

PLANNING STATEMENT

Completion of Part-Built Building and Change of Use to
Managed Flexible Workspace (Use Class B1)

Location of the development:

Crug y Môr, Moylegrove, Cardigan, Pembrokeshire SA43 3BW
(formerly the Richards Brothers Bus and Coach Depot)

Applicant: [REDACTED]
[REDACTED]

Architect: [REDACTED]
[REDACTED]

Date of application: 22 July 2026

Local Planning Authority: Pembrokeshire Coast National Park Authority

The applicant is managing the planning process directly. The project architect will handle technical submissions to Building Control and SuDS approval where these rely on the approved construction drawings.

1. Introduction

- 1) This Planning Statement supports an application for the completion of part-built buildings at Crug y Môr, Moylegrove, and the use of the main building as a managed flexible workspace facility (Use Class B1). The application also seeks retrospective consent for the two buildings now substantially complete on site, constructed in the siting, form and materials previously agreed with the Authority.
- 2) The site is the former Richards Brothers bus and coach depot, a long-established commercial and employment site that has been in continuous use since at least the 1920s. Richards Brothers continues to operate as a bus and coach company from premises on the A487 between Cardigan and Newport; the Moylegrove depot ceased operation some years before the applicant's acquisition of the site. Both buildings are now structurally complete to roof level, with foundations, steel frames and roofs in place. The main building has three of its four external walls completed. The storage shed has all four walls in place, with a security door and roller shutter fitted; minor completion works including additional wall fixings and guttering remain outstanding on both buildings. Decontamination of the upper yard area and SuDS works around both buildings also form part of the proposed development.
- 3) Construction of the main building was paused as a precautionary measure by the applicant, who considered it prudent, given the judicial review proceedings then underway, to leave the building in a state where the internal configuration could be adapted if necessary.
- 4) The judicial review, brought by Wild Justice, was successful and the original planning permission was quashed. The applicant has since engaged in pre-application discussions with the Authority (reference PA25/0174, March 2026), which confirmed that the design and form of the existing buildings is acceptable and that a small-scale employment use with conditioned hours of operation is considered potentially appropriate in principle.
- 5) This application responds directly to that pre-application advice. The proposed use - managed flexible workspace - is an employment use entirely consistent with Policy 43 of the LDP2, the previously developed status of the land, and the Authority's own indication of what uses may be acceptable at this location.
- 6) The proposed use falls within Use Class B1 business use, comprising office, research, professional, creative and administrative activities, together with any light work activity capable of being carried out in a manner compatible with the amenity of the area. Users may include sole traders, remote workers, small businesses, organisations and freelance practitioners across any sector whose activities are consistent with B1 use - whether their primary work is desk-based, field-based, creative, technical or practical. The proposal does not seek permission for retail use, public events, exhibitions or training courses open to the public, general industrial use, residential use, visitor accommodation, or unrestricted public attendance.

2. Executive Summary

The Proposal

- 7) The application seeks two forms of consent in a single application:
- 8) Retrospective consent for the two buildings now substantially complete on site, in the siting, form and materials previously agreed with and assessed by the Authority as appropriate; and

- 9) Full permission for the completion and change of use of the main building as a managed flexible workspace facility (Use Class B1), comprising two communal workspace areas, a bookable room for meetings and study, a dedicated accessible office, and ancillary storage, together with retention of the detached storage building for bicycles, equipment and associated storage, and completion of the associated site works including decontamination and SuDS.

The Site

- 10) Crug y Môr occupies a long-established commercial yard immediately adjacent to the village of Moylegrove. The site has been in continuous employment use since at least the 1920s and constitutes previously developed land. It is enclosed by retaining walls and embankments and is not open countryside in any functional, visual or historical sense. The site comprises three distinct terraced levels rising from the village road: the lower level, which accommodates the main building and ten car parking spaces; the mezzanine level, which accommodates the detached storage shed and two additional parking spaces; and the upper yard, a grassed area above the mezzanine level which will provide incidental outdoor amenity space with picnic seating. The two buildings sit on a largely hardstanding, terraced platform that is visually and functionally contiguous with the village.

The Use

- 11) The facility will provide managed flexible workspace for local businesses, sole traders, organisations and their visiting clients requiring a professional working environment in northern Pembrokeshire. Access will be on a membership and booking basis, managed through an electronic booking system. All users of the facility will be registered members or business visitors accompanying a registered member for business purposes. Members may bring clients, colleagues and business visitors, who will be recorded on the relevant booking. Day passes and longer-term licences will be available. Access to the building will be controlled by a digital entry system. Entry will be limited to registered members and their business visitors, attendance being subject to a valid booking being in place. The booking system will manage vehicle capacity for each period. There will be no general public access or drop-in use.
- 12) The use is defined by the manner in which activities are carried out rather than by the occupation or trade of individual users. Activity on the site takes place indoors during conditioned hours. The facility will generate vehicle movements consistent with a small-scale employment use.

Why It Is Appropriate

- 13) The proposed use addresses a specific gap in full-service managed workspace provision in northern Pembrokeshire. Existing provision in the area offers basic individual desk space but does not extend to bookable private rooms, flexible open-plan workspace configurable for different group sizes, valuables storage, ground-floor accessible workspace, or shower facilities supporting sustainable travel. The proposed facility provides that combination in an edge-of-settlement location with free on-site parking - a model that serves sole traders, small businesses, organisations and remote workers who need occasional access to professional facilities without travelling to larger towns.
- 14) The use is inherently low-impact, entirely indoor, and fully manageable through conditioned hours and a booking system. It is consistent with Policy 43's protection of employment sites, with PPW's priority for the reuse of previously developed land,

and with the Authority's own pre-application indication of what uses may be acceptable at this location.

Key Safeguards

- 15) Hours of operation: 07:30–21:00 Monday to Saturday; 08:00–20:00 Sunday.
- 16) Access by membership and booking only: no drop-in or unmanaged public access.
- 17) No organised external activity, external gatherings or amplified sound outside the main building or the storage building.
- 18) On-site management: Consulting AM Ltd occupies the building as anchor tenant. A responsible person nominated by Consulting AM Ltd will be contactable during all operating hours and will attend the site regularly.
- 19) The main building will be locked outside operating hours, with access controlled by a digital entry system; the storage building will be secured by its existing security door and roller shutter. The parking areas will remain open at all times to meet Highway Authority requirements for site access.
- 20) CCTV covering the building entrance will provide an additional security record supporting compliance with the facility's operating conditions.
- 21) Parking: ten parking spaces on the lower level, two additional spaces on the mezzanine level; no reliance on on-street parking. Vehicle capacity managed through the booking system.
- 22) No retail, no public events, exhibitions or training courses open to the public, no activities involving unrestricted public attendance.

3. Planning and Site History

Site History

- 23) The site has been in continuous commercial and employment use since at least the 1920s, first as a haulage yard and subsequently as the Richards Brothers bus and coach depot. Richards Brothers is a well-known local company that operated - and continues to operate - bus and coach services across northern Pembrokeshire and beyond; the company's current operations are based on the A487 between Cardigan and Newport. The Moylegrove depot ceased operation some years before the applicant's acquisition of the site and, following the cessation of those operations, fell into disuse and became derelict - a visible and acknowledged eyesore at the entrance to the village.
- 24) The Authority has previously recognised the site's long-standing commercial character. The officer committee report for NP/24/0198/FUL (October 2024) noted explicitly that the lawful fallback position on this site was 'an industrial garage with no conditions relating to hours of use' - a use generating unrestricted vehicle movements, mechanical activity and engine noise legally capable of occurring at any hour. The pre-application response (PA25/0174) confirms that the land is previously developed land protected under Policy 43 and that its edge-of-settlement character is accepted.

Planning History

- 25) NP/20/0231/FUL - Demolition of former bus depot and development of one detached dwelling - Refused 18 November 2021. The Authority's refusal confirmed the site's established employment history and the presumption against residential development in this location.

- 26) NP/24/0198/FUL - Proposed building and change of use to outdoor adventure centre, with storage space above in the main building and a detached storage shed, and associated works - Approved by Planning Committee October 2024. The permission confirmed that the design and form of the buildings, their siting, external materials and impact on the amenity of neighbouring properties were all acceptable. The Highway Authority did not object and considered access and parking arrangements for the site acceptable. CADW, NRW and Welsh Water all raised no objection or gave conditional consent. Construction commenced under this permission.
- 27) Judicial Review - R (Wild Justice) v Pembrokeshire Coast National Park Authority [2025] EWHC 2249 (Admin) - The permission was quashed following a successful judicial review on two grounds: first, that an NRW draft report relied upon in the Appropriate Assessment and Officers' Report had not been disclosed as required by section 100D of the Local Government Act; and second, that the Committee had not been properly directed to the presumption against development likely to damage the Aberarth-Carreg Wylan SSSI or to the requirement under PPW12 for careful assessment of potential impacts on that site. The principle of development, the design of the buildings and their impact on amenity were all accepted as appropriate.
- 28) PA25/0174 - Pre-application advice - Received March 2026. The Authority confirmed that the design and form of the existing buildings is acceptable; that a small-scale employment use with conditioned hours of operation is considered potentially appropriate in principle; and that storage use may also be acceptable. The Authority indicated that 'small-scale business units with appropriate parking and landscaping is considered a potentially acceptable use in this location.' This application is the direct response to that advice.
- 29) Enforcement Warning Notice EC26/0015 - Served February 2026, giving a 12-month period within which an alternative planning application should be submitted. This application is submitted within that period.

