

WHY EVERY COASTEERING PROVIDER IN PEMBROKESHIRE SHOULD BE PAYING ATTENTION

Before the new licensing scheme goes any further

Adventure Beyond has been under sustained attack from local campaigners — incessant complaints, and surveillance of its every move — which has done real and significant damage to a business built up over thirty years. But recently disclosed documents show this was never just about Ceibwr Bay. All of Pembrokeshire is now at risk.

THE LETTER YOU NEED TO READ

Attached to this note is a letter PCNPA received from a group describing itself as “representatives of the Ceibwr community.” Ceibwr is just the warm-up act.

Turn to page 7, and it goes much further. Read this passage twice:

“The current PMC allows adventure providers and boat operators to continue shaping management rules for their benefit. This influence has gone on for too long, resulting in a weaker regulatory framework that cannot meet modern statutory requirements.” — page 7

And it doesn't stop there. The same letter goes on to demand:

“The PMC must be revised... [to] Prevent further influence by commercial operators over conservation rules.” — page 7

This letter doesn't name who's next. It doesn't need to. It shows the ambition doesn't stop at one bay. It demands an end to any influence at all for commercial operators over the Marine Code — the code that governs how every provider works, everywhere on the Pembrokeshire coast.

THEY TOLD THEIR OWN COMMITTEE ONE THING, AND TOLD PROVIDERS ANOTHER

Nobody has to guess at PCNPA's real reasoning. It is written down, in its own words, to two different audiences, on the same subject, weeks apart.

To its governing committee, in the official report that took the decision to licence coasteering, PCNPA's Director said plainly:

“changes in the number of providers operating over time and complaints raised in the last two years have highlighted the benefits of moving to a more formal arrangement.”

Complaints, stated as a reason — and repeated in person, in front of the whole committee, when the Director presented the report.

To providers, when one of them asked directly whether complaints were driving this, PCNPA answered:

“Our move to licensing is not motivated by a need to deal with the complaints we have had.”

Put both statements in front of PCNPA and ask for one explanation that covers both audiences. “Highlighted the benefits” and “not motivated by” are not the same thing — and one of these sentences was written for the people with the power to say no.

WHAT THEIR LEASE ACTUALLY SAYS

PCNPA has told providers, in writing, that “PCNPA's lease from the Crown Estate requires PCNPA to regulate commercial activity.” That is not what the lease says. The lease gives PCNPA a right to issue licences — it does not require them to licence anything. A right is not a duty, and PCNPA has never explained the difference away.

More telling still: the enforcement power the lease actually spells out is aimed mainly at physical things left on the foreshore — moorings, for example, and structures like them. Coasteering makes no mark and leaves no trace. The lease reads like it was written to deal with physical infrastructure, not transient passage.

WATCH PCNPA'S OWN STORY CHANGE

Nobody needs to take anyone's word for why licensing is really happening. Read PCNPA's own words, in the order it gave them, and draw your own conclusion.

November 2025: Mark Underhill, speaking on behalf of both the National Trust and PCNPA, explaining the decision to introduce licensing, to providers:

“There are a number of factors that have led us to this decision... but central to our decision — is the risk of a legal challenge to commercial coasteering.”

The same month, PCNPA telling providers directly:

“PCNPA's lease from the Crown Estate **requires** PCNPA to regulate commercial activity.”

March 2026, to its own committee: the existing system had “operated successfully for many years” — and complaints were cited as a reason to replace it anyway.

April 2026, to providers again:

“the decision to move to a licensing approach has been made to meet environmental legislation requirements.”

September 2026, in a formal document filed with the High Court, defending against Adventure Beyond's claim: the story shifts again. The lease still gets a mention — but now only, in PCNPA's own barrister's words, to “reinforce, but not the sole source of,” PCNPA's right to exclude it. The real argument has

moved. PCNPA is no longer saying the lease requires this. It is arguing that, as landlord, it does not have to justify itself at all:

“the exercise of a private property right as leaseholder... not the exercise of a statutory discretion.”

First, the reason given to providers is legal risk. Then, within weeks, it becomes a lease requirement. Then a complaints problem, told only to the committee. Then an environmental duty, told to providers again. And in front of a judge, none of that — just “we’re the landlord.”

Whatever PCNPA's real reasoning, look at what the “we’re the landlord” argument would actually achieve if it succeeds. The letter attached to this note states, as its opening and repeated position: “commercial coasteering should not be permitted at Ceibwr Bay.” That is the Ceibwr group's stated, primary demand. If PCNPA's argument succeeds — that it can exclude a provider from its own land without having to justify the decision at all — the practical result is exactly that outcome.

PCNPA may say this argument is specific to this one demand, and doesn't automatically extend to how the future licensing scheme will work. Perhaps so. But if “we’re the landlord, we don't have to explain ourselves” is accepted as lawful once, ask what stops the same argument being reached for again — against any provider PCNPA would rather not have operating somewhere.

QUESTIONS WORTH ASKING PCNPA DIRECTLY

- Which is true — that complaints “highlighted the benefits” of licensing, as told to PCNPA's own committee, or that licensing “is not motivated” by complaints, as told to providers?
- If PCNPA's own case in court now rests on being “the landlord,” why were providers ever told licensing was required by the lease, or by environmental legislation?
- If the existing system “operated successfully for many years,” what evidence, if any, showed it stopped working — evidence providers have actually been shown?
- If PCNPA can decide, as a private landowner, who gets to operate and who doesn't, without needing to justify it — what happens when your own licence comes up, and someone decides they'd rather you didn't have one either?

WHAT PROVIDERS SHOULD DO

Don't wait to find out how this applies to you. Ask PCNPA these questions directly, in writing. Ask for straight answers.

At least providers have PCF to speak with one voice on this — or so it might seem. PCNPA's own Income Diversification Group reported to its Members in June that it would retain PCF's £15,000 funding “while we introduce a Licencing Scheme for Coasteering,” but would “review whether to continue with this funding once the scheme has been introduced.” Internal papers go further: one option under active

consideration is to “move away from funding PCF” altogether once licensing is in place.

The outlook, if that happens, is the one common voice providers currently have falls silent just as licensing takes hold — leaving each provider to face PCNPA alone. That is precisely the position the authors of the attached letter would want.

PCNPA tells a different story every time it is asked. The real agenda is unknown. But what is visible is an authority reaching for unaccountable power, with no clear legal basis to back it up — and providers who don't ask questions now risk finding out, one by one, what that looks like in practice.

The documents referred to in this note can be supplied on request.

What has happened to Adventure Beyond this summer can happen to any operator PCNPA decides it would rather not have on this coast. The only defence any provider has is asking the same hard questions, together, before the scheme is finished and it's too late to ask them at all.

THE LETTER REFERRED TO ABOVE

The following pages are the letter sent to PCNPA by a group describing itself as “representatives of the Ceibwr community,” reproduced in full. See page 7 for the passages referred to above.

Subject: Coasteering Licensing & Policy Framework — Ceibwr Bay

Dear Members of Pembrokeshire Coast National Park Authority,

We write as representatives of the Ceibwr community in Moylgrove regarding the ongoing development of a coasteering licensing framework. While this approach could be a promising step forward in regulating adventure tourism, we have several concerns that must be addressed before any licensing decisions are made.

Our position remains unchanged: commercial coasteering should not be permitted at Ceibwr Bay.

1. Legislative Context – Wales Environment Bill and Pembrokeshire Marine Code of Conduct

We have noted with concern that the **new Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill** is not currently referenced in the PCNPA's draft list of policies. This Bill embeds **core environmental principles** — including prevention and precaution— establishes statutory **biodiversity targets**, and creates the **Office of Environmental Governance Wales (OEGW)** with powers to monitor, enforce, and hold public authorities accountable.

