

Dr Steven Jones
Pembrokeshire County Council

By email

Eich cyfeirnod
Your reference

Ein cyfeirnod
Our reference

Dyddiad
Date

Llinell uniongyrchol
Direct line

Ebost
Email:

PE366

3 April 2024

0300 0256004

scheduledmonuments@gov.wales

Dear Dr Steven Jones,

**ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979
APPLICATION FOR SCHEDULED MONUMENT CONSENT
HAVERFORDWEST CASTLE (PE366)**

1. Introduction

1.1 Thank you for your application of 13 December 2022 to Cadw for scheduled monument consent for:

Conversion (including partial demolition and extension) to provide new visitor attraction facilities containing space for ticketing, exhibition, technical support and storage spaces, staff/administration space, café, shop and associated works including plant enclosure involves the following elements within the scheduled area: (i) installation of site compound and site set up, (ii) removal of existing retaining wall that bounds the southern edge of the car park; (iii) backfilling of archaeological evaluation trenches, (iv) removal of turf and topsoil and installation of hard-core storage area to provide lay-down and storage space for the demolition works, (v) resurfacing of car park, installation of bollards, hard landscaping and turf reinstatement; (vi) temporary removal of southern masonry gatepost at main entrance off Castle Street; (vii) installation of new services and drainage; (viii) construction of new waste store to northwest of existing car park; (ix) installation 3 no x 4m high lighting columns, (x) removal of features located at ground level on the western and northwest wall of the listed building, and (xi) three new trees to be planted in containers at the above scheduled monument.

1.2 Cadw is a Department within the Welsh Government that undertakes the statutory functions of the Welsh Ministers in determining applications for scheduled monument consent.

1.3 Each application for scheduled monument consent is considered on its own merits in accordance with *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* ([Conservation Principles](#)) and Annex A of *Technical Advice Note 24: The Historic Environment* ([TAN 24](#)). In particular, TAN 24 explains that the main purpose of scheduling is to ensure the preservation of ancient

monuments and, when considering an application for scheduled monument consent, there is a presumption against proposals which would involve significant alteration or cause damage or which would have a significant impact on the setting of remains.

2 Assessment

2.1. Your application and supporting documentation has been assessed by our Regional Inspector of Ancient Monuments who has recommended that conditional scheduled monument consent should be approved for conversion (including partial demolition and extension) to provide new visitor attraction facilities containing space for ticketing, exhibition, technical support and storage spaces, staff/administration space, café, shop and associated works including plant enclosure involves the following elements within the scheduled area: (i) installation of site compound and site set up, (ii) removal of existing retaining wall that bounds the southern edge of the car park; (iii) backfilling of archaeological evaluation trenches, (iv) removal of turf and topsoil and installation of hard-core storage area to provide lay-down and storage space for the demolition works, (v) resurfacing of car park, installation of bollards, hard landscaping and turf reinstatement; (vi) temporary removal of southern masonry gatepost at main entrance off Castle Street; (vii) installation of new services and drainage; (viii) construction of new waste store to northwest of existing car park; (ix) installation 3 no x 4m high lighting columns, (x) removal of features located at ground level on the western and northwest wall of the listed building, and (xi) three new trees to be planted in containers.

2.2. The reasons for the Inspector's conclusions are set out in **Annex A** of this letter.

2.3. I have carefully considered the impact of the proposed development on the scheduled monument and its setting in light of the advice that I have received from our Regional Inspector of Ancient Monuments. I have no reason to disagree with the advice of our Regional Inspector and am satisfied that his recommendation is consistent with the objectives of Conservation Principles and TAN 24.

3. Decision

3.1. Accordingly, I hereby approve conditional scheduled monument consent for the proposed works as outlined in section 1.1.

3.2. In reaching this decision, I have taken into account the requirement of sections 3 and 5 of the Wellbeing of Future Generations Act. I consider that this decision is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of *A Wales of vibrant culture and thriving Welsh Language*.

3.3. Any development control issues associated with wider development will be a matter for any application for planning permission. It is the responsibility of the

applicant to establish whether any further approval or consents are required for the proposed development.

4. Conditions

4.1. The following conditions are intended to protect the monument from damage or significant alteration as set out in TAN 24: *The Historic Environment* and to ensure that details of the project are archived.

- a) The applicant shall provide Cadw with reasonable advance notice of commencement of works on site and will afford access at all reasonable times to any Cadw official or archaeologist nominated by Cadw to monitor progress of the works;
- b) The approved works shall be carried out strictly in accordance with the application form, plans and documents as listed below. No variations are permitted unless they have been authorised in advance in writing by Cadw;

Number	Document / plan	Reference Number (if applicable)	Date
1	SMC application form signed by Dr Steven Jones of Pembrokeshire County Council and dated 2022		13/12/2022
2	Revised Scheme: various design drawings, plans and survey reports in Asbri Planning's Document Issue Sheet		24/01/2024
3	Design and Access Statement by DB3		19/12/2023
4	Written scheme of investigation for archaeological evaluation by Dyfed Archaeological Trust (DAT) Archaeological Services	REPORT NO. 2023-17	For works June/July 2023
5	Archaeological Evaluation 2023 by DAT Archaeological Services	REPORT NO. 2023-17	September 2023
6	Historic Building Record by DAT Archaeological Services	REPORT NO. 2023-40	November 2023
7	Backfilling Excavations	20730-RCA-WP4-	7/11/2023

