

PROSPERITY PARC, FORMER PENRHOS ALUMINIUM WORKS, HOLYHEAD, YNYS MON

Cultural Heritage Desk-Based Assessment

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CRYNODEB GWEITHREDOL

Mae safle datblygiad arfaethedig Parc Ffyniant ar hen safle Gwaith Alwminiwm Penrhos, Caergybi, ar Ynys Môn wedi cael ei adolygu oherwydd ei botensial o ran ei dreftadaeth a'i archeoleg.

Yn unol â pholisi a chanllawiau cynllunio llywodraeth leol, ymgwymerwyd ag asesiad o'r ddesg er mwyn ceisio cael eglurder ynghylch potensial y maes astudiaeth o safbwynt treftadaeth ac archeoleg.

Nid oes unrhyw asedau hanesyddol penodedig (Safleoedd Treftadaeth Byd, Henebion Cofrestredig, Adeiladau Rhestredig, Safleoedd Brwydrau Hanesyddol, Parciau a Gerddi Cofrestredig, Safleoedd Llongdrylliadau Gwarchoddedig ac Ardaloedd Cadwraeth) o fewn y safle astudiaeth ei hun, er bod nifer o Henebion Cofrestredig ac Adeiladau Rhestredig o fewn 2km i'r ardal astudiaeth. Mae traweffeithiau datblygiad posib i'r asedau hyn wedi eu hasesu ac ystyrir na fydd unrhyw draweffaith ar leoliad nac arwyddocâd yr asedau hanesyddol penodedig hyn, ac eithrio mymryn lleiaf o draweffaith negyddol i arwyddocâd Heneb Gofrestredig Beddrod Siambr Trefignath oherwydd y bwriad i godi ffurfiau newydd a fydd mewn golwg i'r dwyrain o'r heneb.

Nid yw'r safle astudiaeth wedi'i leoli o fewn ardal sydd o flaenoriaeth archeolegol penodedig.

Gwneir cais am ganiatâd amlinellol fel bod yr ailddatblygiad yn cynnwys dymchwel strwythurau ac adeiladau er mwyn caniatáu i ofod llawr newydd gael ei greu, gan gynnwys canolfannau data (dosbarth defnydd B8), swyddfeydd a gofodau ymchwil a datblygiad (dosbarth defnydd B1), a storio ynni batri (defnydd Unigryw). Bydd y datblygiad yn cynnwys trefniadau draenio a thirlunio newydd, porthdai, ac adeiladau cysylltiedig eraill, isadeiledd a gwaith peiranyddol. Mae pob mater wedi'i neilltuo ac eithrio (cadw) mynedfeydd i'r safle o'r A5.

Ymgwymerwyd ag ymarfer treialu cloddio ffosydd a thwll turio archeolegol ym mis Awst a Medi 2024 (Archeoleg Wessex 2024) er mwyn cefnogi'r cynnig datblygiad. Ni lwyddodd y ddwy ffos dreialu a dargedwyd ar linell Ffordd Telford i'w adnabod yn yr un o'r ddwy ffos. Dangosodd y ddwy ffos dystiolaeth ar gyfer amhariad modern trwm yn gysylltiedig gydag adeiladu'r Gwaith Alwminiwm. Bu i'r gwaith georcheolegol, oedd yn archwilio'r hen gilfach llanw sydd i'w gweld ar fapiau cynnar yn rhan gogledd-orllewinol y safle, sefydlu bod yna amgylcheddau arfordirol newidiol, gyda dyddodion o'r traeth a'r llanw wedi eu selio gan fawn trwchus oedd wedi'i selio, yn ei dro gan dywod eolaidd wedi'i chwythu gan y gwynt, o bosib yn cynrychioli twyni oedd yn dynesu, ac a oedd yn eu tro wedi'u selio gan ddyddodion mawn mwy diweddar. Yn anffodus, nid oes unrhyw fawn a dynnwyd ymaith yn addas at bwrpas dyddio, ond mae'r gwaith yn dynodi amgylchedd arfordirol newidiol dros amser.

Ystyrir ei bod yn debygol bod gweithgarwch amaethyddol o'r cyfnod ôl-ganoloesol ymlaen wedi cael traweffaith negyddol gymedrol ar ddyddodion archeolegol o dan y ddaear, ond bod hynny dros ardal helaeth.

Bu i waith datblygu'r safle astudiaeth yn ystod ail hanner y 20fed ganrif i hwyluso adeiladu Gwaith Alwminiwm Penrhos arwain at flaendorri lletraws difrifol o'r dyddodion o dan y ddaear presennol, gan dynnu ymaith yr holl nodweddion archeolegol llorweddol cynharach a dyddodion cysylltiedig. Ystyrir ei bod yn debygol fod hyn wedi cael traweffaith negyddol ddifrifol, helaeth ar ddyddodion archeolegol o dan y ddaear.

Yn seiliedig ar y dystiolaeth sydd ar gael, mae yna botensial mewn theori i olion o dan y ddaear sydd o ddiddordeb fod yn gysylltiedig gyda'r cyfnod Cyn-hanesyddol a'r 19eg ganrif fod yn bresennol o fewn y safle astudiaeth. Oherwydd y traweffeithiau sylweddol o dan y ddaear sy'n gysylltiedig gydag adeiladu Gwaith Alwminiwm Penrhos yn ystod ail hanner yr 20fed ganrif, rhagwelir y byddai unrhyw ddyddodion archeolegol cynharach o ddiddordeb wedi cael eu blaendorri a fwy na thebyg wedi eu tynnu ymaith. Ar sail hyn, ni argymhellir unrhyw waith maes archeolegol pellach. Nid oes unrhyw waith ymwithiol wedi'u cynllunio yn ardal yr hen gilfach i'r gogledd-orllewin o'r safle, ac nid ystyrir bod unrhyw waith georcheolegol pellach yn angenrheidiol.

EXECUTIVE SUMMARY

The site of the proposed Prosperity Parc development on the former Penrhos Aluminium Works, Holyhead, Ynys Mon has been reviewed for its heritage and archaeological potential.

In accordance with central and local government planning policy and guidance, a desk based assessment has been undertaken to clarify the heritage and archaeological potential of the study area.

There are no designated historic assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Historic Battlefields, Registered Park and Gardens, Protected Wreck Sites, and Conservation Areas) within the study site itself, although there are a number of Scheduled Monuments and Listed Buildings within the 2km study area. The potential development impacts to these assets have been assessed and it is considered that there will be no impact to the setting or significance of these designated historic assets, with the exception of a slight negative impact to the significance of the Trefignath Chambered Tomb Scheduled Monument due to the proposed construction of new built forms within views to the east from the monument.

The study site is not located in an area of designated archaeological priority.

Outline permission is being sought for the redevelopment to include demolition of structures and buildings to allow construction of new employment floorspace including, data centres (use class B8), offices and research and development space (use class B1), and battery energy storage (Unique use). The development will include drainage arrangements, retained and new landscaping, gatehouses, and other associated buildings, infrastructure and engineering works. All matters are reserved except for (retained) site accesses from the A5.

An archaeological trial trenching and borehole exercise was undertaken in August and September 2024 (Wessex Archaeology 2024) in support of the development proposal. The two trial trenches targeted on the line of the Telford road failed to identify it in either trench. Both trenches showed evidence for heavy modern disturbance linked to the construction of the Aluminium Works. The geoarchaeological work, investigating the former tidal inlet shown on early maps in the north western part of the site, established that there were fluctuating coastal environments, with beach and tidal flat deposits sealed by thick peats, sealed in turn by aeolian wind-blown sands, possibly representing encroaching dunes which were in turn sealed by later peaty deposits. Unfortunately, none of the peat recovered was suitable for dating purposes, but the work does indicate a fluctuating coastal environment over time.

Agricultural activity from the Post-medieval period onwards is considered likely to have had a moderate, but widespread, negative impact on below ground archaeological deposits.

The development of the study site during the second half of the 20th century to facilitate the construction of the Penrhos Aluminium Works resulted in severe horizontal truncation of existing below ground deposits, removing all earlier archaeological horizons and associated deposits. This is considered likely to have had a severe, widespread, negative impact on below ground archaeological deposits.

Based on the available evidence, there is a theoretical potential for below-ground remains of interest associated with the Prehistoric period and the 19th century to be present within the study site. Due to the substantial below-ground impacts associated with the construction of the Penrhos Aluminium Works during the second half of the 20th century, it is anticipated that any earlier archaeological deposits of interest would have been truncated and probably fully removed. On this basis, no further archaeological fieldwork is recommended. No intrusive works are planned in the area of the former inlet in the north western area of the site, and no further geoarchaeological works are considered necessary.

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1 INTRODUCTION AND SCOPE OF STUDY

- 1.1 This cultural heritage desk-based assessment has been prepared by Chris Clarke of RPS on behalf of Anglesey Land Holdings Ltd.
- 1.2 The subject of this Assessment comprises the Prosperity Parc development on the former Penrhos Aluminium Works, Holyhead, Ynys Mon (hereafter, 'the study site'). The study site is centred at NGR SH 26525 81015 within the County of The Isle of Anglesey (see Figs. 1-2). It is located within, and bounded on all sides by, the existing industrial buildings and hardstanding which comprise the former Penrhos Aluminium Works. The study site measure approximately 87.92ha in size.
- 1.3 There are no designated heritage assets - World Heritage Sites, Scheduled Monuments, Registered Historic Landscapes, Historic Battlefields, Registered Historic Park and Gardens, Protected Wreck Sites, and Conservation Areas lie within the study site, nor does it lie within an area of designated archaeological priority.
- 1.4 Within the wider 2km study area there are, however, a number of designated heritage assets. These include some 66 Listed Buildings, comprising two Grade I Listed Buildings, three Grade II* Listed Buildings and 61 Grade II Listed Buildings. There are also seven Scheduled Monuments within this wider study area, and two Conservation Areas in Holyhead. These are detailed in Appendix 2 and potential impacts upon them through development within their settings are considered in Section 5 below.
- 1.5 Anglesey Land Holdings Ltd have commissioned RPS to establish the heritage potential of the study site, and to provide guidance on ways to accommodate any heritage constraints identified.
- 1.6 In accordance with relevant policy and guidance on heritage and planning, and in accordance with the 'Standard and Guidance for Historic Environment Desk-Based Assessments' (Chartered Institute for Archaeologists October 2020), this assessment draws together the available archaeological, topographic and land-use information in order to clarify the heritage potential of the study site.
- 1.7 This desk-based assessment comprises an examination of evidence deriving from multiple sources, including the Heneb Historic Environment Record, and Anglesey Archives. The report also includes the results of a map regression exercise, and site walkovers undertaken on 1st November 2023 and 5th June 2024. A Written Scheme of Investigation setting out the methodology for production of the Cultural Heritage Desk-Based Assessment was submitted in June 2024 and approved by Jenny Emmett at Heneb.
- 1.8 The Assessment thus enables relevant parties to assess the heritage potential of various parts of the study site and to consider the need for design, civil engineering, and archaeological solutions to the archaeological potential identified.

2 PLANNING BACKGROUND AND DEVELOPMENT PLAN FRAMEWORK

National Legislation and Policy

- 2.1 Legislative frameworks provide protection to the historic environment while planning policy guidance provides advice concerning how the historic environment should be addressed within the planning process.
- 2.2 Statutory protection for archaeology is principally enshrined in the *Ancient Monuments and Archaeological Areas Act* (1979) amended by the *National Heritage Acts* (1983 and 2002). Nationally important archaeological sites are listed in a Schedule of Monuments and are accorded statutory protection.
- 2.3 The *Hedgerow Regulations* 1997 set out criteria for the identification of 'Important Hedgerows'; these include several historic environment criteria. Consent from the local planning authority is usually required for the removal of an 'Important Hedgerow', however such removal is deemed to be permitted where a DCO has been granted.

The Historic Environment (Wales) Act 2016

- 2.4 The *Historic Environment (Wales) Act* became law after receiving Royal Assent in March 2016. It gives more effective protection to listed buildings and scheduled monuments, improves the sustainable management of the historic environment, and introduces greater transparency and accountability regarding decisions affecting the historic environment.
- 2.5 This Act amended the two pieces of UK legislation, the *Ancient Monument and Archaeological Areas Act 1979* and the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which previously provided the framework for the protection and management for the Welsh historic environment. These amendments predominantly relate to the transference of a number of existing powers, including the designation of scheduled monuments and listed buildings, from the Secretary of State to Welsh Ministers. The key provisions of the Act can be summarised as the following:
- amendments to the procedure for determining scheduled monument consent;
 - provision for Welsh Ministers to enter into a Heritage Partnership Agreement with the owner of a scheduled monument, or any associated land, within Wales;
 - provision for Welsh Ministers to compile and maintain a register of historic parks and gardens of special historic interest; and
 - provision for Welsh Ministers and/or local authorities to enter into a Heritage Partnership Agreement with the owner of a listed building, or part of such a building, situated in Wales.
- 2.6 The Act included a provision for historic parks and gardens to be placed on a statutory register and this came into force on 1st February 2022. The statutory register does not include historic landscapes, which are instead identified on the non-statutory *Register of Landscapes of Outstanding Historic Interest in Wales* (published as Part 2.1, by Cadw, in 1998), and on the non-statutory *Register of Landscapes of Special Historic Interest in Wales* (published as Part 2.2, by Cadw, in 2001).
- 2.7 The Act also contains new stand-alone provisions for the compilation of a list of historic place names in Wales; for the compilation of an historic environment record for each local authority area in Wales; and for the establishment of an Advisory Panel for the Welsh Historic Environment.

