 to 6.6.36), and G (Application Reference Numbers: 6.7.42 to 6.7.46) of this Environmental Statement for more information on the results of these surveys and investigations.

11.4.11 The baseline for the Disposal Site has been established using the results of a marine archaeological desk-based survey and a marine geophysical survey (see appendices D11-3c Wylfa Newydd Proposed New Nuclear Power Station Marine Archaeology Baseline Report revision 2, Application Reference Number: 6.4.73; and D11-3d Holyhead Deep Disposal Site - Micro-site for rock disposal: Archaeological Assessment of Marine Geophysical Survey Data, Application Reference Number: 6.4.74).

11.4.12 Please note that while four Seascape Character Areas were identified as heritage assets in the Marine Archaeology Baseline Report (please refer to appendix D11-3a, Application Reference Number: 6.4.71), potential effects on these have been assessed in chapter D10 (landscape and visual) (Application Reference Number: 6.4.10) of this Environmental Statement, and are therefore not discussed further in this chapter.

11.4.13 In order to assess potential impacts on the setting of designated heritage assets, data obtained from Cadw was used to identify designated cultural heritage assets within the ZTVs for the WNDA Development, Off-Site Power Station Facilities, Park and Ride, A5025 Off-line Highway Improvements and the Logistics Centre (refer to the landscape and visual chapters D10, Application Reference Number: 6.4.10; E10, Application Reference Number: 6.5.27; F10, Application Reference Number: 6.6.38; G10, Application Reference Number: 6.7.48; and H10, Application Reference Number: 6.8.10 for more information, and figures E10-1, Application Reference Number: 6.5.27; F10-1, Application Reference Number: 6.6.38; G10-13 to G10-17, Application Reference Number: 6.7.48; and H10-1, Application Reference Number: 6.8.29 for their extent); the setting of which may be affected by the WNDA Development and Off-Site Power Station Facilities or Associated Development. Ordnance Survey mapping, online aerial photography and site inspections were used to identify the setting of assets and assess effects.

Table B11-10 Cultural Heritage baseline characterisation

Receptor	Data collection (including duration)
WNDA Development	
Archaeological remains	<p>Desk-based surveys undertaken in 2009, 2011, 2012 and 2016.</p> <p>Walkover surveys and site inspections undertaken in:</p> <ul style="list-style-type: none"> • September 2009, • November 2009, • August 2011, • 24 March 2015 to 26 March 2015, • 14 April 2015 to 16 April 2015, • 30 November 2015 to 3 December 2015, • 27 January 2016, • 2 March 2016, and • 15 to 19 May 2017. <p>Archaeological trial trenching undertaken from:</p> <ul style="list-style-type: none"> • 26 October 2015 to 25 April 2016, • 12 July 2016 to 23 August 2016, • 12 August 2016 to 22 September 2016, and • 24 August 2016 to 4 November 2016. <p>Archaeological watching briefs undertaken in:</p> <ul style="list-style-type: none"> • 2011, between March and December 2014, • 22 July to 4 August 2015, and • 22 September to 24 September 2015. <p>Marine desk-based survey undertaken in 2015.</p> <p>Archaeological interpretation of geophysical survey undertaken in 2011.</p>

Receptor	Data collection (including duration)
	<p>Dive surveys undertaken from 14 May to 16 May 2016.</p> <p>Designated heritage asset data obtained from Cadw, the historic environment service of the Welsh Government.</p>
Historic buildings	<p>Desk-based surveys undertaken in 2009, 2011, 2012 and 2016.</p> <p>Walkover surveys and site inspections undertaken in:</p> <ul style="list-style-type: none"> • September 2009, • November 2009, • August 2011, • 24 March 2015 to 26 March 2015, • 14 April 2015 to 16 April 2015, • 30 November 2015 to 3 December 2015, • 27 January 2016, and • 2 March 2016 and 15 to 19 May 2017. <p>Designated heritage asset data obtained from Cadw, the historic environment service of the Welsh Government.</p>
Historic landscape types	<p>Desk-based surveys undertaken in 2009, 2011, 2012 and 2016.</p> <p>Site inspections to identify historically important hedgerows 20 July 2015 to 24 July 2015.</p> <p>Designated heritage asset data obtained from Cadw, the historic environment service of the Welsh Government.</p> <p>LANDMAP data obtained April 2017.</p>
Off-Site Power Station Facilities	
Archaeological remains	<p>Desk-based survey undertaken in 2015.</p> <p>Walkover and site inspections undertaken on 27 January 2016.</p> <p>Designated heritage asset data obtained from Cadw, the historic environment service of the Welsh Government.</p>
Historic buildings	<p>Desk-based survey undertaken in 2015.</p> <p>Site inspections undertaken on 27 January 2016.</p> <p>Designated heritage asset data obtained from Cadw, the historic environment service of the Welsh Government.</p>

