

Rhys James Baker
Pembrokeshire County Council

By email
rhys.baker@pembrokeshire.gov.uk

Eich cyfeirnod
Your reference

Ein cyfeirnod
Our reference

Dyddiad
Date

Llinell uniongyrchol
Direct line

Ebost
Email:

PE479 – SMC24-066

27 February 2025

0300 0256004

scheduledmonuments@gov.wales

Dear Rhys James Baker,

**HISTORIC ENVIRONMENT (WALES) ACT 2023
APPLICATION FOR SCHEDULED MONUMENT CONSENT
TRAMROAD INCLINE AT SAUNDERSFOOT (PE479) – SMC24-066**

1. Introduction

- 1.1 Thank you for your application of 21 November 2024 to Cadw for scheduled monument consent for the installation of new Engineering Works, consisting of upgrade works to the existing surface currently natural mud/stone 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 monuments of national importance 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 the installation of new engineering works including (i) install filter drains, (ii) upgrade the existing surface of natural mud/stone to a hard standing, and (iii) a new ramp connecting the Tramroad Incline to Incline Way.

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 Well-being of Future Generations (Wales) Act 2015. 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 Rhys James Baker		21/11/2024



	and dated 21/11/2024		
2	Rhys Baker email – revised scheme		11/12/2024
3	Drawing CA1892 ATC Saundersfoot Incline Path, Cross Sections 2	CA1892- F1002- CADW	11/12/2024
4	Drawing CA1892 ATC Saundersfoot Incline Path, Cross Sections 3	CA1892- F1003- CADW	11/12/2024
5	Drawing CA1892 ATC Saundersfoot CADW Location Plan Incline Way	CA1892- X102A- CADW	11/12/2024
6	Drawing CA1892 ATC Saundersfoot Incline Path, Section C	CA1892- C107-RB	11/12/2024
7	Drawing CA1892 ATC Saundersfoot Incline Path, Cross Sections Ramped Area	CA1892- F1001- CADW	11/12/2024
8	Additional information via email regarding ATC		14/02/2025

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	Preparation works to existing path surface, details of site compound (to be located beyond the scheduled area, programme of work, ingress /egress vehicles, how the scheduled area will be protected, installation of new materials.	Before work commences.
2	Arrangements for secure storage of loose archaeological finds.	Before work commences.



3	Details of new materials to be used for upper finish and sample to be approved by Cadw.	Before material installed.
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- 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 monitoring and recording for any works or operation occurring within the scheduled area. No work shall commence until Cadw has confirmed in writing that the proposed archaeologist is acceptable;
- f) A digital copy of the draft archaeological monitoring and recording report shall be submitted to Cadw for approval within 8 weeks of the archaeological fieldwork being completed²;
- g) A digital copy of the approved archaeological monitoring and recording 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.

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.

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.



5.2 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 30(2)(b) of the 2023 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 19(2) of the 2023 Act, if no works to which this consent relates are 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 13 of the 2023 Act. It is the responsibility of the applicant to obtain any such approval or consent where necessary.

6. Mechanism for Challenge

6.1 Sections 72 and 73 of the 2023 Act explain 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 day after 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.

6.2 The 'relevant requirements' mentioned above are defined in Section 73(5) of the 2023 Act and it is advisable to seek legal advice before taking any action.

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

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

Yours sincerely,

Denise Harris
Historic Environment Branch
under authority of Jack Sargeant MS – Minister for Culture, Skills and Social Partnership

Annex A

ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979 APPLICATION FOR SCHEDULED MONUMENT CONSENT Tramroad Incline at Saundersfoot, PE479 – SMC24-066

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. Tramroad Incline at Saundersfoot

- 2.1 The following provides a general description of the Scheduled Ancient Monument.

The monument consists of the remains of the incline, part of the Saundersfoot Railway and Harbour Company tramroad constructed to carry coal from local collieries to the harbour. The 4.75 mile long route was authorized by an Act of 1829 and opened in 1832. The incline at gradient of 1 in 5 was its main engineering feature. The incline track was double, with a shared middle rail and a passing loop halfway up. The original rails were cast-iron fish bellied rails laid on stone sleepers at just over 4 feet gauge. This was replaced by steel rails on wooden sleepers in 1874. The incline was self-acting by counterbalance, and



the level sections were horse-drawn until locomotives were introduced in the 1870s. The railway closed c1940, following the closure of local mines.

Today, the incline forms the route of a footpath from the Ridgeway to Westfield Road, a distance of approximately 370m. There is a consistent gradient, with level areas at top and bottom. The upper level section is partially embanked and includes the remains of the drum house, a small stone building with walls complete to roof height on three sides and exposed foundations on the fourth. The building housed a counterbalance drum and brake mechanism, together with a working area for the brakesman. Large holding down bolts and beam holes for the drum are visible. A fireplace and window giving a view up the track are in the rear gable. Minor alterations can be traced in the fabric, and fish bellied rails have been re-used as lintols. The track bed of the incline itself appears to have been roughly 5m wide. The upper section is in a cutting which is 5m deep at its greatest, with some revetment walls and relict hedgerows on both sides. The bottom third of the incline is on a shallow embankment. A flat marshalling area at the bottom of the incline crosses a stream by a long masonry culvert.

