

**Appendix 3: NRW's response to statutory consultation comments on the assessment, boundary, extents and management mechanisms.**

| 1. Challenges to the assessment, evidence and in turn the landscapes included for designation  |
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| 1052   |
| <p><b>Gronant and Talacre Dunes</b></p> <p>Haven Leisure Limited owns and operates Presthaven Beach Resort near Prestatyn and extends to 137 ha covering the operational area of the existing park, sand dunes, agricultural land and land in the tidal zone.</p> <p>Haven has no in principle objection to the wider designation but is concerned that there is insufficient justification for the areas surrounding the park, particularly as this is different to the extent of the designation in the earlier proposals.</p> <p>The Gillespies study concluded that the area's landscape and scenic quality as a whole is of much lower quality with intrusive built development and incongruous land uses. Along with its broader discussion on the merits of including this area, Gillespies recommended that the area should be excluded.</p> <p>The Final Assessment of Land for Designation document (11 September 2025) states that the change was made due to significant local support during public consultation and for the protection and enhancement of a number of rare species in this area.</p> <p>This reason is not sufficient given that the evidence collated to assess the designated site was based upon the smaller area, without the Gronant/Talacre area. The Supporting Evidence, as explained on the NRW website, provides assessment reports prepared to inform decision-making. It is difficult to see how these have then be used to prepare the 'Historical Reports' some of which do include the area in question.</p> <p>The new evidence of species noted has limited analysis and it is not clear how there is a significant opportunity to benefit nature via the National Park mechanism, as set out by NRW in the Final Assessment Report.</p> <p>Finally, as this area has been added at a relatively late stage, there has been no engagement with the landowner to discuss the precise boundary. Locating the boundary adjoining the current operational areas of the park appears to have been made following a lack of analysis in the supporting evidence. The implications do not appear to have been fully considered or the boundary refined in any detail.</p> <p>This area should either be removed or further work undertaken, including with the landowner, to review this part of the proposed National Park.</p> |
| <p><b>NRW's Response:</b></p> <p>Gillespie's Evaluation report 2024 for Evaluation Area 1 Talacre and Gronant Dunes, did confirm notable evidence of Natural Beauty and Opportunities for Outdoor Recreation. Some key points from the assessment:</p> <ul style="list-style-type: none"> <li>• The Dunes &amp; Dune Slack, Estuary and Wetland units exhibit a 'high' integrity and quality, with the flat open lowland farmland units assessed as 'low' and 'moderate'.</li> <li>• The rarity of the Estuary unit is considered to be 'outstanding' as it includes characteristic features and qualities that are unique, exceptionally uncommon, or are the best example. The Wetland and Dunes &amp; Dune Slack units are assessed as having a 'high' rarity, with the Flat Open Lowland Farmland units assessed as 'moderate'.</li> </ul>   |

- The Wetland unit is assessed as having an ‘outstanding’ distinctiveness, the Dunes & Dune Slack and Estuary units ‘high’, and the Lowland Farmland units assessed as ‘moderate
- The extensive composition of semi-natural and natural coastal habitats contributes to a strong sense of wildness across most northern parts of the EA
- Although parts of the beach and sand dunes can offer a sense of peace and quiet at times, with nearby caravan parks and good access from Prestatyn, the beach can be very busy during periods of good weather.
- There is a suite of nationally and internationally important nature conservation designations (as well as a Nature Reserve) covering most of the EA, the variety and wealth of natural interest significantly contributes to a strong sense of being close to nature.
- Species of note include Natterjack Toads that breed in shallow pools and a migrating Little Tern colony that breed in the dunes. Interesting dune plants include marram grass, Sea Holly and Glasswort. The mudflats also attract many birds such as Oystercatcher.
- The composition of dune systems, marram grass, wetlands and native wildflowers notably contribute to a distinctive natural character and along the coast, the natural dynamics of the marine environment heighten the sense of naturalness.
- High recreation provision – Wales Coastal Path, National Cycle Route 5, several public rights of way, good access to the dunes, beach and local nature reserve, accessible routes through the dunes, located in close proximity to large centres of population

It was the close proximity of detractive elements - caravan parks, leisure uses and carparking in the dunes at Talacre, farmland and the golf course and the busy A548, that led Gillespie’s to exclude the area from the Candidate Area 2024.