Receptor	Data collection (including duration)
Historic landscape types	<p>Desk-based survey undertaken in 2015.</p> <p>Site inspections undertaken on 27 January 2016.</p> <p>Designated heritage asset data obtained from Cadw, the historic environment service of the Welsh Government.</p> <p>LANDMAP data obtained April 2017.</p>
Park and Ride	
Archaeological remains	<p>Desk-based survey undertaken in 2013.</p> <p>Walkover survey and site inspections undertaken on 29 January 2016.</p> <p>Archaeological geophysical survey undertaken 27 April to 28 April and on 17 May 2016.</p> <p>Archaeological trial trenching undertaken October to November 2016.</p> <p>Designated heritage asset data obtained from Cadw, the historic environment service of the Welsh Government.</p>
Historic buildings	<p>Desk-based survey undertaken in 2013.</p> <p>Site inspections undertaken on 29 January 2016.</p> <p>Designated heritage asset data obtained from Cadw, the historic environment service of the Welsh Government.</p>
Historic landscape types	<p>Desk-based survey undertaken in 2013.</p> <p>Designated heritage asset data obtained from Cadw, the historic environment service of the Welsh Government.</p> <p>LANDMAP data obtained April 2017.</p>
A5025 Off-line Highway Improvements	
Archaeological remains	<p>Desk-based survey undertaken in 2015.</p> <p>Archaeological geophysical survey undertaken between 24 August and September 11 2015.</p> <p>Archaeological trial trenching and hand auger survey undertaken between 22 August 2016 and 28 October 2016.</p> <p>Walkover and site inspections undertaken between 16 and 20 May 2016 and 15 to 19 May 2017.</p> <p>Designated heritage asset data obtained from Cadw, the historic environment service of the Welsh Government.</p>
Historic buildings	Desk-based survey undertaken in 2015.

Receptor	Data collection (including duration)
	<p>Walkover and site inspections undertaken between 16 and 20 May 2016, and 15 to 19 May 2017.</p> <p>Designated heritage asset data obtained from Cadw, the historic environment service of the Welsh Government.</p>
Historic landscape types	<p>Desk-based survey undertaken in 2015.</p> <p>Designated heritage asset data obtained from Cadw, the historic environment service of the Welsh Government.</p> <p>LANDMAP data obtained April 2017.</p>
Logistics Centre	
Archaeological remains	<p>Gwynedd Archaeological Trust (GAT) Historic Environment Record data obtained 11 April 2017.</p> <p>Walkover survey and site inspections undertaken on 23 May 2017.</p> <p>Designated heritage asset data obtained from Cadw, the historic environment service of the Welsh Government.</p>
Historic buildings	<p>GAT Historic Environment Record data obtained 11 April 2017.</p> <p>Walkover survey and site inspections undertaken in May 2017.</p> <p>Designated heritage asset data obtained from Cadw, the historic environment service of the Welsh Government.</p>
Historic landscape types	<p>Walkover survey and site inspections undertaken in May 2017.</p> <p>Designated heritage asset data obtained from Cadw, the historic environment service of the Welsh Government.</p> <p>LANDMAP data obtained April 2017.</p>

Assessment of effects

Value of receptors

11.4.14 The *Overarching National Policy Statement for Energy (EN-1)* requires that, as part of an Environmental Statement, the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance. It defines significance as “...the sum of the heritage interest that a heritage asset holds”. This significance may be related to historic, archaeological, architectural or artistic interest, and may also derive from the setting of the site [RD1].

11.4.15 In this assessment, the term ‘value’ is used instead of ‘significance’ when describing a heritage asset. This is intended to avoid confusion with the terminology for impact assessment and ‘significance of effect’ as commonly used in EIAs.