4. Proposed Use

Use Description

- 30) The application seeks permission for the completion of the main building and ancillary works, and the use of the main building as a managed flexible workspace facility (Use Class B1), comprising:
- 31) A ground floor communal workspace and break-out area providing an open, professionally equipped working environment for booked users and their visiting clients. This space includes a kitchenette, a mix of work tables with bench seating and comfortable informal seating, and a communal refreshment station. This area is always available to all booked users and is not exclusively bookable.
- 32) A first floor flexible workspace area providing open-plan co-working space arranged with moveable panels to create different sized working areas to suit different users and groups, with fixed lockable storage cupboards along the interior wall for the secure storage of users' equipment, materials and valuables between visits. The first floor occupies the eastern portion of the building, on the side where the ground rises to the next terrace, extending the full length of the building from north to south and measuring approximately 8 metres wide by 15 metres long.
- 33) A bookable room for meetings, study, briefings and collaborative work ancillary to the primary workspace use, on the ground floor of approximately 28 square metres, available for exclusive use when booked. The room is equipped with

audio-visual facilities. When not booked for exclusive use, the room is available as additional workspace.

- 34) An accessible office at ground floor level, approximately 9 square metres, bookable for exclusive use and available as a priority for disabled users, with lockable storage at ground floor level.
- 35) Ancillary storage facilities within the main building and the detached storage building, available to workspace users for equipment, bicycles and associated items.
- 36) Welfare facilities including two combined shower and WC rooms - one standard, one with level-access shower and full accessible provision - a plant room and a kitchenette.
- 37) An entrance lobby providing arrival and orientation space for users.

Nature of the Use

- 38) The use is defined by the manner in which activities are carried out, rather than by the occupation or trade of individual users. Users of the facility may include sole traders, small businesses, organisations, consultants, researchers and their clients - any person or body requiring a professional working environment in northern Pembrokeshire. The facility does not restrict access by sector or profession. Any business or individual whose activities are consistent with Use Class B1 may use the facility.
- 39) Activities within the building are conducted in a manner that does not give rise to material noise, vibration, fumes or other impacts harmful to the amenity of neighbouring properties.

Access and Management

- 40) The facility will operate on a membership and booking basis. All users of the facility will be registered members or business visitors accompanying a registered member for business purposes. Access will be managed through an electronic booking system and a digital entry system. The booking system will manage vehicle capacity for each period, preventing bookings that would require more vehicles than the site's parking provision can accommodate. There will be no general public access, no drop-in use and no unmanaged attendance.
- 41) Consulting AM Ltd will occupy the facility as anchor tenant. A responsible person nominated by Consulting AM Ltd will be contactable during all operating hours and will attend the site regularly. The main building will be locked outside operating hours, with access controlled by a digital entry system; the storage building will be secured by its existing security door and roller shutter. The parking areas will remain open at all times to meet Highway Authority requirements for site access. The booking system provides a documented record of all users and their attendees, supporting compliance with any conditions attached to the permission.

Hours of Operation

- 42) The facility will operate within the following hours:
- 43) Monday to Saturday: 07:30 to 21:00
- 44) Sunday: 08:00 to 20:00
- 45) The buildings will not be open to booked users outside these hours, and access to the buildings outside operating hours will be limited to emergency access, maintenance, security, servicing or other incidental access that does not give rise to material harm to neighbouring amenity. The parking areas, access and upper yard

will remain openly accessible at all times to meet Highway Authority requirements for site access, but will not be used for any organised activity, external gathering or amplified sound in connection with the use. The use is not intended to generate late-night activity. The main building will be locked outside operating hours, with access controlled by a digital entry system; the storage building will be secured by its existing security door and roller shutter.

5. Need and Rationale

The Gap in Full-Service Rural Workspace Provision

- 46) The proposed facility addresses a specific gap in full-service managed workspace provision in northern Pembrokeshire. Existing provision in the area offers basic individual desk space but does not extend to bookable private rooms, flexible open-plan workspace configurable for different group sizes, valuables storage, ground-floor accessible workspace, or shower facilities supporting sustainable travel. The proposed facility provides that combination in an edge-of-settlement location with free on-site parking - a model that serves sole traders, small businesses, organisations and remote workers who need occasional access to professional facilities without travelling to larger towns.
- 47) The absence of this provision reflects a structural gap in the professional infrastructure of northern Pembrokeshire. Full-service flexible workspace of this kind tends naturally to locate away from town centres, where lower costs, free parking, quieter surroundings and a more attractive working environment offer advantages that a high street location cannot. The proposed facility fits that established model while serving a catchment that extends across the whole of northern Pembrokeshire. This gap has widened since 2020, as remote and hybrid working has become the norm for a significant and growing proportion of the workforce.

The Post-Pandemic Demand for Rural Flexible Workspace

- 48) The shift to remote and hybrid working that accelerated during and after the Covid-19 pandemic has created a substantial and sustained demand for rural flexible workspace. A significant proportion of the workforce now works from home by default but seeks occasional access to a professional working environment - for focused work, for client meetings, for collaboration with colleagues, and for the social and motivational benefits of working alongside others in a shared professional setting.
- 49) This demand is particularly pronounced among the growing number of people who have relocated to rural Pembrokeshire in recent years and who value the quality of life the area offers. For these individuals, the ability to work in a National Park setting - with the Pembrokeshire Coast Path accessible at lunchtime and the coast within easy walking distance - is a genuine draw that a town centre office cannot replicate. The proposed facility serves this emerging demographic directly, providing a professional workspace that complements, rather than compromises, the reasons they chose to live here.

The Locational Case

- 50) The site is immediately adjacent to the village of Moylegrove and is ten minutes' drive from both Cardigan and Newport Pembrokeshire. It is accessible to businesses and organisations operating across the whole of northern Pembrokeshire. The location is particularly well-suited to people who have chosen to live in this part of the National Park and who wish to work locally - those for whom the quality of the working environment, the proximity to the coast and the landscape, and the

avoidance of a town centre commute are more important than a conventional office address.

Brownfield Land and Policy 43

- 51) The site has been in continuous employment use since at least the 1920s. Policy 43 of the LDP2 protects existing employment sites for employment uses and directs small-scale employment proposals to locations in or adjacent to identified Centres. The site is immediately adjacent to the Moylegrove Rural Centre. The proposed use directly satisfies Policy 43 by delivering new employment infrastructure on a long-established employment site without any change to the building envelope or any new intrusion into open countryside.
- 52) Planning Policy Wales prioritises the reuse of previously developed land for new development, including employment uses. The site is previously developed land in all material respects - it is largely hardstanding, enclosed, and has been in continuous commercial use for over a century. The proposed use represents the sustainable reuse of that land in a manner entirely consistent with PPW's objectives for brownfield development and rural employment.

6. Design, Facilities and Layout

External Appearance

- 53) The siting, form and external materials of both buildings were assessed and accepted by the Authority in granting permission NP/24/0198/FUL in October 2024. CADW confirmed in its response dated 21 May 2024 that the buildings have no impact on the setting of scheduled monument PE386 Penrallt yr Esgob Cairn and that they echo the appearance of the previously demolished structures on the site. The current proposal retains the same building form, height, profile and external materials without modification. Those conclusions carry across unchanged to this application.
- 54) The main building is a steel-framed building measuring approximately 15m long and 4.467m to the eave with a pitched roof to 8.219m at the ridge. The main frame is 8 metres wide with a lean-to extension of approximately 5 metres on the western elevation. At ground floor level the lean-to and central area provide the communal workspace, meeting room and entrance lobby. The eastern portion of the ground floor, beneath the first floor, houses the accessible office, stair, shower and WC rooms, and plant room. The first floor occupies the eastern portion of the building where the ground rises to the next terrace, extending the full length of the building from north to south and measuring approximately 8 metres wide by 15 metres long. The storage building is a single-storey steel-framed building measuring 6m by 12m. Both buildings echo the agricultural and industrial character of the former depot.

Internal Layout - Ground Floor

- 55) The ground floor provides the communal workspace accommodation, comprising:
- 56) A large communal workspace and break-out area of approximately 73 square metres, open to all booked users at all times during operating hours. This space is furnished with a mix of worktables with bench seating and comfortable informal seating, and includes a kitchenette and a communal refreshment station. The space functions as shared workspace with ancillary refreshment and informal seating for booked users, accommodating both focused individual work and informal group interaction.

- 57) A bookable room for meetings, study, briefings and collaborative work ancillary to the primary workspace use, of approximately 28 square metres, available for exclusive use when booked. It is suitable for ancillary meetings, study, briefings and collaborative work by booked users. The room is equipped with audio-visual facilities. When not booked for exclusive use, the room is available as additional workspace.
- 58) A dedicated accessible office of approximately 9 square metres, bookable for exclusive use and reserved as a priority for disabled users. Dedicated lockable storage for the accessible office user is provided at ground floor level.
- 59) Two combined shower and WC rooms - one standard, one with level-access shower and full accessible provision - providing welfare facilities for all users including those arriving on foot or by bicycle.

Internal Layout — First Floor

- 60) The first floor provides a large open-plan flexible workspace area. The floor plate extends the full 15 metres length of the building from north to south and measures approximately 8 metres wide, set into the hillside on the east elevation. The space is arranged with moveable panels that allow different sized working areas to be created according to the needs of different users and groups on any given day - from individual quiet working zones to larger collaborative areas for group sessions. Natural light and ventilation are provided by windows on the northern elevation and on both the eastern and western elevations, creating a well-lit working environment without reliance on artificial lighting during daylight hours. Fixed lockable storage cupboards run along the interior wall, providing secure dedicated storage for members' equipment, materials and valuables between visits. The first floor is accessed by a stair from the ground floor entrance area.

Internal Layout — Storage Building

- 61) The detached storage building provides ancillary storage for workspace users, including secure storage for bicycles and larger equipment. Use of the storage building is available to members as an optional adjunct to their workspace arrangement. The building is not accessible to the public.