This framework fundamentally changes the statutory context in which planning, licensing, and regulatory decisions must now be made in Wales. Decisions must **prioritise prevention of environmental harm** and actively support **nature recovery**. Voluntary codes or reactive management approaches may be insufficient to meet these legal duties.

We urge that this framework be explicitly acknowledged and integrated into PCNPA's coasteering licensing policy.

Furthermore, the **Pembrokeshire Marine Code (PMC)** is relevant to this discussion. While it has been reviewed in 2024, it remains **materially weaker than standard marine wildlife guidance**, relying on **causation of disturbance** as a trigger for action (see **Annex B**). This means that cumulative impacts can occur before any response is required. The Code allows operators to approach wildlife too closely and only instructs them to move away **after disturbance has already happened**, effectively permitting harm. PMC reform is essential to align with statutory duties, including the **precautionary principle** and clear preventative measures, and must be treated as a **primary consideration** in licensing decisions.

2. Community Engagement and Position

We reviewed the available video of the committee meeting of 25/03/2026 regarding licencing and were disappointed to note that communities and private landowners have had minimal inclusion in consultations, while providers appear to have been consulted. We thank Cllr Mike James for raising the issue of community involvement. The Moylgrove community has been pivotal in advocating for stronger protections for Ceibwr Bay and for nature restoration, and we feel must be fully engaged in any licensing decisions.

Our position remains unchanged: commercial coasteering should not be permitted at Ceibwr Bay. This stance is strongly supported by the **Environment Bill** as described above.

We have repeatedly encountered claims that coasteering could be managed responsibly. In a site of such ecological sensitivity, these claims are insufficient:

- **Management alone is no longer the legal test;** the question is whether activities can occur **without causing harm**, not whether impacts can be mitigated afterwards.
- **Monitoring is reactive;** reliance on detecting disturbance after it occurs is incompatible with legal duties in SAC and SSSI sites.
- **Controlled or small-scale activity** can still have cumulative effects, particularly with multiple operators, repeated disturbance, and seasonal sensitivities affecting seabirds and grey seals.
- **Reputable operators cannot eliminate the fundamental risk;** even careful operations cause disturbance in confined haul-outs, caves, and key wildlife corridors.

The **Pembrokeshire Marine Code of Conduct** is particularly inadequate. As a **reactionary code**, it instructs operators to move away **only after disturbance has been observed**, meaning harm has already occurred. This approach cannot underpin any licensing decision under the new statutory framework, where **precaution, prevention, and accountability** are mandatory.

Our community is also essential in ensuring **scientific rigour**. For example, a Freedom of Information response from NRW indicated that the disturbance of **herring gulls** was not considered in the ‘spirit of the concordat’. This is unacceptable, as herring gulls are **red-listed and legally protected**, demonstrating the lack of sufficient ecological rigour in current assessments. Furthermore, without **comprehensive baseline data**, it is impossible to reliably conclude that coasteering would not damage sensitive habitats or species.

We continue to support **quiet, low-impact tourism**, including **birdwatching, walking, and other non-intrusive recreation** that allows public enjoyment without compromising wildlife or habitats. Ceibwr Bay is a sanctuary for biodiversity and for visitors seeking tranquillity.

3. Protected Features – SAC and SSSI

Ceibwr Bay is exceptional in both ecological complexity and sensitivity:

- **Cardigan Bay SAC:** bottlenose dolphins, Atlantic grey seals, sea and river lampreys, reefs, subtidal sandbanks, sea caves.
- **Pembrokeshire Marine SAC:** reefs, estuaries, bays, subtidal sandbanks, caves, grey seals, otters, lampreys.
- **Aberarth – Carreg Wylan SSSI:** cliffs, shoreline habitats, grey seals, Eurasian otters, multiple bird species.

Ceibwr Bay itself is an exceptionally sensitive and ecologically integrated site, containing a concentration of multiple habitats and protected species, including sea caves, biogenic reef, Schedule 1 choughs, nesting seabirds, otters, grey seals, and shallow inlets. These features interact dynamically, forming a coherent ecological system in which the habitats and species are interconnected and cannot be considered in isolation. The bay’s unique combination of features, habitats, and species makes it irreplaceable and particularly vulnerable to disturbance.