11.4.16 The value of known heritage assets is assessed on a five-point scale of:

- ‘high’;
- ‘medium’;
- ‘low’;
- ‘negligible’; and
- ‘unknown’.

The assessment of value is based on professional judgement informed by the criteria presented in table B11-11, which has been developed with reference to Conservation Principles [RD15].

11.4.17 The value of the majority of archaeological remains is primarily derived from the evidence that their physical remains contribute to the ability to understand past human activity (‘evidential value’ in the terminology used in Conservation Principles [RD15]). This contribution has been assessed based on the capacity of archaeological remains to provide evidence to support national or regional research objectives. Where other elements (such as ‘historical value’, ‘aesthetic value’, ‘communal value’ [RD15]) or setting contribute significantly to the value of archaeological remains these are identified in appendices D11-1 (Application Reference Numbers: 6.4.68), D11-3a (Application Reference Number: 6.4.71), E11-1 (Application Reference Number: 6.4.72), F11-3 Land at Dalar Hir: Archaeological Trial Trenching (Application Reference Number: 6.3.34) and H11-1 (Application Reference Number: 6.8.26).

Table B11-11 Criteria used to assess the value of heritage assets

Value	Archaeological remains	Historic buildings	Historic landscape types
High	Archaeological remains of national importance, e.g. Scheduled Monuments (including proposed sites) or undesignated assets of schedulable quality; and archaeological remains that are very sensitive to change and have little capacity to accommodate a change.	Historic buildings of national importance, e.g. Scheduled Monuments with standing remains, Grade I and Grade II* Listed Buildings, other Listed Buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in the listing grade, Conservation Areas containing very important buildings, and/or undesignated structures of clear national importance; and historic buildings that are very sensitive to change and have little capacity to accommodate a change.	Registered Landscapes of Outstanding Historic Interest in Wales and Registered Landscapes of Special Historic Interest in Wales. Grade I, II* and II parks and gardens, undesignated landscapes of high quality and importance and of demonstrable national value, well-preserved historic landscapes exhibiting considerable coherence, time-depth or other critical factor(s); and historic landscapes that are very sensitive to change and have little capacity to accommodate a change.
Medium	Archaeological remains of regional importance; and archaeological remains that are moderately sensitive to change and have a moderate capacity to accommodate a change.	Historic buildings of regional importance, Grade II Listed Buildings, historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical associations, Conservation Areas containing buildings that contribute significantly to their historic characterhistoric townscape or built-up areas with important	Parks and gardens and landscapes of regional value; and historic landscapes that are moderately sensitive to change and have a moderate capacity to accommodate change.

Value	Archaeological remains	Historic buildings	Historic landscape types
		historic integrity in their buildings, or built settings (e.g. including street furniture and other structures); and historic buildings that are moderately sensitive to change and have moderate capacity to accommodate change.	
Low	Archaeological remains of local importance or archaeological remains compromised by poor preservation and/or poor survival of contextual associations; and archaeological remains that are not particularly sensitive to change and have considerable capacity to accommodate change.	Historic buildings of local importance, e.g. 'Locally Listed' buildings, historic (unlisted) buildings of modest quality in their fabric or historical association, historic townscape or built-up areas of limited historic integrity in their buildings, or built settings (e.g. including street furniture and other structures); and historic buildings that are not particularly sensitive to change and have considerable capacity to accommodate change.	Historic landscapes of local importance, e.g. robust undesignated historic landscapes, those historic landscapes with importance to local interest groups, historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations; and historic landscapes that are not particularly sensitive to change and have considerable capacity to accommodate change.
Negligible	Heritage assets with very little or no surviving archaeological interest; and archaeological remains that are not sensitive to change and have very considerable capacity to accommodate change.	Buildings of no architectural or historical note; and/or buildings of an intrusive character; and historic buildings that are not sensitive to change and have very considerable capacity to accommodate change.	Landscapes with little or no significant historical interest; and historic landscapes that are not sensitive to change and have very considerable capacity to accommodate change.

Value	Archaeological remains	Historic buildings	Historic landscape types
Unknown	The value of the archaeological remains cannot be ascertained based on existing information and professional judgement.	Buildings with some hidden (i.e. inaccessible) potential for historic significance.	The value of the historic landscape cannot be ascertained based on existing information and professional judgement.

