

From: [REDACTED]
To: [REDACTED]
Subject: Re: Reply to Moylegrove residents - TO/SG/05802/26
Date: 07 September 2026 14:38:19
Attachments: [REDACTED]

Dear [REDACTED]

Thank you for giving the opportunity to explain again why we believe this requires a call in, and why we believe that our call -in request fulfills 5 of the six considerations,

The previous application recieved so many local objections - enough to be considered material in the planning process.

This new application also is receiving much concern from residents.

Please find attached 2 letters regarding reply to your email.

Concerned residents of Moylgrove.

On Wed, Sep 2, 2026 at 8:23 AM [REDACTED] wrote:

Residents of Moyelgrove,

Thank you for your email below regarding your request for the Welsh Ministers to call-in application NP/26/0374/FUL.

As specified in a letter issued to you on 26 August by [REDACTED], the Welsh Government's policy on calling in planning applications is set out in paragraph 1.35 of Planning Policy Wales (Edition 12, February 2024) and applications will only be called in if they raise issues of more than local importance. This includes proposals which:

- are in conflict with national planning policies;
- could have wide effects beyond their immediate locality;
- may give rise to substantial controversy beyond the immediate locality;
- are likely significantly to affect sites of scientific, nature conservation or historic interest or areas of landscape importance;
- raise issues of national security; or
- raise novel planning issues.

It would be particularly useful for us if you could clearly and explicitly set out the reasons why you believe application NP/26/0374/FUL should be called in by the Welsh Ministers for determination, taking into account those matters set out in the bullet point list above against what the application is seeking planning permission for.

Regards,

[REDACTED]

[REDACTED]

Y Gyfarwyddiaeth Gynllunio | Planning Directorate

Llywodraeth Cymru | Welsh Government

Parc Cathays | Cathays Park

Caerdydd | Cardiff

CF10 3NQ

Ebost | E-mail:

[REDACTED]

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

From:

[REDACTED]

Sent: 28 August 2026 12:48

To:

[REDACTED]

[REDACTED]

[REDACTED]

Subject: Re: Reply to Moylegrove residents - TO/SG/05802/26

Dear Minister,

Thank you for your reply and for explaining the reasons for the decision not to call in planning application NP/26/0374/FUL.

We respectfully disagree again with the decision and ask that it be reconsidered. We will try to keep this brief, but there are several important matters which we believe have not been adequately addressed.

1. The previous call-in decision and the Judicial Review – our concerns were proved right

Your response refers to the previous decision not to call in application NP/24/0198/FUL in 2024.

We respectfully disagree with that decision. The concerns we raised at the time were subsequently proved to be justified. The planning permission was successfully challenged through Judicial Review and was quashed because of issues concerning the wider effects of the development.

The previous call-in decision stated:

“Given the scale and nature of the proposed development I am content that the effects of the development do not significantly extend beyond the local area. The scheme is not likely to affect sites of scientific, nature conservation or historic interest, or areas of landscape importance.”

We therefore do not believe it is appropriate to rely on that previous decision as a reason not to call in the current application. The Judicial Review showed that the concerns we raised about the wider effects of the development could not simply be dismissed as matters of purely local significance.

We believe the same issue arises again. The current proposal could potentially affect areas of SSSI and SAC, and therefore we are concerned that the very problem which arose with the previous application has not gone away.

In short, we raised concerns about the wider environmental effects in 2024, and the subsequent Judicial Review showed that those concerns were not unfounded. We believe that history should be given proper weight when considering whether the current application should be called in.

2. The proposed use – greater scrutiny is needed

We are particularly concerned by the statement in your response:

“There is no evidence in the application submission and the accompanying documentation to suggest the proposed development and use would be linked to an outdoor adventure centre with activities undertaken off site.”

With respect, we believe too much weight is being placed on the applicant’s description of the proposed use.

