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Pembroke Castle Trust
Pembroke
Pembrokeshire
SA71 4LA

Eich cyfeirnod
Your reference

PE005

Ein cyfeirnod
Our reference

DH

Dyddiad
Date

8 December 2022

Llinell uniongyrchol
Direct line

0300 0256004

Ebost
Email:

scheduledmonuments@gov.wales

Dear Sir/Madam,

**ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979
APPLICATION FOR SCHEDULED MONUMENT CONSENT
PEMBROKE CASTLE (PE005)**

1. Introduction

1.1 Thank you for your application of 27 July 2022 to Cadw for scheduled monument consent for repointing and associated works to twin stacks to east end of gatehouse 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 works to the twin stacks at the east end of the gatehouse, including: (i) erection of scaffold; (ii) Joss/Doff cleaning of historic masonry; (iii) picking out and repointing; (iv) removal of existing chimney capping and installation of bespoke ventilation capping affixed using stainless steel dowels into the existing sand/cement; and (v) application of 2 coats Keim Lotexan (this element of the application withdrawn on 7/11/2022). The reasons for the Inspector's conclusions are set out in **Annex A** of this letter.



2.2. 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. Proposed Conditions

4.1. The following proposed 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 shall 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 Peter Holden and dated 27/07/2022		27/07/2022
2	Report and justification statement with specification		27/07/2022

3	Commentary by Neil Ludlow		27/06/2022
4	3D images by Aerial-Cam		27/07/2022
5	A2007E/SKI Location Plan		27/07/2022

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	Details for design, erection, removal, and ingress/egress of access scaffolding of all elevations of the twin stacks.	Before work commences.
2	Details for Joss/Doff cleaning.	Before work commences.
3	Details for picking out and repointing, including extent and proposed mortar mix.	Before work commences.
4	Details for design, materials and installation of chimney ventilation caps.	Before work commences.

e) That two coats Keim Lotexam solution is not applied to the masonry;

f) 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;

g) That Cadw's Inspector is to approve a trial panel of Joss/Doff cleaning and the methodology to be employed before full cleaning of masonry is undertaken;

h) That Cadw's Inspector is to approve a trial panel of mortar mix and pointing style before full repointing is undertaken;

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.

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.

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 Deputy Minister for Arts and Sport, and Chief Whip, one of the
Welsh Ministers

**ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979
APPLICATION FOR SCHEDULED MONUMENT CONSENT
PEMBROKE CASTLE (PE005)**

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. Pembroke Castle

- 2.1 Pembroke castle is sited on a high ridge between two tidal inlets, a strategic position located on a major route-way chosen early in the first Norman incursions into south-west Wales, when the castle was founded by Roger of Montgomery in 1093, the castle was never to fall to the Welsh. It was from here that the Normans embarked upon their Irish campaigns. In 1189, the castle came into the hands of William Marshal, who, over the next 30 years transformed an earth-and-timber castle into a mighty stone fortification. First to be built was the inner ward, within which is a magnificent round keep over 22m in height possessing a remarkable domed roof. The keep had four floors, connected by a spiral stair which also led to the battlements. Large square holes at the top on the outside could hold a timber hoard, or fighting platform. The

original entrance was on the first floor, approached by an external stair, the present ground-floor entrance is a later insertion.

Enclosing the keep was the inner-ward curtain wall, to the south-west stood a large horseshoe-shaped gate of which now only the footings survive, and to the east a strong round tower with a basement prison. Along the cliff edge only a thin wall was required, this had a small observation turret at the apex, a square stone platform to the north of it supported a huge medieval catapult for defence against attack from the sea. Domestic buildings were on the west and east of the inner ward including William Marshal's Hall and private apartments. These were improved and further buildings added in the later 13th century, when a new Great Hall was built with walling projecting over the south-east corner to enclose the mouth of a large cavern in the rock below which may have served as a boathouse. At the same period, a large single-storey building was added near the keep to serve as the county court. By this time, the castle had passed to the de Valence family; the Hastings family then held it from 1324 to 1389, after which the castle passed into the hands of the crown.

Much of the building work in the outer ward may also belong to the early 13th-century and to William Marshal, and the main plan of the present defences remains as originally constructed though the result of a systematic programme of restoration in the 19th and early 20th century. Much of the north-eastern defences, most of the curtain wall, the outer parts of the gatehouse and barbican, and most of the Westgate and Henry VII towers have been rebuilt from footings. Around the outer ward are a fine series of four round towers, the St Annes's Bastion on the north-east and a southern Great Gatehouse. Postern gates on either side were defended by the bastion and the Monkton Tower respectively. The Great Gatehouse had two portcullises, stout doors, and three machicolation in the vaulting as well as a series of arrowslits, it is one of the finest and earliest of its kind.

The gatehouse western Bygate Tower has a prison in its basement. Each gate tower has a ground and two upper floors reached by stairs spiralling in opposite directions. Doors lead from the upper rooms on to the wall-walk. The gatehouse is in essence a double-towered gate, with one of the towers moved along the curtain wall to clear the oblique entrance approach; its outer parts are further defended by a fine semi-circular barbican.

