20 November 2026

Dear

ATISN 26-0156: Funding for legal advice

Thank you for your request which we received on 26 October 2026. You asked for the following information:

- Please can you tell me if you ever awarded monies to cover legal advice to remove covenants for the development or acquisition of land to the following organisations:

    - Harlech Ardudwy Leisure (HAL)
    - Harlech Community Council
    - Harlech Community Investment (CIC).

We are also replying to your subsequent email of 03 November 2026, which asked for the following information:

- 1. **The Business Case:** What robust community benefit was demonstrated to justify spending £25,000 of public money strictly to remove protective community covenants.
- 2. **Conflict Disclosures:** Did the grant application submitted to Visit Wales explicitly declare that members of the applying/beneficiary boards hold overlapping seats on the Community Council and the CIC?
- 3. **Funding Suspension:** Will the Welsh Government pause the release or execution of these funds until a full independent review into the governance of HAL and Harlech Investment CIC is completed?

Our response

Funding of up to £24,999 was awarded to Harlech Community Council. It is specifically intended to support the following preparatory activities:

- Clarifying land ownership and resolving title issues to support potential land assembly;
- Supporting the creation of a single serviced development plot;
- Reducing delivery risks for prospective hotel developers; and
- Securing long-term community benefit through the establishment of a Community Interest Company (CIC).

The award of this funding does not constitute approval or a commitment that a hotel development will proceed. Any future development proposal would be subject to the necessary statutory and regulatory processes, including obtaining any required planning consent. The development and progression of any such proposal would be a matter for Harlech Community Council, working in consultation with the community it serves.

1. **The Business Case:** What robust community benefit was demonstrated to justify spending £25,000 of public money strictly to remove protective community covenants?

Over the past 15 years Visit Wales has been approached by different groups identifying the paucity of high quality visitor accommodation in the area and their opinion that improved accommodation options would encourage economic development in the town

(footfall, spend, particularly restaurants etc). Previous studies have been unable to find a viable site.

Harlech Community Council (the democratically elected representatives of the town) requested help to undertake work on the land assembly activities specified above.

2. **Conflict Disclosures:** Did the grant application submitted to Visit Wales explicitly declare that members of the applying/beneficiary boards hold overlapping seats on the Community Council and the CIC?

The applicant and funding recipient was Harlech Community Council. It is an important safeguard that HCC (as the representatives of the community) have full control over the Community Interest Company.

We are aware this means there is a membership mirroring between the community council and the CIC. Councillors could change after the community council elections in May 2027 but we would expect Harlech Community Council to still retain full control of the CIC.

3. **Funding Suspension:** Will the Welsh Government pause the release or execution of these funds until a full independent review into the governance of HAL and Harlech Investment CIC is completed?

Your request for the suspension of funding pending an independent review is noted.

Next steps

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at: Information Rights Unit, Welsh Government, Cathays Park, Cardiff, CF10 3NQ or Email: Freedom.ofinformation@gov.wales

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely,