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Vicky Fisk

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Date: 6th October 2026

Dear Vicky

**Re: CML2492 - Condition 3.24 Recording of Historic Asse at
Blackpool Mill River Wall, Eastern Cleddau, Pembrokeshire**

I write on behalf of Bluestone Resorts further to your email requesting the historic correspondence and evidence relating to Condition 3.24 - Recording of Historic Assets. I have now obtained and reviewed the earlier correspondence between Natural Resources Wales (NRW), the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW), JBA Consulting and Bluestone. The original correspondence in an email string can be provided.

Having reviewed the chain, I believe it provides a clear contemporaneous record of how the recording requirement was developed, and that the required recording was subsequently undertaken by Dr Julian Whitewright of RCAHMW. For ease of review, I have set out the material exchanges below using the dates and times shown in the original emails.

Condition 3.24 - final wording

"The Licence Holder must submit a record of the surviving section of wharf wall to the Licensing Authority for written approval at least 6 weeks prior to commencement of the Licensed Activities. No Licensed Activities may be undertaken prior to written approval from the Licensing Authority."

6 March 2025 - 20:04 | Dr Julian Whitewright (RCAHMW) to Stephen Treby (NRW)

At consultation stage, RCAHMW confirmed that it had no overall objection to the proposed river wall repair, but asked that the surviving portion of the wall be recorded if it was to be replaced. The initial preference was for a 3D digital record.

"If the latter, then we would like to see a 3D digital record, e.g. photogrammetry, made of the surviving portion prior to its replacement."

26 March 2025 - 08:05 | Sheena Peat (JBA) to Dr Whitewright, copied to Stephen Treby (NRW)

The practical issue with the proposed methodology was then raised. JBA advised that the surviving wall was unstable and that vegetation clearance in advance of the works could itself present a safety concern.

"As it is not stable, vegetation clearance may be unsafe to do in advance of the works. The Applicant is wondering if a scan with vegetation in place or 2D photograph would be acceptable?"

26 March 2025 - 12:47 | Dr Julian Whitewright to Sheena Peat, copied to Stephen Treby (NRW)
Dr Whitewright responded that conventional photography could provide an appropriate record of the character of the wall, subject to the acknowledged limitations created by the vegetation.
“Regular photography would suffice to get some of the character of things...”

2 April 2025 - 09:29 | Stephen Treby (NRW) to Dr Julian Whitewright
NRW then sent Dr Whitewright draft wording for Condition 3.24, at that point referring specifically to a “3D digital record”, and asked whether that wording aligned with RCAHMW's expectations.

2 April 2025 - 10:08 | Dr Julian Whitewright to Stephen Treby (NRW)
Dr Whitewright proposed a broader wording so that the method could respond to the site and safety constraints, specifically suggesting that the requirement should be for “a record” rather than exclusively a 3D survey.
“I think, given the potential difficulties of the vegetation, could we opt simply for 'a record' of the surviving section. That way, if its not possible to undertake a 3D survey, we can resort to a set of still images...”

2 April 2025 - 10:34 | Stephen Treby (NRW) to Dr Julian Whitewright
NRW replied *“Certainly, thanks Julian!”*. This exchange is consistent with the final wording of Condition 3.24, which requires “a record” and does not prescribe a 3D survey. I therefore understand this correspondence to evidence acceptance of the revised approach to the recording methodology.

23 April 2025 - 13:50 | Dr Julian Whitewright to Stephen Treby (NRW)
This is the key completion correspondence. Following his site visit to Blackpool Mill on 23 April 2025, Dr Whitewright contacted NRW directly and confirmed that he had undertaken the required record of the surviving wall.
“An update on the recording work for CML2492 - I had a site visit at Blackpool Mill today, and undertook to make the required record of the surviving part of the wall. So from the archaeological element of the marine license, all is complete.”

16 December 2025 - 09:27 | Dr Julian Whitewright to Liz Weedon (Bluestone Resorts Limited)
The position was subsequently confirmed again by RCAHMW. Dr Whitewright expressly confirmed that the photographic record had been made as required and explained why there was no separate report document.
“This confirms that the photographic record of the wall was made as required by ourselves... There isn't a report as such. We simply update the National Monuments Record (NMR) for the site and then the photos are added to the associated archive...”

The same email confirms that the National Monuments Record had been updated at Coflein site record 420658 and that the photographs from the survey were filed within archive reference DS2025_158.

Position in respect of Condition 3.24

Taken together, the correspondence demonstrates that the recording requirement was actively discussed between NRW and RCAHMW, the proposed methodology was amended in response to the physical condition of the wall and the associated safety constraints, the final condition wording reflects that revised approach, RCAHMW then attended site and completed the required record, and completion was notified directly to NRW on 23 April 2025.

On that basis, please accept this letter together with the enclosed original correspondence as the supporting information for Condition 3.24. Could you please confirm in writing that the evidence is sufficient to satisfy the condition and that Condition 3.24 may now be formally discharged / closed on the Marine Licensing Team's records.

Should you require the original photographic archive, confirmation directly from Dr Whitewright, or any further information to conclude the condition, please let me know and I will coordinate this with Bluestone and RCAHMW.

Yours Sincerely,

A handwritten signature in black ink that reads "A. Jones". The signature is written in a cursive style with a long horizontal stroke at the end.

Andrew Jones - Phoenix Architecture

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