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Magnitude of change

11.4.18 Magnitude of change is a measure of the scale or extent of change in baseline conditions, irrespective of the value of the heritage assets affected. The criteria used to determine the magnitude of change for cultural heritage are set out in table B11-12. These have been refined from the generic criteria outlined in chapter B1 (Application Reference Number: 6.2.1) of this Environmental Statement for the cultural heritage assessment.

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Table B11-12 Criteria used to assess the magnitude of change on heritage assets

Magnitude of change	Archaeological remains	Historic buildings	Historic landscapes types
Large	Change to most or all key archaeological materials, such that the resource is totally altered. Comprehensive changes to the ability to understand the setting of archaeological remains.	Change to key historic building elements, such that the resource is totally altered. Comprehensive changes to the ability to understand setting.	Change to most or all key historic landscape elements, parcels or components, extreme visual effects; gross change of noise or change to sound quality; fundamental changes to use or access; resulting in total change to historic landscape character units.
Medium	Changes to many key archaeological materials, such that the resource is clearly modified. Considerable changes to the ability to understand the setting of archaeological remains.	Change to many key historic building elements, such that the resource is significantly modified. Considerable changes to the ability to understand the setting of an historic building.	Changes to many key historic landscape elements, parcels or components, visual change to many key aspects of the historic landscape, noticeable differences in noise or sound quality, considerable changes to use or access, resulting in moderate changes to historic landscape character.
Small	Changes to key archaeological materials, such that the asset is slightly altered. Slight changes to setting or the ability to understand the setting of archaeological remains.	Change to key historic building elements, such that the asset is slightly different. Slight changes to setting or the ability to understand the setting of an historic building.	Changes to few key historic landscape elements, parcels or components, slight visual changes to few key aspects of historic landscape, limited changes to noise levels or sound quality; slight changes to use or access, resulting in limited changes to historic landscape character.

Magnitude of change	Archaeological remains	Historic buildings	Historic landscapes types
Negligible	Very minor changes to archaeological remains, or to the ability to understand their setting.	Very minor changes to historic buildings, or to the ability to understand their setting.	Very minor changes to key historic landscape elements, parcels or components, virtually unchanged visual effects, very slight changes in noise level or sound quality, very slight changes to use or access, resulting in a very small change to historic landscape character.

11.4.19 The assessment of the magnitude of change was informed by the duration of that change and geographical scale on which it would be felt. Table B11-13 provides definitions of the durations and geographical scale used in chapters D11 (Application Reference Number: 6.4.11), E11 (Application Reference Number: 6.5.11), F11 (Application Reference Number: 6.6.11), G11 (Application Reference Number: 6.7.11) and H11 (Application Reference Number: 6.8.11).

Table B11-13 Definition of the geographic scale and duration of effects used in chapters D11 (Application Reference Number: 6.4.11), E11 (Application Reference Number: 6.5.11), F11 (Application Reference Number: 6.6.11) and H11 (Application Reference Number: 6.8.11)

Duration/geographical scale	Criteria
Short-term	Reversible effects that do not last longer than the duration of the construction or decommissioning period.
Medium-term	Reversible effects that last for the duration of operation period.
Long-term	Reversible effects that last beyond the construction, operation, and decommissioning periods.
Temporary	Effective action can be taken to reverse or mitigate this effect once it has taken place.
Permanent	No effective action can be taken to reverse or mitigate this effect once it has taken place.
Local	The effect results in changes to heritage assets that have been assessed to be of local importance.
Regional	The effect results in changes to heritage assets that have been assessed to be of regional importance.
National	The effect results in changes to heritage assets that have been assessed to be of national importance.

Assessment of significance

11.4.20 For the purposes of this assessment on heritage, an effect may be significant if, in the professional judgement of the expert undertaking the assessment, it would meet at least one of the following criteria:

- after mitigation, it could result in substantial harm (EN-1, 5.8.14 [RD1]) to, or loss of, designated assets;
- it is likely that the consenting authority will reasonably consider applying a planning condition, requirement or legal agreement to the consent to require specific mitigation to reduce or overcome the effect;
- it threatens or enhances the viability, integrity, enjoyment or understanding of a heritage asset or group of heritage assets; or

- it is likely to be material to the ultimate decision about whether or not the consent application should be approved.