Parking, Access and Sustainable Travel

- 62) The site provides ten car parking spaces on the lower level. Two additional spaces are available on the mezzanine level; these spaces require vehicles to reverse on exit and are suitable for use by professional or experienced drivers, reflecting the physical parking layout previously assessed by the Highway Authority in connection with the earlier consented scheme. The site's parking provision is sufficient to accommodate all vehicles expected to be associated with the use. The proposal does not rely on the public car park or on-street parking, although users remain free to use public parking lawfully available in the village. The access arrangements and parking provision were assessed and accepted by the Highway Authority in respect of the previously approved scheme and remain unchanged.
- 63) The facility actively supports sustainable travel. Secure bicycle storage with electric charging points is provided within the storage building, making the facility accessible by e-bike from a wide catchment area across northern Pembrokeshire. Shower facilities within the main building support users who choose to arrive by bicycle or on foot in all weather conditions. The booking system records the anticipated mode of travel for each booking, enabling vehicle capacity to be managed at the point of booking.

Ground Contamination and Upper Yard Remediation

- 64) Comprehensive contamination investigations were undertaken as part of the original consent, including a Stage 1 Desk Study, Stage 2 Intrusive Investigation and a full Remediation Strategy Report (TFW Group Ltd, March 2025). These documents collectively characterised the site and established appropriate mitigation. The original permission addressed the lower and mezzanine levels only; the upper yard area was not included within that application.
- 65) The present application includes remediation of the upper yard area, where made ground containing isolated asbestos fragments was previously recorded. Remediation will be carried out in accordance with Options 2 or 3 (page 10) of the Remediation Strategy. Under this approach the made ground will be removed to natural soil, validation sampling will confirm removal of contamination, and the area reinstated either with certified clean topsoil to BS8332:2015 and BS8601:2013 (Option 3 - if no contamination found) or with topsoil placed over a double non-dig barrier (Option 2 - if residual contamination is found).
- 66) All excavation within the Tree 2 Root Protection Area will be undertaken by hand in accordance with the Tree Works remediation report by Murray Taylor (7 May 2025), with roots protected throughout.
- 67) Limited remaining ground works at the lower and mezzanine levels consist of replacement of small areas of existing concrete hardstanding with permeable plastic grid and gravel in accordance with SUDS requirements, and installation of a one-cubic-metre oil filter chamber within the Root Protection Area of an existing tree. Both operations will be shallow, localised and carried out under standard health-and-safety protocols to prevent any risk of asbestos fibre release.
- 68) Once remediated, the upper yard will provide a modest landscaped outdoor amenity area for users of the workspace facility, with picnic seating as shown on the approved plans. While the change of use extends to the site as a whole, the operational activity of the B1 use - the work itself - is conducted within the main building and the storage building. The external areas, including parking, access and the upper yard, function as curtilage supporting that use rather than as the locus of any activity generating noise or disturbance. The upper yard will provide incidental outdoor amenity space for users, with no organised external activity, no amplified sound and no public events.

7. Neighbour Amenity

The Lawful Baseline

- 69) In determining the adventure hub application (NP/24/0198/FUL), the officer committee report recorded that the lawful fallback position on this site was 'an industrial garage with no conditions relating to hours of use.' That baseline use - the previous Richards Brothers bus and coach depot - generated daily large-vehicle movements, mechanical activity and engine noise, all legally capable of occurring at any hour without planning restriction. The officer committee report further noted that the site 'operated for many years with multiple journeys associated with that use.'
- 70) Against that lawful baseline, the officer found the adventure hub use acceptable in terms of amenity and recommended approval. The proposed workspace use operates within the same physical envelope and within conditioned hours. The operational use of the site is conducted within the main building and the storage building; there is no mechanical or industrial activity outside; and vehicle movements are those of people arriving and departing in ordinary vehicles. Both uses represent

a very substantial improvement in amenity impact compared to the lawful industrial baseline.

Context

- 71) The site's closest neighbour [REDACTED], which is currently uninhabited but is assumed for planning purposes to be capable of residential occupation. Even at this distance the separation exceeds the 25-metre threshold generally applied in amenity assessments. The nearest currently occupied dwelling, [REDACTED]. Based on standard acoustic propagation principles, normal conversation generating approximately 65 dB(A) at one metre reduces to approximately 36 dB(A) at 28 metres and approximately 32 dB(A) at 40 metres - at or below typical rural background noise levels in both cases. The operational use of the site takes place indoors, with the building fabric providing further substantial attenuation.
- 72) The Authority's pre-application response identified amenity - specifically the potential for noise and disturbance - as the principal concern in respect of any use of this site. The proposed workspace use has been designed specifically to address those concerns. The use has no overnight element, is not designed to generate late-night arrivals or departures, and is managed through a booking system and a digital entry system that provides enforceable operational control. The main building will be locked outside operating hours, with access controlled by a digital entry system; the storage building will be secured by its existing security door and roller shutter.

Noise and Disturbance

- 73) The proposed use generates no continuous, mechanical or industrial external noise. Transient noise associated with vehicles arriving and departing - engine noise, doors and normal conversation - is indistinguishable from that generated by any occupied building and is managed within the conditioned operating hours. There is no amplified music, no external gathering, and the use does not involve or require any noise-generating activity outside the buildings during or outside operating hours. The main building is locked outside operating hours, with access controlled by a digital entry system, and the storage building is secured by its existing security door and roller shutter, providing a practical and enforceable mechanism for ensuring that occupied use of the buildings remains within the conditioned hours. The parking areas remain openly accessible at all times, in line with Highway Authority requirements, but are not used for any organised activity, external gathering or amplified sound in connection with the use. Normal incidental activity - people arriving and leaving, brief conversations in the car park, general day-to-day movement - will occur, but will remain entirely consistent with a low-intensity employment use at this separation distance.
- 74) At [REDACTED], indoor workspace activity within the proposed hours would not be expected to be audible at a level giving rise to material disturbance. The WHO community noise guidelines indicate that typical indoor office activity at this separation distance would be well within acceptable limits for both daytime and evening use.

Windows

- 75) The first floor workspace requires windows on the western elevation to provide natural light and ventilation for an acceptable working environment. In considering the appropriate specification for these windows the applicant has had regard to the amenity of neighbouring properties, fire safety requirements and the need for adequate fresh air. On the question of opening, the applicant considers that

openable windows are appropriate for ventilation purposes and notes that the position of the window above the lean-to roof may provide a useful secondary means of escape in an emergency, a matter which will be addressed in detail at building regulations stage.

- 76) On the question of glazing, the applicant has considered the separation distances and viewing angles carefully. The proposed windows are approximately 50 metres from [REDACTED]. At these distances, with oblique viewing angles and intervening vegetation, no new areas of private garden or habitable room become visible that are not already visible from ground level on the existing platform. The proposed window is situated approximately 3 metres above the platform level, which is itself approximately 5 metres above the roof level of all four neighbouring properties. The line of sight from the windows is therefore directed steeply downward across roof planes rather than towards habitable rooms or private gardens at any of the properties. The windows do not therefore materially intensify overlooking compared with the existing situation.
- 77) The relationship with [REDACTED] specifically supports this conclusion. [REDACTED] such that the existing view from the site toward [REDACTED] is already a downward view directed over its roof rather than into private amenity space; the proposed window, situated a further 3 metres above the existing platform, remains directed over the same roofscape and does not introduce a new or more direct viewing relationship. [REDACTED] is also at a lower level than the site, and the existing view toward it from the concrete apron is already directed toward its upper-floor windows; the higher vantage point of the proposed window introduces a more oblique angle of view [REDACTED] than exists from the apron today, rather than a more direct one. In both cases the change in viewpoint moves the relationship toward, rather than away from, a less intrusive outlook. The existing sightlines toward these properties are illustrated at Schedule 8 (C1 and C3).
- 78) This assessment is consistent with appeal decision APP/X1118/W/21/3274931 (Sticklepath) where comparable views at similar distances were held not to create additional harm, and with local precedent NP/19/0328/S73 (Freshwater East) where clear glazing was accepted for a new dwelling just 23 metres from its neighbour, a separation distance materially less than the closest property at Crug y Môr. The applicant is therefore satisfied that clear openable glazing is appropriate for the western elevation windows and that the proposal complies with LDP2 Policy 30.

Hours of Operation

- 79) The proposed hours - 07:30 to 21:00 Monday to Saturday and 08:00 to 20:00 on Sundays - are appropriate for a low-intensity employment use at this location. A facility of this kind is intended to serve sole traders, home-based workers and small businesses, whose working patterns increasingly do not follow a conventional 9am-to-5pm structure. It is a well-recognised feature of modern flexible and home-based working that the working day is often structured around other commitments - childcare, caring responsibilities, or other personal circumstances - resulting in working patterns that begin earlier, pause during the middle of the day, or extend into the early evening. A facility restricted to conventional office hours would not reflect how this category of user actually works, and would undermine the viability of the facility as a flexible workspace offer in this location. The proposed hours are accordingly a functional characteristic of the use itself, matched to the operating pattern of the market it is designed to serve, rather than an arbitrary extension of a conventional working day. They remain within normal social hours throughout.

- 80) Weekend availability is a core feature of that operating pattern, not an incidental extension of a conventional working week. Sole traders and small business owners frequently rely on weekends for the business administration, planning and client preparation that weekday commitments do not allow, and for a significant part of this user base Saturday and Sunday form part of their normal working pattern rather than leisure time. A facility available only on weekdays would exclude a substantial part of the market the facility is designed to serve and would materially undermine its commercial viability. The restriction to 20:00 on Sundays reflects the quieter character of that day and provides additional reassurance to neighbouring occupiers.
- 81) For context, the previously approved adventure centre was permitted to operate between 8am and 6pm, Monday to Sunday inclusive - a uniform seven-day pattern with no reduction in hours on Sundays. The proposed workspace hours are broadly comparable to that established pattern, with a modest extension into the early morning and early evening - within which no external activity takes place on the site. Unlike the adventure centre's permission, which applied the same closing time across all seven days, the proposed hours include a specific reduction on Sundays, closing two hours earlier than on the rest of the week in recognition of that day's quieter character.