Planning Policy Wales (Edition 12, February 2024)

- 2.8 The principal national planning policy is *Planning Policy Wales* (Edition 12, Welsh Government, February 2024, PPW12). This establishes Welsh Government objectives with regard to the protection of the historic environment and explains that responsibility for caring for the historic environment lies with all those that have an interest in the planning system.
- 2.9 PPW12 sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs). Procedural advice is given in circulars and policy clarification letters.
- 2.10 Chapter 6 of PPW12, entitled 'Distinctive and Natural Places', has a section entitled 'The Historic Environment' (section 6.1 - pp. 129-135) which provides policy for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Overall, the objectives of Section 6.1 in relation to the historic environment can be summarised as seeking to:
- protect the Outstanding Universal Value of the World Heritage Sites;
 - conserve archaeological remains, both for their own sake and for their role in education, leisure and the economy;
 - safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved;
 - preserve or enhance the character or appearance of conservation areas, whilst the same time helping them remain vibrant and prosperous;
 - preserve the special interest of sites on the register of historic parks and gardens; and protect areas on the register of historic landscapes in Wales.
- 2.11 Section 6.1 of PPW12 describes the historic environment as comprising all the surviving physical elements of previous human activity and illustrates how past generations have shaped the world around us. The historic environment is made up of individual historic features, archaeological sites, historic buildings and historic parks, gardens, townscapes and landscapes, collectively known as historic assets. It notes that the ways in which historic assets are identified varies, with the most important historic assets often having statutory protection, yet other assets may yet to be formally identified.
- 2.12 Regarding archaeological remains, Section 6.1 of PPW12 states: *'The conservation of archaeological remains and their settings is a material consideration in determining planning applications, whether those remains are a scheduled monument or not' (Paragraph 6.1.23). 'Where nationally important archaeological remains are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in a direct adverse impact on a scheduled monument (or an archaeological site shown to be of national importance)' (Paragraph 6.1.24). 'In cases involving less significant archaeological remains, local planning authorities will need to weigh the relative importance of the archaeological remains and their settings against other factors, including the need for the proposed development' (Paragraph 6.1.25).*
- 2.13 Section 6.1 goes on to say: *'Where archaeological remains are known to exist or there is a potential for them to survive, an application should be accompanied by sufficient information, through desk-based assessment and/or field evaluation, to understand a full understanding of the impact of the proposal on the significance of the remains' (Paragraph 6.1.26). 'If the planning authority is minded to approve an application and where archaeological remains are affected by proposals that alter or destroy them, the planning authority must be satisfied that the developer has secured appropriate*

and satisfactory provision for their recording and investigation, followed by the analysis and publication of the results and the deposition of the resulting archive in an approved repository' (Paragraph 6.1.27).

- 2.14 Section 6.1.7 notes that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets, and that this will include consideration of the setting of an historic asset. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.
- 2.15 Section 6.1.9 reiterates that any decisions made through the planning system must fully consider the impact on the historic environment and on the significance and heritage values of individual historic asset and their contribution to the character of place.
- 2.16 Section 6.1.10 states that there should be a general presumption in favour of the preservation or enhancement of a listed building and its setting, which might extend beyond its curtilage. It advises that for any development proposals affecting a listed building or its setting, the primary material consideration is the statutory requirement to have special regard to the desirability of preserving the building, its setting or any features of special architectural or historic interest which it possesses. Applicants for listed building consent must be able to justify their proposals, shows why the alteration or demolition of a listed buildings is desirable or necessary, and consider the impact of any change upon its significance. This must be included in a heritage impact statement, which will be proportionate both to the significance of the building and to the degree of change proposed.
- 2.17 Concerning conservation areas, section 6.1.14 states that there should be a general presumption in favour of the preservation or enhancement of the character or appearance of a conservation area or its setting. Conversely, section 6.1.15 states that there will be a strong presumption against the granting of planning permission for developments, including advertisements, which damage the character of appearance of a conservation area or its setting to an unacceptable level. However, it states that *'In exceptional cases, the presumption may be overridden in favour of development considered desirable on public interest grounds'* (Paragraph 6.1.15).
- 2.18 Section 6.1.16 states that preservation or enhancement of a conservation area can be achieved by a development which either makes a positive contribution to an area's character or appearance or leaves them unharmed. Mitigation measures can also be considered which could result in an overall neutral or positive impact. Section 6.1.17 states that proposals should be tested against conservation area appraisals, where they are available.
- 2.19 Section 6.1.29 addresses locally specific historic environment policies, stating that development plans should consider the inclusion of locally specific policies relevant to the historic environment, but that these must be distinctive and only cover those elements deemed as important considerations from a local planning perspective. It is noted that planning authorities may develop lists of historic assets of special local interest, that do not have statutory protection, but that make an important contribution to local distinctiveness and have the potential to contribute to public knowledge. Where a planning authority chooses to identify historic assets of special local interest, policies for the conservation and enhancement of those assets must be included in the development plan.
- 2.20 PPW11 also includes policies regarding historic landscapes: *'Planning authorities should protect those assets included on the register of historic landscapes in Wales.....The register should be taken into account in decision making when considering the implications of developments which meet the criteria for Environmental Impact Assessment, or, if on call in, in the opinion of Welsh Ministers, the development is of a sufficient scale to have more than a local impact on the historic landscape'* (Paragraph 6.1.21).
- 2.21 The aspirations and vision of the Welsh Government regarding the historic environment are additionally expressed in the following documents.

- *People, Places, Future: The Wales Spatial Plan* (Welsh Assembly Government, 2008).
- *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* (Welsh Assembly Government, 2011).
- *Historic Environment Strategy for Wales* (Welsh Government, 2013).

Historic Environment (Wales) Act 2023

- 2.22 The aspirations and vision of the Welsh Government regarding the historic environment are additionally expressed in the following documents.
- 2.23 The Historic Environment (Wales) Act 2023 was introduced into Senedd Cymru on 4 July 2022, passed on 28 March 2023 and received Royal Assent on 14 June 2023. It is anticipated to be enacted late in 2024. It will replace The Ancient Monuments and Archaeological Areas Act 1979; The Historic Environment (Wales) Act 2016 and The Planning (Listed Building and Conservation Areas) Act 1990. The enactment of the Act will also lead to revisions to Technical Advice Note 24 :The Historic Environment 2017 and other guidance notes.
- 2.24 The Act is a Consolidation Act and should not alter legislation, but references to the various parts of the Acts that have been consolidated will need to be changed to refer to the 2023 Act. The most important change is that section 66 (1) of the Listed Building and Conservation Act 1990 will become section 314A of the Town and Country Planning Act 1990.

National Guidance

Technical Advice Note (TAN) 24: The Historic Environment (2017)

- 2.25 TAN 24 is one of a suite of documents designed to aid the application of PPW11. TAN 24 was adopted in May 2017, and supersedes pre-existing Welsh Office Circulars concerning the historic environment.
- 2.26 TAN 24 provides specific guidance on how the planning system considers each aspect of the historic environment during development plan preparation and decision-making on planning and Listed Building (LBC) applications. It also sets out that it is for an applicant to provide the LPA with sufficient information to allow the assessment of their proposal in respect of historic assets, irrespective of their designation, which may take the form of a heritage impact statement.
- 2.27 Regarding archaeological remains, TAN24 provides the following guidance:

'Archaeological remains are a fragile and non-renewable resource. In many cases they are highly fragile and vulnerable to damage and destruction. Produced by human activity over thousands of years, they are the only evidence of our prehistoric past and complement historic records from the last 2,000 years. Archaeological remains include evidence buried below the ground and the surviving fabric of historic buildings and structures. Their significance, as evidence of the past development of our civilisation and as part of Wales' identity, is not necessarily related to their size, visibility or popularity.' (Paragraph 4.1)

'The conservation of archaeological remains is a material consideration in determining a planning application. When considering development proposals that affect scheduled monuments or other nationally significant important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e., a presumption against proposals which would involve significant alteration or cause damage, or which would have a significant adverse impact causing harm within the setting of the remains (see Annex A). In cases involving less significant

archaeological remains, local planning authorities will need to weigh the relative importance of the archaeological remains and their settings, including the need for the proposed development.' (Paragraph 4.2)

2.28 With regards to Listed Buildings, it states:

'Listed buildings are nationally important assets which represent a unique source of information about the past and make a valuable contribution to the quality and character of Welsh landscapes and townscapes. Buildings are listed when they are considered to be of special architectural or historic interest.' (Paragraph 5.1)

2.29 Annex A of TAN24 as referenced above deals with the legal issues applied to scheduled monuments.

'Where development might reveal, disturb or destroy archaeological remains, including palaeoenvironmental evidence, it is important that opportunities to record archaeological evidence are taken and that archaeological remains are not needlessly destroyed. The ability to record such evidence should not be a factor in deciding whether controlled removal should be permitted.' (Paragraph 4.3)

'The needs of archaeology and development may be reconciled and potential conflicts between development proposals and the preservation of significant archaeological remains can often be avoided through pre-application discussion. This should be between the applicant, the local planning authority, their archaeological advisors and, in cases where scheduled monuments may be affected, Cadw. In the case of those local authorities that do not have in-house archaeological advisors, they could draw upon the expertise and advice of the curatorial sections of the Welsh Archaeological Trusts.' (Paragraph 4.4)

'Where there is a possibility that archaeological remains may be present, applicants are encouraged to make an enquiry with the body responsible for the relevant historic environment record and seek advice from the local planning authority's advisor at an early stage in considering their development proposal. This will help determine if the proposal might impact on known archaeological remains. Certain major developments require pre-application consultation with the local planning authority and, where specialist advice is required, the Welsh Ministers through Cadw.' (Paragraph 4.5)

'Where archaeological remains are known to exist, or considered likely to exist, and a study has not been undertaken by the applicant, the local planning authority should ask an applicant to undertake a desk-based archaeological assessment and, where appropriate, an archaeological evaluation. These should be done by a competent expert to the appropriate standard. The reports of these investigations will form part of the planning application. Applicants should show how they have modified their development proposals to minimise any negative impact on the identified archaeological remains, and how they intend to mitigate any remaining negative impacts.' (Paragraph 4.7)

'The need for a desk-based assessment, and field evaluation where appropriate, should be discussed with the local planning authority prior to submission of an application, and where required the results of these studies should be submitted as part of the planning application. Failure to provide sufficient archaeological information of the appropriate standard may be a valid reason for the local planning authority to refuse planning permission.' (Paragraph 4.8)

'When considering planning applications that affect known or potential archaeological remains, the local planning authority should consult with their archaeological advisor, about the impact, including

the potential scale and harm, of the development on archaeological remains, and/or the adequacy of the mitigation of what has been proposed. Where a planning application directly affects a scheduled monument and its setting then the local planning authority is required to consult the Welsh Ministers through Cadw.’ (Paragraph 4.9)

‘The case for the preservation of archaeological remains that are not considered to meet the criteria for national importance (See Annex A2), must be assessed on the individual merits of each case. The local planning authority must take into account relevant policies and material considerations, and will need to weigh the significance of the remains against the benefits of, and need for the proposed development. In cases where there are issues of more than local importance, applications may be called in for determination by the Welsh Ministers.’ (Paragraph 4.10)

- 2.30 Annex A2 of TAN24 as referenced above identifies the criteria used for assessing the national importance of an ancient monument, but these criteria are not regarded as definitive.

‘Having considered all policies and other material considerations and the need for the proposed development, the local planning authority may decide that the significance of the archaeological remains is not sufficient to justify their physical preservation. In these cases, the local planning authority must satisfy itself that the necessary and proportionate arrangements for the excavation and recording of these archaeological remains are secured, and the results of this archaeological work are properly analysed and published, and that arrangements are made for the deposition of the resulting archive to the appropriate standards. This can be achieved by the local planning authority issuing a brief setting out the scope of the archaeological work that is required, which should be prepared in conjunction with their archaeological advisor.’ (Paragraph 4.12).

Technical Advice Note (TAN) 12: Design (2016)

- 2.31 TAN 12 provides advice on the good design of new development. Alongside promoting sustainability, it sets out that the context of a development should be appraised, including the historic environment, to inform design.
- 2.32 Section 5.6 Historic Environment highlights that design should have regard to the desirability of preserving or enhancing the character and appearance of areas of special character, such as conservation areas. It also highlights that specialists are needed to accurately assess areas of architectural or historic character.

Conservation Principles for the Sustainable Management of the Historic Environment in Wales (Conservation Principles) (2011)

- 2.33 Conservation Principles provides the basis upon which Cadw discharges certain statutory duties on behalf of the Welsh Ministers. It is also for use by others (including owners, developers and other public bodies) to assess the potential impacts of development proposals on the significance of historic assets, and assist in the decision-making process where the historic environment is affected by the planning process.
- 2.34 The document echoes PPW in the emphasis it places upon the importance of understanding significance as a means to properly assess the effects of change to heritage assets. The guidance describes a range of heritage values which enable the significance of assets to be established systematically, with the four main component values being:
- 2.35 **Evidential value:** which derives from those elements of an historic asset that can provide evidence about past human activity, including its physical remains or historic fabric. These may be visible and relatively easy access, or may be buried below ground, under water or be hidden by later fabric.