The castle was granted out by the crown with a series of short-lived tenancies and fell into considerable disrepair. In 1405 Francis Court was hastily given munitions to hold the castle against Owain Glydwr's uprising. The castle later passed into the hands of Jasper Tewdwr, earl of Pembroke, and was apparently the birthplace of his nephew Henry, later King Henry VII. Pembroke declared its support for Parliament at the beginning of the Civil War, but in 1648, the town's mayor, John Poyer, disgruntled at his lack of reward, joined a disaffected group of Roundheads unwilling to be demobilised. Cromwell himself came to besiege the castle which only fell after seven weeks when the water supply was cut off and a train of siege cannon arrived to start a bombardment. After this defiance Cromwell blew up the barbican and the fronts of all the towers to prevent the castle ever being used again militarily. The monument is of national importance

for its potential to enhance our knowledge of medieval defensive 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. The scheduled area comprises the remains described and areas around them within which related evidence may be expected to survive.

- 2.2 Today the castle is well-maintained and presented to the public by the Pembroke Castle Trust.

3. The Application

- 3.1 This application for scheduled monument consent involves works to the twin stacks at the east end of the gatehouse, including: (i) erection of scaffold; (ii) Joss/Doff cleaning of historic masonry; (iii) picking out and repointing; (iv) removal of existing chimney capping and installation of bespoke ventilation capping affixed using stainless steel dowels into the existing sand/cement; and (v) application of 2 coats Keim Lotexan (this element of the application withdrawn on 7/11/2022).
- 3.2 The applicant submitted supporting information including a plan showing the location of the twin stacks, images as existing, report on water ingress, justification for work, and assessment of historical significance. Additional information on the extent of scaffolding and the use of Keim Lotexan was required, which was discussed with the applicant in a telephone call on 7/11/2022.
- 3.3 The heritage values of the twin stacks at the east end of the gatehouse are summarised below:
- Evidential Value:
'Flemish' style chimneys considered 16th / 17th date, though potentially original 13th century chimneys serving the gatehouse. Civil War date at the latest, since castle abandoned afterwards. Surviving features include the chimney stack and flue.
- Historic Value:
Demonstrating well planned defensive and domestic arrangements.
- Aesthetic Value:
The great gatehouse is an excellent and well-preserved example of its type and has a commanding position visible within the town.
- Communal Value:
Public access is provided by private owners who maintain this popular castle.

4. Assessment

- 4.1 The applicant proposed to erect scaffold to the west elevation only and for work to be restricted to this area. During the telephone call on 7/11/2022 the applicant explained that the extent of scaffold was restricted to limit expense, and that the pointing would be restricted to the west elevation. Following advice from the IAM the applicant agreed that all elevations of the twin stack should be scaffolded, picked out and repointed to ensure that water ingress is prevented.

Damage to historic fabric will be avoided by provision of a scaffold design and installation MS by the applicant, to be approved by the IAM.

- 4.2 Joss/Doff cleaning is proposed to remove algal growth to enable re-pointing. Joss/Doff are brand names for machines that essentially do the same thing, which is pressured steam cleaning. They work by using heat to cause the dirt to swell and separate from the stone while simultaneously washing it off with pressure. These treatments can be very aggressive. Inadvertent damage of historic masonry can be avoided by attaching a condition to the SMC for a test panel to be cleaned and the methodology approved by the IAM. Cleaning of the masonry will improve the appearance of the monument.
- 4.3 Repointing is uncontentious and reversible. An agreed methodology, mortar mix, and test panel to be approved by the IAM will ensure that picking out and repointing are beneficial and do not damage historic masonry.
- 4.4 The installation of chimney covers will prevent water ingress into the medieval flues and adjacent historic fabric. Fixings will be drilled into sand/cement capping and historic masonry. The alternative, fixing by mortar, is not appropriate or safe in this highly exposed position. Drilling will extend into and damage historic masonry. This damage will be very localised, minimal, and acceptable as the harm caused will be outweighed by the benefit of preventing water ingress and improving ventilation. The proposed installation will have a negligible negative impact on the appearance of the chimneys.
- 4.5 Application of Keim Lotexan, a silicone sealant, is irreversible and not appropriate for use on historic fabric. During the telephone call on 7/11/2022 the applicant acknowledged that this treatment is not recommended and withdrew this element of the application.
- 4.6 The proposed works will reduce water ingress, thus improving the long-term preservation of the monument, its appearance and accessibility to areas within it.

5. Recommendation

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

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 Peter Holden and dated 27/07/2022		27/07/2022
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3	Commentary by Neil Ludlow		27/06/2022
4	3D images by Aerial-Cam		27/07/2022
5	A2007E/SKI Location Plan		27/07/2022

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:

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6.5 That 2 coats Keim Lotexam solution is not applied to the masonry.

6.6 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.

6.7 That Cadw's Inspector is to approve a trial panel of Joss/Doff cleaning and the methodology to be employed before full cleaning of masonry is undertaken.

6.8 That Cadw's Inspector is to approve a trial panel of mortar mix and pointing style before full repointing is undertaken.

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: 06/12/2022

COMPLETION NOTICE

Name of Monument: PEMBROKE CASTLE

Monument Number: PE005

Conditions	Date	Signature
Completion of works on site		
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.		

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