Vehicle Movements

- 82) Vehicle movements will be consistent with a small-scale employment use. Users will typically arrive once and remain on site for extended periods - a working day, a half-day meeting, or a multi-hour session. The booking system enables active management of vehicle arrivals and records the anticipated mode of travel for each booking. Vehicle movements and patterns of use are addressed further in the Transport Statement at Schedule 7.
- 83) The officer committee report for the previously approved adventure centre noted that the lawful baseline use generated multiple daily vehicle movements at any hour without restriction, and found the adventure centre acceptable against that baseline. The Highway Authority did not object to the adventure centre and considered access and parking arrangements for the site acceptable. Those conclusions in respect of the site access, layout and parking provision remain valid and applicable to this proposal, which operates within the same physical infrastructure.

Management

- 84) Consulting AM Ltd will occupy the facility as anchor tenant. A responsible person nominated by Consulting AM Ltd will be contactable during all operating hours and will attend the site regularly. The booking system provides a documented record of all users and their attendees and a practical mechanism for managing vehicle capacity and compliance with operating conditions. The main building will be locked outside operating hours, with access controlled by a digital entry system; the storage building will be secured by its existing security door and roller shutter. The parking areas will remain openly accessible at all times to meet Highway Authority requirements for site access, providing a clear and enforceable end to each operating day for the buildings themselves.

Lighting

- 85) No external floodlighting is proposed. External lighting will be limited to a single PIR-activated light at the building entrance, set to minimum sensitivity and short-timer operation. After operating hours, all external lighting will be extinguished. This is consistent with the dark skies objectives of the National Park.

8. Traffic and Parking

- 86) The site provides ten car parking spaces on the lower level. Two additional spaces are available on the mezzanine level; these spaces require vehicles to reverse on exit and are suitable for use by professional or experienced drivers, reflecting the physical parking layout previously assessed by the Highway Authority in connection with the earlier consented scheme. The on-site parking provision is sufficient to accommodate all vehicles expected to be generated by the use. The proposal does not rely on the public car park or on-street parking, although users remain free to use public parking lawfully available in the village. No reliance is placed on that facility, and no overspill impact on the village road network is anticipated.
- 87) The booking system manages vehicle capacity at the point of booking, recording the anticipated mode of travel and preventing bookings that would require more vehicles than the parking provision can accommodate. This provides a practical and enforceable mechanism for ensuring that vehicle movements remain proportionate to the site's physical capacity.
- 88) The Highway Authority did not object to the previously approved adventure hub and considered the site access, layout and parking arrangements acceptable, subject to conditions. The officer committee report also acknowledged that the previous bus depot use had operated for many years with multiple daily vehicle movements and no planning restriction - a baseline against which the proposed workspace use represents a clear improvement. The Highway Authority's conclusions in respect of the site infrastructure remain valid and applicable to this proposal.
- 89) The facility actively supports sustainable travel by providing secure bicycle storage with electric charging points within the storage building, making the site accessible by e-bike from a wide catchment area. The provision of shower facilities within the main building further encourages users to arrive on foot or by bicycle.
- 90) Vehicles leaving the site can join the public highway in three directions. Only one of these routes passes through the centre of the village; the other two lead directly outwards and pass only a very small number of houses. Vehicle movements associated with the use will therefore be naturally dispersed across the local road network rather than concentrated on a single route through the village.

9. Scale and Capacity

- 91) The scale of the use is inherently limited by the size of the building and the physical capacity of the site. The ground floor provides approximately 110 square metres of usable workspace across three distinct spaces. The first floor provides a further open-plan workspace area approximately 8 metres wide across the full length of the building. The parking provision accommodates ten cars on the lower level plus two further vehicles on the mezzanine level.
- 92) Activity will typically be modest. On most days there will be present relatively few users, who may, on occasion, be accompanied by business visitors. The physical capacity of the site - in particular the parking provision of ten car spaces on the lower level plus two additional spaces on the mezzanine level - provides a natural and enforceable ceiling on the scale of activity at any one time.
- 93) Vehicle capacity is managed through the booking system, which prevents bookings that would require more vehicles than the on-site parking provision can

accommodate. This is the operative management mechanism for capacity - it is practically enforceable, it is tied to the physical constraints of the site, and it operates automatically without requiring manual intervention.

- 94) The Authority has previously approved a use of this site generating activity across all seasons based on the same parking provision of ten car spaces on the lower level plus two additional spaces on the mezzanine level. The proposed use asks for no greater vehicle capacity than was previously found acceptable. The impact of that level of vehicular activity on the road network and on neighbouring occupiers has therefore already been assessed and found acceptable by the Authority.

10. Welsh Language

- 95) On securing planning permission for the previous use, the applicant chose to name the facility Crug y Môr, reflecting both its coastal location and the Welsh language character of the area. Welsh language provision will be included in the facility's online presence and on-site information as appropriate.

11. Policy Compliance

Future Wales — The National Plan 2040

- 96) Future Wales Policy 12 (Distinctive and Natural Places) requires development within National Parks to be consistent with their special qualities and statutory purposes. The proposed use - a low-impact indoor employment use on previously developed land - is consistent with those purposes. It gives rise to no material adverse landscape or environmental impact, and no material change to the character of the site or its surroundings.

Planning Policy Wales Edition 12 (2024)

- 97) PPW prioritises the reuse of previously developed land for new development and emphasises that economic development should support sustainable rural communities. The proposed use delivers both objectives. It reuses a long-established employment site for a new employment use without any new intrusion into open countryside, and it provides workspace infrastructure that supports the economic resilience of the rural community it serves.
- 98) PPW's sustainable development principles require that development should not cause unacceptable harm to people or the environment. The proposed use gives rise to no unacceptable harm to people or the environment. It is an indoor, low-intensity employment use that operates within conditioned hours, generates vehicle movements proportionate to its parking provision, and is not expected to give rise to material noise or disturbance.

LDP2 Policy 01 - National Park Purposes and Duty

- 99) Policy 01 requires development to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park and to promote opportunities for the understanding and enjoyment of its special qualities. The proposed use does not materially harm any of the National Park's special qualities and does not affect any designated site, species or habitat. It supports the economic sustainability of a rural community within the National Park.

LDP2 Policy 06 - Rural Centres

- 100) Moylegrove is identified as a Rural Centre under Policy 06 of the LDP2. The application site lies immediately adjacent to the defined Centre boundary rather than within it, and therefore falls to be considered under Policy 07 as previously developed land in the countryside. Policy 06 is nonetheless a material consideration: it establishes that small scale employment development is a land use priority for Moylegrove as a Rural Centre, and at limb (c) expressly directs such development to Policy 43. The proposed use is consistent with the employment land use priorities that Policy 06 establishes for this settlement, and the site's edge-of-Centre location and long-established employment history are directly relevant to the weight given to those priorities.

LDP2 Policy 07 - Development in the Countryside

- 101) The site falls just outside the defined Moylegrove Rural Centre boundary and is therefore in the countryside for LDP2 purposes. Policy 07 restricts development in the countryside to specified forms of development. The proposal is consistent with the purpose of limb (h) of Policy 07, read together with Policy 43, because it concerns a small-scale employment use on previously developed land immediately adjacent to a Rural Centre.
- 102) The site is immediately adjacent to the Moylegrove Rural Centre boundary and constitutes previously developed land with a century of continuous employment history. The proposed use is a small scale employment use on that land. It does not require any new release of greenfield land, does not extend beyond the established employment footprint, and replaces a lawful industrial use with a quieter, lower-impact employment use. The proposal is therefore consistent with limb (h) of Policy 07 and with the policy's objective of strictly controlling development in the countryside while permitting appropriate edge-of-Centre employment uses. Policy 43 provides additional support through its specific protection of employment sites. The proposal should therefore be treated as an appropriate edge-of-Centre employment use supported by Policies 07 and 43.

LDP2 Policy 08 - Special Qualities

- 103) The proposed use does not affect any of the special qualities of the National Park. It is an indoor employment use on a previously developed site giving rise to no material adverse landscape, ecological or historic environment impact. The design and materials of the buildings have been accepted by both the Authority and CADW as appropriate to the setting.

LDP2 Policy 30 - Amenity

- 104) Policy 30 requires that development does not cause unacceptable harm to the amenity of neighbouring occupiers. The officer committee report for the previously approved adventure centre confirmed that the lawful baseline on this site was unrestricted industrial use. Against that baseline, the officer found the adventure centre use acceptable. The proposed workspace use operates within the same physical envelope and within conditioned hours, with the operational use conducted indoors. The nearest occupied residential property is approximately 40 metres from the building. The proposed use will cause no material harm to the amenity of neighbouring occupiers.
- 105) The use has no overnight element, is not designed to generate late-night arrivals or departures, and is managed through a booking system and a digital entry system that provides enforceable operational control. The main building is locked outside

operating hours, with access controlled by a digital entry system; the storage building is secured by its existing security door and roller shutter.

LDP2 Policy 43 - Employment Sites and Live/Work Units

- 106) Policy 43 protects existing employment sites for employment uses and directs small-scale employment proposals to appropriate locations in or adjacent to identified Centres. The site is a long-established employment site immediately adjacent to the Moylegrove Rural Centre. The proposed use is a small-scale employment use of a previously developed employment site. The proposal satisfies Policy 43 in full.
- 107) The Authority's own pre-application advice specifically identified 'small-scale business units' as a potentially acceptable use at this location. The proposed use delivers exactly that.

LDP2 Policy 59 — Sustainable Transport

- 108) The proposed use generates vehicle movements proportionate to its parking provision and consistent with a small-scale employment use. The site is accessible from Cardigan and Newport Pembrokeshire within a ten-minute drive. The facility's booking system manages vehicle capacity to avoid concentrations that would cause highway concern. The parking provision accommodates all users within the site. The provision of bicycle storage with electric charging and cyclist welfare facilities further supports sustainable travel to the site. The proposal is consistent with Policy 59.