Consultation on the Candidate Area 2024 led to representations by the public, RSPB and North Wales Wildlife Trust in support of the re-inclusion of the area. NRW’s Benefits of Nature report 2025 reaffirmed Gillespie’s evaluation of the area’s natural heritage value, but in addition highlighted the national significance and rarity of this area – the only remaining section of natural dunes along the north Wales coastline and this being the only site in Wales for Little Turns. Close proximity to large centres of population (Prestatyn and other coastal towns and villages) and to visitors to the caravan parks and the areas accessibility was also a significant consideration in the provision this area provided.

NRW re-evaluated the area in summer 2025 and carried out site visits. We concluded that much of the coastal edge, dunes and dune slacks provided and very high and notable experience of Natural Beauty- scenic quality, semi naturalness, wildness and tranquility. Towards the southern edge near the adjacent to the caravan parks, development did start to become apparent and influence landscape perceptions, but that there remained a significant core area of landscape unaffected. On reviewing the golf course, with the exception of the club house, the golf course has a coastal links character and merges with the natural elements of the dunes along its edges. The principle of ‘wash over’ – the inclusion of land of lower quality where it sits between landscape that meets the statutory criteria, is an accepted means of drawing together a contiguous area for designation (NRW Procedural Guidance GN010 page 18).

This led us to conclude that that the negative affects set out in Gillespie’s evaluation were not sufficiently significant enough to warrant excluding this area of notable Natural Beauty and Recreation provision.

NRW carried out a site visit to test the location of a potential boundary. NRW Procedural Guidance GN010 requires physical features such as roads, boundaries and fencelines to be followed where available. The following extract is taken from NRW’s Boundary report 2025. It starts at Barkby Beach Car Park and runs clockwise along the boundary to the Village of Gronant:

Barkby Beach car parks are excluded. The boundary heads out to the mean low water sea level, aligned with a marker post in the sea, before turning eastwards along the low water extents of the beach/shoreline of Gronant and Talacre Dunes. At the point of Ayre light house marking the mouth of the Dee Estuary the boundary curves southwards until intercepted by Sluice House Gutter. It's meandering course is followed back to shore towards the Point of Ayre gas terminal. The boundary turns northwards to meet the Wales Coast path at a tight bend marked by a buoy/sculpture. This section of the boundary is 'for the time being' due to natural processes.

The boundary continues northwards along the Wales Coast Path to the point where it meets the northern end of Station Road. The boundary turns sharply westwards following a fence line demarcating the edge of residential and caravan park development and the warren, scattered woodland, dunes and coastline of the proposed National Park to the north. Continuing westwards and just before the next caravan park the boundary joins a cycle path and excludes a field with a stock pen and eroded grassland. The boundary continues around the northern edge of the caravan park in an area where there is no defined boundary and the sand dunes limit where caravans have been sited.

On reaching the eastern end of the caravan park, the boundary turns southwards to follow Shore Road. On crossing the railway line a small plot used for storage and a car park and recreation field are excluded. On crossing the A545 Prestatyn Road the boundary follows the most strongly intact hedgerows and tree lines next to the village of Gronant, before rejoining the National Landscape boundary at Gronant Road.

In conclusion NRW is satisfied the areas included within the proposed boundary meet the statutory criteria for National Park designation.

824; 1622

The respondent questions the justification for including **Pwll Glas Evaluation Area 16 (EA16)** in the proposed National Park boundary and strongly advises its removal.