These designations require robust assessment of all qualifying features before permitting any activity likely to affect the integrity of these sites. Fifteen years of coasteering in the bay may

have already caused cumulative damage, meaning **there is no true baseline for ecological assessment.**

4. Survey Gaps and Lack of Comprehensive Baseline Data

To date, there has been no comprehensive ecological survey covering all key habitats and protected species at Ceibwr Bay. The most recent formal survey was a 2024 seabird breeding study commissioned by Natural Resources Wales (NRW). While the report stated that no disturbance-related impacts were recorded (limited survey time), it noted actions were observed that could reduce breeding success and recommended improved education and exclusion zones.

This report:

- Did not include other legally protected features (e.g., seals, reefs, sea caves, or broader SSSI/SAC integrity).
- Was limited in scope and methodology, did not undergo independent peer reviews, and the methodology was criticised by qualified scientists.
- Leaves a substantial evidence gap, meaning decision-makers cannot reliably conclude that coasteering will not adversely affect protected features.

As Mark Underhill highlighted at a National Trust meeting with the community, the current assessments rely only on existing data rather than new site-specific surveys. Where data are lacking, the precautionary principle applies: it is not legally or ecologically appropriate to permit activities in areas where the potential for harm is unassessed.

Consequently, decision-makers cannot reliably conclude that commercial coasteering will not adversely affect protected features at Ceibwr without further survey work and precautionary measures. Moreover, given the cumulative impacts of over 15 years of coasteering, any new survey is likely to reflect a **degraded baseline**. Only by prohibiting coasteering can future monitoring accurately capture genuine ecological recovery.

5. Cumulative Sensitivity

Ceibwr Bay exhibits **multiple compounding factors**:

1. Confined amphitheatre geography
2. Recreational cul-de-sac dynamics
3. Overlapping wildlife habitats in a small area
4. Grey seal disturbance bottlenecks
5. Long-term failure of voluntary management systems

Few, if any, coastal sites in Wales exhibit all five factors simultaneously. The presence of these characteristics creates a site structurally predisposed to cumulative disturbance.

Allowing coasteering here would not only threaten local biodiversity but set a precedent that could undermine protections at other sensitive sites. **In other words, permitting high-intensity recreational activity at Ceibwr risks making no coastal site fully safe under the Habitats Regulations and SSSI protections.**

6. Precautionary Principle and Regulatory Compliance

Under the **Habitats Regulations 2017**, activities must not cause disturbance to SAC species. The **Pembrokeshire Marine Code**, being reactive and cannot **prevent harm proactively**. The new Wales Environment Bill further embeds the duty to **prevent environmental harm and support nature recovery**, raising the legal bar beyond previous voluntary frameworks.

7. Legal and Advocacy Context

We note that litigation and continued active engagement by environmental NGOs, independent conservationists, and Wild Justice continues to focus attention on the need for rigorous legal compliance in coastal management. This community position aligns with **emerging legal interpretations prioritising the prevention of environmental harm and enforcement of statutory duties.**

8. Public Awareness, Media, and Political Interest

Ceibwr in Wales stands at a crossroads, with the potential to become a flagship example of nature recovery. The National Trust and PCNPA have a real opportunity to lead the way—establishing Ceibwr as a model permanent exclusion zone and working closely with the local community to ensure nature recovery. Decisions about this site are under intense scrutiny, with mainstream media requesting regular updates, while local MPs, the Welsh Government, and the Green Party are all monitoring progress, reflecting strong public and political interest in safeguarding this vital habitat.

8. Conclusion and Position

The Ceibwr community maintains a firm position that commercial coasteering and other commercial adventure activities should not be allowed in Ceibwr Bay.

