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Representation in respect of Planning Application C26/0342/00/LL Barmouth North Promenade Flood Alleviation Scheme

Barmouth Town Council objects to this planning application.

The Council recognises the increasing flood risk facing Barmouth and supports the principle of investing in improved flood protection. The Council does not object to flood defence in principle. Its objection is to the current scheme as submitted.

The Council's objection is not based on opposition to flood defence itself, but on the view that the current application has not yet demonstrated that this particular scheme is the optimum solution for Barmouth.

Having considered the planning application and supporting documentation, the Council is not satisfied that the proposal demonstrates that it represents the most appropriate balance between flood protection, public safety, visual impact, design quality, public amenity, access, tourism, long-term maintenance and the wider interests of the community.

The Council's principal concerns are set out below.

1. Character, Design Quality and Visual Impact

The proposal would introduce a substantial engineered intervention along Barmouth's North Promenade, including extensive rock armour, a secondary flood wall, flood gates, altered beach access arrangements and associated public realm works.

Whilst the engineering function of these elements is recognised, the Council considers that the cumulative visual impact of the rock armour, secondary wall and associated engineering works may be greater than reflected within the submitted Landscape and Visual Impact Assessment.

The Council is particularly concerned that the application provides insufficient explanation of the design rationale for the appearance of the secondary wall. Whilst its engineering purpose is understood, little justification is provided for the choice of finishes or for whether alternative architectural treatments were considered that could soften its appearance and better reflect the character of Barmouth.

The Council considers that, as a prominent permanent structure within one of the town's most important public spaces, the architectural quality of the wall should receive the same level of consideration as its engineering performance.

The Council further notes that the affected frontage sits within the Abermaw Conservation Area and the Abermaw Special Landscape Area (as identified by the Council's own Planning Policy Unit response of 24 June 2026 by reference to Policy AMG 2 of the Joint Local Development Plan), and considers that the application does not adequately assess the impact of the proposed permanent engineered infrastructure on the character or appearance of either designation.

2. Beach Amenity, Tourism and Public Use

The Council remains concerned that the proposal would fundamentally alter the character and recreational value of the beach frontage.

Barmouth's beach and promenade are central to the town's identity, economy and quality of life. The Council is not satisfied that the application adequately demonstrates the likely long-term effect of the completed scheme on public enjoyment of the seafront, visitor experience and the tourism economy upon which the town depends.

3. Public Safety

The submitted General Arrangement Drawings (BMTH-ARP-HGN-PROM-DR series) illustrate extensive areas of rock armour together with new beach access arrangements.

Whilst the engineering purpose of the rock armour is understood, the Council is not satisfied that the application adequately demonstrates how the long-term public safety implications associated with public use of the beach frontage will be managed.

The Council remains concerned about risks associated with slips, falls, entrapment, algae growth, litter accumulation and the practical use of access points throughout the lifetime of the development.

Given the scale of the proposed rock armour and the popularity of the beach, the Council considers that these matters require greater confidence than is provided by the submitted application.

4. Alternatives

The Environmental Statement addresses the need for the scheme and describes the assessment of alternatives.

However, the Council remains concerned that the preferred option was identified before the current detailed design had been developed.

The proposal now before the Planning Authority differs significantly in its scale, extent of rock armour, wall design and public realm works from the earlier concepts considered during option appraisal.

The Council is not satisfied that the application adequately demonstrates why the final submitted design remains the most appropriate option when assessed against its visual, amenity and community impacts.

5. Surface Water and Residual Flood Risk

The Council notes that the Flood Consequence Assessment addresses tidal flooding and drainage.

However, the Council is not satisfied that the submitted information clearly explains, in terms readily understandable to non-specialists, how the completed scheme will interact with existing surface water drainage, tide-locking, heavy rainfall events and flood pathways behind the proposed defences.

The Council considers that greater clarity is required regarding the management of residual flood risk and the implications for properties beyond the immediate frontage.

6. Long-Term Maintenance

The proposal introduces substantial new infrastructure requiring inspection and maintenance throughout its operational life.

The Council considers that the application provides insufficient clarity regarding the long-term maintenance responsibilities and funding arrangements for the proposed rock armour, drainage infrastructure, flood gates, beach access points, planting and public realm features.

The long-term management of algae, litter, drainage openings and access routes will be fundamental to both public safety and the appearance of the completed scheme.

7. Public Access and the Wales Coast Path

The Council is concerned about the effect of the proposal on public access along and from the promenade, including beach access and routes forming part of the Wales Coast Path.

Whilst replacement access arrangements are proposed, the Council is not satisfied that the application fully demonstrates that the quality, usability and accessibility of these routes will be maintained following completion of the scheme.