**Challenges to NRW's assessment :**

- Weak Justification: Inclusion appears based largely on proximity to SSSIs, which the respondent argues is insufficient grounds for designation.
- Limited Recreation Value: Existing recreation opportunities are confined to quiet enjoyment via an established PROW network; further infrastructure is seen as unnecessary and potentially harmful.

**Concerns:**

- Impact on Tranquility: Increased public access could disturb the relative tranquility of sensitive habitats and ancient woodland.
- Ecological Risks: Greater visitor pressure may introduce pathogens, threatening Ancient Woodlands.
- Infrastructure Constraints: The area lacks adequate parking and facilities, raising concerns about future visitor management.
- Sanctuary Argument: EA16 should remain a protected, low-access area rather than being promoted for tourism.

**Conclusion:** The respondent considers the reasoning for EA16's inclusion "spurious" and recommends withdrawing it from the final National Park proposal to safeguard its sensitive character.

**NRW's Response:**

NRW's Final assessment of land for designation September 2025 sets out the Natural Beauty features that have given us reason to include EA16 within the proposed National Park:

a very high proportion and a distinctive pattern of Ancient Woodlands, along with limestone cliffs, small rolling hills and areas of parkland, the EA exhibits a strong sense of place. Limestone cottages and farmsteads also make a notable contribution to sense of place, and a strong pattern of irregular pastures enclosed by species rich hedgerows with mature trees and small woodlands, contribute to a very rural and intimate experience. A strong time-depth is also experienced throughout the EA.

**Opportunities for Outdoor Recreation:**

Although recreational opportunities are largely limited to the quiet enjoyment of the countryside via the public right of way network, this is very extensive and well-connected. There are also good opportunities to further enhance the network to establish locally promoted circular routes that link with the town of Ruthin, as well cycle routes along the quiet rural lanes.

NRW is satisfied that the evidence it has collated, demonstrates the landscapes within EA16 meet the statutory requirement for designation.

**Concerns:**

If designated, a National Park Authority would have a statutory duty to develop a management plan. The concerns raised - balancing conservation with access, management of visitors, the need for sensitive new infrastructure, and any other issues, would fall within the remit of the management plan.

**Gwynedd Council**

It was noted that the area of Gwynedd which is included within the current proposed boundaries of Glyndŵr National Park was originally identified by Hobhouse as possible AONB land to be included in Y Berwyn and not to be included in Snowdonia National Park. It is not clear what has changed in the landscape to be included in the new national park.

**NRW's Response:**

Welsh Government's interest in exploring a potential new National Park in NE Wales has led NRW to evaluate landscape against the two National Park statutory criteria – Natural Beauty and Opportunities for Outdoor Recreation.

Gillespies evaluation report 2024 identified part of EA20 Mynydd Mynyllod and the Upper Dee Valley as meeting the Natural Beauty and Opportunities for Outdoor Recreation criteria. This led to the Upper Dee Valley at Llandderfel being included within the proposed National Park for the especially scenic mosaic lowland valley setting to the picturesque village of Llandderfel, the natural character and quality of the meandering River Dee with significant contribution to the natural beauty, and the very strong sense of place created by the backdrop of the nearby Berwyn uplands and the Eryri National Park.

This part of the EA has good public rights of way links from Llandderfel. The Tegid Way lies on the boundary of the area and there are opportunities to further develop the recreational offer along the river.

The Hobhouse report 1947 in this context, provides historical information on landscape designations in Wales at that time.

NRW is satisfied that the evidence it has collated, demonstrates the landscapes included within the proposed National Park meet the statutory requirement for designation.

## Powys

Powys County Council objects to the proposed designation of the Glyndŵr National Park for the following reasons:

- A. Powys questions the approach taken to the landscape evaluation, the assessment of Natural Beauty and the extents of the proposed National Park;
- B. Powys questions the proposed National Park's Opportunities for Outdoor Recreation.

Below, we summaries the points raised by Powys and then provide our response.