These remains provide the primary evidence for when and how an historic asset was made or built, what it was used for and how it has changed over time.

- 2.36 **Historical value:** derives from the ways an historic asset might illustrate a particular aspect of past life or be associated with a notable family, person, event or movement. These illustrative or associative values of an historic asset may be less tangible than its evidential value but will often connect past people, events and aspects of life with the present. As the functions of an historic asset are likely to have changed over time, the full range of changing historical values might not become clear until all the evidential values have been gathered together.
- 2.37 **Aesthetic value:** which derives from the ways in which people draw sensory and intellectual stimulation from a place. Aesthetic values can be the result of the conscious design of a place, including artistic endeavour, or they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time, or a combination of both.
- 2.38 **Communal value:** which derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (particularly associative) and aesthetic values, but tend to have additional and specific aspects. Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it. Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Spiritual value attached to places can emanate from the beliefs and teachings of an organised religion or reflect past or present-day perceptions of the spirit of a place.

Best Practice Guidance Overview

- 2.39 Cadw publishes a wide range of Best Practice Guidance documents (BPGs). This guidance relates to the care and understanding of historic buildings, scheduled monuments and other archaeological remains; understanding the significance of, and managing, conservation areas; managing local lists, historic parks and gardens, wider historic landscapes, and World Heritage Sites; the role of the planning system in the management of the historic environment; and technical guidance for conservation.
- 2.40 This Best Practice Guidance is intended to complement the Historic Environment (Wales) Act 2016 and recent planning policy and advice. In particular, it is designed to provide information on good conservation practice to assist LPAs, planning and other consultants, owners, applicants, and other interested parties when implementing Welsh policy. BPGs of particular relevance are discussed below:

Heritage Impact Assessment in Wales (May 2017)

- 2.41 Guidance on Heritage Impact Assessment in Wales has been published by Cadw (2017a) on behalf of the Welsh Government. This document advises that a heritage assessment should *'take into account sufficient information to enable both the significance of the asset and the impact of change to be understood. It should be proportionate both to the significance of the historic asset and to the degree of change proposed'* (Page 5).
- 2.42 This document sets out the general principles to consider when planning changes to historic assets and applying for listed building, conservation area, and scheduled monument consent. In particular, it emphasises the purpose and value of undertaking Heritage Impact Assessments in order to help identify the most appropriate way to accommodate change within the historic environment. The guidance echoes PPW11 by stressing that understanding the significance of historic assets is key to making decisions regarding the historic environment.

Setting of Historic Assets in Wales (May 2017)

- 2.43 This guidance document focuses on the management of change within the setting of heritage assets. It explains what setting is, how it contributes to the significance of a historic asset, and why it is important, in order to aid practitioners with the implementation of Welsh national policies and guidance relating to the historic environment.
- 2.44 In the Conservation Principles document (Cadw, 2011), setting was defined as: *'The surroundings in which an historic asset is experienced, its local context, embracing present and past relationships to the adjacent landscape'*.
- 2.45 This definition has been updated thus in TAN24: *'The setting of a historic asset includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Setting is not a historic asset, though land within a setting may contain other historic assets'* (Welsh Government, 2017, Annex D).
- 2.46 The definition is repeated in recent guidance regarding the issue of the settings of historic assets in Wales (Cadw, 2017b), which makes the following points:
- Setting usually extends beyond the property boundary of an individual historic asset.
 - Intangible factors such as function, sensory perceptions or historical, artistic, literary and scenic associations can be important in understanding settings, as well as physical elements within the surroundings of the asset.
 - When development is proposed there is a need to assess the historic assets that may be affected and understand how their settings contribute to the significance of these assets.
- 2.47 The 2017 document goes on to outline a four-stage approach to decision-taking, as follows:
1. Identify which historic assets and their settings could be affected by a proposed development;
 2. Define and analyse the setting of each historic asset and assess whether, how and to what degree the setting contributes to the significance of the asset;
 3. Evaluate the effects of the proposed development, whether beneficial or harmful, on that significance; and
 4. Consider options to mitigate or improve potential impacts on that significance.
- 2.48 Although assessments of changes within the settings of historic assets can involve non-visual issues such as noise, odour and vibration, it is more usually the visual aspects of a development that form the major part of the assessment.
- 2.49 The existence of direct lines of sight between the historic asset and the proposed development is an important factor in judging the visual impact of the development. However, it is possible for changes within the setting to occur even when such a relationship does not exist. For example, views towards a listed building from a frequently visited location, such as a park or a public footpath, may be affected by the presence of a larger development, even if the development is not directly visible from the building itself.
- 2.50 An assessment of visual impacts on the historic assets and their settings needs to consider a wide variety of factors including the location of the asset within the physical landscape, its relationship with contemporary and non-contemporary features within that landscape and the location, size and character of the proposed development in relation to these factors.
- 2.51 The assessment then needs to balance the impact of these various considerations based on informed professional judgment. Assessment of visual impacts can be undertaken in accordance

with the procedures expressed in the *Guidelines for Landscape and Visual Impact Assessment* (3rd Edition, Landscape Institute, 2013). If there is the potential for changes within the setting of historic assets due to noise or other impacts than these would be considered using appropriate procedures.

- 2.52 There should also be consideration of the sensitivity to change of the setting of a historic asset. This requires examination of the current setting with regard to identifying elements that contribute to the significance of the asset, elements that make a neutral contribution to the significance of the asset and elements that make a negative contribution to (i.e., detract from) the significance of the asset.
- 2.53 The guidance states that the introduction of offsetting or compensatory proposals, such as public access or interpretation panels, will not reduce the impact of the development within the setting of the historic asset, and thus should not be accepted as mitigation. However, these may be considered when the decision-making body weighs up the benefits of the scheme.

Local Planning Policy

- 2.54 The site is located within the Isle of Anglesey County Council area, which has adopted the Anglesey and Gwynedd Joint Local Development Plan 2011-2026, in July 2017.
- 2.55 This local plan contains the following policies relating to the Historic Environment:

POLICY PS 20: PRESERVING AND WHERE APPROPRIATE ENHANCING HERITAGE ASSETS

In seeking to support the wider economic and social needs of the Plan area, the Local Planning Authorities will preserve and where appropriate, enhance its unique heritage assets. Proposals that will preserve and where appropriate enhance the following heritage assets, their setting and significant views into and out of the building/area will be granted:

- 1. Scheduled Ancient Monuments and other areas of archaeological importance (in line with Policy AT 4).**
- 2. Listed Buildings and their curtilages.**
- 3. Conservation Areas (in line with Policy AT 1).**
- 4. Beaumaris Castle and Caernarfon Castle and Town Walls World Heritage Sites (in line with Policy AT 1).**
- 5. Candidate World Heritage Sites.**
- 6. Registered Historic Landscapes, Parks and Gardens (in line with Policy AT 1).**
- 7. Buildings of architectural/ historic/ cultural merit that are not designated or protected (in line with Policy AT 3).**

POLICY AT 1: CONSERVATION AREAS, WORLD HERITAGE SITES AND REGISTERED HISTORIC LANDSCAPES, PARKS AND GARDENS

Proposals within or affecting the setting and/ or significant views into and out of Conservation Areas, World Heritage Sites and Registered Historic Landscapes, Parks and Gardens shown on the Constraints Map must, where appropriate, have regard to:

- 1. Adopted Conservation Area Character Appraisals, Conservation Area Plans and Delivery Strategies.**

2. World Heritage Site Management Plans.

3. The Register of Landscape, Parks and Gardens of Special Historic Interest in Wales.

Proposals should be supported by a Heritage Impact Assessment, where appropriate.

POLICY AT 3: LOCALLY OR REGIONALLY SIGNIFICANT NON-DESIGNATED HERITAGE ASSETS

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, identity and variation across the Plan area, by:

1. The sympathetic re-use of redundant and under-used historic buildings and areas that are consistent with their conservation;

2. Ensuring that all development within the Plan area's historic public realm, including transport and infrastructure work, is sympathetic to the historic environment;

3. Appropriate siting, massing, form, height, scale, detail and use of local materials.

POLICY AT 4: PROTECTION OF NON-DESIGNATED ARCHAEOLOGICAL SITES AND THEIR SETTING

Proposals which may have a significant adverse impact on sites that are of potential national archaeological importance and their setting, or are of acknowledged local heritage importance, including sites of industrial archaeology that are not scheduled and their settings will:

1. Be assessed in terms of the intrinsic importance of the 'site' and the potential extent of harm.

2. Require, where appropriate, either an archaeological assessment and/ or field evaluation by an archaeological body or a professionally qualified archaeologist in order to determine the archaeological impact of the proposed development before the Planning Authority determines the application. A proposal which affects locally important archaeological remains will only be granted if the need for the development overrides the significance of the archaeological remains. Where proposals are acceptable, a condition will be attached to the permission stating that no development should take place until an agreed programme of archaeological work has taken place.

2.56 In line with relevant planning policy and guidance, this desk-based assessment seeks to clarify the site's archaeological potential and the likely significance of that potential and the need or otherwise for additional mitigation measures.

3 GEOLOGY AND TOPOGRAPHY

Geology

- 3.1 The study site is located on the eastern part of Holy Island, immediately to the west of the main island of Anglesey. The Holyhead Bay coastline is located approximately 800m to the northeast of the study site.
- 3.2 The area under review within this appraisal comprises an irregularly shaped parcel of land comprising the site of the former Penrhos Aluminium Works and its grounds, lying to the east of the Holyhead Retail Park, currently comprising areas of landscaped grounds to the west, some buildings of the former Aluminium Works, and the extensive demolished remains of others, areas of a concrete apron and wooded areas at the bounds of the site, and extending to some 87.92ha. The site is centred at NGR SH 26525 81015.
- 3.3 The underlying solid geology of the study site comprises Mica schist and psammite of the New Harbour Group, metamorphic bedrock formed between 635 and 541 million years ago during the Ediacaran period. The drift geology of the site largely comprises Diamicton Till, superficial sedimentary Devensian deposits formed between 116 and 11.8 thousand years ago during the Quaternary period, although there are traces of a former tidal inlet in the north western area of the site. This is characterised by Devensian Glaciofluvial Deposits of sands and gravels formed between 116 and 11.8 thousand years ago – and by Quaternary Tidal Flat Deposits of Clay and silt formed between 11.8 thousand years ago and the present, whilst there are small blown sand deposits formed between 2.588 million years ago and the present on the north western edge of the site. (British Geological Survey Viewer, accessed 30/05/24).
- 3.4 A number of ground investigations have been undertaken on the site, primarily in support of previous applications on the site. Ground investigations in 2016 focussed on areas of wetland and woodland in the northern and north eastern areas of the site, and was followed by a contamination survey in 2017 (H B Geotechnical Services 2023). These determined that deposits of made ground sealed superficial deposits of sandy clays and clayey gravels, with localised bands of sands and gravels. These sealed solid deposits comprising weathered schists, which in many areas took the form of clayey gravels or cobbles of mica schist.

Topography

- 3.5 The study site is broadly flat at some 10m above Ordnance datum (aOD), rising slightly to the northern edge of the site. There is one watercourse within the site – a series of small watercourses lie within the marshy area of the former tidal inlet in the north, which feed northwards towards Penrhos bay. A series of waterfilled ditches in the north eastern area of the site drain a former area of marsh in this area, whilst the beach at Penrhos lies some 830m to the north.
- 3.6 The study site was developed in the 1970's as the site of the Penrhos Aluminium Works, which opened in 1971. Alumina and coke were shipped in to the company's private jetty in Holyhead harbour from overseas. From the jetty material was brought to the plant by a series of conveyor belts running along a tunnel linking the harbour to the plant. In the potlines alumina was dissolved in deep, rectangular steel shells known as reduction pots by electrolysis to form aluminium. Up until its closure Anglesey Aluminium produced up to 142,000 tonnes of aluminium every year and was the biggest single user of electricity (255 MW) in the United Kingdom. The plant was powered by the Wylfa nuclear power station some 15 miles (24 km) away. The contract to supply power ended in 2009, and was not renewed. The plant shut down aluminium smelting at that time, although the aluminium remelt facility remained in operation for a short time, before closure of the

entire facility was announced in 2013. Demolition of the complex in advance of its redevelopment began early in 2024. Most of the buildings within the site have been demolished, with only a few still standing (see Plates 6 – 8).