Any proposal to the contrary would be inconsistent with:

- Legal duties under SAC and SSSI frameworks, including the Habitats Regulations and the precautionary principle
- Emerging Welsh environmental governance and statutory oversight, including the **Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill** and the **Office of Environmental Governance Wales**
- Evidence of cumulative sensitivity, including the bay's confined amphitheatre geography, recreational cul-de-sac dynamics, multiple overlapping wildlife habitats, seal disturbance bottlenecks, and failure of voluntary management systems
- The absence of a comprehensive ecological baseline, noting that 15 years of commercial activity may have already caused damage, and that the 2024 seabird survey is limited in scope, methodology, and independent peer review

We remain committed to working collaboratively with the National Trust and Pembrokeshire Coast National Park Authority to support sustainable, **quiet, low-impact tourism** at Ceibwr Bay. This includes activities such as **birdwatching, walking, wildlife observation, photography, nature journaling, and mindful coastal exploration.** Such recreation aligns with community values and statutory duties, allowing public enjoyment while safeguarding sensitive habitats and species.

Intense recreational use, such as commercial coasteering, would fundamentally compromise this amenity, prioritising high-impact tourism over both wildlife protection and public enjoyment.

The **Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill** has fundamentally changed the legal framework. The test is no longer whether impacts can be managed or monitored, but whether harm can be **prevented before it occurs.** In a sensitive site like Ceibwr Bay, this creates a very high bar—a standard that coasteering, even under controlled conditions, cannot meet.

We agree with **Chris Packham, director of Wild Justice:**

“Fun is fine – but not when it endangers important and diminishing populations of birds and mammals.”

Regards

Concerned residents of Moylgrove community

Annex A – Key Ecological and Legal Concerns at Ceibwr Bay

1. Grey Seals (*Halichoerus grypus*)

- Protected Status: SAC feature under Pembrokeshire Marine SAC and Cardigan Bay SAC
- Ecology: Use haul-outs and caves for resting, breeding, and pupping; rely on undisturbed corridors
- Threat: Ceibwr Bay’s narrow entrance creates a disturbance bottleneck. Repeated recreational activity risks displacement, disturbance to breeding, and abandonment of haul-outs
- Ceibwr provides one of the only safe haul-outs between Poppit and Newport during rough weather
- Legal Reference: Habitats Regulations 2017 – precautionary approach required when disturbance of qualifying SAC species is possible

2. Seabirds (Razorbill, Guillemot, Herring Gull, Fulmar) and Chough

- Protected Status: Breeding seabirds supported under SSSI designations
- Survey Evidence: 2024 NRW seabird study noted coasteering actions observed that could reduce breeding success, recommended exclusion zones and education
- Concern: Survey limited to birds; methodology requires independent peer review. Community-collected evidence indicates actual disturbance not fully captured

3. Otters (*Lutra lutra*)

- Protected Status: European Protected Species; part of SSSI and SAC designations
- Evidence of presence: Photographs and spraints along the river
- Threat: No systematic surveys; potential for coasteering to interfere with feeding or sheltering in shoreline caves and creeks

4. Reefs and Subtidal Habitats

- Protected Status: SAC features (Cardigan Bay, Pembrokeshire Marine)
- Threat: Lack of baseline data; cumulative physical damage from repeated impact by multiple groups

5. Sea Caves and Sheltered Rocky Shoreline

- Ecological Importance: Used by seals, otters, bats, and intertidal species
- Threat: Disturbance from coasteering and other recreational activities may compromise breeding, resting, and sheltering functions
- No baseline data

6. SSSI / Site Integrity

- Designation: Aberarth – Carreg Wylan SSSI protects cliffs, shoreline habitats, and biological diversity
- Concern: Fifteen years of commercial activity may have already caused ecological damage. No full baseline exists to assess current integrity or resilience

7. Cumulative Sensitivity Factors at Ceibwr Bay

Confined amphitheatre geography, recreational cul-de-sac dynamics, multiple wildlife habitats in a small area, seal disturbance bottleneck, previous long-term failure of voluntary management systems

