

Comiswn Brenhinol Henebion Cymru

Royal Commission on the Ancient and  
Historical Monuments of Wales

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Dyddiad / Date: 01/08/2022

**RE: ORML2233 Awel y Mor Offshore Windfarm**

Dear Natural Resources Wales,

We have recently reviewed the marine license application for ORML2233 Awel y More Offshore Windfarm from the perspective of its potential impact on marine archaeology and underwater cultural heritage.

In general, we are in agreement with the main findings of the Environmental Statement (ES) and related Annexes concerning the offshore element of the project. We are also broadly supportive of the draft Offshore WSI and would also like to note that including this document at this stage of the process is very helpful. We have some comments and requirements in relation to the Offshore Draft WSI that are set out below.

We would also like to note (to NRW) that the application overall highlights the ongoing problem caused by placing the inter-tidal zone within the terrestrial elements of the project, rather than the offshore. The Welsh National Marine Plan takes effect from the Mean High Water mark, and so the inter-tidal zone is part of the marine planning process. As such, it should be covered within the maritime/marine EIA elements and associated WSI, rather than being segmented into the terrestrial part.

Despite this, we are in agreement with the main findings of the onshore ES which relates to the inter-tidal zone, and with the overall direction of the inter-tidal elements of the draft onshore WSI. Further comments are provided below.

As the maritime archaeologist with the RCAHMW I can act as the contact for any queries arising and I would be happy to liaise with the applicant and yourselves as required.

Yours

Julian Whitewright

Senior Investigator (Maritime), RCAHMW, [REDACTED]



Croesewir gohebiaeth yn y Gymraeg a'r Saesneg | Correspondence welcomed in Welsh and English

## **ORML2233 General Comments**

### **Offshore Element. Draft WSI Specific Comments:**

#### **Section 10 Post-Construction Monitoring**

The provision of post-construction monitoring, specific to archaeological assessment is welcomed. We look forward to further proposals regarding the frequency of such monitoring as part of the finalised WSI.

#### **Section 11.1.2**

This states that “all archaeological finds from marine contexts will be retained, although those from features of modern date (19<sup>th</sup> century or later), may be recorded on site and not retained, depending on the research objectives of the project”. The implication of this is that material from the 19<sup>th</sup> century may be discarded, regardless of their importance to research, knowledge and understanding outside of the AyM project. This is not acceptable given the potential of artefactual material from this period, and indeed the first half of the 20<sup>th</sup> century to offer insight and knowledge of maritime affairs, as well as enjoyment to the general public.

We therefore require that Section 11.1.2 is amended to state so that all archaeological finds pre-dating the end of the Second World War will be retained. This should be a condition of approval of the WSI.

#### **Section 12.2.3**

We can confirm that the RCAHMW will receive copies of all archaeological reports generated during the project. We would emphasise that we assume that this will include reports relating to post construction monitoring of AEZs and A2 geophysical anomalies.

We can confirm that the RCAHMW will also receive surveyed spatial data, as outlined in 12.2.3. In particular archaeological monitoring data relating to the identified AEZs and A2 geophysical anomalies offers a clear opportunity for the ongoing enhancement of historic assets, as per Policy\_Soc05 of the Welsh National Marine Plan (WNMP). In this regard we very much support the statements made subsequently in Section 12.2.4 about making information publicly available. Deposition of all survey data related to historic assets with the RCAHMW is the best way to achieve this in the longer-term.

### **Onshore Element. Draft WSI Specific Comments:**

We welcome the inclusion of a proposal for a geoarchaeological borehole survey of the inter-tidal zone of the scheme area. This is critical for understanding the formation of the submerged forest in this area and will greatly enhance our knowledge of this group of historic assets (WNMP Policy\_Soc05). By preference, we would prefer ambitions for palaeoenvironmental sampling and radiocarbon dating to be included within the initial survey where possible, rather than as additional ‘recommended work’.

We can confirm that the RCAHMW can receive copies of all archaeological and related geotechnical reports generated during this phase of the project.

The various chapters covering the inter-tidal zone make clear the richness of archaeological material identified during the walkover survey of December 2021. As part of the final WSI we would welcome proposals for a programme of more detailed recording of these historic assets, including sampling of all such features as are still visible, as a means to identify aspects such as tree species and date. Detailed 3D recording of sampled features via methods such as photogrammetry would also make a welcome enhancement to these historic assets (WNMP Policy\_Soc05) and allow for better future monitoring.

We can confirm that the RCAHMW will receive any resulting spatial datasets, such as GPS locations, photographs, point clouds, etc.