### **A. The approach taken to landscape evaluation, the assessment of Natural Beauty and the extents of the proposed National Park**

#### **Landscape character**

1. *The Council does not consider that the proposed National Park has had proper regard for Landscape Character and the quality of the landscape does not meet the thresholds for Designation;*
2. *the proposed National Park boundary appears not to have had regard to the detailed work prepared and published by Powys (Powys's Landscape Character Assessment);*
3. *the proposed National Park cuts across identified distinctive landscape units.*

#### **Natural Beauty, distinctiveness and coherence**

4. *NRW's LANDMAP analysis identifies areas of high scenic value, but extensive areas within Powys comprise commercial forestry and intensively farmed land, lacking the distinctive character expected of a National Park.*
5. *The proposed area, while containing valued landscapes, includes large tracts of improved farmland and settlements that do not meet the threshold of "natural beauty" envisaged by the Act and guidance.*
6. *The proposed National Park lacks coherence as a single extensive tract of natural beauty or landscape character and is not a unified area with a unique and recognisable identity.*
7. *The Banwy Valley in particular has its own defined character, yet only parts of the northern valley side, totalling less than 1.5% of the character area, is included within the proposed National Park boundary.*

#### **Landscape quality and natural beauty is to be questioned**

8. *Those areas wholly, or almost wholly, within the proposed National Park do not exhibit distinctive geological and physiographical features. LCA 2 identifies the Berwyn Mountains LCA as "...an extensive area of upland moorland plateau.....on the edge of Snowdonia National Park." As the area has previously been excluded from Snowdonia National Park, despite its proximity, it's landscape quality and natural beauty is to be questioned.*

## **NRW's Response:**

### **Landscape Character, Natural Beauty, distinctiveness and coherence**

NRW's Statutory landscape designation: procedural guidance GN010 March 2022 has been applied in the evaluation of Natural Beauty, the Opportunities for Outdoor Recreation (the statutory tests) and boundary setting considerations.

The following findings of the South Downs Public Inquiry set out in the Secretary Of State's Decision Letter, also clarify how we have addressed distinctiveness, characteristic natural beauty and the evaluation of Natural Beauty:

- There is no need for a National Park to display a distinctive and coherent identity (IR2 letter p3);

- In light of NERC, the proper test is simply natural beauty, not the more restrictive test of characteristic natural beauty. Hence a National Park can contain different landscapes so long as they all satisfy the natural beauty test. Each may display key characteristics but there is no need for these to be park-wide (IR2 paras 2.45-2.46);
- Where land meets the statutory tests visual associations may be used to help define the extent of land to be included in a designation (IR2 para 3.13);
- Satisfaction of the natural beauty test can be achieved for a variety of reasons, individually or in combination. Different tracts can satisfy the test for different reasons (IR2 para 2.47).
- Land is not prevented from being treated as being of natural beauty by the fact that it is used for agriculture, or woodlands, or as a park, or that its physiographical features are partly the product of human intervention in the landscape (Section 99 NERC).

The proposed Glyndŵr National Park boundary as drawn within Powys includes the Berwyn Mountains, Berwyn foothills and the valleys that cut into the Berwyn uplands and extends in the east to take in the hills and ancient semi-natural woodland that enclose and contribute to Sycharth's landscape setting. Sycharth and Glyndyfrdwy in the Dee Valley are associated with Owain Glyndŵr.

The villages of Llangynog and Llansilin lie within the area, enclosed hillside farmland and some valley farmland and some forestry plantations are included. The area does not include large tracts of improved farmland. The boundary was drawn to exclude settlement where it coincided with boundary in accordance with boundary setting considerations. Eryri National Park includes some large areas of coniferous plantation, where they lie within a larger physiographic landscape that meets the statutory criteria.

The location of the boundary is primarily guided by evidence of Natural Beauty. Physiographic elements and physical features on the ground help guide local boundary setting. In some circumstances the three considerations don't align completely.

The Banwy Valley is not included within the proposed Glyndŵr National Park.