LDP2 Policy 60 — (Impacts of Traffic)

- 109) Policy 60 prevents development where appropriate access cannot be achieved, where traffic would generate an unacceptable adverse effect in terms of congestion or times of generation, or where there is an unacceptable adverse effect on road safety. The proposed use satisfies all three limbs of this test. The site access, visibility splays, parking layout and internal circulation arrangements were assessed and accepted by the Highway Authority in connection with the previously approved use, subject to standard conditions. Those physical arrangements are unchanged. The proposed workspace use generates modest and dispersed vehicle movements across the operating day, well within the capacity of the local road network and materially lower in intensity than the lawful industrial baseline. The proposal accords with Policy 60.

12. Habitats Regulations Assessment

- 110) The proposed use is an indoor employment facility with no functional connection to any European designated site. In the applicant's assessment, the use is not likely to have a significant effect on any designated site, either alone or in combination with other plans or projects, and the applicant invites the Authority to record its own HRA screening conclusion accordingly.

13. Conclusion

- 111) This application seeks permission for the completion of part-built buildings at Crug y Môr, Moylegrove, and the use of the main building as a managed flexible workspace facility (Use Class B1). The proposal responds directly to the Authority's pre-

application advice and delivers exactly the use the Authority indicated may be acceptable at this location.

- 112) The proposed use is a low-impact indoor employment use on previously developed land immediately adjacent to the Moylegrove Rural Centre. It gives rise to no material adverse landscape, ecological or historic environment impact, and no material harm to the amenity of neighbouring occupiers. It addresses a gap in full-service managed workspace provision in northern Pembrokeshire and supports the economic resilience of the rural community it serves.
- 113) The officer committee report for the previously approved adventure centre confirmed that the lawful fallback on this site was unrestricted industrial use generating multiple daily vehicle movements and mechanical activity at any hour. Against that baseline, the adventure centre was found acceptable. The proposed workspace use, operating within conditioned hours with the operational use of the site conducted within the main building and the storage building, is at least as benign as the adventure centre in amenity terms and very substantially more benign than the lawful industrial baseline.
- 114) The use is consistent with Future Wales, PPW, and the relevant policies of LDP2, including Policies 01, 06, 07, 08, 30, 43, 59 and 60. It represents an appropriate edge-of-Centre small employment use, consistent with Policy 07 read together with Policy 43. It is consistent with the land use priorities for Moylegrove as a Rural Centre under Policy 06. It causes no material harm to amenity as required by Policy 30.
- 115) In the applicant's assessment, the proposed use has no functional connection to any European designated site and is not likely to have a significant effect on any designated site's qualifying features; the Authority is invited to record its own HRA screening conclusion accordingly.
- 116) The applicant respectfully invites the Authority to grant planning permission for the proposed development, subject to appropriate conditions as set out in Schedule 1 below.

Schedule 1 - Suggested Conditions

The applicant proactively offers the following conditions in support of the application. These conditions reflect the operational model of the facility and are intended to provide the Authority with enforceable controls that address the amenity concerns identified in the pre-application response.

Hours of Operation

Condition: The main building and the storage building shall not be open to booked users except between the hours of 07:30 and 21:00 Monday to Saturday and 08:00 and 20:00 on Sundays. Access to the buildings outside these hours shall be limited to emergency access, maintenance, security, servicing or other incidental access that does not give rise to material harm to neighbouring amenity. The main building shall be locked outside these hours, with access controlled by a digital entry system; the storage building shall be secured by its existing security door and roller shutter. The parking areas, access and upper yard shall remain openly accessible at all times, in accordance with Highway Authority requirements.

Reason: To protect the amenity of neighbouring residential properties in accordance with Policy 30 of the LDP2.

Access by Membership and Booking Only

Condition: The premises shall be operated on a membership and booking-only basis. No drop-in or unmanaged public access shall be permitted. A booking record sufficient to demonstrate compliance with this condition, including the date, duration of each booking and anticipated vehicle demand, shall be maintained and made available to the Authority on reasonable request.

Reason: To ensure that the level of activity remains manageable and proportionate to the site's capacity, and to provide an enforceable mechanism for monitoring compliance with operating conditions.

Vehicle Capacity

Condition: No more than ten vehicles shall be present on the lower level and no more than two vehicles on the mezzanine level at any one time in connection with the use. The booking system shall be operated so as to prevent bookings that would require more vehicles than this provision can accommodate.

Reason: To ensure that vehicle movements remain proportionate to the site's parking capacity and to protect the amenity of neighbouring properties and the safety of the highway network.

No Noise-Generating External Activity

Condition: No part of the site outside the main building and the storage building - including the parking areas, access and the upper yard - shall be used for any organised activity, external gathering, or amplified sound in connection with the use. The main building shall be locked outside the approved operating hours, with access controlled by a digital entry system. The storage building shall similarly be secured outside operating hours by its existing security door and roller shutter.

Reason: To protect the amenity of neighbouring residential properties in accordance with Policy 30 of the LDP2.

Parking

Condition: The parking provision shown on the approved plans shall be maintained and kept available for use at all times during operating hours. No parking associated with the use shall take place on the public highway.

Reason: To ensure adequate on-site parking provision and to prevent harm to highway safety and the amenity of the village.

Lighting

Condition: No external floodlighting shall be installed or operated at the site. External lighting shall be limited to a PIR-activated light at the building entrance, set to minimum sensitivity and short-timer operation. All external lighting shall be extinguished outside operating hours, save for any statutory safety or emergency lighting requirements.

Reason: To protect the dark skies character of the National Park and the amenity of neighbouring properties.

Use

Condition: The site edged red on the application plans shall be used only for the following purposes, and for no other purpose: the main building as a managed flexible office/workspace facility; the smaller building as ancillary storage associated with that use; and the associated parking, access and landscaped areas as ancillary to that use. All such uses shall fall within Use Class B1. The use shall not include any retail activity, public events, exhibitions or training courses open to the public, or activities involving unrestricted public attendance.

Reason: To ensure that the use remains compatible with the character of the location and the amenity of neighbouring properties, and that each part of the site is used in a manner consistent with its function within the approved scheme.

Management Plan

Condition: Prior to first use of the premises, a management plan setting out the operational arrangements for the facility shall be submitted to and approved in writing by the Authority. The facility shall thereafter be operated in accordance with the approved management plan. The management plan shall include arrangements for: the membership and booking system; a designated contact method available and monitored during all operating hours; management of vehicle arrivals and departures; locking and securing of the main building and storage building outside operating hours, and the arrangements for keeping the parking areas, access and upper yard openly accessible at all times; a procedure for recording, investigating and responding to complaints from neighbouring occupiers; and CCTV coverage of the building entrance to be maintained and records retained for a minimum of 30 days.

Reason: To ensure that the facility is managed in a manner compatible with the amenity of neighbouring properties and the character of the location.

Power Supply

Condition: The facility shall be supplied by a standard mains connection to the National Grid. Should a mains connection not be achievable despite reasonable endeavours, a generator may be installed only as a last-resort contingency, subject to prior submission to and approval by the Authority of details of its specification, siting, acoustic enclosure, hours of operation and fuel storage arrangements. Any such generator shall be used only to the extent necessary to maintain the lawful operation of the site, and generator operation shall be restricted to operating hours only, save for emergency use.

Reason: To secure the facility's power supply by the quietest and lowest-impact means available, and to protect the amenity of neighbouring residential properties and the character of the National Park should a generator become necessary as a last-resort contingency.

Schedule 2 — Building Control and Technical Matters

Accessibility

The ground floor of the main building provides a fully accessible working environment for all users, including wheelchair users. The accessible office at ground floor level - approximately 9 square metres - is reserved as a priority for disabled users, with dedicated lockable storage provided at ground floor level. The accessible WC and shower room provides full level-access facilities. This ground floor provision ensures that disabled users have access to an equivalent workspace experience to that available to all other users.

The first floor workspace is accessed by a stair from the ground floor entrance area. The specification of that stair in relation to Part M of the Building Regulations is subject to pre-application discussion with Building Control, which will be conducted prior to the submission of the Building Regulations application. The applicant intends to establish with Building Control whether the completion and change of use of this partially built structure - originally designed for a different approved use and left without a stair as a deliberate design decision - is treated as new build or as alteration and change of use for Part M purposes, and what stair specification is required accordingly.

Fire Safety

Fire safety requirements have been incorporated into the building design. A full fire strategy for the completed building will be submitted to Building Control as part of the Building Regulations application.

Sustainable Drainage (SuDS)

A SuDS approach for the site - including permeable surfacing and rainwater harvesting - was agreed in principle through the earlier application. The current proposal introduces no new hardstanding and no additional run-off. The SuDS scheme will be finalised, submitted for SAB approval and completed prior to occupation. Compliance will be secured through the Pembrokeshire County Council SAB process in the normal way.

Schedule 3 — Services and Utilities

Water Supply

A mains water supply is available at the site. A 7,000-litre rainwater harvesting system will supplement mains supply for toilet flushing (non-potable use only), reducing potable water demand in line with sustainable design objectives.

Drainage

Foul drainage discharges to the public sewer via an existing on-site connection. Surface-water drainage will be managed through SuDS-compliant measures described in Schedule 2, including gravel and grid infiltration areas and rainwater harvesting to reduce runoff and potable-water demand.

Power

The preferred and intended power source is a standard connection to the National Grid, to be installed subject to securing the necessary wayleave with adjoining landowners. Grid supply is the simplest, quietest and lowest-impact solution.

Space heating and hot water will be provided by LPG appliances; small appliances and equipment will be electric. This significantly reduces the site's electrical demand compared with full electric heating and means that any off-grid solution operates at low intensity.