Implication: Few coastal sites exhibit all five simultaneously. Allowing coasteering would set a precedent undermining protection of sensitive sites across the coast

8. Legal and Regulatory Context

- Precautionary Principle: Activities must not proceed without ensuring no adverse effect on SAC or SSSI features
- Appropriate Assessment Requirement: Potential for disturbance and cumulative impacts triggers Likely Significant Effect screening and, where necessary, full Appropriate Assessment under Habitats Regulations
- NGO Oversight: Wild Justice and other eNGOs continue to monitor and take interest, reinforcing need for stringent legal compliance
- Public awareness – growing awareness of damage from adventure tourism activities

9. Community Access and Recreation Values

While we support equitable access to the coast, “access for all” does not justify permitting commercial adventure tourism in highly sensitive areas. Ceibwr Bay is quiet, tranquil, and valued for **low-impact recreation**, including **walking, birdwatching, wildlife observation, photography, and mindful engagement with nature**.

There are no public toilets and limited parking, High-intensity coasteering is incompatible with this character and will generate cumulative disturbance, parking pressures, litter, human excrement (an unfortunate common problem at Ceibwr), and exclusivity for paying clients. Low-impact, inclusive recreation must take precedence over commercial tourism at Ceibwr Bay.

10. Survey Gaps / Baseline Deficiency

- No comprehensive ecological survey covering all key habitats and species
- Existing studies limited in scope (e.g., seabird report 2024)
- Community evidence indicates actual disturbance but has not been systematically analysed
- Without full baseline data, it is impossible to reliably conclude that coasteering would not harm protected features
- Baseline data may have been compromised by 15 years of coasteering

Strategic Takeaway:

The combination of ecological sensitivity, legal obligations, and lack of comprehensive baseline data makes Ceibwr Bay unsuitable for commercial coasteering. Any licensing risks non-compliance with statutory duties, undermines biodiversity recovery, and threatens precedent for other sensitive coastal sites.

Annex B – Pembrokeshire Marine Code: Compromise, Limitations, and Need for Reform

1. A Code of Compromise

- The Pembrokeshire Marine Code (PMC) represents a historic compromise with adventure providers and boat operators, reflecting the **lowest common denominator** rather than the highest environmental standards.
- It was designed to allow commercial activities to continue with minimal restrictions, rather than prioritising the protection of wildlife and habitats.

2. Reactive, Not Preventative

- The PMC relies on operators **moving away only after disturbance has occurred**, meaning that wildlife is **allowed to be disturbed repeatedly**.
- This approach is incompatible with statutory duties under SAC, SSSI, and the Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill, which mandate precaution, prevention, and accountability.

3. Cumulative Impacts Ignored

- By relying on evidence of disturbance after it happens, the Code **fails to prevent cumulative impacts** from multiple operators, repeated visits, and seasonal sensitivities.
- Sensitive species at Ceibwr Bay—including grey seals, seabirds, otters, and reef communities—remain vulnerable.

4. Undue Influence of Commercial Operators

- The current PMC allows adventure providers and boat operators to **continue shaping management rules** for their benefit.
- This influence has gone on **for too long**, resulting in a weaker regulatory framework that cannot meet modern statutory requirements.

5. Need for Fundamental Revision

- The PMC must be **revised and strengthened** to align with statutory recommendations of the 100m rule:
 - Apply the **precautionary principle** and proactive protections.
 - Eliminate reactive, post-disturbance management as the primary tool.
 - Reduce cumulative impacts and set clear, enforceable limits on activity.
 - Prevent further influence by commercial operators over conservation rules.

Strategic Takeaway:

The PMC is a **compromise that prioritises commercial convenience over environmental protection**. Continuing to rely on it risks **irreversible harm to Ceibwr Bay's wildlife** and **fails to comply with statutory duties**. Fundamental reform is urgently required to ensure prevention, precaution, and ecological integrity to all sites in Pembrokeshire.