		XX-TN-S-0924	
8	Draft Method Statement – bat roost mitigation and compensation measures by Landsker Ecology	HOP-H'west Gaol-WP4/PCC/LE 22.12	22/12/2023
9	Swift mitigation report by Landsker Archaeology	Haverfordwest Castle /Swift Mitigation/PCC/LE23.12	17/01/24
10	Site Plan	Roger Casey Associates	03/03/2024
11	Site Layout Drawing		03/03/2024
12	Construction Environmental Management Plan		03/03/2024
13	HOP Work Package 4 Method Statement Topsoil removal	For topsoil removal and hardstanding	05/03/2024
14	16692-DB3-B01-XX-RP-A-00005-S3-P02 WP4 Heritage Impact Assessment		05/03/2024
15	Archaeological Evaluation Interim Report DAT	FS23-046 - Haverfordwest Gaol Building Development Phase II Eval Interim Report_V1	07/03/2024
16	16692-DB3-B01-00-DR-A-20036-S3-P01 Bin Store Drawings		13/03/2024
17	WP4_Site Plan_3 (290224)		13/03/2024

c) The approved works shall be carried out strictly in accordance with a 'Method Statement' to be submitted in advance and formally approved in writing by Cadw before work commences. The 'Method Statement' shall be adhered to throughout the project and any variations shall be approved by Cadw prior to works commencing;

d) The Method Statement shall provide for:

	INFORMATION REQUIRED	Date when information required
1	Installation of site compound and site set up, including details for temporary surface Heras type fencing, ingress and egress of vehicles, dismantling and removal of fencing.	Before work commences.
2	Installation of temporary fixed fencing, including details for design, installation, ingress and egress of vehicles, removal and ground reinstatement.	Before temporary fixed fencing is installed.
3	Removal of turf and topsoil and installation of hard-core storage area, including details for ingress and egress of vehicles, materials, and depths of layers to be installed.	Before work commences.
4	Dismantling, temporary removal, and rebuilding in situ of southern masonry gatepost at main entrance off Castle Street, including recording, labelling, dismantling, transportation, storage, and rebuilding of the gate pier to ensure that a like for like rebuild in terms of both appearance and dimensions is attained. How the wall terminals will be secured and stabilised following the removal of the gate piers	Before work commences.
5	Installation of new services and drainage	Before work commences.
6	Resurfacing of car park including details for ingress and egress of vehicles, materials, and depths of layers to be installed.	Before resurfacing work commences.
7	Installation of bollards including details for locations, design,	Before installation of bollards and

	dimensions for receiver pits, HIA, including assessment against results of archaeological evaluation, and method statement for installation.	resurfacing of car park commences.
8	Installation of EV chargers including details for locations, design, dimensions for receiver pits, HIA including assessment against results of archaeological evaluation, and method statement for installation.	Before installation of EV chargers and resurfacing of car park commences.
9	Cycle Stands including details for locations, design, dimensions for receiver pits, HIA including assessment against results of archaeological evaluation, and method statement for installation.	Before installation of cycle stands and resurfacing of car park commences.
10	Feeder Pillar including details for location, design, dimensions for receiver pit, HIA including assessment against results of archaeological evaluation, and method statement for installation.	Before installation of feeder pillar and resurfacing of car park commences.
11	Construction of new waste store, including location, design, dimensions for receiver pit and slab, revised HIA including assessment against results of archaeological evaluation, and method statement for installation.	Before installation of new waste store and resurfacing of car park commences.
12	Installation 3 no x 4m high lighting columns, including locations, design, dimensions for receiver pits, HIA, including assessment against results of archaeological evaluation, and method statement for installation.	Before installation of lighting columns and resurfacing of car park commences.
13	Hard landscaping and turf reinstatement	Before hard landscaping and turf reinstatement work commences.

- e) No works, including site clearance, shall commence until Cadw has been informed in writing of the name of an appropriately qualified archaeologist operating to ClfA published standards and guidance¹ who is to be present to undertake archaeological excavation, building recording and archaeological

¹ Chartered Institute for Archaeologists <https://www.archaeologists.net/codes/cifa> .

monitoring and recording for any works or operation occurring within the scheduled area and in accordance with the written scheme of investigation which has been submitted to, and approved in writing by, Cadw. No work shall commence until Cadw has confirmed in writing that the proposed archaeologist is acceptable;

- f) A digital copy of the the draft report shall be submitted to Cadw for approval within 8 weeks of the archaeological fieldwork being completed²;
- g) A digital copy of the approved report shall be submitted to the regional Historic Environment Record and National Monuments Record of Wales to be incorporated into these public records³, and the applicant shall inform Cadw when this has been completed;
- h) Cadw shall be invited to attend a site meeting within the first 5 working days of commencement of the project to review the programme, submitted method statement and arrangements that have been established for archaeological mitigation/building recording;
- i) That, upon completion of the project the applicant shall produce a completion report including an annotated photographic record detailing the site before, during and after works took place and including final versions of plans and elevations as built. The draft should be sent to Cadw in digital format for approval within 25 working days of the works being completed; and
- j) Any historic or archaeological features not previously identified which are revealed when carrying out the works shall be retained *in situ* and reported to Cadw within two working days. Works shall be halted in the area/part of the site affected until provision has been made for retention and/or recording of the feature by a suitably qualified archaeologist in accordance with details submitted to and approved in writing in advance by Cadw.

