THE TRUST FOR WELSH ARCHAEOLOGY
YMDDIRIEDOLAETH ARCHAEOLEGOL CYMRU

GWASANAETH CYNGOR CYNLLUNIO / PLANNING ADVICE SERVICE

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30 October 2026
Our ref: 1030je/D3963.02

Dear Emma

Marine Licence Application: CML2619
Barmouth North Promenade Flood Alleviation Scheme

Thank you for consulting us on the above marine licence application. We have been consulted also on the planning application (C26/0342/00/LL) and our comments are copied below, being relevant to the identified licensable activities. At the time of writing the planning application has not yet been determined. Our planning recommendation for a condition to secure proportionate archaeological mitigation has therefore been reiterated here, for consistency across the consenting processes.

I have reviewed the details of the above application and am writing to advise on the potential archaeological implications. The application includes an Environmental Statement, which includes a chapter on Cultural Heritage. The chapter is supported by technical appendices including a report on archaeological monitoring and recording during ground investigations, which I have previously received and approved (Heneb report 1833, November 2025). The Cultural Heritage chapter itself provides a detailed account and assessment of the archaeological potential of the application site, in line with my pre-application advice, and includes helpful background about the construction of the original sea defences. I am satisfied that it has been prepared in accordance with the relevant professional standards for such work, and I am in agreement with its conclusions and mitigation recommendations. These are set out in paragraph 9.8.2 as follows:

- Low tide intertidal walkover survey to be undertaken across the beach and foreshore pre-construction but relatively close to the start of work to allow any features exposed by most recent storms/high tides to be identified and recorded. If archaeological remains of high value are identified, then these may need to be left in situ and protected during the course of the works.
- Archaeological monitoring where excavation into the beach deposits is required. This is largely limited to works along the sheet pile wall and the rebuilt access ramps.

Cadeirydd / Chair: Dr Carol Bell PSG / CEO: Richard Nicholls
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All forms of piling are not conducive to archaeological excavation, so monitoring of these works will be limited to any preliminary excavations or other enabling groundworks.

In light of the above comments, it is recommended that, should the marine licence be granted, Natural Resources Wales should require the implementation of a proportionate programme of archaeological mitigation. The following condition wording is suggested to secure such work:

(i) No development (including site clearance, topsoil strip, excavation works etc.) shall take place until a specification for archaeological work has been submitted, and approved in writing by Natural Resources Wales. The development shall be carried out and all archaeological work completed in accordance with the approved specification.

(ii) A detailed report on the archaeological work required by condition (i) shall be submitted to Natural Resources Wales within 6 months of completion of archaeological fieldwork and must then be approved in writing by Natural Resources Wales.

Reasons: 1) To ensure the implementation of an appropriate programme of archaeological mitigation.

2) To ensure that the work will comply with MORPHE/Management of Archaeological Projects (MAP2) and the Standards and Guidance of the Chartered Institute for Archaeologists (CIfA).

All elements of the archaeological evaluation must be undertaken by a professional archaeological firm, in accordance with the relevant professional standards and guidance. The Chartered Institute for Archaeologists maintains a searchable peer-reviewed register of professional archaeologists which can be found here: https://www.archaeologists.net/register/ro.

Please do not hesitate to contact me with any queries regarding the above.

Yours sincerely

Jenny Emmett

National Lead: Planning