4 ARCHAEOLOGICAL AND HISTORICAL BACKGROUND WITH ASSESSMENT OF SIGNIFICANCE

Timescales used in this report

Prehistoric

Palaeolithic	900,000 -	12,000 BC
Mesolithic	12,000 -	4,000 BC
Neolithic	4,000 -	1,800 BC
Bronze Age	1,800 -	600 BC
Iron Age	600 -	AD 43

Historic

Roman	AD 43 -	410
Saxon/Early Medieval	AD 410 -	1066
Medieval	AD 1066 -	1485
Post Medieval	AD 1486 -	1799
Modern	AD 1800 -	Present

Introduction

- 4.1 This chapter reviews the available heritage evidence for the study site and the archaeological/historical background of the general area, and, in accordance with PPW, considers the potential for any as yet to be discovered archaeological evidence on the study site.
- 4.2 A study area for this desk based assessment was agreed with the Senior Planning Archaeologist at Heneb (formerly the Gwynedd Archaeological Trust), who advise the Local Planning Authority on heritage matters. What follows comprises a review of known non-designated historic assets on the Heneb Historic Environment Record (HER) and the National Monuments Record (NMR) within a 1km study area and a review of designated historic assets held by Cadw within 2km radius of the study site (Figs. 2a-2c), also referred to as the wider study area. This is supported by an historic map regression exercise charting the development of the study area from the late nineteenth century onwards until the present day.
- 4.3 There are seven HER records within the site itself (Fig 2b). One (2503) records the finding of a Roman coin hoard of 17 coins at Penrhos Isaf, but the findspot itself is only a general one, and it is not known whether the hoard was found within the site itself, or elsewhere in the Penrhos landscape. The majority of the remainder are post medieval or modern in date, including the line of Telford's Holyhead Road (16081) the Penrhos Aluminium Works itself (21160/NMR 402430), the former farms at Glan Gors Bach (31544) and Glan-y-gors farm (97686) and the former historic landscape on the site (34735).the only other asset is the site of an undated inscribed stone, set into the wall of the former house at Penrhos-Bradwen (90303).
- 4.4 The map regression exercise and a review of documentary evidence and secondary sources demonstrates that, with the exception of the construction of the early nineteenth century Holyhead

Road, the study site appears to have primarily remained undeveloped up to the mid-20th century after which the extensive Penrhos Aluminium Works were built.

- 4.5 Chapter 5 subsequently considers the site conditions and whether the proposed development will impact the theoretical archaeological potential identified below.

Designated assets

- 4.6 There are no designated heritage assets (no World Heritage Sites, Scheduled Monuments, Listed Buildings, Historic Park and Gardens, Registered Battlefields, Protected Wreck sites, or Conservation Areas) within the study site. Nor does it lie within one of the Registered Landscapes of Outstanding and of Special Interest in Wales, nor does it lie within an area of designated archaeological priority.
- 4.7 There are seven Scheduled Monuments, 66 Listed Buildings and two conservation areas located within the wider 2km study area. All have the potential to have their significance impacted through development within their setting. Accordingly, the site visit was used to determine whether the proposed redevelopment of the site has the potential to impact upon these designated assets.
- 4.8 The following Listed Buildings lie within the 2km study area:

Listed Buildings

Grade I

- St Cybi's Church, Holyhead (5413),
- Walls of upper churchyard of St Cybi's Church, Holyhead (5415)

*Grade II**

- Kingsland Windmill (5762)
- Harbour Office, Holyhead (5772)
- George IV Arch (5773)

Grade II

- Melin y Gof aka Stanley Windmill (5263)
- Capel y Bedd (5414)
- The Skinner Monument (5417)
- No 2, Victoria Terrace, Holyhead (5724)
- Tanalltran Cottages (5726)
- Plas Alltran (5727)
- Stable Block to Plas Alltran (5728)
- 1, Turkey Shore Rd, Holyhead (5729)
- Fitting, Boiler and Smithy Shops, Holyhead (5734)
- Office and Stores Building, Holyhead (5735)
- Sailmakers, Seamstresses and Polishers Workshops, Holyhead (5736)I
- Store, Old Boiler Shop & Sawmill buildings at Marine Yard, Holyhead (5737)
- Ucheldre Centre (Former Bon Sauveur Convent Chapel) (5741)

- Market Hall, Holyhead (5763)
- Candle Tower and walls adjoining remains of Penrhos House (5764)
- Tower, walls and courtyard buildings, Penrhos (5765), (Plate18)
- Bailiff's Tower and with boundary wall, gates and attached outbuildings at Penrhos Home Farm (5766)
- Barn and cartsheds, Penrhos Home Farm (5767), (Plate 16);
- Watertower, Penrhos (5768), (Plate 20)
- The Betting Stand (aka Rotten Tower) (5769), (Plate 19)
- The Battery (5770), (Plate13)
- Customs House, Holyhead (5771)
- Stanley House (14726)
- The Captains Table (14727)
- Ty'n Parc (14728)
- Ebenezer Chapel (14733)
- Tanalltran Cottages (14734)
- Clock Turret in Station Approach (14735)
- Caernarfon Castle PH (14736)
- Tabernacl Chapel (14737)
- Hyfrydle Chapel (including Forecourt Gates and Railings) (14738)
- Train Shed at Holyhead Station (14739)
- 2 Turkey Shore Road (14740)
- Pillbox near Skinner's Monument (14741)
- South Pier (14742)
- Stanley Cottages (14743)
- Stanley Cottages (14744)
- Stanley Cottages (14745)
- Stanley Cottages (14746)
- Stanley Cottages (14747)
- Stanley Cottages (14748)
- Cenotaph (14749)
- Lower Churchyard Walls and Gateway (14750)
- No 3, Victoria Terrace, Holyhead (14751)
- No 4, Victoria Terrace, Holyhead (14752)
- No 5, Victoria Terrace, Holyhead (14753)
- No 6, Victoria Terrace, Holyhead (14754)

- Admiralty Pier (including Sea Wall between Salt Island Bridge and George IV Arch) (14757)
- Lighthouse on Admiralty Pier (14758)
- Bridge Over Railway near Ty Mawr Farmhouse (16526)
- Stanley Embankment (19231)
- Telford Milestone (4) (19232)
- Stanley Tollhouse (20069), (Plate 15)
- Telford Milestone (3) (20073), (Plate 14)
- Stanley Embankment (20074)
- Cae Grugog (20075)
- Pillbox adjacent to Trearddur Bay Hotel (20079)
- Pillbox in grounds of Trearddur House (20080)
- Cybi Building, Holyhead High School (87587)
- Boundary Wall to Cybi Building, Holyhead High School (87588)
- Telford Milestone (1) (87929)

- 4.9 The majority of the Listed Buildings Listed Buildings lie to the north west of the study site, within Holyhead or its environs (Fig 2a). This includes both of the Grade I Listed Buildings - St Cybi's Church (5413) and the walls of the upper churchyard at St Cybi's (5415) – and two of the three Grade II* Listed Buildings – the Harbour Office (5772) and the George IV Arch (5773). The site visit established that because of the intervening topography, vegetation and built form, that there will be no impact on these Listed Buildings. There is a second smaller group of Listed Buildings to the north west, on the south western edge of Holyhead, incorporating the Grade II* Kingsland Windmill (some 860m to the north west) and the Grade II Listed Stanley Cottages (some 760m away) and Ebeneser Chapel (800m distant). Of these, only the Kingsland Windmill (5762) has the potential to have intervisibility, but the thick vegetation surrounding the study site and a number of substantial modern buildings in the intervening land, including those on the Parc Cybi development, has led to the windmill being scoped out from further assessment, along with the other assets in this area. Similarly, the nearby Bridge Over Railway near Ty Mawr Farmhouse (16526) some 500m to the north west, has been scoped out of further assessment because it has no intervisibility.
- 4.10 There is a small cluster of three Listed Buildings in Trearddur – the Arts and Craft house known as Cae Grugog (20075) and two World War II pillboxes (20079 and 20080). There is no intervisibility between these and the site, and no known historic associations, and they have therefore been scoped out of further assessment. Similarly, the Melin y Gof aka Stanley Windmill (5263) has been scoped out of further assessment because it shares no intervisibility or historic associations with the site.
- 4.11 The remaining Listed Buildings lie to the east and north east of the study site, with a particular concentration at Penrhos. Here, a number of buildings associated with the former Penrhos house are Grade II Listed (5764 – 5769), as is the nearby Battery (5770). The Penrhos estate itself is heavily wooded, as is the northern boundary of the study site, and there is no intervisibility between these assets and the study site. There are some historic associations between the Penrhos estate and the study site – the land once belonged to the Penrhos estate, and was sold to enable the construction of the Aluminium Works. However, whilst that historic association remains, the construction of the Aluminium Works and its subsequent demolition has robbed that

association of much of its meaning. These assets have therefore been scoped out of further assessment.

- 4.12 The final group of six Listed Buildings lies to the east, and are all associated with the Telford Road, constructed between 1810 and 1815, comprising the Stanley Embankment (19231 and 20074) itself, the Stanley Tollhouse (20069) and two milestones (19232 and 20073). All of these are screened from the study site by buildings and thick belts of vegetation, and no visual impacts are expected. The former line of the Telford Road ran through the middle of the Penrhos Aluminium Works site, so there are historic associations, but these have largely been lost through the construction and subsequent demolition of the Aluminium Works.

Scheduled Monuments

- Trefignath Chambered Tomb (AN011)
 - Tŷ Mawr Standing Stone (AN012)
 - Roman Wall Surrounding St Cybi's Churchyard (AN031)
 - Ynys Leurad Hut Circles (AN035)
 - Tre-Arddur Hut Group (AN092)
 - Newlands Fish Weir (AN 146)
 - The Holyhead Road: quay on the Stanley Embankment (AN146)
- 4.13 A site visit determined that there was no intervisibility between the study site and the majority of these assets, due to intervening topography, vegetation and buildings and there are no known historical associations between them. The only monument to potentially have intervisibility with the study site is the Trefignath Chambered Tomb (AN011). In the light of this, impacts on the designated assets listed above, apart from the Trefignath Chambered Tomb, have been scoped out of further assessment.

Conservation Areas

- 4.14 There are 2 conservation Areas within the 2km wider study area – the Holyhead Conservation Area and the Holyhead Beach Conservation Area. Neither have intervisibility with the site as a result of intervening topography, buildings and vegetation, and as a result, have been scoped out of further assessment.

Previous work

- 4.15 An archaeological trial trenching and borehole exercise was undertaken in August and September 2024 (Wessex Archaeology 2024). The purpose of this exercise was twofold – firstly, to excavate two trenches targeted along the line of the former Telford Road as it crossed the study site, and secondly, to investigate and characterise geoarchaeologically the former tidal inlet in the north western area of the site.
- 4.16 The trial trenching failed to identify the line of the Telford Road in either trench, but did identify extensive modern truncation and made ground. It is thought that the line of the Telford Road survives better in the Western half of the site, where it lies in landscaped grassland, and can be seen to survive as a cropmark (see Figure 14).
- 4.17 The geoarchaeological works comprised one borehole and three hand auger samples. The Wessex Archaeology report concluded that the:
- “sedimentary sequence recorded by the geoarchaeological work suggests a continuous coastal and near coastal environment reflecting the dynamic nature of such landscapes in response to*

changing land-sea relationships. The base of the sequence comprises gravelly beach and tidal flat deposits, overlain by a thick peat (0.75–2.25 m below ground level), which may have formed in a back-barrier marshland. The lower peat is overlain by a well-sorted fine sand which may represent further tidal flat deposits but that seems more likely to be of aeolian (wind-blown) origin, representing the landward encroachment of a dune-system located within Penrhos bay and which has subsequently prograded and largely deflated. The age of the deposit sequence is unknown, although the surficial marsh deposits at the top of the sequence is likely to be of a more recent date.”

- 4.18 Unfortunately, none of the samples taken from the peat sequences were suitable for radiocarbon dating. However, the lower peat deposit was considered to have high geoarchaeological potential and the upper one moderate geoarchaeological potential.
- 4.19 A review of the HER data for the study area indicates that there are a high number of records present within the study area which primarily relate to the Post-Medieval and Modern industrial development of the area and are of limited direct relevance to previous activity within the study site itself. Recent archaeological investigations to the southwest of the study site have identified a notable spread of Prehistoric activity in the vicinity of the study site, while there is evidence for a low density of Roman activity also taking place within the study area.

Prehistoric

- 4.20 The earliest evidence for human activity within the study area derives from a concentration of Prehistoric features identified during large-scale archaeological investigations at Parc Cybi in 2007/08, and Penrhos Leisure Village in 2015, located c200m to the west of the study site. The evidence for Neolithic activity principally consisted of scattered individual pits/potholes and groupings of pits, many of which contained worked flint and Grooved Ware or Fengate Ware pottery (74831, 74832, 76099, 96726, 96727, and 96729).
- 4.21 To the south of these pit groupings, and c350m southwest of the study site, the remains of a Scheduled Neolithic long cairn are recorded (the Trefignath chambered tomb, AN011/2500m NMR 95535). The long cairn was totally excavated during the late 1970s, which demonstrated that the monument was altered on three occasions owing to substantially different building styles used in each phase of construction. The remains of hearths and Early Neolithic pottery were found underneath the long cairn with flint and chert tools, although no building remains were revealed.
- 4.22 The Scheduled Bronze Age Standing Stone of Tŷ Mawr (AN012) is located c400m to the west of the study site. The standing stone is 2.5m high, 1.5m wide at the base and 0.4m thick. It stands on a local high point, in a gently undulating field northwest of Trefignath burial chamber. The views are good all round, but especially good of Holyhead Mountain to the north west.
- 4.23 The excavations at Parc Cybi also identified a series of features and artefacts indicative of later Bronze Age occupation, taking the form of further pits and posthole clusters representing possible structures (31580 and 31851). There is an antiquarian record of a Bronze Age cist burial also being excavated in the immediate vicinity (81341). Cotemporary pottery was also recovered (96730).
- 4.24 A possible extant Bronze Age standing stone is located within one corner of a field c450m to the north of the study site (7169).
- 4.25 Iron Age activity at Parc Cybi consisted of the identification of a hearth, adjacent postholes and a pit group, indicating that a degree of activity extended into the latter part of the Prehistoric period (31598 and; 31599).