2. Next Steps

5. Compliance

5.1. Where a condition requires approval or any contact with Cadw you are advised to contact Louise Mees by email scheduledmonuments@gov.wales.

5.2. When all work has been completed and the conditions have been discharged, please complete and return the 'completion notice' at **Annex B** to Cadw. Section 2(6) of the 1979 Act provides that non-compliance with a condition attached to a grant of scheduled monument consent shall be an offence.

² Cadw will retain a copy of the watching brief report for our records.

³ Cadw requires formal confirmation of report deposit to discharge condition.

5.3. By virtue of Section 4 of the 1979 Act, if no works to which this consent relates are executed or started within 5 years from the date of this letter, the consent shall cease to have effect at the end of that period (unless it is revoked in the meantime).

5.4. This letter does not convey any approval or consent required under any enactment, bylaw, order or regulation other than Section 2 of the Ancient Monuments and Archaeological Areas Act 1979. It is the responsibility of the applicant to obtain any such approval or consent where necessary.

6. Mechanism for Challenge

6.1 Section 55 of the 1979 Act explains that if you are aggrieved by the decision given in this letter, you may challenge its validity by applying to the High Court within six weeks from the date of my decision. Furthermore, the legislation explains that the grounds on which an application may be made to the Court are;

- a) that my decision is not within the powers of the Act (i.e. that I have exceeded the powers available under the Act); and
- b) that any of the relevant requirements set out in the Act have not been complied with and that your interest has been substantially prejudiced by the failure to comply.

The 'relevant requirements' mentioned above are defined in Section 55 of the 1979 Act and it is advisable to seek legal advice before taking any action.

6.2. Should you have any queries please do not hesitate to contact me.

6.3 Finally, please note that your personal data is managed in compliance with the [General Data Protection Regulations.](#)

Yours sincerely,

Denise Harris

Casework Manager

under authority of the Cabinet Secretary for Culture and Social Justice, one of the Welsh Ministers

**ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979
APPLICATION FOR SCHEDULED MONUMENT CONSENT**

Haverfordwest Castle (PE366) – Conversion (with partial demolition) to provide new visitor attraction facilities containing space for ticketing and orientation, exhibition, education centre, café and shop and associated works including plant enclosure.

INSPECTOR'S ADVICE

1. Policy Context

- 1.1 An application for scheduled monument consent (SMC) is considered on its own merits in accordance with *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* ([Conservation Principles](#)) and Annex A of *Technical Advice Note 24: [The Historic Environment \(TAN 24\)](#)*. In particular, TAN 24 explains that the main purpose of scheduling is to ensure the preservation of ancient monuments and, when considering an application for SMC, there is a presumption against proposals which would involve significant alteration or cause damage, or which would have a significant impact on the setting of remains. Therefore, applicants are expected to demonstrate that no practicable alternative route or location, avoiding the scheduled area, exists and that the need to undertake works outweighs the presumption in favour of the protection of the scheduled monument.
- 1.2 The Welsh Government's six principles for sustainable management of the historic environment in Wales are also used as a guide when considering applications for scheduled monument consent. These are:
- Historic assets will be managed to sustain their values.
 - Understanding the significance of historic assets is vital.
 - The historic environment is a shared resource.
 - Everyone will be able to participate in sustaining the historic environment.
 - Decisions about change must be reasonable, transparent and consistent.
 - Documenting and learning from decisions is essential.

2. Haverfordwest Castle (PE366)

- 2.1 The following provides a general description of the Scheduled Monument: 'The monument consists of the remains of a castle, dating to the medieval period. It stands at the end of ridge falling steeply on all but the western side that overlooks the western Cleddau and tidal reaches at the lowest fordable location. The castle was founded sometime between 1108 and 1124 by Tancred an immigrant Fleming as part of the encouraged settlement of the cantref of Rhos at this time and is first recorded when held by his son Richard Fitz Tancred in 1188, at the time of Gerald of Wales visit in the retinue of

Archbishop Baldwin. At this stage the castle will have been a mostly earth and timber construction though with a masonry keep part of which still survives. Richard's heir Robert was removed from the castle in 1210 by King John who in 1215 granted it to William Marshall, Earl of Pembroke. An attack on Haverfordwest in 1220 by Llywelyn the Great burnt the town but failed to breach the castle and it is likely by this time it had been rebuilt in stone. The castle passed to the de Bohun family in the mid thirteen century and in 1289 was exchanged with Queen Eleanor. In the short period before her death in 1290 the queen spent large sums on the castle and much of the existing masonry which is late 13th century in style can be ascribed to this building program. In the 14th century the castle was held by a series of owners including Edward the Black prince (from 1359 to 1367) and was repaired in the hands of the Crown in 1381-1385. It repulsed an attack during the Glyndwr rebellion in 1405. By the 16th century it was derelict but hastily refortified during the Civil War, lost to Parliamentary forces in 1644, later recaptured and held for a year before surrendered after the battle of Colby Moor, not far to the west in 1645 after the route of a Royalist army on the march. In 1648 it was ordered to be slighted.