### **Evaluation of Natural Beauty**

All published landscape evidence was taken into account including – National Landscape Character Areas (NCLA), LANDMAP visual and sensory aspect areas, local landscape assessments (Powys LCA, Wrexham LANDMAP SPG) and local landscape designations (Wrexham County Borough Council, Conwy County Council and Gwynedd Special Landscape Areas).

The Evaluation Areas used to assess evidence of Natural Beauty and opportunities for outdoor recreation (Gillespies Evaluation Report 2024) are based upon LANDMAP visual and sensory aspect areas – the same units and assessment data used for compiling Powys's Landscape Character Assessment.

In addition to published landscape evidence, Gillespies assessment included site evaluation of the 6 Natural Beauty criteria<sup>1</sup>; analysis of the visual and sensory perceptual characteristics, detractors and variations in Natural Beauty across an evaluation area.

Landscape Character Areas whilst pertinent to the process of gathering and analysing landscape information, do not determine the location of the proposed boundary. The extents of the proposed National Park are guided first by evidence of Natural Beauty and secondly opportunities for outdoor recreation (the statutory tests). Natural Beauty may not necessarily be equally strong or coherent across a Landscape Character Area. For these reason and as presented within Powys's letter figure 1, the proposed National Park boundary differs to the boundaries of Powys's Landscape Character Areas.

<sup>1</sup> NRW Statutory landscape designation: procedural guidance GN010 March 2022 (section 3)

## **The landscape quality and natural beauty of the Berwyn Mountains is questioned by Powys**

The following designation history confirms the Berwyn Mountains have been considered as a candidate for statutory landscape designation since the 1940s.

The **Hobhouse report 1947** identified two Conservation Areas (later known as AONBs)-the Clwydian Range and Y Berwyn (the latter extending south-westwards into Powys to the edge of the Eryri National Park. The area around Llyn Vyrnwy was shown as being part of a recommended North Wales National Park.

Both areas were seen by the Countryside Commission as a priority for designation (**internal paper 5 August 1974**). During 1974 the Countryside Commission, through Clwyd County Council and Montgomeryshire District Council, undertook a consultation exercise on a proposal to designate both Y Berwyn and the Clwydian Range as Areas of Outstanding Natural Beauty. The outcome of which was that, whilst Clwyd County Council strongly supported designation of both areas, Powys County Council, Montgomeryshire District Council and the majority of farming and landowning bodies were opposed to the designation of Y Berwyn. The Commissioners authorised the Committee for Wales to proceed with formal designation procedures for both areas, but advised that the Clwydian Range be given priority.

**The Countryside Commission Policy Statement on AONB's 1980.** The Countryside Commission confirms its wish to complete the designation procedure for the Berwyn Mountains AONB.

**Fourteenth Report of the Countryside Commission 1981** reports that no formal action has been taken on designating the Berwyn Mountains due to controversy over proposed SSSI designation by the Nature Conservancy Council.

**The Clwydian Range AONB 1985** was designated by the Countryside Commission but (for reasons unknown) the designation boundary lay much further north than that indicated by Hobhouse.

**A joint CCW and Countryside Commission policy statement 1991** on AONBs stated that the question of the Berwyns would be considered by CCW (ie CCW inherited the unresolved issue).

**Internal CCW papers and map of a possible boundary prepared 1994.** No further action although CCW's Council endorsed the view that Y Berwyn is of AONB quality by comparison with the existing designated areas.

**CCW policy document on the Welsh Landscape, Policy 28 1997.** Consultation indicated no clear mandate for AONB designation for Y Berwyn.

**Denbighshire Unitary Development Plan 1996-2011 Policy ENV2,** recognises the national landscape importance of Y Berwyn and supports designation of the whole area as AONB. As a short term measure it has been proposed by Denbighshire County Council to extend the Clwydian Range AONB southward to include areas in Llantysilio, Eglwyseg and the Dee Valley which were originally included as part of Y Berwyn.