11.4.21 The assessment of the degree of significance of an effect was undertaken using professional judgement, guided where necessary by the matrix shown on figure B1-2 in chapter B1 (Application Reference Number: 6.2.1) of this Environmental Statement. The degree of significance is influenced by the value of a receptor and the magnitude of the predicted change from the baseline condition. In accordance with chapter B1 (Application Reference Number: 6.2.1) of this Environmental Statement, the significance of effect is first assessed with the inclusion of embedded mitigation measures. These are measures which are already incorporated within the current design. Good practice mitigation measures are also taken into account within the initial assessment. Where an effect is still predicted after the implementation of embedded and good practice mitigation, additional mitigation measures are then identified. Any effects following implementation of mitigation are referred to as 'residual effects'.

11.4.22 Degrees of significance are described on a scale from 'negligible' to 'major', with intermediate terms of 'minor' and 'moderate'. An effect is considered to be 'significant' with respect to the EIA Regulations if it is identified to have 'major' or 'moderate' degree of significance, having regard for the approach set out earlier in this section.

DMRB assessment methodology for the A5025 Off-line Highway Improvements

11.4.23 For all three sub-topics, i.e. archaeological remains, historic buildings and the historic landscape, an assessment of the value of each cultural heritage asset was undertaken on a six-point scale of Very High, High, Medium, Low, Negligible and Unknown, based on professional judgement and guided by the criteria provided in HA 208/07 [RD28] as presented in table B11-14.

11.4.24 Assessment of magnitude of impact was based on professional judgement informed by the methodology and criteria provided by HA 208/07 [RD28] for archaeological remains, historic buildings and the historic landscape. These criteria are presented in table B11-15.

11.4.25 The assessment of the magnitude of change has been informed by the duration of that change. Table B11-16 provides definitions of the durations used in chapter G11 (Application Reference Number: 6.7.11) of this Environmental Statement.

11.4.26 For all three sub-topics, the significance of effect with and without mitigation was determined as a combination of the value of the asset and the magnitude of impact. In accordance with the guidance provided by paragraph 5.36 of HA 208/07 [RD28], significance of effect was assessed on a five-point scale of Very Large, Large, Moderate, Slight or Neutral using professional judgement informed by the matrix illustrated in table B11-17 below. Five levels of significance of effect are defined which apply equally to adverse and beneficial impacts.

11.4.27 For the purpose of this assessment effects of moderate or greater are considered to be significant with respect to the EIA Regulations.

Substantial Harm

11.4.28 Substantial harm in line with the *Overarching National Policy Statement for Energy (EN-1)* [RD1], was taken to be commensurate with permanent, adverse effects on designated heritage assets with a major or very large residual significance of effect.

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Table B11-14 DMRB criteria for establishing the value of heritage assets

Value	Archaeological remains	Historic buildings	Historic landscape
Very High	<p>World Heritage Sites (including nominated sites).</p> <p>Assets of acknowledged international importance.</p> <p>Assets that can contribute significantly to acknowledged international research objectives.</p>	<p>Structures inscribed as of universal importance as World Heritage Sites.</p> <p>Other buildings of recognised international importance.</p>	<p>World Heritage Sites inscribed for their historic landscape qualities.</p> <p>Historic landscapes of international value, whether designated or not.</p> <p>Extremely well-preserved historic landscapes with exceptional coherence, time-depth, or other critical factors.</p>
High	<p>Scheduled Monuments (including proposed sites).</p> <p>Undesignated assets of schedulable quality and importance.</p> <p>Assets that can contribute significantly to acknowledged national research objectives.</p>	<p>Scheduled Monuments with standing remains.</p> <p>Grade I and Grade II* Listed Buildings.</p> <p>Other listed buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in the listing grade.</p> <p>Conservation Areas containing very important buildings.</p> <p>Undesignated structures of clear national importance.</p>	<p>Designated historic landscapes of outstanding interest.</p> <p>Undesignated landscapes of outstanding interest.</p> <p>Undesignated landscapes of high quality and importance, and of demonstrable national value.</p> <p>Well-preserved historic landscapes, exhibiting considerable coherence, time-depth or other critical factors.</p>

Value	Archaeological remains	Historic buildings	Historic landscape
Medium	Designated or undesignated assets that contribute to regional research objectives.	Grade II Listed Buildings. Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical associations. Conservation Areas containing buildings which contribute significantly to its historic character. Historic Townscapes or built-up areas with important historic integrity in their buildings, or built settings (e.g. including street furniture and other structures).	Designated special historic landscapes. Undesignated historic landscapes that would justify special historic landscape designation, landscapes of regional value. Averagely well-preserved historic landscapes with reasonable coherence, time-depth or other critical factors.
Low	Designated and undesignated assets of local importance. Assets compromised by poor preservation and/or poor survival of contextual associations.	'Locally Listed' buildings. Historic (unlisted) buildings of modest quality in their fabric or historical association. Historic Townscapes or built-up areas of limited	Robust undesignated historic landscapes. Historic landscapes with importance to local interest groups. Historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations.