The castle is divided into two wards, the inner ward has round towers on the north-west and south-west corners, while the south-east corner has a square tower with an additional projecting turret. The north-east corner being defended by the rectangular keep which survives as footings incorporating some early arrow loops. The ward was entered to the west by a gatehouse in a location now occupied by an 18th century building dating to the later use of the castle as a prison. The remains of a spacious hall with large windows lie on the south side. Private apartments formed part of an east range where later conversion to a prison has blocked windows and seen much of the masonry refaced. The south-west and south-east towers have three storeys, the latter will have incorporated the chapel and at the base is a postern gate. The northwest tower preserves a wall walk carried on a row of corbels on its east side, much of the exterior masonry was refaced in the later conversion. The interior of outer ward provided a site for a new prison in 1820 and has seen redevelopment to modern times. Little remains of the medieval defences though the curtain wall survives in a much-rebuilt form along most of the north side with one small semi-circular turret and one square tower further east. The outer gatehouse of which no trace remains is likely to have been on the west; removal of both outer and inner gatehouses may have begun as a result of the Civil War slighting, completed by the stone robbing and development of later centuries. The monument is of national importance for its potential to enhance our knowledge of medieval defensive and domestic practices. The monument is well-preserved and an important relic of the medieval landscape. It retains significant archaeological potential, with a strong probability of the presence of both structural evidence and intact associated deposits.'

3. The Application

- 3.1 This application for scheduled monument consent for conversion (including partial demolition and extension) to provide new visitor attraction facilities containing space for ticketing, exhibition, technical support and storage spaces, staff/administration space, café, shop and associated works including plant

enclosure involves the following elements within the scheduled area: (i) installation of site compound and site set up, (ii) removal of existing retaining wall that bounds the southern edge of the car park; (iii) backfilling of archaeological evaluation trenches, (iv) removal of turf and topsoil and installation of hard-core storage area to provide lay-down and storage space for the demolition works, (v) resurfacing of car park, installation of bollards, hard landscaping and turf reinstatement; (vi) temporary removal of southern masonry gatepost at main entrance off Castle Street; (vii) installation of new services and drainage; (viii) construction of new waste store to northwest of existing car park; (ix) installation 3 no x 4m high lighting columns, (x) removal of features located at ground level on the western and northwest wall of the listed building, and (xi) three new trees to be planted in containers.

4. Assessment

- 4.1 The applicant wishes to convert the former prison at Haverfordwest Castle to a new use. The applicant has submitted documentation including detailed plans, drawings, a heritage impact assessment, and reports on archaeological evaluations.
- 4.2 Following the submission of proposals in 2022 archaeological investigations were undertaken with Class 7 consent. The identification of areas of high archaeological sensitivity to the north, east and southeast of the existing prison building has led the applicant to significantly revise the 2022 scheme. The revised proposal is to redevelop the prison within the existing fabric and building footprint with minimal need for extension and significant alteration. The prison building is listed and lies within an area of unscheduled land within the wider scheduled monument. Scheduled monument consent is required for works on or within the scheduled area boundary. The separate items are considered below.
- 4.3 Item (i) installation of site compound and site set up. The applicant has provided a Construction Environmental Management Plan outlining proposals for site set up. The impact of these works on aesthetic values will be temporary.
- 4.4 The site cabins, storage containers, skips, security hut and turnstile will be set on protective matting, existing hard surfaces or surfaces reinstated following backfilling or the newly installed hard-core area (item iii) and temporary surface Heras type will not have a direct impact on physical remains if undertaken according to a method statement for set up and removal approved by Cadw.
- 4.5 Installation of temporary fixed fencing has potential to impact on physical remains. The applicant must submit a detailed method statement for the design and installation of temporary fixed fencing, and for its removal and reinstatement of the ground surface. Installation of temporary fixed fencing, and excavation of the service trench and manhole will need to be monitored archaeologically, and the details must form part of the nominated archaeological contractor's written scheme of investigation for archaeological monitoring and recording.