This is particularly important for older people, families, disabled users and the many visitors who use the promenade throughout the year.

The Council also draws attention to the response of Cyngor Gwynedd's Rights of Way Officer dated 17 June 2026, which identifies that the proposed development could block or restrict public access on Public Rights of Way 24 and 25 and that the routes may lose their functionality. The Wales Coast Path, running through the affected frontage, is a designated national trail under the Countryside and Rights of Way Act 2000 and the Marine and Coastal Access Act 2009, and its integrity along this section warrants specific assessment.

8. Accessibility of the Planning Information

The Council acknowledges the considerable technical work undertaken in preparing the application.

However, the planning submission comprises a very large number of technical reports, appendices and engineering drawings without providing a concise plain-English overview of the final scheme.

Although the General Arrangement Drawings illustrate the proposed works, the Council has been unable to identify a simple summary of the overall extent, dimensions and visual scale of the rock armour or a clear explanation of how the final design differs from earlier consultation proposals.

For a development of this scale and significance, the Council considers that members of the public should reasonably have been able to understand the proposal without having to interpret numerous engineering drawings and technical reports.

9. Consistency of the Submitted Information

The Council has identified inconsistencies between elements of the submitted reports and drawings and remains unclear on aspects of the detailed design forming part of the planning application.

The Council is also concerned that elements of the public realm design, including finishes, materials, landscaping and wall treatments, could be amended following the grant of planning permission without further public consultation.

Given the prominence and permanence of the proposed works, the Council considers that, if planning permission is granted, robust planning conditions should secure the quality of materials, finishes, public realm works, access arrangements and long-term maintenance.

The applicant's own published feedback response records the March 2026 drop-in as attended by approximately 300+ people and characterises the dominant tone of the response as critical with limited supportive engagement.

10. Removal of the Groynes

The proposal includes the permanent removal of the existing timber groynes along the northern beach frontage. The Council recognises that, with the proposed rock revetment in place, retention of the groynes would create foreseeable entrapment hazards between the groynes and the rock, and that removal of the groynes is therefore an inevitable consequence of the design choice that has been made.

The concern the Council wishes to raise is with the process of decision-making that has led to that design choice. The groynes have been progressively neglected over approximately five decades on the stated basis that they were ineffective at retaining beach levels. However, the applicant has now acknowledged in its published response to consultation feedback that the lowering of the beach north of the promenade is attributable to wave reflection from the existing concrete sea wall, and not to any ineffectiveness of the groynes. The rationale that supported the long-term absence of maintenance of the groynes is therefore no longer supportable on the applicant's own evidence.

The Council is not satisfied that the application adequately considers what function properly maintained groynes could have performed over the intervening period, nor whether an alternative scheme that retained or reinstated a maintained groyne system alongside softer defence measures would have avoided the necessity of the extensive rock revetment now proposed. A decision to adopt a scheme whose design requires the removal of the groynes should, in the Council's view, rest on a demonstration that the chosen approach is materially superior to alternatives that would have preserved them.

11. Consistency with the Shoreline Management Plan and Local Development Plan Policy Area 1

The Council notes that the application requires a Major Policy Change to the West of Wales Shoreline Management Plan 2, since the currently adopted policy for Barmouth North at epoch 2 is Managed Realignment. The Major Change process is being progressed through the West Wales Coastal Group but has not yet been endorsed by Welsh Ministers. Gwynedd's Joint Local Development Plan Policy Area 1 (Coastal Change Management Area) requires proposals for new or replacement coastal defence schemes to be consistent with the management approach set out in the Shoreline Management Plan and to demonstrate that there will be no material adverse impact on the environment. The Council is not satisfied that the application demonstrates satisfaction of the first limb of that test at this time.

Conclusion

Barmouth Town Council supports the objective of improving flood resilience for the town.

However, having carefully considered the submitted application, the Council remains unconvinced that it demonstrates that the current proposal represents the most appropriate balance between flood protection, design quality, public safety, beach amenity, tourism, accessibility and the long-term character of Barmouth's seafront.

For these reasons, Barmouth Town Council objects to Planning Application C26/0342/00/LL.

Should the Local Planning Authority not be minded to refuse the application, the Council respectfully requests that these matters are fully considered before any decision is made and that any permission granted is subject to robust conditions securing design quality, public access, public safety and long-term maintenance.

The Council also asks the Local Planning Authority to recognise that this proposal has generated significant public concern within the community. The breadth of concern expressed by residents, businesses and other stakeholders underlines the importance of ensuring that the final scheme is demonstrably the most appropriate solution for Barmouth and that the reasons for that conclusion are clearly evidenced.

Heather Brown

Clerk to Barmouth Town Council on behalf of the Mayor and Councillors of Barmouth Town Council..