Value	Archaeological remains	Historic buildings	Historic landscape
	Assets of limited value, but with potential to contribute to local research objectives.	historic integrity in their buildings, or built settings (e.g. including street furniture and other structures).	
Negligible	Assets with very little or no surviving archaeological interest.	Buildings of no architectural or historical note; buildings of an intrusive character.	Landscapes with little or no significant historical interest.
Unknown	The importance of the site has not been ascertained.	Buildings with some hidden (i.e. inaccessible) potential for historic significance.	Not applicable.

Table B11-15 DMRB criteria for the magnitude of impact on heritage assets

Magnitude of change	Archaeological remains	Historic buildings	Historic landscape
Major	Change to most or all key archaeological materials, such that the resource is totally altered. Comprehensive changes to setting.	Change to key historic building elements, such that the resource is totally altered. Comprehensive changes to the setting.	Change to most or all key historic landscape elements, parcels or components; extreme visual effects; gross change of noise or change to sound quality; fundamental changes to use or access; resulting in total change to historic landscape character unit.
Moderate	Changes to many key archaeological materials, such that the resource is clearly modified.	Change to many key historic building elements, such that the resource is significantly modified.	Changes to many key historic landscape elements, parcels or components; visual change to many key aspects of the historic landscape; noticeable differences in noise or sound quality; considerable changes to use or

Magnitude of change	Archaeological remains	Historic buildings	Historic landscape
	Considerable changes to setting that affects the character of the asset.	Changes to the setting of an historic building, such that it is significantly modified.	access; resulting in moderate changes to historic landscape character.
Minor	Changes to key archaeological materials, such that the asset is slightly altered. Slight changes to setting.	Change to key historic building elements, such that the asset is slightly different. Change to setting of an historic building, such that it is noticeably changed.	Changes to few key historic landscape elements, parcels or components; slight visual changes to few key aspects of historic landscape; limited changes to noise levels or sound quality; slight changes to use or access; resulting in limited changes to historic landscape character.
Negligible	Very minor changes to archaeological remains, or setting.	Slight changes to historic buildings elements or setting that hardly affect it.	Very minor changes to key historic landscape elements, parcels or components; virtually unchanged visual effects; very slight changes in noise levels or sound quality; very slight changes to use or access; resulting in a very small change to historic landscape character.
No change	No change.	No changes to fabric or setting.	No change to elements, parcels or components; no visual or audible changes; no changes arising from amenity or community factors.

Table B11-16 Definition of the duration of effects used in chapter G11

Duration	Criteria
Temporary	Effective action can be taken to reverse or mitigate this effect once it has taken place.

Duration	Criteria
Permanent	No effective action can be taken to reverse or mitigate this effect once it has taken place.
Short term	Reversible effects that do not last longer than the construction period.
Medium term	Reversible effects that last beyond the construction period, but for no more than 15 years.
Long term	Reversible effects that last for more than 15 years.
Temporary	Effective action can be taken to reverse or mitigate this effect once it has taken place.

Table B11-17 DMRB matrix for determination of significance of effect on heritage assets

		Magnitude of Impact				
		No change	Negligible	Minor	Moderate	Major
Value	Very High	Neutral	Slight	Moderate/Large	Large or Very Large	Very Large
	High	Neutral	Slight	Moderate/Slight	Moderate/Large	Large/Very Large
	Medium	Neutral	Neutral/Slight	Slight	Moderate	Moderate/Large
	Low	Neutral	Neutral/Slight	Neutral/Slight	Slight	Slight/Moderate
	Negligible	Neutral	Neutral	Neutral/Slight	Neutral/Slight	Slight

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Limitations

11.4.29 Through the results of the desk-based surveys, site inspections, walkover surveys, non-invasive investigations and invasive investigations, the cultural heritage baseline including the potential for the presence of unknown archaeological remains is well understood for all heritage assets located within the Wylfa Newydd Development Area and at the site of the Park and Ride and the A5025 Off-line Highway Improvements.