There are clear financial and contractual links between the development, the grant funding and Adventure Beyond. The agreement between Consulting AM and Adventure Beyond specifically describes the project as a “community outdoor activities hub”, with Adventure Beyond responsible for providing the outdoor activities. Given these links, we believe the proposed use requires greater scrutiny than simply relying on the description contained in the current planning application by the applicant.

Our concern is not simply what the applicant says the building will be used for

today, but what it could realistically be used for once it is built. The proposed flexible workspace, meeting rooms and storage could potentially provide a base for briefings, administration, equipment storage and preparation for outdoor activities taking place elsewhere.

We therefore do not believe there is sufficient certainty to conclude that the building could not support an outdoor adventure operation in some form. Given the history of the proposal, the previous Judicial Review, the environmental concerns, the public funding and the contractual links with Adventure Beyond, we believe this warrants much greater scrutiny. Relying solely on the applicant's stated intentions **could carry a risk of significant reputational and public-interest consequences** if the building were later used in a way that differed from the basis on which the application was considered.

3. Public funding and what happens to the building

We also have serious concerns about the public funding behind this project. The FOI correspondence from the funding manager at Pembrokeshire County Council is particularly concerning. It says the project had to be delivered at a "fairly breakneck pace", while acknowledging that the exact costs and what could ultimately be delivered were not fully known. More importantly, it states that the redevelopment must be "capable of delivering the output and outcome targets (even if it does not do so)."

The grant has now been fully released. This raises a simple question: **what safeguards are now in place to ensure the building actually delivers the purpose for which the public money was provided?**

If the building is approved and shown to be capable of supporting adventure activities, what would prevent it being sold or used for something completely different? The agreement between Consulting AM and Adventure Beyond already contains provisions for the property to be sold.

We are not suggesting this is the applicant's intention. We are asking what protections are actually in place to safeguard public money.

Given that the previous planning permission was quashed following Judicial Review, including environmental concerns, we believe the funding history, the links with Adventure Beyond and the future use of the building all warrant greater scrutiny.

Wider concerns – potential environmental impacts beyond this site

Separately, we understand that the National Trust has served Adventure Beyond with a trespass notice. There are also concerns regarding non-compliance and alleged contraventions affecting local residents, including potential environmental impacts.

Our concern is that if activities supported by this development take place at other locations, including environmentally sensitive sites, there must be effective means of ensuring that those activities are properly controlled and compliant. If enforcement action cannot be effectively taken where a provider is found to be non-compliant, this raises much wider questions about how SSSIs, SACs and other protected sites are being safeguarded.

Call in request -

Taken together, the previous Judicial Review, the environmental concerns, the public funding, the “breakneck” timetable, the contractual relationship with Adventure Beyond, the uncertainty over the building’s future use and these wider concerns make this much more than a simple local planning matter.

There is significant continued interest from environmental groups and the mainstream media in Wales and beyond. We believe all these issues need to be considered together, rather than separately.

We respectfully ask the Minister to reconsider the decision not to call in this application and to consider the wider implications for the environment and the protection of public money and the reputational risks of authorities concerned.

We felt our concerns were not properly heard before, but the Judicial Review showed they were not unfounded. We hope they will be given proper consideration this time, helping to avoid further environmental, legal or reputational risks.

Regards

Moylegrove

On Thu, Aug 27, 2026 at 4:42 PM [REDACTED] wrote:

Dear Concerned residents of Moylegrove

Thank you for your email of 26 August asking for a reconsideration of the decision not to call in application NP/26/0374/FUL for determination by the Welsh Ministers.

The original application for proposed development at the site (NP/24/0198/FUL), explicitly sought planning permission for a proposed building and change of use to an outdoor adventure centre with supporting documentation setting out how the proposed building would be used as a base and storage, with activities being undertaken off site. Requests were received to call in the application from residents of the Moylegrove and Ceibwr Communities. After careful consideration it was decided that the application should not be called in and a Decision Letter issued to Pembrokeshire Coast National Park Authority, the Planning Authority (PA), on 3 October 2024. I

attach for information, a copy of the Decision Letter which sets out some of the main issues raised and the consideration of those issues. As you are aware, the decision to grant planning permission was quashed following a successful Judicial Review challenge.