- 4.26 In the northern half of the study area there is an antiquarian report of a possible promontory fort, typical of the Iron Age, located approximately 100m to the northwest of the study site. No evidence for the enclosure is recorded, and the putative location was heavily impacted by development in the second half of the 20th century. There is also speculation that the antiquarian report may relate to a different promontory fort further along the coast (2509).
- 4.27 A possible Iron Age pit was found during archaeological trial trenching just outside the western boundary of the study site (15695).
- 4.28 The Scheduled Ynys Leurad Hut Circles (AN035) are located c1.4km to the southeast of the study site. No firm dating evidence is available, but they are suspected as being Later Prehistoric in date, or potentially later. The Scheduled remains represent a small group of hut circles on a low, sandy peninsular projecting from the eastern bank of the strait between Holyhead and Anglesey. The best preserved hut, on the north side of the group, is c9m in diameter, that in the centre c 6m diameter. At the south end is a large, ruined hut with a small rectangular 'workshop' to the east.
- 4.29 The investigations at Parc Cybi and Penrhos Leisure Village also record a substantial number of other pits, postholes, structures, and linear features during the course of the works that remain undated but due to form or proximity to the known Neolithic, Bronze Age or Iron Age features, have been attributed to the Prehistoric period in general (14587, 31576, 31577, 31578, SH 25779 80726; 31579, 34746, 96725, 96728, 96734, 96735, and 96736).
- 4.30 The Scheduled Prehistoric Hut Circle at Tre-Arddur is located approximately 750km to the south of the study site encompassed by a modern caravan park. The monument comprises the remains of an enclosed settlement of multiple hut circles, which probably dates from the first millennium BC. Three round huts, with diameters of 15.5m, 4m and 2.5m, together with lengths of enclosure walls are situated on a rocky knoll (AN092/2003).
- 4.31 Several spreads of burnt stone have been recorded along the route of the modern A55, some 50m to the west of the study site. Such spreads of burnt stones are frequently postulated as having their origins in the Prehistoric period (31804, 31805, and 31806). Two more possible burnt mounds are recorded c350m and c500m to the southwest of the study site (34742 and 34743).
- 4.32 Two human skulls associated with several Prehistoric worked flints were recovered in 1949 approximately 300m to the north of the study site (2505 and 7895).
- 4.33 Prehistoric, or later, quern stones have been recovered c350m to the north east of the study site (5541).
- 4.34 The recent archaeological investigations at Parc Cybi and Penrhos Leisure Village have indicated that there was a clear concentration of Prehistoric activity present within the local landscape from the Neolithic period onwards. This is supported by the Scheduled Neolithic long cairn and Prehistoric hut circles in the southern study area, and a scatter of Prehistoric features and finds deriving from the northern study area. In all, the density of activity recorded within the study area indicates that there is a moderate potential for Prehistoric remains to be present within the study site, where not impacted by later activity.

Roman

- 4.35 Evidence for Roman activity within the study area is relatively scarce. The most substantive activity associated with this period was encountered during the Penrhos Leisure Village c200m to the southwest of the study site, where a metalled surface and ditch associated with a possible Roman trackway were recorded (96731 and 96732).
- 4.36 The postulated alignment between Tal y Foel and Holyhead Roman road encroaches into the southwest study area traveling on a roughly northwest to south alignment, c400m to the south

west of the study site. Supporting evidence for its physical presence is currently very limited (17843).

- 4.37 A hoard of seventeen Roman coins was found in brass vessel near Penrhos Isaf in 1710, although the exact location of the discovery is unknown and the HER provides a general grid reference within the site itself (2503). A small group of Roman coins were recovered as surface finds in 1852 c200m to the north east of the study site (2508).
- 4.38 Due to the limited number of HER records relating to Roman activity occurring within the study area, the potential for such remains within the study site is considered to be low.

Early Medieval & Medieval

- 4.39 A Viking period spearhead was found near Ty'n Rhosydd, c200m to the north east of the study site (2076).
- 4.40 The remains of a Medieval farmstead at Tre-gof are located c350m to the south of the study site (36508), while it is thought a Medieval tide mill could have been located on the coastline c850m to the south west of the study site (7212). A second probable Medieval farmstead is located c200m to the south west of the study site (13929).
- 4.41 A Medieval coin was recovered approximately 500m to the north east of the study site (81517).
- 4.42 During the Early Medieval and Medieval periods, the study site is likely to have been located in a more marginal coastal area containing scattered farmsteads. In general, there is considered to be a low potential for Early Medieval and Medieval remains within the study site, although the presence of residual artefacts and contemporary field boundaries cannot be precluded.

Post Medieval & Modern (including map regression exercise)

- 4.43 During the Post-Medieval period it is likely that land within the study area was progressively cleared for agricultural purposes. The presence of scattered Post-Medieval farmstead and associated field systems are attested to on the HER with a number of such features scattered throughout the study area at a distance from the study site (31544, 31559, 31610, 34745, 34747, 70620, 97686, 97691, 97763, and 98068,). The closest recorded farmstead to the study site, c100m to the southwest, is Tyddyn Bach Farm marked on the 1st edition Ordnance Survey mapping (31566).
- 4.44 The most notable land holding within the study area during the Post-Medieval period is that of the Penrhos Estate. The original house at Penrhos, located c200m to the northeast of the study site (34727, NMR 15789) was said to have been built during the reign of Henry VIII, on land granted to John ap Owen. At this time, the land consisted of little more than the Penrhos headland upon which a farm was built, originally known as Tudor House and subsequently, Penrhos. Most of the land was owned by the Penrhos family, who stabilised their surname to Owen in the early 16th century. A new house was built c1720-30. In 1763 Margaret Owen, the heiress to Hugh Owen, married John Stanley and the Penrhos Estate passed to the Stanleys of Alderley (74967). It is likely that the study site would have fallen into the wider Penrhos Estate.
- 4.45 The Penrhos Estate was extensively remodelled in the 19th century. Multiple buildings constructed at this time, including ornate towers and ancillary buildings, are likely to be contemporary with the new country house built at this time and share distinctive architectural features, all of which are Grade II Listed. These designated buildings comprise:

- Tower, walls and courtyard buildings (5765, NMR 31082) located c175m to the north east of the study site (Plate 18);
 - Candle Tower and walls adjoining remains of Penrhos House (5764) located c175m to the northeast of the study site (11589, NMR 22997)
 - Bailiff's Tower and with boundary wall, gates and attached outbuildings at Penrhos Home Farm (5766, NMR 22995) located c250m to the north of the study site (Plate 17);
 - Barn and cartsheds, Penrhos Home Farm (5767, NMR 31081) c250m to the north of the study site (Plate 16);
 - The Betting Stand (aka Rotten Tower) (5769, NMR 22996) c100m to the northeast of the study site (Plate 19);
 - Watertower (5768, NMR 22998, Plate 20) located c200m to the northeast of the study site.
- 4.46 The Battery (5770, Plate 13) is a Grade II Listed Building located c350m to the north of the study site and represents a D-shaped naval fortification probably built between 1801 and 1808.
- 4.47 In an effort to decrease the travel time between London and Holyhead, Thomas Telford was commissioned to improve the road network between these two locations, resulting in the construction of the Holyhead Road between 1810 and 1815. The course of the Holyhead Road, notable by its very straight alignment, was constructed through the study site, as depicted on the early historic mapping. A surviving section of this historic road is located just within the north western edge of the study site (16801).
- 4.48 One feature associated with Telford's Holyhead Road has been Scheduled in the form of substantial quay on the north side of Stanley Embankment (AN146) located c950m to the east of the study site. The embankment was originally constructed as an earth and sand core with a clay capping and a stone facing. The quay is the one section of the Stanley Embankment that remains largely as built. The quay retains its substantial masonry walls, set vertically on the base of the embankment but at angles in plan in order to receive vessels. The substantial unloading area remains above the quay. The Stanley Embankment is also designated under two separate Grade II Listed Building records (19231 and 20074).
- 4.49 The Grade II Listed Stanley Tollhouse (20069, NMR 23479, Plate 15) is located c300m to the east of the study site and was built as part of the infrastructure for Telford's Holyhead Road in the early nineteenth century. The stone built octagonal two storey toll house was moved to its current location from the edge of the A5 in 1975. The Grade II Listed Telford Milestone 3 (20073, Plate 14) is located close to the toll house.
- 4.50 The Grade II* Listed Kingsland Windmill (5762) was probably built in the 1820s by Hugh Hughes. The windmill is a stone built conical tower with recent whitewashed render. The cap and sails were removed during World War II. The asset is located c860m to the west of the study site.
- 4.51 The grey stone single arched Bridge Over Railway near Ty Mawr Farmhouse (16526), Grade II Listed, is located c500m to the west of the study site. It is similar in style to the nearby Pont Cytir, which bears date of 1847.
- 4.52 Located approximately 760m to the northwest of the study site is a group of six Grade II Listed Buildings known as 1-6 Stanley Cottages (14743-14748, NMR 23147). The single storey almshouses were built in c1866 of grey brown rubble construction.
- 4.53 A short distance to the south of the Stanley Cottages, is the Grade II Listed Ebenezer Chapel (14733, SH 2492 8121). The chapel was built in the late 19th century utilising grey stone construction to the front with bath stone dressings. The pedimented 'temple' front with elaborate finial is of note.

- 4.54 Although the area of the site is shown on the John Speed's 1662 Map of Anglesey, it is not depicted in any detail. John Evans' 1795 Map of North Wales (Fig 3), although not detailed enough to show field boundaries, does show both Penrhos and the separate farm of 'Penrhos brydwen' and the farm at Glan y gors. The study site probably comprised lands from both farms. Telford's New Holyhead Road had not yet been constructed running through the study site.
- 4.55 The Ordnance Surveyors Drawing of 1818 (Fig 4) does show the new Holyhead Rd, as well as some of the field boundaries in the vicinity of the site, which lies in land to the south east of the farmstead at 'Penrhos Brodwen'. This also shows the Ty Mawr stone (marked as 'erect stone', the Trefignath chambered tomb (marked as 'Cromlech') and the Battery, as well as the complex at Penrhos.
- 4.56 The first truly detailed map of the study site is the 1840 Holyhead Tithe Map (Fig 5). The study site overlies a number of small fields. The majority of the fields lay within the Penrhos Bradwen landholding, which was owned by the Reverend John Owen Jones and tenanted by Margaret Jones and Elizabeth Hughes. The remaining land belonged to the Penrhos estate, owned by Lord Stanley of Alderney.
- 4.57 The earliest Ordnance Survey map of 1888-89 (Fig. 6) shows the study as occupying agricultural fields either side of the Holyhead Road. The layout of the study site remains unchanged between 1901 and 1963 (Figs. 7 - 9).
- 4.58 The Penrhos Aluminium Works was built between 1969 and 1970, coming operation in 1971. To facilitate the construction of the Penrhos Aluminium Works the line of Telford's Holyhead Road was re-aligned to the north of the works cutting through the former grounds of Penrhos house. During operation the works smelter was one of the largest suppliers of aluminium in the UK, producing 125,000 tonnes of aluminium per annum. In September 2009 Anglesey Aluminium ceased smelting operations due to not being able to source a commercially viable power contract. In October 2009 Anglesey Aluminium transformed its operations into a re-melt facility for the continued production of billet (21160 and 34735). The plant closed in 2013. A record of the complex was made upon its closure by the RCAHMW (NMR 705238)
- 4.59 The 1979 Ordnance Survey map (Fig. 10) shows the Penrhos Aluminium Works having been constructed and occupying an extensive area of land around the study site. The study site itself lies at the south eastern end of the long potlines where the aluminium was smelted. The layout of the study site remains unaltered up to the present (Figs. 11 - 14).
- 4.60 The potential for significant archaeological features dating to the Post-Medieval or Modern periods is solely associated with any below ground remains relating to Telford's original construction of the Holyhead Road. Given the importance of the Penrhos Aluminium Works to the economy of the island and to the growth of Holyhead, the unique complex of surviving buildings and associated infrastructure (such as the tunnel and jetty) should be considered non designated heritage assets in their own right.

Undated

- 4.61 A Latin inscribed stone was previously recorded as being incorporated into the wall of Penrhos-Bradwen, a former estate house located within the study site (90303). The inscription, in Latin, suggests a medieval date. The whereabouts of the stone is currently unknown.

Assessment of Significance

- 4.62 Existing national policy guidance for archaeology enshrines the concept of the ‘significance’ of heritage assets. Significance as defined in the PPW11 centres on the value of an archaeological or historic asset for its ‘heritage interest’ to this or future generations.
- 4.63 The Trefignath Chambered Tomb Scheduled Monuments, due to its archaeological interest, can be considered of national significance.
- 4.64 No impacts are anticipated in relation to the remaining designated historic assets within the study area, and as a result, these have been scoped out of further assessment.
- 4.65 As identified by desk based work, archaeological potential by period and the likely significance of any archaeological remains which may be present is summarised in table form below:

Period:	Identified Archaeological Potential	Identified Archaeological Significance
Prehistoric	Moderate	Low (Local) to Moderate (Regional)
Roman	Low	Low (Local)
Early Medieval & Medieval	Low	Low (Local)
Post Medieval & Modern	Solely associated with any surviving remains of Telford’s original Holyhead Road and the Penrhos Aluminium works	Low (Local) to Moderate (Regional)

- 4.66 The potential, and associated significance, for such remains will only be applicable where such remains have not been impacted by later activity.