The applicant has considered low-carbon heating options, including an air-source heat pump. Heat pumps perform most efficiently under continuous, steady demand, whereas the workspace's occupancy-driven, intermittent heating pattern is less well suited to that mode of operation. LPG is therefore proposed as the practical interim solution for this variable-occupancy building at this stage. The applicant will keep heating provision under review and will consider lower-carbon alternatives, including heat pump technology, as the facility becomes established and occupancy patterns become clearer.

Should a mains connection not be achievable despite reasonable endeavours, a modest photovoltaic array with battery storage is the preferred off-grid solution: this could meet the site's electrical demand for lighting, sockets and small appliances, is silent in operation and carries no amenity impact. Only if neither a grid connection nor a solar-battery system proves viable would a small diesel generator be considered, and then only as a last-resort contingency, used solely to the extent necessary to maintain the lawful operation of the site. Details of any such generator, including its specification, siting, acoustic enclosure, hours of operation and fuel storage arrangements, shall be submitted to and approved by the Authority before installation, save for emergency use.

Waste

Refuse and recycling collections will operate via standard council rounds, with on-site storage provided to the rear of the main building.

Schedule 4 — Green Infrastructure Report

Purpose and Scope

This Green Infrastructure and Biodiversity Statement reflects the proposed use of the site as a managed flexible workspace facility and the completion of the main buildings. The statement demonstrates compliance with Planning Policy Wales (Edition 12, Chapter 6), Technical Advice Note 5 (Nature Conservation and Planning), LDP2 Policy 8 (Special Qualities), and the Environment (Wales) Act 2016 duty to maintain and enhance biodiversity.

The proposal does not extend the development footprint beyond that previously approved and already constructed. It represents a lower-intensity use, focused on small-scale employment use with all activity within the building.

The former corrugated tin shed, which stood on a subsiding concrete base, has been removed to address health and safety risks and stabilise the ground. Its removal improves visual quality and structural safety without altering the ecological baseline, as the structure offered negligible bat or nesting potential.

Existing Site Features

Site context:

Former brownfield site (old bus depot) located on the edge of Moylegrove, now redeveloped with two steel-frame buildings set into the hillside.

Ecological value:

The main hardstanding area has limited intrinsic ecological value. Habitat value is concentrated along the western and southern boundaries, where mature hedgerows and medium trees provide structure and nesting opportunities. The construction work required to complete the buildings will not affect any of the hedgerows or trees on site.

Green Infrastructure Measures

Category	Existing / Retained	Enhancement / New Measure
Vegetation	Retention of all boundary hedgerows and tree lines including Trees 1 and 2.	Infill planting using native species (hawthorn, blackthorn, hazel) and enhancement of the upper area as set out under landscaping. Additional native trees and shrubs will be planted to exceed the former vegetation cover and deliver a clear biodiversity gain.
Fauna Habitat	N/A — previously developed brownfield site with no extant habitat features.	Two bat boxes and two small bird boxes will be installed on existing boundary trees at the western and southern edges of the site. Annual visual checks will ensure they remain serviceable.
Water Management	Developed area fully concreted; surface water currently runs off freely with no	Installation of a SuDS-compliant system incorporating an oil interceptor, attenuation tank, controlled discharge, and

	formal drainage or infiltration system.	a 7,000-litre rainwater-harvesting tank for WC flushing.
Access and Movement	Single existing vehicular access from the public highway with hardstanding on site.	A formalised parking layout for ten cars on the lower level and two additional spaces on the mezzanine level; secure cycle storage with electric charging to support active travel; increased use of permeable surfacing where practicable.
Amenity and Landscape	Upper part of the site previously used as informal waste ground containing rubble, glass, and minor asbestos traces planned for removal.	Removal of waste-laden surface material and replacement with clean topsoil. Planting of native trees and shrubs around the margins to create a natural screen, with a central open area part-surfaced in gravel to provide stable ground for picnic tables.

Lighting and Disturbance Controls

External lighting will follow current Bat Conservation Trust / ILP guidance. Fixtures will be positioned and shielded to avoid illuminating hedgerows, roosting features or flight corridors. All lights will be low-intensity, warm-white, downward-directed and controlled by timers or motion sensors to minimise operating time. No lighting will be installed on the western elevation facing the boundary vegetation.

The proposed use generates negligible ecological disturbance. The absence of external lighting outside operating hours, outdoor events or amplified sound means there will be no material effect on foraging or commuting species. The development therefore maintains dark-corridor conditions and is compatible with the site's existing biodiversity value.

Net Benefit for Biodiversity and Maintenance

The retained and enhanced vegetation, the addition of bird and bat boxes, and the improved water-management system collectively deliver a clear net ecological benefit compared with the former bus-depot use. Planting and habitat features will be checked and maintained annually by the site owner.

Compliance and Conclusion

This statement demonstrates that the proposed development retains and enhances on-site habitats, improves water management and resource efficiency, avoids light spill and disturbance to wildlife, and integrates biodiversity enhancement through responsible design and landscaping. Accordingly, the proposal accords with Policy 8 of the Pembrokeshire Coast National Park LDP2, Planning Policy Wales (Chapter 6), and the Environment (Wales) Act 2016 biodiversity duty.

Schedule 5 — Landscape Management and Maintenance Plan

Introduction

This Landscape Management and Maintenance Plan sets out the long-term management of existing and proposed soft landscaping and surface areas to ensure the site integrates sensitively into its rural setting and contributes positively to local biodiversity. The proposal represents a low-intensity reuse of previously developed land, with no increase in the built footprint and extensive use of native planting, permeable surfaces, and rainwater harvesting.

Landscape and Planting Scheme

General principle: retain existing mature trees and hedgerows; reinforce boundaries with new native species to strengthen biodiversity corridors.

- Species mix: Hawthorn 30%, Blackthorn 30%, Crab apple 10%, Rowan 10%, and 20% combined of Guelder rose, Dog rose, Spindle, and Wild privet.
- Stock: 1+1 bare-root whips (20–40 cm) or 60–90 cm container stock; local provenance (Seed Zone 303 or 304).
- Planting period: November to March, at 30 cm spacing, single staggered row.

Ground Finish

The two lower platform levels containing the main and ancillary buildings are fully capped in accordance with the approved decontamination strategy. Surface finishes will comprise concrete, plastic-grid gravel or plain gravel as appropriate. These areas are maintained as hard or semi-permeable surfaces for circulation, parking and maintenance access, consistent with SuDS requirements where infiltration is not permitted.

The upper open area will be treated in line with the approved decontamination strategy, with contaminated surface material removed and replaced with clean topsoil before planting with the native species mix described above. A small central section (approximately 6 × 6 metres) will be surfaced in compacted gravel to provide stable ground for picnic tables for workspace users.

Visual Integration

The site is triangular in form and already visually contained along its western and southern boundaries by mature woodland and hedgerow. Limited additional planting of native shrubs and low trees on the upper terrace will provide modest softening when viewed from the upper approach road, helping the development blend with the dark, natural colour palette of the surrounding landscape.

Maintenance and Management

- Protection: each plant protected with 38 mm spiral guard and 600 mm cane.
- Watering: immediately after planting, with occasional watering during the first summer to ensure establishment.
- Weeding: hand-weed twice annually for first three years to control competition.
- Cutting: December to March only, avoiding bird-nesting season; no cutting during frost or flowering.
- Replacement: any losses replaced during next planting season.
- Guard removal: remove guards once growth exceeds browsing height.

- Safety and cleanliness: landscaped areas to be kept free of debris and checked quarterly for trip hazards or settlement around gravel areas.

Review

A light-touch annual review will be undertaken by the site manager to check plant survival, condition of guards, and general landscape appearance. A brief note of each inspection will be kept on file and made available to the Park Authority if requested.

Schedule 6 — Ecology and Bats

An ecological inspection undertaken in 2019 recorded a minor transient summer bat roost within the former corrugated tin shed that then occupied the site.

An ecological inspection in 2024 concluded that there was no evidence of bat presence and that the building could be removed without requiring a licence.

In October 2025, a full photographic inspection confirmed that no bats or recent signs of bat use were present in the shed and that the structure offered negligible potential for roosting. The shed was therefore removed following recognised good practice for avoiding disturbance, with notice and photographic evidence provided to Natural Resources Wales for transparency.

The remaining works involve cladding, glazing and minor ground installations associated with sustainable drainage, including a small machine-excavated pit within the technical Root Protection Area of Tree 1. The excavation will take place beneath an existing concrete slab where no functional roots are expected, and earlier trenching in an adjacent section of the RPA confirmed no root damage. These activities will not disturb any potential bat-roost features, foraging habitat or the health of Tree 1.

All buildings are of steel-frame construction with no cavities, voids, or rough surfaces capable of supporting roosting, so the developed area of the site offers negligible potential for bats. The surrounding tree belt at the site boundaries offers some general foraging potential, but this will remain unaffected by the proposal.

Two tree-mounted bat boxes and two bird boxes will nevertheless be installed on the periphery of the site as a voluntary biodiversity enhancement consistent with current good practice and Policy 11 of the Local Development Plan.

Accordingly, the proposal results in no loss or disturbance of any known bat roost or foraging habitat and will not harm Tree 1.

On the basis of the previous ecological inspections and the limited nature of the remaining works, the applicant does not consider that further survey work is necessary. If the Authority considers that an updated ecology note is required, the applicant will provide one.

Schedule 7 — Transport Statement

Purpose

This statement addresses vehicle movements, parking, and sustainable access associated with the proposed managed flexible workspace facility at Crug y Môr, Moylegrove.

Access and Local Road Network

The site is reached via the existing vehicular access from the single-track village road serving the former bus depot. Pembrokeshire County Council Highways confirmed during the 2024 application process that the access arrangement and visibility were suitable for cars and light service vehicles.

Three approach routes serve the village and provide access to the site. All are lightly trafficked rural lanes of similar character. One route passes through the core of Moylegrove, while the other two pass only a small number of dispersed dwellings before reaching the site. Vehicle movements associated with the workspace facility will therefore be naturally dispersed across the local road network rather than concentrated on a single route through the village.