The monument is of national importance for its potential to enhance our knowledge of 18th and 19th century industrial and transportation practices. The cutting, track bed, drumhouse and embankments may all be expected to contain archaeological information regarding construction techniques and functional detail.

The scheduled area comprises the remains described and areas around them within which related evidence may be expected to survive. It is roughly 363m long and 10m wide, including the full widths of the cuttings, embankments, and boundary hedges.

2.2 The heritage values of the monument is summarised below:

Evidential value:

Surviving section of the industrial transport route includes standing remains, a sleeper (not in situ) and potential for other buried remains to survive.

Historic Value:

Demonstrates 18th and 19th century industrial and transportation practices.

Aesthetic Value:

The tramroad is a tangible link to enable understanding and appreciation of the area's industrial heritage.

Communal Value:

The tramroad is a public right of way (footpath) well used by residents and visitors.

2.3 The most recent Cadw visit to the monument was undertaken by the Regional Inspector on 26/11/2024, at which time the MaR level was recorded as Medium due to the impact of visitor and natural erosion on the footpath.

3. The Application



- 3.1 This application for scheduled monument consent involves installation of new engineering works including (i) install filter drains, (ii) upgrade the existing surface of natural mud/stone to a hard standing, and (iii) a new ramp connecting the Tramroad Incline to Incline Way.
- 3.2 The applicant submitted pre-application documentation and discussed their proposals with Cadw via Teams. Cadw's IAM visited the monument on 26/11/2024, after which the applicant responded to a request for additional information and provided a revised scheme.

4. Assessment

- 4.1 The applicant proposes to improve the condition of the tramroad incline as part of the local Active Travel Plans. The work includes laying drains and installing new path materials. All work involves building up over the existing surfaces: no excavation is proposed. Due to funding restrictions and unsuitability of the upper section of the tramroad for use by cyclists, the proposed works are located on the lower section of the tramroad and a new connection to Incline Way. The visible surviving sleeper is located on the upper section of the tramroad and unaffected by these works.
- 4.2 Items (i) install filter drains, (ii) upgrade the existing surface of natural mud/stone to a hard standing. The proposed works will affect modern surfaces, materials, and previously disturbed areas where the existing path and water pipes have been installed.
- 4.3 The work involves renewal of existing paths and introduction of drains within the path material, therefore not changing aesthetic values. The work will maintain and improve public access and thus benefit communal values. Surfaces will be built up above existing levels, therefore, it is unlikely that the works will affect physical remains (evidential values) of the monument.
- 4.4 Item (iii) a new ramp connecting the Tramroad Incline to Incline Way. Most of this element of the work is located beyond the scheduled area, for which the applicant is required to consult Heneb, their archaeological advisors. Unauthorised use of the part of this route within the scheduled area has caused slight disturbance to the ground surface. Installation of a modern surface will prevent further damage to the physical remains of the monument.
- 4.5 The slight risk that inadvertent damage during implementation of items (i), (ii) and (iii) could potentially affect archaeological remains can be averted by attaching conditions to the consent for the provision of method statements and archaeological monitoring and recording.

5. Recommendation

- 5.1 I recommend that SMC is granted for the above listed works according 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 Rhys James Baker and dated 21/11/2024		21/11/2024
2	Rhys Baker email – revised scheme		11/12/2024
3	Drawing CA1892 ATC Saundersfoot Incline Path, Cross Sections 2	CA1892-F1002-CADW	11/12/2024
4	Drawing CA1892 ATC Saundersfoot Incline Path, Cross Sections 3	CA1892-F1003-CADW	11/12/2024
5	Drawing CA1892 ATC Saundersfoot CADW Location Plan Incline Way	CA1892-X102A-CADW	11/12/2024
6	Drawing CA1892 ATC Saundersfoot Incline Path, Section C	CA1892-C107-RB	11/12/2024
7	Drawing CA1892 ATC Saundersfoot Incline Path, Cross Sections Ramped Area	CA1892-F1001-CADW	11/12/2024
8	Additional information via email regarding ATC		14/02/2025

- 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	Preparation works to existing path surface, details of site compound (to be located beyond the scheduled area, programme of work, ingress /egress	Before work commences.



	vehicles, how the scheduled area will be protected, installation of new materials.	
2	Arrangements for secure storage of loose archaeological finds.	Before work commences.
3	Details of new materials to be used for upper finish and sample to be approved by Cadw.	Before material installed.

- 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 monitoring and recording for any works or operation occurring within the scheduled area. No work shall commence until Cadw has confirmed in writing that the proposed archaeologist is acceptable.
- 6.6 A digital copy of the draft archaeological monitoring and recording 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 archaeological monitoring and recording 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.
- 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: 19/02/2025

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: Tramroad Incline at Saundersfoot

Monument Number: PE479

Conditions	Date	Signature
Start 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.		
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 archaeological monitoring and recording report shall be submitted to Cadw for approval within 8 weeks of the archaeological fieldwork being completed.		
A digital copy of the approved archaeological monitoring and recording report shall be submitted to the regional HER and NMR of Wales.		
Cadw shall be invited to attend a site meeting within the first 5 working days of commencement of the project.		
That upon completion of the project the applicant shall produce a completion report.		
Any historic or archaeological features not previously identified which are revealed when carrying out the works shall be		



retained <i>in situ</i> and reported to Cadw within two working days.		
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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



Llywodraeth Cymru
Welsh Government