5 SITE CONDITIONS, THE PROPOSED DEVELOPMENT & REVIEW OF POTENTIAL DEVELOPMENT IMPACTS ON ARCHAEOLOGICAL ASSETS

Site Conditions

- 5.1 A site visit was undertaken on November 1st, 2023, with a second visit on 5th June 2024. The weather on both occasions was overcast with sunny spells, and visibility good. Views into and out of the site were reviewed. There was no direct intervisibility between the study site and many of the designated assets identified above, although the Trefignath burial chamber is visible from the northern end of the sites. The study site is well screened in most directions by existing built form or vegetation.
- 5.2 The study site itself is currently subject to a major demolition exercise, with the removal of most of the buildings of the former Penrhos Aluminium Works complex (Plates 7 and 8). This has revealed that the former Aluminium Works and in particular the long potlines, had deep foundations. Construction of the works would have resulted in severe horizontal truncation of existing below-ground deposits, removing all earlier archaeological horizons and associated deposits in these areas. Furthermore, agricultural activity from the Post-Medieval period onwards is likely to have had a moderate, but widespread, negative impact on below ground archaeological deposits.

Proposed Development

- 5.3 Outline permission is being sought for the redevelopment to include demolition of structures and buildings to allow construction of new employment floorspace including, data centres (use class B8), offices and research and development space (use class B1), and battery energy storage (Unique use). The development will include drainage arrangements, retained and new landscaping, gatehouses, and other associated buildings, infrastructure and engineering works. All matters are reserved except for (retained) site accesses from the A5.
- 5.4 The proposals for the Prosperity Parc redevelopment will comprise:
- up to 10,000sqm B1 office
 - up to 5,000sqm B1 research and development space
 - minimum of 223,000sqm/maximum of 238,000sqm B8 data centre use (with the data centre use exclusively, and no standard B8 storage and distribution uses).
- 5.5 The proposed development will involve extensive intrusive works, both during demolition and subsequent construction, particularly in areas where buildings previously stood, or new buildings are proposed. This would have the potential to impact upon any archaeological remains which might survive within the site.

Review of Potential Development Impacts on Historic Assets

- 5.6 In order to accurately assess the potential impacts to the setting of the heritage assets adjacent to the site, a staged approach, as recommended within 'The Setting of Heritage Assets in Wales' (Cadw 2017) has been adopted.
- 5.7 This assessment has identified that there are a number of designated assets within 2km of the site where there is a potential that the proposed development might lead to an alteration of their setting, and potentially impact upon their significance. Following a site walkover and visits to these designated assets, all except for one of the designated assets has been scoped out of further assessment, based on the lack of intervisibility or known historical associations between the study site and the assets. The single exception is the Trefignath Chambered Tomb (Scheduled Monument No AM011)

Trefignath Chambered Tomb (AN011)

- 5.8 The Trefignath Chambered Tomb lies on atop a small rocky outcrop some 400m to the west of the study site. It comprises the much altered remains of a Neolithic chambered tomb, built in three phases from 3750-3500 BC and possibly in use until c. 2250 BC. Initially it comprised a small burial chamber opening to the north, replaced by a second (slightly larger) chamber with an eastern entrance (see plates , before a third larger eastern chamber was added. The result is a long stone chambered tomb, aligned roughly west to east, with a prominent eastern entrance, with some of the stones held in place by modern supports. The tomb was excavated in 1977 – 1979 before being consolidated for public access. Its location on a prominent stone outcrop in the local landscape suggests that views to the monument, and possibly also from the monument played a part in its siting. -
- 5.9 Although the monument has largely been excavated, its primary value is evidential, as noted in the scheduling text, which states:
- “The monument is of national importance for its potential to enhance our knowledge of prehistoric burial and ritual. The monument is an important relic of a prehistoric funerary and ritual landscape and retains significant archaeological potential, with a strong probability of the presence of both intact burial or ritual deposits and environmental and structural evidence, including a buried prehistoric land surface.”*
- 5.10 The monument has little aesthetic or aesthetic value, but as a monument open to the public, it does have some communal value. Neolithic burial monuments are often visited both by visitors seeking to learn more about the history of the monuments and also by others who see them as more spiritual places, and can often become foci of modern offerings.
- 5.11 The primary setting of the chambered tomb is the tomb itself, the rocky outcrop on which it sits and its immediate surrounds. Visibility of and from the monument is limited to the to the west, south west and south due to a stand of trees and the hedges bordering the field, but there are more open views to the north west, north, north east, east and south east as a result of the elevated position of the tomb. The immediate views in these directions take in agricultural fields in which Neolithic remains have also been identified and provide a pleasant bucolic backdrop to the monument. This immediate setting, enclosed to the west and south, but more open to the north and east. makes a minor positive contribution to the significance of the monument.
- 5.12 Beyond this, however, lie a number of modern intrusions. To the north east, east and south east these include the A5 dual carriageway and the railway with their linear planting schemes, and beyond those are the visible Penrhos Aluminium Works and the Holyhead Retail Park. There are also long views to the north west to Holyhead mountain, although a number of modern buildings of

the Parc Cybi development are visible in the foreground in this view. These longer views, containing much evidence for the modern world, do not contribute positively to the significance of the monument.

- 5.13 A number of Neolithic monuments in the British Isles appear to have been constructed in order to reference specific alignments, including alignments to the passage of the sun or the moon through the sky at different times of the year. The Trefignath Chambered Tomb is aligned broadly west east, with the latest chamber opening to the east, broadly in line with the rising sun. This may not have been the only important alignment, or indeed an important alignment – lunar alignments have been recorded in Neolithic monuments. The west-east axis of the tomb does, however, suggest that this axis may have been important in its construction and use. As mentioned above, views to the west are restricted. Long views to the east include the study site. The proposed development would result in the introduction of new modern built forms in those views, albeit significantly mitigated by the introduction of additional planting along this boundary of the development, which would result in a slight negative impact on the significance of the monument.
- 5.14 Based on the available evidence, there is a theoretical potential for below-ground remains of interest associated with the Prehistoric period and the post medieval period to be present within the study site. Due to the substantial below-ground impacts associated with the construction of the Penrhos Aluminium Works during the second half of the 20th century, it is anticipated that any earlier archaeological deposits of interest would have been truncated and fully removed. On this basis, no further archaeological fieldwork or recording is recommended.

6 SUMMARY AND CONCLUSIONS

- 6.1 The site of the proposed Prosperity Parc development on the former Penrhos Aluminium Works, Holyhead, Ynys Mon has been reviewed for its heritage and archaeological potential.
- 6.2 In accordance with central and local government planning policy and guidance, a desk based assessment has been undertaken to clarify the heritage and archaeological potential of the study area.
- 6.3 There are no designated historic assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Historic Battlefields, Registered Park and Gardens, Protected Wreck Sites, and Conservation Areas) within the study site itself, although there are a number of Scheduled Monuments and Listed Buildings within the 2km study area. The potential development impacts to these assets have been assessed and it is considered that there will be no impact to the setting or significance of these designated historic assets, with the exception of a slight negative impact to the significance of the Trefignath Chambered Tomb Scheduled Monument due to the proposed construction of new built forms within views to the east from the monument.
- 6.4 The study site is not located in an area of designated archaeological priority.
- 6.5 Outline permission is being sought for the redevelopment to include demolition of structures and buildings to allow construction of new employment floorspace including, data centres (use class B8), offices and research and development space (use class B1), and battery energy storage (Unique use). The development will include drainage arrangements, retained and new landscaping, gatehouses, and other associated buildings, infrastructure and engineering works. All matters are reserved except for (retained) site accesses from the A5.
- 6.6 An archaeological trial trenching and borehole exercise was undertaken in August and September 2024 (Wessex Archaeology 2024) in support of the development proposal. The two trial trenches targeted on the line of the Telford road failed to identify it in either trench. Both trenches showed evidence for heavy modern disturbance linked to the construction of the Aluminium Works. The geoarchaeological work, investigating the former tidal inlet shown on early maps in the north western part of the site, established that there were fluctuating coastal environments, with beach and tidal flat deposits sealed by thick peats, sealed in turn by aeolian wind blown sands, possibly representing encroaching dunes which were in turn sealed by later peaty deposits. Unfortunately, none of the peat recovered was suitable for dating purposes, but the work does indicate a fluctuating coastal environment over time.
- 6.7 Agricultural activity from the Post-medieval period onwards is considered likely to have had a moderate, but widespread, negative impact on below ground archaeological deposits.
- 6.8 The development of the study site during the second half of the 20th century to facilitate the construction of the Penrhos Aluminium Works resulted in severe horizontal truncation of existing below ground deposits, removing all earlier archaeological horizons and associated deposits. This is considered likely to have had a severe, widespread, negative impact on below ground archaeological deposits.
- 6.9 Based on the available evidence, there is a theoretical potential for below-ground remains of interest associated with the Prehistoric period and the 19th century to be present within the study site. Due to the substantial below-ground impacts associated with the construction of the Penrhos Aluminium Works during the second half of the 20th century, it is anticipated that any earlier archaeological deposits of interest would have been truncated and probably fully removed. On this basis, no further archaeological fieldwork is recommended. No intrusive works are planned in the area of the former inlet in the north western area of the site, and no further geoarchaeological works are considered necessary.

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Aerial photographs

RAF Verticals

14; 106G/UK/566; 4350 & 4353; 13/8/45

3G/TUD/T67; 5027; 17/10/45

1055A; 540/39; 5124; 19/5/48

1055; 58/411; 5168 & 5173; 15/4/50

1210; 58/682; 4001; 19/5/51

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2309; 58/3805 F21; 0006; 8/9/60

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2214; 58/4228 F22; 0007; 16/3/61

RAF Medmenham

2578; 2.6; 22/4/42

2204; 026; 10/10/41

OS Verticals

04-037; 011; 16/5/04

02-135; 065; 5/8/02

99-024; 029; 13/3/99

99-023; 058; 13/3/99

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72-061; 197 & 191; 14/4/72

WDA Obliques

1999 shot of the site

RCAHMW Obliques

99-cs-837

AP_2005_226

AP_2012_205 to 212; 214 to 252; 280; 285

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1940 Nov 24th 4029 Luft 165

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1960 6004 58RAF3579 F21 0004

1966 6614 OS66_016 116

1967 6737 OS 67_027 080

1971 7165 OS 71_102 207

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1982 8233 CUCAP RC8_ET 052

1985 8512 RAF 1PRU0740 026

1992 9205 ADAS 555 203

1993 9313 RAF 39_6152 0295

1995 9544 OS95_104 009

1999 9951 OS99_023 032

1999 9951 OS99_023 058



FIGURES



PLATES



APPENDICES

Appendix 1

Trefignath Chambered Tomb Scheduled Monument

Summary Description of a Scheduled Monument

Reference Number

AN011

Name

Trefignath Chambered Tomb

Date of Designation

Status

Designated

Location

Unitary Authority

Isle of Anglesey

Community

Trearddur

Easting

225859

Northing

380553

Broad Class

Religious, Ritual and Funerary

Site Type

Chambered round barrow

Period

Prehistoric

Description

Summary Description and Reason for Designation

The following provides a general description of the Scheduled Monument. The monument comprises the remains of a chambered tomb, dating to the Neolithic period. This ruinous megalithic monument is situated on a long and almost bare rocky ridge. It was built in three separate stages from about 3750-3500 BC and may have been active until about 2250 BC. The structure was greatly damaged in the last decade of the eighteenth century and the cairn that surrounded the stones was largely removed in 1870. It was excavated in 1977-79 before being consolidated and restored for public viewing. The monument was built over a scatter of occupation debris including flints and pottery. This was dated to about 3100 BC by a radio carbon determination. The first stage of the monument was a small chamber set in a cairn up to 4.0m across. It opened to the north via a short passage. The second stage saw a larger chamber built on the east side of the first stage monument, whose cairn was incorporated in a much larger wedge shaped cairn defined by drystone walling. The new chamber opened onto a

recessed forecourt at the eastern end. In the third stage a new chamber was built in the second stage forecourt and the cairn was extended around it. This final chamber had tall portal stones on the east standing more than 2.0m high. Fragments of bone were found in this eastern chamber. The monument is of national importance for its potential to enhance our knowledge of prehistoric burial and ritual. The monument is an important relic of a prehistoric funerary and ritual landscape and retains significant archaeological potential, with a strong probability of the presence of both intact burial or ritual deposits and environmental and structural evidence, including a buried prehistoric land surface. Chambered tombs may be part of a larger cluster of monuments and their importance can further enhanced by their group value. The scheduled area comprises the remains described and an area around them within which related evidence may be expected to survive.

