

Dear [REDACTED],

Thank you for giving us the opportunity to explain again why we believe application NP/26/0374/FUL should be called in for determination by Welsh Ministers.

When the evidence is considered against the criteria set out in Planning Policy Wales, we believe this application engages at least **five of the six relevant considerations** – which we will set out below.

We understand that the application is now going to the Development Management Committee. This makes the matter particularly urgent. If the Committee determines the application before Welsh Ministers have reconsidered the call-in issue, the opportunity for the application to be called in may effectively be lost.

Why we believe this case needs to be looked at again

This is a highly controversial and very complex case.

In our view, in the handling of this there have been failures from the outset and there is potential for the very same mistakes to be made again. It involves planning, public funding, protected sites, the intended use of the building and the relationship between a public grant and private commercial interests. All these are inextricably intertwined – and continue into this new planning application. There is much continued scrutiny from the public, the media and environmental NGOs.

To be clear, the planning application for Crug y Mor is for use of the **same building** which has quashed planning in a judicial review - and is currently unlawful and unauthorised. Approximately **£518,000 of public money** has been invested in the Coastal Connections project. This was originally presented as an **adventure hub in Moylegrove**, with Consulting AM Ltd and Adventure Beyond joint recipients of the grant. Consulting AM Ltd obtained ownership of the land, with the land purchase **fully funded through government grant funding**, while Adventure Beyond was involved in delivering the outdoor activities.

The agreement between Consulting AM Ltd and Adventure Beyond Ltd confirms the relationship between the two parties. It also confirms that Adventure Beyond has a **50% financial interest in the property** and, subject to the agreement, an entitlement to **50% of any net sale proceeds**.

In our understanding, this funding secured the purchase of the land and the construction of a large incomplete building in a countryside location adjacent to the village of Moylegrove.

We believe these facts are highly relevant to understanding what this building may actually be intended to achieve.

There is also an important issue about what each party has at stake.

In our view, **both Adventure Beyond and Consulting AM Ltd have a great deal to lose if the building cannot be secured and used for the purpose for which the original project was intended.**

For Adventure Beyond, if the building cannot be used as a base or hub for its outdoor adventure activities, it potentially loses the benefit of the site and facilities intended to support its operation.

For Consulting AM Ltd, there is a different but equally important interest. A substantial amount of public grant funding has already been invested in the land and building. If the project cannot be completed and used in the way originally intended, there may be consequences for the grant funding, including potential clawback if the required outcomes are not achieved. Clawback could affect Adventure Beyond losing their financial interest too.

This means that both parties have significant interests in securing an outcome that allows the building and the project as an adventure base to continue, although their interests are not identical. 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.

We are not suggesting that this, in itself, means that anything improper has happened. However, **it is highly relevant when assessing whether statements made in support of the planning application should simply be accepted at face value.**

Indeed the ministers accepted no risk to protected sites at face value when refusing call-in, in 2024. and more recently, the ministers, in your reply to us on 27th August 2026 accepted this again at face value - 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... 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."

This shows that if the ministers simply accept at face value without raising any scrutiny, therefore how easy it could be for members of the public or committee members to accept this at face value when indeed, as we have shown - to accept this at face value could leave authorities vulnerable to legal and reputational risks - the same ones that have arisen before.

We could face another groundhog day of the previous errors that led to a judicial review - and ultimately risk to protected sites.

The 5 considerations we consider must be taken into account:

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. **Through that case, we helped establish an important legal precedent that the**

activities associated with a development cannot simply be disregarded when considering its planning impacts.

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 be confined to the building at Crug y Môr. If the building is intended to support Adventure Beyond's outdoor activities, those activities take place across Pembrokeshire and beyond, including at environmentally sensitive sites.

Our community's campaigning has also contributed to wider changes in how commercial coastering is being considered, including the move towards licensing and individual ecological assessment of sites. This demonstrates that the issues arising from this case are not confined to Moylegrove but have wider county and potentially national implications.

The recent **National Trust trespass action concerning Adventure Beyond's commercial use of Ceibwr** further demonstrates the wider significance of these issues, including questions around access, responsible management of sensitive sites and compliance with restrictions intended to protect nesting birds and seal pupping areas. We have documentary evidence supporting these concerns.

Many environmental NGOs nationally are following this closely regarding environmental protection.

What happens in this case therefore has potential implications for the management of similar activities at protected and sensitive sites elsewhere in Wales, making this a matter of wider public and national interest.

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 for what appears to be private investment, 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.**

Please read the Wild Justice blog concerning this [REDACTED]

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 a highly unusual combination of circumstances:

- a previous planning permission has been quashed by the High Court;
- the current proposal is substantially retrospective;
- The original preplanning application for an adventure hub said unlikely to be approved but had a complete U turn with a substantial increase in height from the original 5.2 to 8.9m.
- 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.
- 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.
- In the Planning Officer's own words following ; "I.do.understand.that.this.is.a.very.unusual.set.of.circumstances.given.the.Committee.decision.and.the.subsequent.judicial.review.decision?but.we.are.now.in.a.situation.where.a.partially.completed.building.is.on.site.without.the.benefit.of.any.planning.permission; »

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

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.

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.

Regards

Moylgrove