Parking Provision

Ten car parking spaces are provided on the lower level. Two additional spaces are available on the mezzanine level. One electric vehicle charging point will be installed, meeting the requirements of Part S of the Building Regulations.

Expected Trip Generation

The nature of flexible workspace use means that vehicle movements are characteristically spread across the operating day rather than concentrated in peak hours. Workspace users typically arrive once and remain for an extended period - a full day, a half-day session, or a multi-hour meeting - rather than making multiple short trips. This arrival pattern is fundamentally different from a retail or leisure use and generates very low peak-hour intensity.

On a typical busy day, with the majority of car spaces occupied, total vehicle movements (arrivals plus departures) are expected to be in the range of 15 to 25. On quieter days the figure will be substantially lower. These levels are modest and well within the capacity of the local rural road network, particularly given the managed booking system. The booking system manages vehicle capacity at the point of booking and prevents demand exceeding the parking provision.

Active Travel and Sustainable Access

Secure cycle storage with electric charging points is provided within the storage building, making the site accessible by e-bike from a wide catchment area across northern Pembrokeshire. Shower facilities within the main building support users who choose to arrive on foot or by bicycle in all weather conditions. Users are encouraged through the booking system and membership information to consider sustainable travel modes where practicable.

Servicing and Deliveries

Regular servicing will comprise periodic refuse and recycling collection and occasional maintenance deliveries. LPG for space heating will be supplied by small domestic tankers or light commercial vehicles typical of rural supply. Other ad-hoc deliveries will

be by standard light vans and of a scale consistent with normal employment use. No heavy-goods vehicles will be required.

Traffic and Safety Summary

Total vehicle movements are expected to peak at around 15 to 25 per day on the busiest days. These levels are modest and well within the capacity of the local rural road network, particularly given the managed booking system and the absence of short-stay public turnover. Emergency access is adequate via three unrestricted approach routes, each of which can accommodate standard emergency vehicles.

Conclusion

Traffic generation associated with the workspace facility is low and well within the capacity of the local road network. The proposal accords with the transport objectives of Planning Policy Wales (Edition 12), Future Wales Policy 11, and PCNPA LDP2 Policies 59 and 60, promoting sustainable access and active travel.

Schedule 8 – Photo Pack

Photo Pack – Overview

The following images provide visual context for the Crug y Môr shared workspace proposal. They illustrate (i) the relationship between the site and nearby dwellings, (ii) the degree of topographic and vegetative separation, and (iii) the visual character of the existing buildings on the historic depot terrace. The photographs support the conclusions in the Statement: that the built form is contained within the established footprint, that views are long-established and oblique, and that the development does not introduce any materially greater overlooking, massing impact, or landscape intrusion compared with the baseline.

This Schedule groups all photos into three logical themes:

- Section A – Aerial context and overall site form
- Section B – Public and roadside views
- Section C – Neighbour intervisibility and privacy

SECTION A – Aerial Context & Overall Site Form

(see next page)

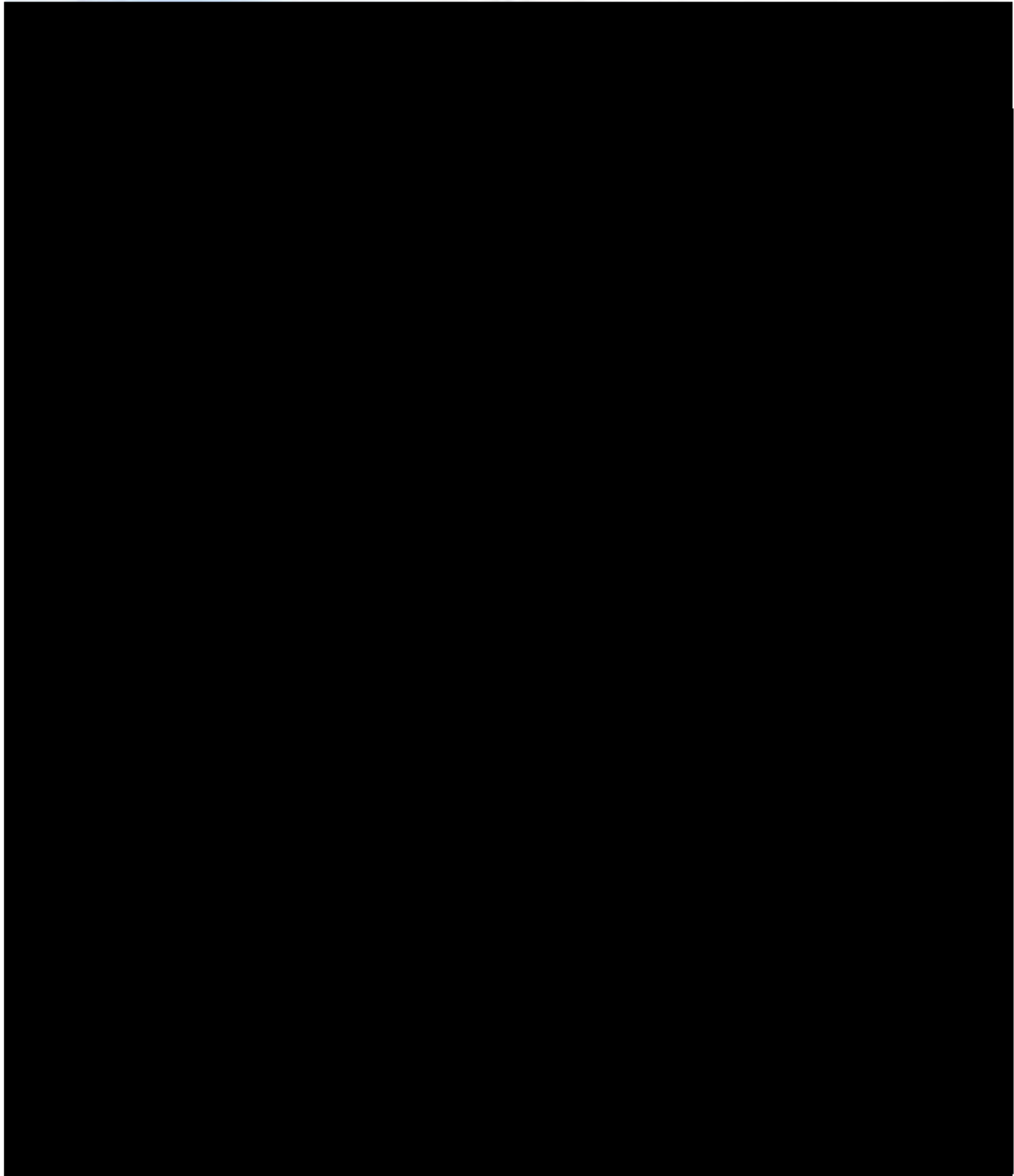
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A2 – Aerial view: Existing buildings on terrace (progress to date)

Current construction progress of the Crug y Môr buildings, showing the erected steel frame and external cladding on the historic depot terrace. The image illustrates the siting, massing and materials that were previously accepted in the Authority's assessment, and demonstrates that the built form occupies the established, recessed footprint without extending development into new ground.



A3 – View of existing buildings on the terrace

Closer view of the existing buildings on the former bus-depot terrace. The simple rectangular forms, dark cladding and modest height reflect the agricultural/utility character referenced in the design section and show how the built form is already contained within the historic developed footprint.



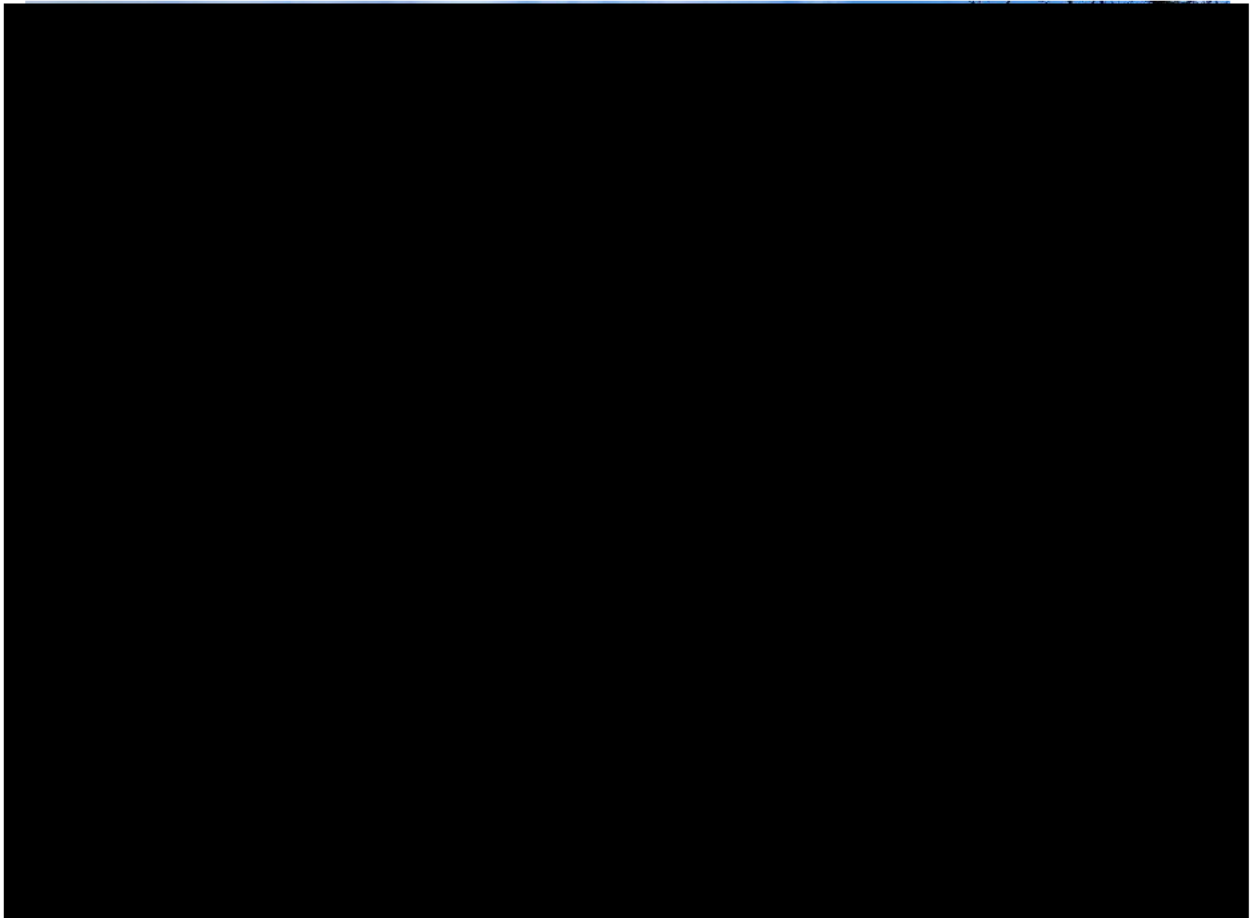
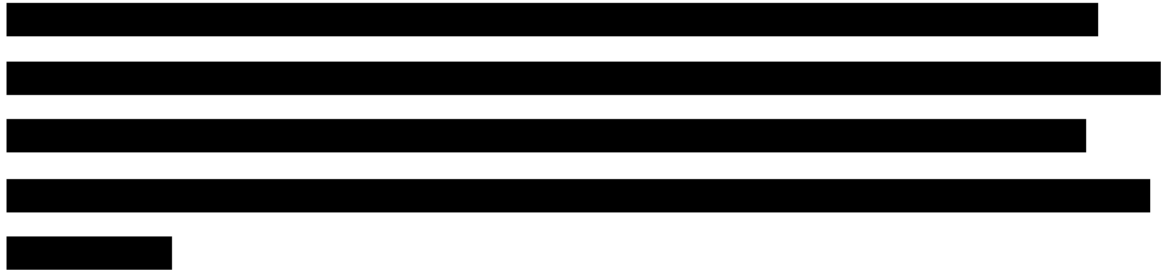
A4 – View looking south-east over fields