Appendix 2

Gazetteer of Designated Assets, NMR data and Historic Environment Record Data

Scheduled Monuments

SAM Number	Name	Period
AN031	Roman Wall Surrounding St Cybi's Churchyard	Roman
AN092	Tre-Arddur Hut Group	Prehistoric
AN012	Tŷ Mawr Standing Stone	Prehistoric
AN011	Trefignath Chambered Tomb	Prehistoric
AN035	Ynys Leurad Hut Circles	Roman
AN145	Newlands Fish Weir	Post Medieval
AN146	The Holyhead Road: quay on the Stanley Embankment	Post Medieval/Modern

Listed Buildings

Record Number	Name	Grade
5263	Melin y Gof aka Stanley Windmill	II
5413	St Cybi's Church	I
5414	Capel y Bedd	II
5415	Walls of upper churchyard	I
5417	Skinner Monument	II
5724	NO 2, VICTORIA TERRACE, VICTORIA TERRACE,,,,,GWYNEDD,	II
5726	Tanalltran Cottages	II
5727	Plas Alltran	II
5728	Stable Block to Plas Alltran	II
5729	,1,TURKEY SHORE ROAD,Holyhead,,GWYNEDD,	II
5734	Fitting, Boiler and Smithy Shops	II
5735	Office and Stores Building	II
5736	Sailmakers, Seamstresses and Polishers Workshops	II
5737	Store, Old Boiler Shop & Sawmill buildings at Marine Yard	II
5741	Ucheldre Centre (Former Bon Sauveur Convent Chapel),	II
5762	Kingsland Windmill	II*
5763	Market Hall	II
5764	Candle Tower and walls adjoining remains of Penrhos House	II
5765	Tower, walls and courtyard buildings	II
5766	Bailiff's Tower and with boundary wall, gates and attached outbuildings at Penrhos Home Farm	II
5767	Barn and cartsheds, Penrhos Home Farm	II
5768	Watertower	II
5769	The Betting Stand (aka Rotten Tower)	II
5770	The Battery	II
5771	Customs House	II

CULTURAL HERITAGE DESK-BASED ASSESSMENT

Record Number	Name	Grade
5772	Harbour Office	II*
5773	George IV Arch	II*
14726	Stanley House	II
14727	The Captains Table	II
14728	Ty'n Parc	II
14733	Ebenezer Chapel	II
14734	Tanalltran Cottages	II
14735	Clock Turret in Station Approach	II
14736	Caernarfon Castle P H	II
14737	Tabernacl Chapel	II
14738	Hyfrydle Chapel (including Forecourt Gates and Railings)	II
14739	Train Shed at Holyhead Station	II
14740	2 Turkey Shore Road	II
14741	Pillbox near Skinner's Monument	II
14742	South Pier	II
14743	Stanley Cottages	II
14744	Stanley Cottages	II
14745	Stanley Cottages	II
14746	Stanley Cottages	II
14747	Stanley Cottages	II
14748	Stanley Cottages	II
14749	Cenotaph	II
14750	Lower Churchyard Walls and Gateway	II
14751	NO 3, VICTORIA TERRACE, VICTORIA TERRACE,,,,,GWYNEDD,	II
14752	NO 4, VICTORIA TERRACE, VICTORIA TERRACE,,,,,GWYNEDD,	II
14753	NO 5, VICTORIA TERRACE, VICTORIA TERRACE,,,,,GWYNEDD,	II
14754	NO 6, VICTORIA TERRACE, VICTORIA TERRACE,,,,,GWYNEDD,	II
14757	Admiralty Pier (including Sea Wall between Salt Island Bridge and George IV Arch)	II
14758	Lighthouse on Admiralty Pier	II
16526	Bridge Over Railway near Ty Mawr Farmhouse	II
19231	Stanley Embankment	II
19232	Telford Milestone (4)	II
20069	Stanley Tollhouse	II
20073	Telford Milestone (3)	II
20074	Stanley Embankment	II
20075	Cae Grugog	II
20079	Pillbox adjacent to Trearddur Bay Hotel	II
20080	Pillbox in grounds of Trearddur House	II
87587	Cybi Building, Holyhead High School	II

CULTURAL HERITAGE DESK-BASED ASSESSMENT

Record Number	Name	Grade
87588	Boundary Wall to Cybi Building, Holyhead High School	II
87929	Telford Milestone (1)	II

Conservation areas

Holyhead Conservation Area

Holyhead Beach Conservation Area

NMR data

NPRN	NMRW_Name
8656	Noddfa Welsh Independent Chapel (London Road), Holyhead
8663	Hebron Welsh Baptist Church, Kingsland Road, Holyhead
8671	Disgwylfa Chapel (Welsh Calvinistic Methodist; London Road), London Road, Holyhead
8682	Ebenezer Welsh Calvinistic Methodist chapel, Kingsland Road, Holyhead
15789	Penrhos
22995	Penrhos Home Farm, Bailiffs Tower, Holyhead
22996	Penrhos Betting Stand, Holyhead
22997	Penrhos Candle Tower, Holyhead
22998	Penrhos Water Tower, Holyhead
23147	Penrhos Almshouses;1-5 Stanley Almshouses
23479	Stanley Gate Tollhouse; The Tollhouse, Penrhos, near Holyhead
31081	Penrhos Home Farm, Barn and Cartsheds
31082	Penrhos Home Farm, Tower
40344	Melin Yr Ogof
43582	Capel Ulo, Site of
86553	Llan Fawr, Garden, Holyhead
86554	Frondeg, Garden, Holyhead
86555	Llys-y-Gwynt, Garden, Holyhead
86556	Penrhos, Garden, Holyhead
95535	Trefignath Burial Chamber
270302	Pillbox (Variant), Holyhead
270318	Pillbox (Variant), Holyhead
270319	Pillbox (Variant), Holyhead
270513	Pillbox (Variant), Holyhead
270515	Defended Building, Holyhead
275603	Enclosed Hut Group, Tre-Arddur
302268	Ty-Mawr Standing Stone; Bonc Deg Maenhir
308397	Cyttir Bridge
402429	Possible Burial Chamber North of Trearddur
402430	Anglesey Aluminium Smelting Works, Holyhead

CULTURAL HERITAGE DESK-BASED ASSESSMENT

NPRN	NMRW_Name
416136	1-5 Greenfield Terrace, Holyhead
416139	2-3 Kingsland Road, Holyhead
416140	Kingsland Road, Holyhead
416141	41-47 Kingsland Road, Holyhead
416142	49-63 Kingsland Road, Holyhead
416143	Boston Terrace, Ebernezer Terrace, Kingsland Road, Holyhead
416144	1-8 Cyttyr Road, Holyhead
416148	Gilbert Street, Holyhead
416170	Lligwy Street, Holyhead
416171	Henry Street, Holyhead
416172	Gilbert Street, Holyhead
417386	Ty Mawr Excavations, Holyhead
519048	Penrhos Point Flagstaff
519063	Ruin, Penrhos Point
519064	Square Tower, Ynys Peibio
519065	Summer House, Llanfawr Garden
519066	Mill Stump, Llan Fawr
525369	Tide Mill, Felin-Helyg
705199	Morawelon, Holyhead
705238	Penrhos Business Park, Holyhead
705333	Ty Mawr, Holyhead

HER data (Heneb)

PRN	site name	period
1765	Capel Ulo, Possible Site of, Holyhead	UNKNOWN
2003	Hut Circle Settlement, Trearddur	PREHISTORIC
2076	Viking Spearhead, Findspot, Ty'n Rhosydd	EARLY MEDIEVAL
2500	Trefignath Burial Chamber, Treaddur	NEOLITHIC;PREHISTORIC
2501	Tŷ Mawr standing stone, Holyhead	BRONZE AGE
2502	Coin Hoard, Findspot, Tref Arthur, Holyhead	ROMAN
2503	Roman Coin Hoard, Findspot, Penrhos Isaf, Holyhead	ROMAN
2504	Burial Chamber, Trearddur	PREHISTORIC
2505	Flints and Human Bones, Findspot, Penrhos Beach	UNKNOWN
2506	Stone Tools, Findspot, Penllech Nest	PREHISTORIC
2507	Stone Axes, Findspot, Near Kingsland, Holyhead	PREHISTORIC
2508	Coins, Findspot, Penrhos, Holyhead	ROMAN
2509	'Danish Fort', Site of, Penrhos	PREHISTORIC
2510	Burial Chamber, Site of, Morawellan	NEOLITHIC
2512	Stanley Gate Toll House, Trearddur	POST MEDIEVAL
4467	Penrhos Garden, Holyhead	POST MEDIEVAL
5541	Quernstones, Findspot, Beddmanarch	PREHISTORIC
5683	Stanley Embankment, Anglesey	POST MEDIEVAL
7168	The Battery, Penrhos	POST MEDIEVAL
7169	Standing Stone, Penrhos	BRONZE AGE

CULTURAL HERITAGE DESK-BASED ASSESSMENT

PRN	site name	period
7170	Fish Trap, Cerrig yr Adar, Penrhos	UNKNOWN
7171	Fish Trap, Penrhos	UNKNOWN
7172	Fish Trap, Penrhos	UNKNOWN
7212	Tidal Mill, Possible Site of, Felin-heli	MEDIEVAL
7213	Pillbox, Felin-heli, Holyhead	MODERN
7656	Noddfa Chapel, London Road, Holyhead	POST MEDIEVAL
7671	Disgwylfa Chapel, London Road, Holyhead	POST MEDIEVAL
7682	Capel Ebenezer, Holyhead	POST MEDIEVAL
7895	Flints, Findspot, Brynglas, Penrhos Bay	PREHISTORIC
11048	Ty Mawr Cemetery, Holyhead	EARLY MEDIEVAL
11587	Bailiffs Tower, Penrhos Home Farm	POST MEDIEVAL
11588	The Betting Stand, Penrhos	POST MEDIEVAL
11589	Candle Tower, Penrhos	POST MEDIEVAL
11590	Water Tower, Penrhos	POST MEDIEVAL
11788	Kingsland Windmill; Rogo Mill, St. George's	POST MEDIEVAL
12526	Barn and Cartsheds, Penrhos Home Farm	POST MEDIEVAL
12527	The Tower and Courtyard, Penrhos	POST MEDIEVAL
13925	Field Boundaries, Parc Cybi	POST MEDIEVAL
13926	Road, Lon Towyn Capel	POST MEDIEVAL
13927	Well, Parc Cybi	POST MEDIEVAL
13928	Bonc-deg, Site of, Parc Cybi	POST MEDIEVAL
13929	Trefignath Farm, Site of, Treaddur	MEDIEVAL;POST MEDIEVAL
13930	Possible Prehistoric Site, Ty Mawr	PREHISTORIC
14587	Stone Settings, Trefignath	UNKNOWN
14588	Pen y Lôn Cottage, Site of, Parc Cybi	POST MEDIEVAL
14599	Roundhouse Settlement, Site of, Parc Cybi	IRON AGE;MULTIPERIOD
14602	Romano-British Settlement, Parc Cybi	PREHISTORIC;ROMAN
15694	Field System, Penrhos	POST MEDIEVAL
15695	Pit, Penrhos	IRON AGE
15696	Construction Camp, Penrhos	MODERN
16077	Chester to Holyhead Railway Line	POST MEDIEVAL
16081	Telford's Holyhead Road, Section of, Holyhead	POST MEDIEVAL
16084	Telford Graving Dock, Holyhead	POST MEDIEVAL
16604	Penrhos Bay Submerged Peats, Holyhead	PREHISTORIC
16637	Ellin Stanley's Cross, Holyhead	POST MEDIEVAL
17138	Landscape, Penrhos, Anglesey	MULTIPERIOD
17843	Roman Road, Proposed, Tal y Foel to Holyhead	ROMAN
18291	Quay, Stanley Embankment, The Holyhead Road	POST MEDIEVAL
18401	Ponds, Ty Mawr	POST MEDIEVAL
18402	Enclosure and Structure, site of Tyddyn y Biogen, Parc Cybi	POST MEDIEVAL
18403	Tyddyn Pioden, Site of, Parc Cybi	MEDIEVAL;POST MEDIEVAL
18404	Stone, Natural Feature, Ty Mawr	UNKNOWN
18405	Peat Deposits, Ty Mawr	PREHISTORIC
18406	Occupation Site, Parc Cybi	NEOLITHIC
18407	Cobbled Area, Parc Cybi	UNKNOWN

CULTURAL HERITAGE DESK-BASED ASSESSMENT

PRN	site name	period
19676	London to Holyhead Road, Part of, Penrhos	POST MEDIEVAL
21160	Anglesey Aluminium, Holyhead	MODERN
21167	Pont Penllech Nest, Former Railway Bridge, Holyhead	MODERN;POST MEDIEVAL
21168	Pont Cytir, Holyhead	MODERN
21169	Ty Mawr House, Site of, Holyhead	POST MEDIEVAL
21170	Pont Ty Mawr Footbridge, Holyhead	MODERN
29737	Earthworks, Parc Cybi	UNKNOWN
31544	Glan Gors Bach Farm, Site of, Penrhos	POST MEDIEVAL
31555	Quarry, NE of Tre-gof	UNKNOWN
31559	Tre Ddaniel, Remains of, Treaddur	POST MEDIEVAL
31566	Tyddyn Bach, Site of, Treaddur	POST MEDIEVAL
31570	Neolithic rectangular timber building, Parc Cybi	NEOLITHIC
31571	Pits and Postholes, Parc Cybi	NEOLITHIC
31572	Pit Group, Parc Cybi	NEOLITHIC
31573	Pit Group, Parc Cybi	NEOLITHIC
31574	Pit Group, Parc Cybi	NEOLITHIC
31575	Pit Group, Parc Cybi	PREHISTORIC
31576	Structure, Parc Cybi	PREHISTORIC
31577	Pits and Postholes, Parc Cybi	PREHISTORIC
31578	Structure, Parc Cybi	PREHISTORIC
31579	Structure, Parc Cybi	PREHISTORIC
31580	Pits, Parc Cybi	BRONZE AGE;PREHISTORIC
31581	Structure, Parc Cybi	BRONZE AGE;PREHISTORIC
31582	Burnt Mound, Parc Cybi, Holyhead	BRONZE AGE
31583	Burnt Mound, Parc Cybi, Holyhead	NEOLITHIC
31584	Burnt Mound, Possible, Parc Cybi	PREHISTORIC
31585	Earth Ovens, Possible, Parc Cybi	BRONZE AGE;PREHISTORIC
31586	Burnt Mound, Possible, Parc Cybi	PREHISTORIC
31587	Pits, Parc Cybi, Holyhead	PREHISTORIC
31588	Roundhouse, Parc Cybi	BRONZE AGE
31589	Cist Cemetery, Parc Cybi	BRONZE AGE
31590	Ring Ditch, Parc Cybi	BRONZE AGE
31591	Enclosure, Parc Cybi	BRONZE AGE
31592	Pit Group, Parc Cybi	BRONZE AGE;IRON AGE
31593	Structure, Parc Cybi	IRON AGE
31594	Field Boundaries, Parc Cybi	IRON AGE;ROMAN
31595	Roundhouses, Parc Cybi	IRON AGE
31596	Settlement, Parc Cybi	ROMAN
31597	Trackway, Parc Cybi	ROMAN
31598	Pits, Parc Cybi	IRON AGE;ROMAN
31599	Hearth, Parc Cybi	IRON AGE;ROMAN
31600	Cist Cemetery, Parc Cybi	EARLY MEDIEVAL;ROMAN