11.4.30 Baseline conditions for the study area outside the Wylfa Newydd Development Area and at the Off-Site Power Station Facilities and the Logistics Centre have been established based on desk-based survey, site inspections and walkover surveys, and archaeological investigations of adjacent areas. The values of historic buildings have been established from available desk-based sources and external inspections only, which is a robust method to establish the value of historic buildings and is commensurate with the level of effect predicted.

11.5 References

Table B11-18 Schedule of references

ID	Reference
RD1	Department of Energy and Climate Change. 2011. <i>Overarching National Policy Statement for Energy (EN-1)</i> . London: The Stationery Office.
RD2	Department of Energy and Climate Change. 2011. <i>National Policy Statement for Nuclear Power Generation (EN-6)</i> . London: The Stationery Office
RD3	Welsh Assembly Government. 2008. <i>People, Places, Futures: Wales Spatial Plan</i> . [Online]. [Accessed: 19 April 2016]. Available from: http://gov.wales/docs/desh/publications/130701wales-spatial-plan-2008-update-en.pdf
RD4	Welsh Government. 2016. Technical Advice Note (TAN) 12: <i>Design</i> . [Online]. [Accessed: 19 April 2016]. Available from: http://gov.wales/docs/desh/publications/160316-technical-advice-note-12-en.pdf
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RD6	Welsh Government. 2016. <i>Planning Policy Wales</i> . Edition 9. [Online]. [Accessed: 22 May 2017]. Available from: http://gov.wales/topics/planning/policy/ppw/?lang=en
RD7	Isle of Anglesey County Council. 2014. <i>New Nuclear Build at Wylfa: Supplementary Planning Guidance</i> . [Online]. [Accessed: 19 April 2016]. Available from: http://www.anglesey.gov.uk/Journals/2014/08/11/q/k/h/Wylfa-NNB-SPG-Adopted-July-2014.pdf
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RD9	Institute of Historic Building Conservation. 2003. <i>Code of Conduct</i> . [Online]. [Accessed: 4 July 2017]. Available from: http://ihbc.org.uk/resources/A4-Code-of-Conduct.pdf
RD10	Cadw. 2005. <i>Listed Buildings in Wales. What is Listing?</i> Cardiff: Cadw.
RD11	Historic England. 2017. <i>Understanding the Archaeology of Landscapes: A guide to good recording practice</i> . London: Historic England.
RD12	Cadw and Countryside Council for Wales. 2007. <i>Guide to Good Practice on Using the Register of Landscapes of Historic Interest in</i>

ID	Reference
	<i>Wales in the Planning and Development Process</i> . 2nd Edition. Cardiff: Cadw.
RD13	Isle of Anglesey County Council. 2010. <i>Cemaes Conservation Area Character Appraisal</i> . [Online]. [Accessed: 19 April 2016]. Available from: http://www.anglesey.gov.uk/Journals/2014/10/02/v/y/t/Cemaes-SPG-pdf.pdf
RD14	Isle of Anglesey County Council. 2011. <i>Llanfechell Conservation Area Character Appraisal</i> . [Online]. [Accessed: 19 April 2016]. Available from: http://www.anglesey.gov.uk/Journals/2014/10/02/s/n/p/Llanfechell-SPG-pdf.pdf
RD15	Cadw. 2011. <i>Conservation Principles for the Sustainable Management of the Historic Environment in Wales</i> . Cardiff: Cadw.
RD16	Cadw. 2013. <i>Historic Environment Strategy for Wales</i> . Cardiff: Cadw.
RD17	Chartered Institute for Archaeologists. 2014. <i>Code of Conduct</i> . [Online]. [Accessed 19 April 2016]. Available from: http://www.archaeologists.net/sites/default/files/CodesofConduct.pdf
RD18	Chartered Institute for Archaeologists. 2014. <i>Standard and guidance for an archaeological watching brief</i> . [Online]. [Accessed 19 April 2016]. Available from: http://www.archaeologists.net/sites/default/files/CIfAS&GWatchingbrief_2.pdf
RD19	Chartered Institute for Archaeologists. 2014. <i>Standard and guidance Archaeological excavation</i> . [Online]. [Accessed 19 April 2016]. Available from: http://www.archaeologists.net/sites/default/files/CIfAS&GExcavation.pdf
RD20	Chartered Institute for Archaeologists. 2014. <i>Standard and guidance for the archaeological investigation and recording of standing buildings or structures</i> . [Online]. [Accessed 6 October 2016]. Available from: http://www.archaeologists.net/sites/default/files/CIfAS&GBuildings_1.pdf
RD21	Chartered Institute for Archaeologists. 2017. <i>Standard and guidance for historic environment desk-based assessment</i> . [Online]. [Accessed 03 April 2017]. Available from: http://www.archaeologists.net/sites/default/files/CIfAS%26GDBA_3.pdf
RD22	Welsh Government. 2017. <i>Heritage Impact Assessment in Wales</i> . [Online]. [Accessed 20 December 2017]. Available from: http://cadw.gov.wales/docs/cadw/publications/historicenvironment/2017_0531Heritage%20Impact%20Assessment%20in%20Wales%2026917%20EN.pdf
RD23	Welsh Government. 2017. <i>Managing Change to Registered Historic Parks and Gardens in Wales</i> . [Online]. [Accessed 20 December 2017].