- 4.6 Item (ii) removal of existing retaining wall that bounds the southern edge of the car park. Site inspection during a monitoring meeting (9th February 2024) showed that this modern wall, constructed between 1963 and 1967, is constructed on modern overburden. Removal of this wall will not have any negative impact on physical remains or aesthetic values of the medieval monument or former prison and will improve access, thus enabling the project and improving community value. The wall is clearly built onto modern overburden and its removal does not require a watching brief.
- 4.7 Item (iii) backfilling of archaeological evaluation trenches. The evaluation trenches are a temporary alteration to the site undertaken with Class 7 consent to inform determination of this application for consent. A method statement for backfilling evaluation trenches on the eastern part of the monument in relation to the Class 7 consent has been provided to and approved by Cadw. Cadw's approval included that backfilling in the eastern part of the evaluation area, where voids in medieval material were observed, should be undertaken with an archaeologist present. The method statement submitted to accompany this application for SMC is acceptable for the remainder of the area subject to Class 7 evaluation. Backfilling undertaken according to the agreed method statement will protect buried archaeological remains and return site levels to those in existence prior to the Class 7 evaluation commencing, thus preserving physical remains, improving the appearance of the monument, enabling the development, and enhancing communal values.
- 4.8 Item (iv) removal of turf and topsoil and installation of hard-core storage area to provide lay-down and storage space for the demolition works within the outer bailey to the northeast of the jail. The temporary hard standing is required to enable the development. Removal of turf and topsoil has potential to disturb buried archaeological features. Damage can be avoided by contractors adhering to the method statement submitted to accompany this application for SMC, which includes for small trial pits to be evaluated in each corner of the area to be stripped. Evaluation of the trial pits and removal of turf and topsoil to be monitored archaeologically, details for which should form part of the nominated archaeological contractor's written scheme of investigation for archaeological monitoring and recording. The removal of turf and topsoil and installation of hard-core is acceptable in principle, subject to Cadw's approval agreement method statement for ingress and egress of vehicles, materials, and depths of layers to be installed, through a condition associated with this consent.
- 4.9 Item (v) resurfacing of car park, installation of new bollards, EV chargers, cycle stands, and feeder pillar. Resurfacing work involves removal of existing surfaces and installation of new materials. Archaeological evaluation within this area has exposed made-up ground and revealed features relating to the medieval castle and post-medieval jail at varying levels below the existing ground surface. Removal of existing surfaces has potential to impact upon buried archaeological remains and will need to be monitored archaeologically, and the details should form part of the nominated archaeological contractor's written scheme of investigation for archaeological monitoring and recording.

- 4.10 Resurfacing the car park will renew the existing surface, will improve access and the appearance of the monument, thus improving communal and aesthetic values. Creation of white lines on the surface of the car park will introduce modern markings into the scheduled area. Views of markings will often be impeded by vehicles, reducing their impact on aesthetic values, which will be minimal. Permitting vehicles to park at the site will enable delivery of the local authority's objectives for the monument, maintenance, and public access for all. Resurfacing the car park is acceptable in principle, subject to Cadw's approval of a method statement through a condition associated with this consent and will need to be monitored archaeologically, and the details should form part of the nominated archaeological contractor's written scheme of investigation for archaeological monitoring and recording.
- 4.11 The applicant proposes to install 5 bollards for safety reasons on the eastern side of the car park. The applicant has not provided details for the bollards or included these items in the HIA. Installation of 5 bollards involves removal of existing modern surfaces, excavation for receiver pits and installation of new additions. Archaeological evaluation within the proposed locations for the bollards has revealed features relating to the medieval castle. Therefore, excavation of receiver pits in the proposed locations will disturb buried archaeological remains and is not acceptable. Potential impacts to physical remains can be avoided by the applicant reassessing the proposed locations for 5 bollards and ensuring that the bollards are set into areas of previously disturbed ground.
- 4.12 The installation of bollards is acceptable in principle, subject to Cadw's approval of their locations, design, dimensions for receiver pits, HIA, and method statement for installation, through condition associated with this consent. Excavation of the receiver pits and installation of the bollards will need to be monitored archaeologically, and the details should form part of the nominated archaeological contractor's written scheme of investigation for archaeological monitoring and recording.
- 4.13 The applicant proposes to install 2 EV chargers located in the northwest tower and the southwest corner of the car park. The applicant has not provided details for the chargers or included these items in the HIA. Installation of EV chargers involves removal of existing modern surfaces, excavation for receiver pits and installation of new additions, including power supply. Archaeological evaluation within the car park has revealed features relating to the medieval castle and post-medieval jail. Therefore, excavation of receiver pits in the proposed locations has potential to disturb buried archaeological remains.
- 4.14 Installing an EV charger in the northwest tower will introduce a modern addition into one of only two surviving towers in the outer ward. Installation of an EV charger in this location will detrimentally affect the appearance of the tower and access through the monument (aesthetic values). Other locations are available for the EV charger, which must be assessed through the HIA process and with reference to findings from the archaeological evaluation.

- 4.15 The proposed location for the EV charger in the southwest corner of the car park lies within the archaeological evaluation undertaken to date. Feature J, a post medieval wall lies, within the evaluated trench. A plan is required showing the proposed location of the EV charger in relation to findings from the archaeological evaluation. The proposed location should be assessed through the HIA process and with reference to findings from the evaluation.
- 4.16 Cycle stands. The applicant has not provided details for the cycle stands or included these items in the HIA. Installation of the cycle stands involves removal of existing modern surfaces, potential excavation for receiver pits and installation of new additions. Archaeological evaluation within the car park has revealed post medieval walls and cobbles associated with the post-medieval jail. Therefore, excavation of receiver pits in the proposed locations has potential to disturb buried archaeological remains.
- 4.17 Feeder pillar. The applicant has not provided details for the feeder pillar or included these items in the HIA. The proposed location for the feeder pillar in the northwest corner of the car park lies within the archaeological evaluation undertaken to date. Feature L, a potential medieval wall lies, within the evaluated trench. A plan and section drawing is required showing the proposed location of the feeder pillar in relation to findings from the archaeological evaluation. The proposed location should be assessed through the HIA process and with reference to findings from the evaluation.
- 4.18 The resurfacing of the car park, installation of new bollards, EV chargers, cycle stands, and feeder pillar is acceptable in principle, subject to Cadw's approval of locations, designs, dimensions for receiver pits, HIA including assessment against results of archaeological evaluation, and method statement for installation through a condition associated with this consent.
- 4.20 Item (vi) dismantling, temporary removal, and rebuilding in situ of southern masonry gatepost at main entrance off Castle Street. The gate piers were rebuilt, and the existing gates hung during the 1960s, and are not original medieval fabric. Temporary removal of the southern pier is included within the SMC for conservation works at Haverfordwest Castle granted on 28/04/2022, which is condition that the applicant will need to provide Cadw with a method statement for the recording, labelling, dismantling, transportation, storage, and rebuilding of the gate pier to ensure that a like for like rebuild in terms of both appearance and dimensions is attained. The applicant also needs to demonstrate how the wall terminals will be secured and stabilised following the removal of the gate piers. Level 4 building recording is required prior to dismantling. Dismantling will need to be monitored archaeologically. Details should form part of the nominated archaeological contractor's written scheme of investigation for building recording and archaeological monitoring and recording. The proposal to dismantle and rebuild the gate piers is acceptable in principle, subject to Cadw's approval of the method statement and written scheme of investigation through a condition associated with this consent.
- 4.21 Item (vii) installation of new services and drainage. Plans and drawings, including dimensions and levels for the proposed works have been submitted