CULTURAL HERITAGE DESK-BASED ASSESSMENT

PRN	site name	period
31601	Corn Drier, Parc Cybi	EARLY MEDIEVAL;MEDIEVAL
31602	Corn Drier, Parc Cybi	EARLY MEDIEVAL;MEDIEVAL
31603	Corn Drier, Parc Cybi	EARLY MEDIEVAL;MEDIEVAL
31604	Corn Drier, Parc Cybi	EARLY MEDIEVAL;MEDIEVAL
31605	Ty'n y Coed, Site of, Treaddur	POST MEDIEVAL
31608	Field System, Parc Cybi	Post Medieval
31609	Field System, Parc Cybi	Post Medieval
31610	Field System, Parc Cybi	Post Medieval
31611	Field System, Parc Cybi	MEDIEVAL
31612	Culvert, Parc Cybi	Post Medieval
31613	Culvert, Parc Cybi	Post Medieval
31614	Well, Parc Cybi	Post Medieval
31615	Well, Near, Merddyn Poeth	Post Medieval
31618	Enclosures, Parc Cybi	Post Medieval
31619	Enclosure, Parc Cybi	Post Medieval
31620	Enclosure, Parc Cybi	Post Medieval
31621	Enclosure, Parc Cybi	Post Medieval
31622	Enclosure, Parc Cybi	Post Medieval
31623	Hay Stack. Possible, Parc Cybi	Post Medieval
31624	Clay Pits, Parc Cybi	Post Medieval
31625	Gravel Pit, Possible, Parc Cybi	Post Medieval
31626	Pits, Parc Cybi	Post Medieval
31627	Flints, Findspot, Parc Cybi	MESOLITHIC
31804	Burnt Mound, Possible, Cae-glas	PREHISTORIC
31805	Burnt Mound, Cae-glas	PREHISTORIC
31806	Burnt Mound, Cae-glas	PREHISTORIC
33939	Wall or Trackway, Ty Mawr	UNKNOWN
33940	Wall, Ty Mawr	UNKNOWN
34727	Penrhos House, Remains of, Penrhos	POST MEDIEVAL
34729	Bathing House, Remains of, Penrhos	POST MEDIEVAL
34730	North Lodge, Penrhos	POST MEDIEVAL
34735	Landscape, Anglesey Aluminium, Anglesey	MULTIPERIOD
34742	Burnt Mound, Cae Glas	PREHISTORIC
34743	Burnt Mound, Cae Glas	PREHISTORIC
34744	Culvert, Cae Glas	POST MEDIEVAL
34745	Field System, Cae Glas	POST MEDIEVAL
34746	Ditch, Cae Glas	UNKNOWN
34747	Field System, Penrhos	POST MEDIEVAL
34748	Barn, Site of, Penrhos	POST MEDIEVAL
34749	Barn, Site of, Penrhos	POST MEDIEVAL
34750	Building, Site of, Penrhos	POST MEDIEVAL
36268	Field Drain, Ty Mawr	POST MEDIEVAL

CULTURAL HERITAGE DESK-BASED ASSESSMENT

PRN	site name	period
36269	Boundary Ditch, Possible, Ty Mawr	POST MEDIEVAL
36270	Field Drain, Ty Mawr	POST MEDIEVAL
36271	Field Drain and Ditch, Ty Mawr	POST MEDIEVAL
36272	Field Drain, Ty Mawr	POST MEDIEVAL
36273	Field Boundary, Possible, Ty Mawr	POST MEDIEVAL
36274	Structure, Site of, Ty Mawr	POST MEDIEVAL
36275	Farmyard, Possible, Parc Cybi	POST MEDIEVAL
36276	Flint Flake, Findspot, Ty Mawr	PREHISTORIC
36277	Flint Scraper, Findspot, Ty Mawr	PREHISTORIC
36495	Pillbox, Trefignath, Holyhead	MODERN
36496	Tyddyn-uchaf, Treaddur	POST MEDIEVAL
36497	Trackway, Treddaniel to Tyddyn Bach, Treaddur	POST MEDIEVAL
36498	Stone, Treaddur	UNKNOWN
36505	Structure, Treaddur	UNKNOWN
36507	Cae-glas, Treaddur	POST MEDIEVAL
36508	Tre-gof, Remains of, Treaddur	MEDIEVAL
36509	Merddyn Poeth, Site of, Parc Cybi	POST MEDIEVAL
36510	Ty'n y Pwll, Former Site of, Holyhead	POST MEDIEVAL
36512	Trearddur Farm, Trearddur	POST MEDIEVAL
55940	South Lodge, Penrhos	POST MEDIEVAL
59007	Stanley Gate Toll House, Site of, Treaddur	POST MEDIEVAL
59469	Lime Kiln, Possible Site of, Holyhead	POST MEDIEVAL
59470	Almshouses, Stanley Cottages, Holyhead (now separate PRNs)	POST MEDIEVAL
59471	Reservoir, Site of, Holyhead	POST MEDIEVAL
59736	Pillbox, North-East of Tre Gof	MODERN
60804	Cae Engan Farm, Site of, Penrhos	POST MEDIEVAL
61474	Building, Site of, Treaddur	POST MEDIEVAL
61476	Cae'r Ty Hen, Site of, Treaddur	POST MEDIEVAL
61477	Boathouse, Penrhos	POST MEDIEVAL
61478	Beddmanarch House, Penrhos	POST MEDIEVAL
62296	Llys y Gwynt, Llanfawr Close, Holyhead	Post Medieval
62414	Plas Llanfawr, Holyhead	Post Medieval
66348	No 1, Stanley Cottages, Tyn Pwll Road	Post Medieval
66354	No 4, Stanley Cottages, Tyn Pwll Road	Post Medieval
66356	No 5, Stanley Cottages, Tyn Pwll Road	Post Medieval
66361	No 2, Stanley Cottages, Tyn Pwll Road	Post Medieval
66367	No 3, Stanley Cottages, Tyn Pwll Road	Post Medieval
66369	No 6, Stanley Cottages, Tyn Pwll Road	Post Medieval
66971	Milestone, Trearddur	Post Medieval
67896	Ty Mawr Ring Barrow, Holyhead	NEOLITHIC
68741	Remains of Stone Wall, Holyhead	UNKNOWN
68742	Possible Field Boundary, Holyhead	UNKNOWN
68950	Stanley Embankment, Trearddur	POST MEDIEVAL
69277	Find Spot, Holyhead	NEOLITHIC
69278	Post Holes, Possible, Holyhead	NEOLITHIC

CULTURAL HERITAGE DESK-BASED ASSESSMENT

PRN	site name	period
69279	Hearth, Possible, Holyhead	NEOLITHIC
69280	Ditches, Possible, Holyhead	POST MEDIEVAL
69287	Ty Mawr, Holyhead	MULTIPERIOD
69938	Milestone, Trearddur	POST MEDIEVAL
70620	Trefignath Farm, Site of, Trearddur	POST MEDIEVAL
71173	Building, Tyddyn-bach	UNKNOWN
71175	Enclosure, North-East of Tyddyn-uchaf	UNKNOWN
71177	Well, North-East of Tyddyn-uchaf	UNKNOWN
71179	Well, North-East of Tyddyn-uchaf	UNKNOWN
71181	Building, North-East of Tyddyn-uchaf	UNKNOWN
71183	Building, North-East of Tyddyn-uchaf	UNKNOWN
71185	Building, North-East of Tyddyn-uchaf	UNKNOWN
71187	Horse Gin, Possible, Tre Ddaniel	POST MEDIEVAL
71189	Pump, Tre Ddaniel	POST MEDIEVAL
71191	Horse Gin, Possible, Tre Ddaniel	POST MEDIEVAL
74468	Cobbled Surface, Trearddur Bay	POST MEDIEVAL
74524	Rectangular Structure, Holyhead	UNKNOWN
74683	Bank, Possible, Near Ty Mawr Standing Stone	PREHISTORIC
74830	Structure, Parc Cybi	NEOLITHIC
74831	Pits, Parc Cybi	NEOLITHIC
74832	Pits, Parc Cybi	NEOLITHIC
74952	Enclosure, East of Tre-gof	UNKNOWN
74955	Enclosure, East of Tre-gof	UNKNOWN
74957	Structure, Penrhos	UNKNOWN
74959	Building, Trearddur	UNKNOWN
74961	Building, Trearddur	UNKNOWN
74963	Structure, West of Penrhos Farm	UNKNOWN
74965	Folly, Trearddur	POST MEDIEVAL
74967	Enclosure, West of Beddmanarch	UNKNOWN
74969	Enclosure, West of Beddmanarch	UNKNOWN
74971	Enclosures, South of Beddmanarch	UNKNOWN
74973	Enclosures, Beddmanarch	UNKNOWN
76097	Pit, Parc Cybi	NEOLITHIC
76098	Pit, Parc Cybi	BRONZE AGE
76099	Pit, Parc Cybi	NEOLITHIC
76100	Corn Dryer, Parc Cybi	EARLY MEDIEVAL
76101	Corn Dryer, Parc Cybi	EARLY MEDIEVAL
77126	Wall/Embankment, Stanley Embankment	POST MEDIEVAL
81341	Cist Burial, Possible, Trefignath	BRONZE AGE
81342	Gate posts, Trefignath	POST MEDIEVAL
81343	Corn Dryer, Possible, Parc Cybi	EARLY MEDIEVAL
81515	Penannular Ring, Findspot, Trearddur	BRONZE AGE
81517	Coin, Findspot, Holyhead	MEDIEVAL
90303	Inscribed Stone, Site Of, Penrhos	UNKNOWN
92337	Enclosure, Possible, Trearddur	UNKNOWN
96725	Pit, Cae Glas	PREHISTORIC

CULTURAL HERITAGE DESK-BASED ASSESSMENT

PRN	site name	period
96726	Pit, Cae Glas	NEOLITHIC
96727	Pit, Cae Glas	NEOLITHIC
96728	Pit/Ditch Cae Glas	PREHISTORIC
96729	Pit/Ditch Cae Glas	NEOLITHIC
96730	Pottery, Findspot, Cae Glas	BRONZE AGE
96731	Metalled Surface, Cae Glas	ROMAN
96732	Gully, Cae Glas	ROMAN
96733	Drainage Ditches, Cae Glas	MODERN;POST MEDIEVAL
96734	Pit & Posthole, Cae Glas	UNKNOWN
96735	Drainage Ditch, Cae Glas	UNKNOWN
96736	Postholes, Cae Glas	UNKNOWN
96737	Trackway/Boundary, Possible, Tre'r Gof	POST MEDIEVAL
96738	Ditches, Near Tre'r Gof	MODERN;POST MEDIEVAL
96739	Drainage Ditch, Possible, Cae Glas	POST MEDIEVAL
96808	Square Tower, Ynys Peibio	MODERN;POST MEDIEVAL
97632	Tyddyn-bach, Holyhead	POST MEDIEVAL
97686	Glan-y-gors, Holyhead	POST MEDIEVAL
97691	Cae-glas, Trearddur	POST MEDIEVAL
97736	Felin-heli, Trearddur	POST MEDIEVAL
97737	Outfarm, South-West of Felin-heli, Trearddur	POST MEDIEVAL
97928	Ty-mawr, Holyhead	POST MEDIEVAL
97934	Tyddyn-uchaf, Holyhead	POST MEDIEVAL
98063	Tyddyn-pioden, Holyhead	POST MEDIEVAL
98064	George's Mill, Holyhead	POST MEDIEVAL
98065	Bryniau-llygag, Holyhead	POST MEDIEVAL
98066	Bonc-deg, Holyhead	POST MEDIEVAL
98068	Penrhos farmstead, Holyhead	POST MEDIEVAL
98341	Pigyn-hirnos, Holyhead	POST MEDIEVAL
98343	Efail-bach, Holyhead	POST MEDIEVAL
98344	Llanfair-bach, Holyhead	POST MEDIEVAL
100479	Bwch Alltran Cottage, Holyhead	UNKNOWN
102437	Linear Feature, Penrhos	UNKNOWN



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