

Mr Matthew John
Western Power Distribution
Withybush North
Withybush Business Park
Haverfordwest
SA62 4EQ

Eich cyfeirnod
Your reference

PE416

Ein cyfeirnod
Our reference

DH

Dyddiad
Date

7 October 2022

Llinell uniongyrchol
Direct line

0300 0256004

Ebost
Email:

scheduledmonuments@gov.wales

Dear Matthew John,

**ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979
APPLICATION FOR SCHEDULED MONUMENT CONSENT
PROMONTORY FORT ON GREAT CASTLE HEAD (PE416)**

1. Introduction

1.1 Thank you for your application of 7 September 2022 to Cadw for scheduled monument consent to dismantle overhead power lines and replace with buried services 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 (i) removal of an existing overhead power line, (ii) excavation of a trench 530mm depth, 300mm width and c. 90m length, and (iii) excavation of test pits measuring approximately 1m² to check the route of other utilities, the number and location of which the applicant proposes will be determined by the site works. 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 submitted
1	SMC application form signed by Matthew John and dated 05/09/22		06/09/2022
2	Written Scheme of Investigation for an Archaeological Watching Brief	P22-243 – August 2022	06/09/2022
3	Figure 1 – Scheduled Area Map		06/09/2022
4	Figure 2 – Plan showing new cabling within SM		06/09/2022

5	Figure 3 – Photograph showing track as existing		06/09/2022
6	Figure 4 – Photographs showing area adjacent to wall as existing		06/09/2022
7	Figure 5 – Photograph existing overhead route		06/09/2022
8	Method Statement		06/10/2022
9	Revised co additions		06/10/2022
10	Revised WSI v 1.3		06/10/2022

- c) 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 a watching brief for any works or operation occurring within the scheduled area. No work shall commence until Cadw has confirmed in writing that the proposed archaeologist and their written scheme of investigation for an archaeological watching brief are acceptable;
- d) A digital copy of the draft watching brief report shall be submitted to Cadw for approval within eight weeks of the archaeological fieldwork being completed²;
- e) A digital copy of the approved watching brief 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;
- f) That, in addition to the archaeological WSI report, 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 of the excavated areas and cable installation route. The draft should be sent to Cadw in digital format for approval within 25 working days of the works being completed.

5. Compliance

5.1. Where a condition requires approval or any contact with Cadw you are advised to contact Dr Jonathan Berry 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.

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

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 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
PROMONTORY FORT ON GREAT CASTLE HEAD (PE416)**

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. Promontory Fort on Great Castle Head (PE416)

- 2.1 The monument comprises a well-preserved coastal promontory fort, probably dating from the Iron Age period (800 BC - 74 AD). It is located at the S end of a headland, which projects S into Milford Haven. The fort is defended by steep natural cliffs on the E, S and W sides. The N side of the fort is defended by a single E-W aligned bank and ditch that runs across the neck of the headland. The bank measures 150m in length and is well preserved, except for a gap on the W side where the access road has cut through. The bank ends abruptly on the E side some way short of the edge and may have been disturbed here, although this may be the site of the entrance. The outer ditch is for the most part invisible. A lighthouse compound is situated towards the W edge of the interior and is excluded from the scheduled area. The monument is of national

importance for its potential to enhance our knowledge of Iron Age settlement and social organisation. The monument forms an important element within the wider later prehistoric landscape. The structure itself may be expected to contain archaeological information regarding chronology, building techniques and functional detail. The area scheduled comprises the remains described and an area around within which related evidence may be expected to survive. It is an irregular polygon in shape and measures 290m E-W by 220m transversely.

2.2 At the time of the most recent Cadw Monuments at Risk (MaR) monitoring visit on 17thth January 2019 the MaR level was recorded as 'medium' according to the following criteria:

- Condition trend: stable - limited vegetation management.
- Vulnerability: medium. The site is vulnerable to the results of coastal erosion.
- Current condition: favourable.
- Overall risk level: medium.

2.3 The monument's key heritage values include:

- Evidential: defensive banks and ditches, internal occupation area, buried features such as revetment/house walls, gullies, floor surfaces, hearths / deposits. Installation of a lighthouse and military structures have previously disturbed parts of the interior and defences. In addition, part of a defensive bank was removed in the 1980s, then reinstated during c. 2000.
The monument has not previously been subject to archaeological excavation.
- Aesthetic: defences typical of Iron Age defended promontories.
- Historical: this is one of numerous Iron Age promontory forts on the Pembrokeshire coast. Though the exact dates they were occupied is unknown, and therefore relationships between sites and whether they were contemporary is unclear, there is potential for high group value.
- Communal: located on the Pembrokeshire Coast Path, a popular and well visited destination for local walkers and tourists.