by the applicant. These sub-surface works will not impact on the monument's aesthetic values. Archaeological evaluation within most of the proposed trenches, as reported in the interim report (DAT 6th March 2024), revealed made-up ground, previously disturbed ground within existing service and drainage trenches and exposed nationally important historic features including walls of likely medieval date associated with the castle, and walls and cobbled surfaces associated with the post-medieval jail. Installation of new services and drainage within the evaluated trenches can be accommodated above medieval features and deposits, which will therefore not be damaged by the works.

- 4.22 Installation of new services and drainage within trenches evaluated to date requires removal of post-medieval features including small sections of walls and cobbled surfaces associated with the post-medieval jail. Removal of these features constitutes archaeological intervention according to Cadw's Conservation Principles (Cadw, 2011) and will result in the material loss of evidence. Preservation in situ is not reasonably practical: removal of these features is required to enable the development, which include conservation works to the listed building and bringing the building back into use. Removal of these features by a skilled archaeological team and production of an authoritative record will contribute to archaeological reporting for the wider project, which will be accessible to the public. Therefore, removal of these features is acceptable according to the tests in Conservation Principles. Details should form part of the nominated archaeological contractor's written scheme of investigation for archaeological excavation.
- 4.23 Reopening backfilled evaluation trenches to install new services and drainage has potential to impact upon buried archaeological remains and will need to be monitored archaeologically, and the details should form part of the nominated archaeological contractor's written scheme of investigation for archaeological monitoring and recording.
- 4.24 Completion of the archaeological evaluation is required to assess potential impacts of installing new services and drainage on the monument within the trenches not yet investigated. The proposal to install new services and drainage within the remaining trenches is acceptable in principle, subject to the results of the full evaluation and Cadw's approval of a design and method statement which ensures that nationally important physical remains are preserved in situ through a condition associated with this consent. Installation of new services and drainage and will need to be monitored archaeologically, and the details should form part of the nominated archaeological contractor's written scheme of investigation for archaeological monitoring and recording.
- 4.25 Item (viii) construction of new waste store to northwest of existing car park. New concrete slab (dimensions not provided by the applicant) with 1.8m high larch cladding planks fixed to 100x100 treated soft wood frame as per drawing 20036. Installation of the concrete slab involves removal of existing surfaces and installation of new materials. Archaeological evaluation within this area has exposed areas of bedrock and made-up ground and revealed features relating to the medieval castle and post-medieval jail at varying levels below the existing ground surface. Removal of existing surfaces has potential to impact upon

buried archaeological remains and will need to be monitored archaeologically, and the details should form part of the nominated archaeological contractor's written scheme of investigation for archaeological monitoring and recording.

- 4.26 Installation of the new waste store will introduce a modern structure into the scheduled area potentially impacting upon the appearance of the monument. The proposed location of the new slab and waste store is not ideal, located immediately to the west of the northwest tower. The HIA requires revision by the applicant to include an assessment of potential impacts on aesthetic values and evidential values of potential locations for the slab and waste store, including the northwest corner of the car park.
- 4.27 The proposal to install the new waste store is acceptable in principle, subject to Cadw's approval of its location, design, dimensions for receiver pit and slab, an HIA including assessment against results of archaeological evaluation, setting assessment and method statement for installation, through conditions associated with this consent.
- 4.28 Item (ix) installation 3 no x 4m high lighting columns. Installation involves removal of existing modern surfaces, excavation for receiver pits and installation of new additions. Archaeological evaluation adjacent to the proposed locations has revealed features relating to the medieval castle and post-medieval jail at varying levels below the existing ground surface. Removal of existing surfaces has potential to impact upon buried archaeological remains and will need to be monitored archaeologically, and the details should form part of the nominated archaeological contractor's written scheme of investigation for archaeological monitoring and recording. Installation of lighting columns constitutes modern additions to the scheduled area. Potential impacts to physical remains can be avoided by ensuring that the columns are set into areas of previously disturbed ground. The columns have potential to impact on the appearance and setting of the scheduled monument. The installation of columns is acceptable in principle, subject to Cadw's approval of their locations, design, dimensions for receiver pits, an HIA including assessment against results of archaeological evaluation, setting assessment and method statement for installation, through conditions associated with this consent.
- 4.29 Item (x) removal of features located at ground level on the western and northwest wall of the listed building lying on or within the scheduled area require scheduled monument consent. These works, affecting brickwork, flues, drainage and gratings, and have been considered by PCC's Conservation Officer, who is in agreement that Victorian archaeological features associated with the Grade II listed prison can be conserved, altered or removed following recording. Removal of such features within the scheduled area constitutes archaeological intervention according to Cadw Conservation Principles (Cadw, 2011) and will result in the material loss of evidence. Preservation in situ is not reasonably practical and removal of these features is required to enable the development, which includes conservation works to the listed building and bringing the building back into use. Removal of listed features by a skilled archaeological team and production of an authoritative record will contribute to archaeological reporting for the wider project, which will be accessible to the