View from the site looking south-east over open fields. This illustrates the transition from the developed terrace to the wider rural landscape and supports the conclusion that the building mass sits comfortably within the existing landform without intruding on wider countryside views.



SECTION B – Public & Roadside Views

B1 – Public footpath view looking across Glaneleri towards Crug y Môr



B2 – Road approach between Plas y Mwsswm and Bro Dawel

The shared workspace facility occupies the historic depot terrace, recessed into the hillside with hedgerow and landform screening much of the elevation. This illustrates the low profile of the building within the village streetscape.



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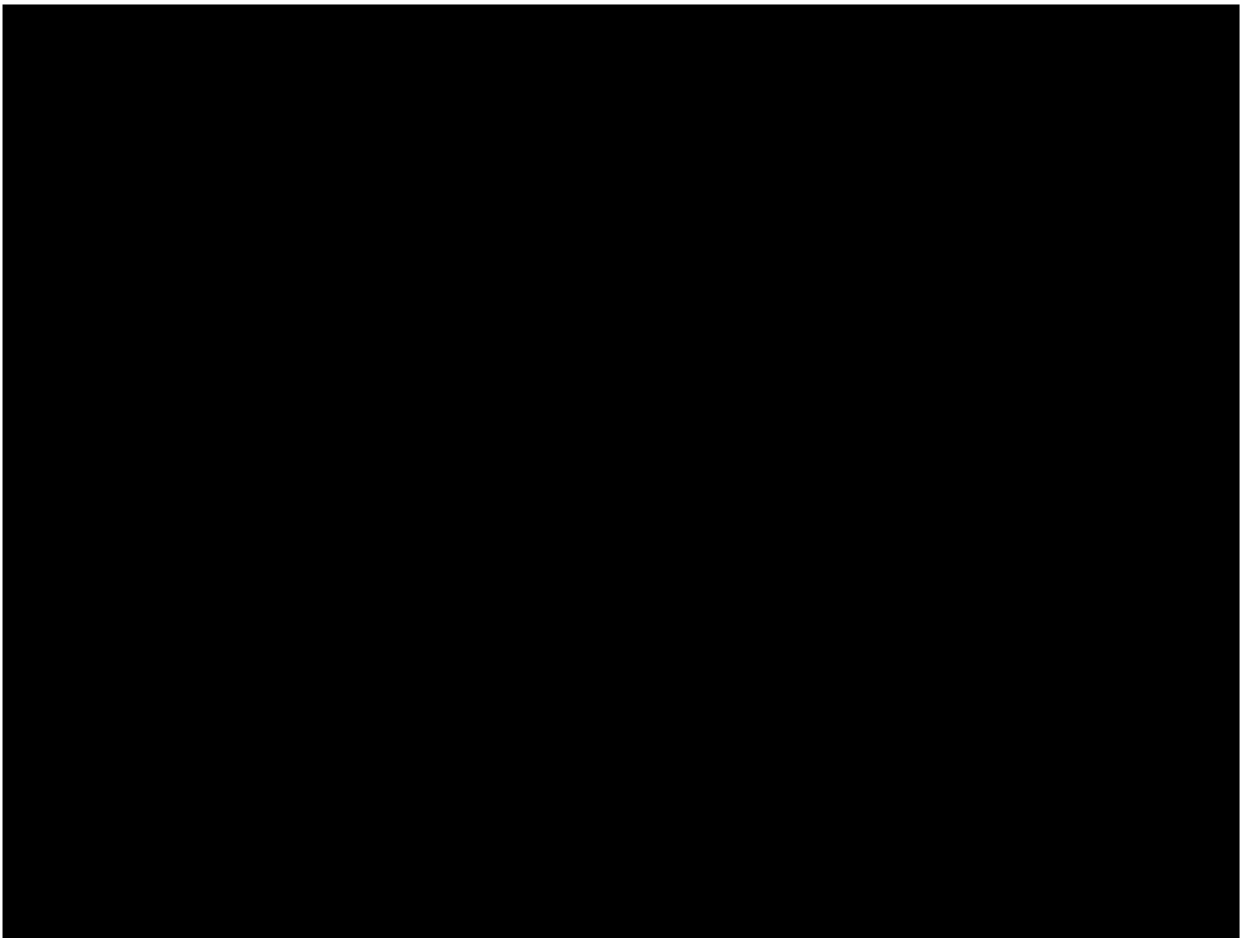
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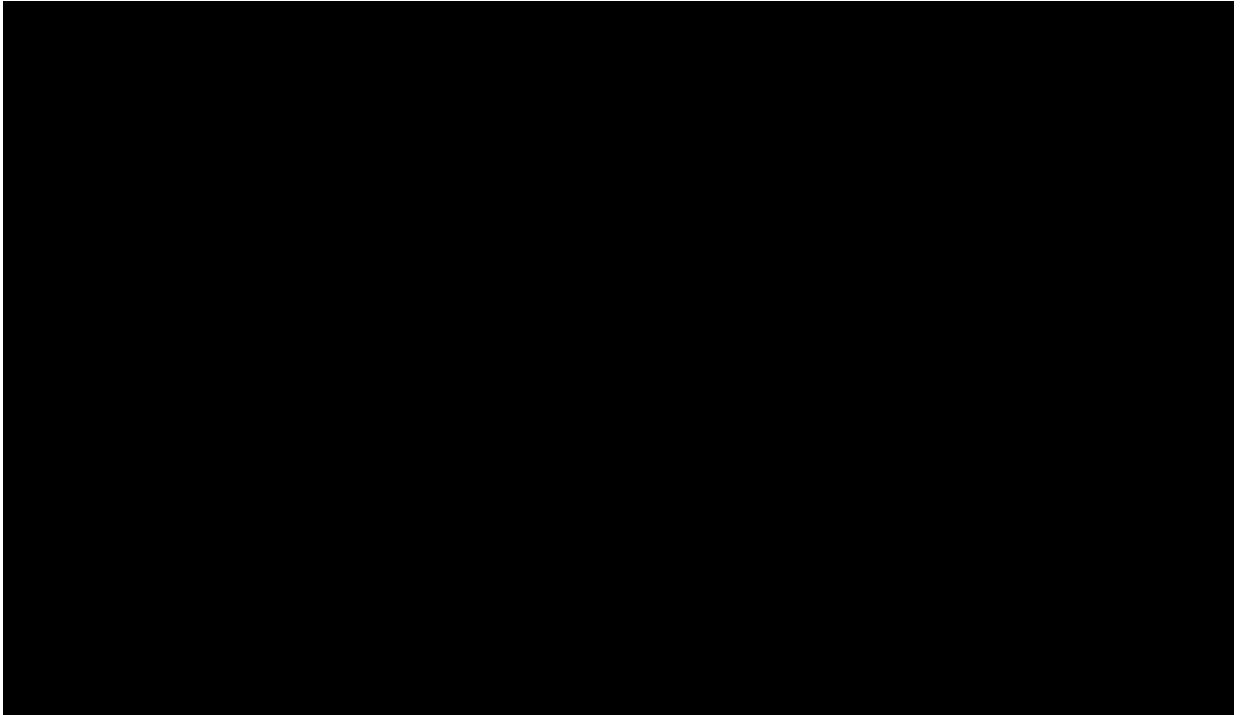
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natural separation limiting any potential amenity interaction.



B4 - View to the north-west from the site

View from the site looking to the north-west. Distance, level changes and intervening landform prevent any direct overlooking of nearby dwellings, reinforcing the conclusion that visual relationships are indirect and typical of an edge-of-village context.



SECTION C – Neighbour Intervisibility & Privacy

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