3. The Application

3.1 This application for scheduled monument consent involves (i) removal of an existing overhead power line, (ii) excavation of a trench 530mm depth, 300mm width and c. 90m length, and (iii) excavation of test pits measuring approximately 1m² to check the route of other utilities, the number and location of which the applicant proposes will be determined by the site works.

4. Assessment

4.1 The work is proposed as part of a project to improve the visual amenity of the Pembroke Coast National Park by dismantling overhead power lines and

replacing them with buried services. The applicant submitted a Written Scheme of Investigation (WSI) for an archaeological watching brief, images of the area as existing, a method statement and a plan of the proposed trenches.

- 4.2 The removal of the existing overhead power line will be beneficial to the monument's heritage values. The applicant proposes to cut the support poles at ground level, and to leave the timber to rot *in situ*. This work will not harm the evidential values of the monument, as there will be no ground disturbance. The removal of the support poles and overhead cabling will improve the appearance of the monument, enhancing the monument's aesthetic values. This element of the proposed works is acceptable.
- 4.3 The applicant proposes to use bog mats if the ground is wet to avoid damage by plant to the surface of the monument. This is acceptable.
- 4.4 The applicant proposes to replace the above ground cable with one buried in the ground. The works require the excavation of a service trench measuring 530mm in depth, 300mm in width and c. 90m in length in the scheduled area. In addition, the applicant proposes to excavate a yet unknown number of 1m² test pits to establish the routes of other utility services.
- 4.5 The primary concern is that the excavation of the proposed service trench and test pits will impact adversely on any underlying archaeological evidence within the scheduled area. It is uncertain whether the proposed ground disturbance along the route and test pit locations will affect any underlying archaeology, as the area has not been excavated before, and there are no records where the ground was previously disturbed.
- 4.6 The applicant proposes to use an archaeologist to maintain a watching brief during all excavation works within the scheduled area. The archaeologist will observe the excavations as the ground is removed in shallow spits using a toothless bucket. They have the power to stop work should any archaeological evidence be encountered. If any archaeological evidence is found, all excavation works within the scheduled area must stop, and Cadw must be informed. The appointed archaeologist is to be given adequate time to record the exposed levels and establish their significance. A meeting will take place and Cadw's Inspector of Ancient Monuments will determine if an alternative route is required.
- 4.7 An excavation in a scheduled area has the potential to be invasive and destructive. National policy states that preservation *in situ* of archaeological remains takes precedence over preservation by record in a scheduled area. In this case, the extent of the proposed excavation has been designed to limit the length of the trench through the scheduled area, to be partially located within the existing track (50m long) (though construction of the track may only have involved surface deposition, not excavation), to be partially located alongside an existing wall (40m long), and to link to existing connections. An archaeological watching brief is deemed to be an adequate and appropriate archaeological control to ensure that scheduled archaeological evidence of national importance is not harmed.

- 4.8 There is a remote possibility that an acceptable route through the scheduled monument will not be identified. In this scenario, it is important to balance the beneficial visual impact of the removal of the support posts and overhead lines against the potential adverse destruction of legally protected archaeological remains. In this case, the preservation of below ground archaeology takes precedence and if a below ground route cannot be identified, the applicant will need to retain the existing above ground utility supply scheme on the grounds that an improvement of the monument's aesthetic values does not outweigh nor justify an adverse impact on the monument's evidential values.

5. Recommendation

- 5.1 I recommend that this application for scheduled monument consent is approved subject to the conditions set out in section six below.
- 5.2 The proposed undergrounding of the electrical supply should not be permitted in the scheduled area if a suitable route that does not impact on nationally important archaeological evidence cannot be found.

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.

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- 6.3 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 a watching brief for any works or operation occurring within the scheduled area. No work shall commence until Cadw has confirmed in writing that the proposed archaeologist and their written scheme of investigation for an archaeological watching brief are acceptable.
- 6.4 A digital copy of the draft watching brief report shall be submitted to Cadw for approval within eight weeks of the archaeological fieldwork being completed⁵.
- 6.5 A digital copy of the approved watching brief 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.
- 6.6 That, in addition to the archaeological WSI report, 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 of the excavated areas and cable installation route. The draft should be sent to Cadw in digital format for approval within 25 working days of the works being completed.

Name of Inspector: Dr Jonathan Berry

Date: 6th October 2022

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.

COMPLETION NOTICE**Name of Monument: Promontory Fort on Great Castle Head****Monument Number: PE416**

Conditions	Date	Signature
Completion of works on site		
A digital copy of the draft watching brief report shall be submitted to Cadw for approval within eight weeks of the archaeological fieldwork being completed		
A digital copy of the approved watching brief 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.		
That, in addition to the archaeological WSI report, 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 of the excavated areas and cable installation route. 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