This new application (NP/26/0374/FUL) seeks planning permission to complete development of the buildings which were started as part of the first application and a change of use to B1, with the main building being a flexible office / workspace facility and the second building being used for ancillary storage.

There is no evidence in the application submission and the accompanying documentation to suggest the proposed development and use would be linked to an outdoor adventure centre with activities undertaken off site. Moreover, the application states the buildings would include communal workspaces, bookable rooms for meetings, studying etc. and would be used by sole traders, small businesses, consultants, researchers etc. where all users of the facility would have to be registered members, or business visitors accompanying a registered member. It would be managed through an electronic booking system and a digital entry system. It also confirms no general public access, drop-in use or unmanaged attendance. Therefore, I confirm that the reasons for call in suggested do not meet the call-in criteria and that your call-in request will not be taken forward.

Responsibility for determining the application rests with the PA and it remains open to you to share your views on the proposal with it. These comments must be taken into account by Pembrokeshire Coast National Park Authority when it decides whether or not to approve the application.

Cangen Gwaith Achos Cynllunio - Planning Casework Branch

Cyfarwyddiaeth Llywodraeth Leol a Chynllunio - Local Government and Planning Directorate

Llywodraeth Cymru - Welsh Government

Parc Cathays - Cathays Park

Caerdydd, CF10 3NQ - Cardiff, CF10 3NQ

From: [REDACTED]

Sent: 26 August 2026 15:46

To: [REDACTED]
[REDACTED]
[REDACTED]

Subject: Re: Reply to Moylegrove residents - TO/SG/05802/26

Dear Minister,

**URGENT REQUEST TO RECONSIDER THE DECISION NOT TO CALL IN
NP/26/0374/FUL**

We respectfully ask Welsh Ministers to reconsider the decision of 26 August 2026 not to call in the Crug y Môr/ Adventure Hub/ Old Bus Depot planning application at Moylegrove.

Your response states that our reasons do not meet the call-in criteria. We respectfully disagree. When the evidence is considered against the criteria set out in Planning Policy Wales, this application engages **at least five of the six relevant considerations**.

1. Conflict with national planning policies

The previous Crug y Môr/ Adventure Hub permission was quashed following Judicial Review, including concerns relating to NRW information and the Aberarth-Carreg Wylan SSSI.

The current application now asserts that there is "**no functional connection**" with European protected sites. However, the documentary evidence raises a material question about that conclusion.

The original publicly funded project was expressly conceived as a **community outdoor activities hub**, with Adventure Beyond responsible for delivering the outdoor activities. The agreement between Consulting AM Ltd and Adventure Beyond Ltd confirms this relationship.

It is therefore necessary to establish whether the proposed building, including its proposed equipment storage and business use, is functionally connected with outdoor activities undertaken elsewhere and whether those activities could affect protected

sites.

This is a national planning-policy issue, not simply a local objection.

2. Wide effects beyond the immediate locality

The potential effects cannot necessarily be confined to the building at Crug y Môr.

If the building is used to support Adventure Beyond's outdoor activities, those activities **may take place at locations elsewhere in Pembrokeshire and beyond, potentially involving SSSIs, SACs and other environmentally sensitive areas.**

The planning question is therefore potentially wider than the immediate locality of Moylegrove.

It concerns how a development at one location facilitates activities and environmental effects elsewhere within the National Park and potentially beyond.

3. Substantial controversy beyond the immediate locality

This is not an ordinary local planning dispute.

The project has already resulted in a successful Judicial Review and the quashing of the previous planning permission. It has generated significant community concern, wider public and continued intense media interest and involvement from elected representatives and has potential for reputational damage to PCNP and PCC.

The controversy also concerns the use of substantial public funds and the planning status and future use of a publicly supported asset.

There is intense media scrutiny – that continues with regard to the grant funding and the environmental concerns at local and national level.