public. Therefore, removal of these features is acceptable according to Conservation Principles. Details should form part of the nominated archaeological contractor's written scheme of investigation for archaeological excavation and building recording.

- 4.30 Item (xi) three new trees to be planted in containers. The applicant has not provided details of the containers or trees. This installation is required for bat habitat and flight paths. Containers constitute modern additions to the scheduled area. Tree roots will not disturb physical remains of the monument if the bases are robust. The containers and trees will partially obscure views of, through and from the monument, and will restrict access. These negative impacts are outweighed by ecological benefits, which are required to enable the development and overall enhancement of communal value. The installation of planters is acceptable in principle, subject to Cadw's approval of their locations, design, dimensions, method statement for installation, through conditions associated with this consent.
- 4.31 Hard landscaping and turf reinstatement is required in the final stages of the scheme. This work is acceptable in principle, subject to Cadw's approval of a design and method statement, through a condition associated with this consent, and will need to be monitored archaeologically. The details should form part of the nominated archaeological contractor's written scheme of investigation for archaeological monitoring and recording.
- 4.32 Following my review of the documents submitted and consideration of impacts, in my opinion the proposed works, if undertaken according to the recommended conditions and method statements to be approved by Cadw, will not cause a significant alteration or significant damage to a scheduled monument, nor have a significant impact on its setting. Neither will they have an unacceptable or cumulative impact.

5. Recommendation

- 5.1 I recommend that scheduled monument consent is granted subject to the conditions below:

6. Proposed Conditions

- 6.1 The applicant shall provide Cadw with reasonable advance notice of commencement of works on site and will afford access at all reasonable times to any Cadw official or archaeologist nominated by Cadw to monitor progress of the works.
- 6.2 The approved works shall be carried out strictly in accordance with the application form, plans and documents as listed below. No variations are permitted unless they have been authorised in advance in writing by Cadw.

Number	Document / plan	Reference Number (if applicable)	Date

1	SMC application form signed by Dr Steven Jones of Pembrokeshire County Council and dated 2022		13/12/2022
2	Revised Scheme: various design drawings, plans and survey reports in Asbri Planning's Document Issue Sheet		24/01/2024
3	Design and Access Statement by DB3		19/12/2023
4	Written scheme of investigation for archaeological evaluation by Dyfed Archaeological Trust (DAT) Archaeological Services	REPORT NO. 2023-17	For works June/July 2023
5	Archaeological Evaluation 2023 by DAT Archaeological Services	REPORT NO. 2023-17	September 2023
6	Historic Building Record by DAT Archaeological Services	REPORT NO. 2023-40	November 2023
7	Backfilling Excavations	20730-RCA-WP4-XX-TN-S-0924	7/11/2023
8	Draft Method Statement – bat roost mitigation and compensation measures by Landsker Ecology	HOP-H'westGaol-WP4/PCC/LE22.12	22/12/2023
9	Swift mitigation report by Landsker Archaeology	HaverfordwestCastle/SwiftMitigation/PCC/LE23.12	17/01/24
10	Site Plan	Roger Casey Associates	03/03/2024
11	Site Layout Drawing		03/03/2024
12	Construction Environmental Management Plan		03/03/2024
13	HOP Work Package 4 Method Statement Topsoil removal	For topsoil removal and hardstanding	05/03/2024
14	16692-DB3-B01-XX-RP-A-00005-S3-P02 WP4 Heritage Impact Assessment		05/03/2024
15	Archaeological Evaluation Interim Report DAT	FS23-046 - Haverfordwest Gaol Building Development Phase II Eval Interim Report_V1	07/03/2024
16	16692-DB3-B01-00-DR-A-20036-S3-P01 Bin Store Drawings		13/03/2024
17	WP4_Site Plan_3 (290224)		13/03/2024

6.3 The approved works shall be carried out strictly in accordance with a 'Method Statement' to be submitted in advance and formally approved in writing by Cadw before work commences. The 'Method Statement' shall be adhered to throughout the project and any variations shall be approved by Cadw prior to works commencing;