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	Available from: http://cadw.gov.wales/docs/cadw/publications/historicenvironment/2017_0531Managing%20Change%20to%20Registered%20Historic%20Park%20&%20Gardens%20in%20Wales%2026922%20EN.pdf
RD24	Welsh Government. 2017. <i>Managing Historic Character in Wales</i> . [Online]. Accessed 20 December 2017]. Available from: http://cadw.gov.wales/docs/cadw/publications/historicenvironment/2017_0531Managing%20Historic%20Character%20in%20Wales%2031145%20EN.pdf
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RD28	Highways Agency. 2007. <i>Design Manual for Roads and Bridges</i> (DMRB). Volume 11, Section 3, Part 2: Cultural Heritage (HA 208/07). London: The Stationery Office.
RD29	Horizon Nuclear Power. 2016. <i>Wylfa Newydd A5025 Highway Improvements: Written Scheme of Investigation for Archaeological Trial Trenching</i> . Unpublished technical report.
RD30	<i>Wylfa Newydd Proposed New Nuclear Power Station: Archaeological Evaluation Strategy (DRAFT)</i> .
RD31	<i>Wylfa Newydd Proposed New Nuclear Power Station: Project Design for an Assessment of Significance of Cestyll Registered Historic Park and Garden. (G2096)</i> . Unpublished technical report.
RD32	<i>Wylfa Newydd Proposed New Nuclear Power Station: Written Scheme of Investigation for Archaeological Trial Trenching and Archaeological Excavation</i> . Unpublished technical report.
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RD35	<i>Wylfa Newydd Proposed New Nuclear Power Station: Written Scheme of Investigation for Archaeological Watching Brief of Ground Investigation Works</i> . Unpublished technical report.
RD36	<i>Wylfa Newydd Proposed New Nuclear Power Station: Overarching Project Design for Archaeological Building Investigation and Recording</i> . Unpublished technical report.
RD37	<i>Wylfa Newydd Proposed A5025 On-line and Off-line Improvements: Written Scheme of Investigation for Archaeological Geophysical Survey</i> . Unpublished technical report.
RD38	<i>Wylfa Newydd Proposed New Nuclear Power Station. Written Scheme Of Investigation For Marine Archaeological Evaluation</i> . Unpublished technical report.
RD39	<i>Wylfa Newydd Associated Development and Off-Site Power Station Facilities: Written Scheme of Investigation for Archaeological Geophysical Survey Land at Madyn Farm, Amlwch and Land at Dalar Hir near Junction 4 of the A55</i> . Unpublished technical report.
RD40	<i>Wylfa Newydd Associated Development and Off-Site Power Station Facilities: Written Scheme of Investigation for Archaeological Geophysical Survey Land at Madyn Farm, Amlwch and Land at Dalar Hir near Junction 4 of the A55</i> . Unpublished technical report.
RD41	<i>Wylfa Newydd Associated Development and Off-Site Power Station Facilities: Written Scheme of Investigation for Archaeological Trial Trenching at Land at Dalar Hir near Junction 4 of the A55</i> . Unpublished technical report.

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