This is therefore a **matter of public interest extending far beyond a disagreement between neighbouring residents** and a local applicant.

4. Likely significant effects on sites of scientific or nature-conservation interest and areas of landscape importance

This is perhaps the most significant issue.

The application is within the Pembrokeshire Coast National Park and raises questions concerning the **Aberarth-Carreg Wylan SSSI, SACs and other protected sites**, as well as National Park landscape and seascape qualities.

Given the previous Judicial Review and the outstanding question of the functional relationship between the proposed building and Adventure Beyond's outdoor activities, **there is a real issue as to whether the environmental effects have been properly identified and assessed.**

The potential consequences of allowing an adventure-tourism operation to be supported from this location could extend beyond the physical footprint of the building.

5. Novel planning issues

This application presents an unusual combination of circumstances:

- a previous planning permission has been quashed by the High Court;
- the current proposal is substantially retrospective;
- an Enforcement Warning Notice has been issued;
- the building is publicly funded and remains incomplete;
- the original project was a joint initiative involving Adventure Beyond's outdoor activities;
- Adventure Beyond has a documented **50% financial interest** in the property and an entitlement to 50% of net sale proceeds;
- approximately **£518,000 of UK Shared Prosperity Fund money** has been invested;
- the Council's audit has identified concerns regarding project evolution, delivery, value for money, long-term benefits, stakeholder engagement and reputational risk; and
- the current planning application asserts no functional connection with European protected sites despite the documented relationship between the building and Adventure Beyond's outdoor activities.

The interaction between these matters creates an **unusual and potentially novel planning issue** which warrants consideration beyond the normal local planning process.

The public-funding dimension

We also believe the public-interest dimension deserves particular consideration.

The CAM/Adventure Beyond agreement confirms that Adventure Beyond has a 50% financial interest in the property and that, subject to the agreement, the parties are entitled to divide net sale proceeds equally.

We are **not alleging wrongdoing**.

However, where more than half a million pounds of public funding has been invested in an asset which has a private contractual financial interest attached to it, there is an obvious wider public-interest question concerning the relationship between the planning permission, the intended purpose of the grant, the future use of the asset and the protection of public investment.

The Council's own audit findings make this issue particularly difficult to characterise as merely a local planning dispute.

An **FOI-released PCC email** says the UKSPF project only needed to be *capable* of delivering its agreed outcomes, even if it did not actually do so.

Could the building therefore be completed as an “adventure centre”, without the activities being delivered, then sold or changed to private workspace?

Given the public funds involved, this should be clarified before the planning decision.

Our request

We respectfully ask Welsh Ministers to reconsider the decision not to call in

NP/26/0374/FUL.

We are not asking Ministers to prejudge whether planning permission should ultimately be granted or refused.

We are asking Ministers to recognise that this application engages **multiple express call-in considerations**, including national planning policy, effects beyond the immediate locality, substantial wider controversy, protected sites and landscape, and novel planning issues.

The timing also makes this matter particularly urgent. The Senedd's confirmed summer recess runs from 20 July to 13 September 2026, with Senedd business resuming on 15 September. The proposed 14 September determination date therefore falls immediately before the Senedd returns. In these circumstances, **and given the exceptional combination of public funding, environmental implications, previous Judicial Review, media scrutiny, and wider public controversy**, we respectfully ask that Welsh Ministers ensure that the call-in question is resolved before the application can be determined.

We would be grateful for a substantive response explaining the reasoning and evidence underlying the decision.

Yours sincerely,

Concerned residents of Moylegrove

On Wed, Aug 26, 2026 at 10:38 AM wrote:

I attach a reply to your email of 23 August.

Cangen Gwaith Achos Cynllunio - Planning Casework Branch

Cyfarwyddiaeth Llywodraeth Leol a Chynllunio - Local Government and Planning Directorate

Llywodraeth Cymru - Welsh Government

Parc Cathays - Cathays Park

Caerdydd, CF10 3NQ - Cardiff, CF10 3NQ

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