6.4 The Method Statement shall provide for:

	INFORMATION REQUIRED	Date when information required
1	Installation of site compound and site set up, including details for temporary surface Heras type fencing, ingress and egress of vehicles, dismantling and removal of fencing.	Before work commences.
2	Installation of temporary fixed fencing, including details for design, installation, ingress and egress of vehicles, removal and ground reinstatement.	Before temporary fixed fencing is installed.
3	Removal of turf and topsoil and installation of hard-core storage area, including details for ingress and egress of vehicles, materials, and depths of layers to be installed.	Before work commences.
4	Dismantling, temporary removal, and rebuilding in situ of southern masonry gatepost at main entrance off Castle Street, including recording, labelling, dismantling, transportation, storage, and rebuilding of the gate pier to ensure that a like for like rebuild in terms of both appearance and dimensions is attained. How the wall terminals will be secured and stabilised following the removal of the gate piers	Before work commences.
5	Installation of new services and drainage	Before work commences.
6	Resurfacing of car park including details for ingress and egress of vehicles, materials, and depths of layers to be installed.	Before resurfacing work commences.
7	Installation of bollards including details for locations, design, dimensions for receiver pits, HIA, including assessment against results of archaeological evaluation, and method statement for installation.	Before installation of bollards and resurfacing of car park commences.
8	Installation of EV chargers including details for locations, design, dimensions for receiver pits, HIA including assessment against results of archaeological evaluation, and method statement for installation.	Before installation of EV chargers and resurfacing of car park commences.
9	Cycle Stands including details for locations, design, dimensions for receiver pits, HIA including assessment against results of archaeological evaluation, and method statement for installation.	Before installation of cycle stands and resurfacing of car park commences.

10	Feeder Pillar including details for location, design, dimensions for receiver pit, HIA including assessment against results of archaeological evaluation, and method statement for installation.	Before installation of feeder pillar and resurfacing of car park commences.
11	Construction of new waste store, including location, design, dimensions for receiver pit and slab, revised HIA including assessment against results of archaeological evaluation, and method statement for installation.	Before installation of new waste store and resurfacing of car park commences.
12	Installation 3 no x 4m high lighting columns, including locations, design, dimensions for receiver pits, HIA, including assessment against results of archaeological evaluation, and method statement for installation.	Before installation of lighting columns and resurfacing of car park commences.
13	Hard landscaping and turf reinstatement	Before hard landscaping and turf reinstatement work commences.

- 6.5 No works, including site clearance, shall commence until Cadw has been informed in writing of the name of an appropriately qualified archaeologist operating to ClfA published standards and guidance⁴ who is to be present to undertake archaeological excavation, building recording and archaeological monitoring and recording for any works or operation occurring within the scheduled area and in accordance with the written scheme of investigation which has been submitted to, and approved in writing by, Cadw. No work shall commence until Cadw has confirmed in writing that the proposed archaeologist is acceptable.
- 6.6 A digital copy of the draft report shall be submitted to Cadw for approval within 8 weeks of the archaeological fieldwork being completed⁵.
- 6.7 A digital copy of the approved report shall be submitted to the regional Historic Environment Record and National Monuments Record of Wales to be incorporated into these public records⁶, and the applicant shall inform Cadw when this has been completed.
- 6.8 Cadw shall be invited to attend a site meeting within the first 5 working days of commencement of the project to review the programme, submitted method statement and arrangements that have been established for archaeological mitigation/building recording.

⁴ Chartered Institute for Archaeologists <https://www.archaeologists.net/codes/cifa> .

⁵ Cadw will retain a copy of the watching brief report for our records.

⁶ Cadw requires formal confirmation of report deposit to discharge condition.

- 6.9 That upon completion of the project the applicant will produce a completion report including an annotated photographic record detailing the site before, during and after works took place and including final versions of plans and elevations as built. The draft should be sent to Cadw in digital format for approval within 25 working days of the works being completed.
- 6.10 Any historic or archaeological features not previously identified which are revealed when carrying out the works shall be retained *in situ* and reported to Cadw within two working days. Works shall be halted in the area/part of the site affected until provision has been made for retention and/or recording of the feature by a suitably qualified archaeologist in accordance with details submitted to and approved in writing in advance by Cadw.

Name of Inspector: Louise Mees

Date: 15/03/2024

COMPLETION NOTICE

Name of Monument: Haverfordwest Castle

Monument Number: PE366

Conditions	Date	Signature
Advance notice of commencement of works.		
The approved works shall be carried out strictly in accordance with the application form, plans and documents as listed.		
The approved works shall be carried out strictly in accordance with a 'Method Statement' to be submitted in advance and formally approved in writing by Cadw before work commences		
No works, including site clearance, shall commence until Cadw has been informed in writing of the name of an appropriately qualified archaeologist operating to ClfA published standards and guidance.		
A digital copy of the draft report shall be submitted to Cadw for approval within 8 weeks of the archaeological fieldwork being completed.		
A digital copy of the approved report shall be submitted to the regional Historic Environment Record and National Monuments Record of Wales to be incorporated into these public records , and the applicant shall inform Cadw when this has been completed.		
Cadw shall be invited to attend a site meeting within the first 5 working days of commencement of the project to review the programme, submitted method statement and arrangements that have been established for archaeological mitigation/building recording.		
Upon completion of the project the applicant will produce a completion report including an annotated photographic record detailing the site		

before, during and after works took place and including final versions of plans and elevations as built. The draft should be sent to Cadw in digital format for approval within 25 working days of the works being completed.		
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Applicant Name:

Signature:

When all work has been completed and the conditions have been discharged, please complete and return this completion notice to Cadw at scheduledmonuments@gov.wales