**Wrexham Unitary Development Plan 1996-2011 Policy EC5** supports a proposal to extend the Clwydian Range to include sections of Ruabon Mountain and Y Berwyn, including much of the Ceiriog Valley, in recognition of the national importance of the landscape.

CCW advice to the **Welsh Office on Protected Landscapes in Wales 1999** states that CCW is not currently recommending any further designations of AONB's with the possible exception of Y Berwyn and that CCW will not move towards a possible AONB designation until this is shown to be the preferred course following a LANDMAP assessment.

Wrexham County Borough request CCW to set up a group to look at the **potential for a Berwyn Range AONB in 2004**.

**Welsh Assembly Government remit letter for CCW 2008** includes a target to draw up draft boundaries for the proposed extension of the Clwydian Range AONB.

**Public Consultation on a proposed extension to the Clwydian Range AONB and draft boundary 2010-11.** Mixture of views is expressed on proposed exclusion of the Ceiriog Valley from proposed extension. Strong support for designation of the Ceiriog Valley from the public but also strong opposition, particularly from farming interests.

**CCW Council on 14 February 2011 agrees to proceed with a statutory consultation on a proposed Clwydian Range and Dee Valley AONB (Designation) Order 2011** together with endorsement to undertake detailed work to consider the appropriateness of designating and managing parts of the Ceiriog Valley and Y Berwyn as an AONB. CCW Council agree, on 28 March 2011, to make the Designation Order and to send to the Minister for the Environment, Sustainability and Housing.

**The Clwydian Range and Dee Valley Designation Order was confirmed 22<sup>nd</sup> November 2011** by the Environment, Sustainability and Housing Minister.

**Welsh Government remit letter to CCW April 2012** sets out for AONBs to continue only the pre-designation work which is committed (essentially the preliminary assessment of the Ceiriog Valley area, linked to the recent extension of the Clwydian AONB).

**CCW agreement on an Operational Process and Designation Procedure September 2012** is tested as part of the work undertaken to consider the appropriateness of designating and managing parts of the Ceiriog Valley and Y Berwyn as an AONB.

**Welsh Government Programme for Wales commitment 2021** includes proposals to designate a National Park based on the Clwydian Range and Dee Valley AONB.

**Gillespies Evaluation Report 2024 and NRW's Benefits of Nature Report 2025** for the proposed Glyndŵr National Park confirm the Natural Beauty value of the Berwyn.

**NRW's Final assessment of land for designation report no: 938a 2025** explains the extents and boundary setting considerations of the proposed designation.

NRW is satisfied that the landscapes included within the proposed boundary meet the statutory criteria for National Park designation.



## **B. The proposed National Park's Opportunities for Outdoor Recreation.**

### **NRW's review and response:**

Powys's submission includes a comprehensive summary of opportunities for outdoor recreation within the proposed National Park area and this concurs with NRW's evaluation:

National trails (Glyndŵr's Way), promoted trails (the Pererindod Melangell and Ann Griffiths walk), public rights of way, and open access land, within the county's extents of the proposed National Park.

Nearly 40% (39.40%) of the proposed National Park within Powys is Open Access Land. This lies within the uplands of the Berwyn Mountains and some hill tops of the Berwyn foothills. 416km of public rights of way link the lower settled landscapes along the western edges of the National Park with the Berwyn Mountains Open Access Land. There is a strong interconnecting network of public rights of way linked to villages just within and outside the National Park boundary.

Powys's comparison of public rights of way with Bannau Brycheiniog National Park (Table 2) shows the proposed Glyndŵr National Park has proportionally more public rights of way and by ways open to traffic, but fewer bridleways and restricted byways.

Llyn Vyrnwy is a destination for promoted walks and RSPB hides for bird watching. Pistyll Rhaeadr waterfall is on private land, but has public access and there are a number of public rights of way into the Berwyn Mountains from here.

Dyfnant Forest provides access for horse riding and carriage driving trails. In addition, Revolution Bike Park provides downhill mountain biking at Llangynog. Mountain bike routes along bridleways cross and travel around the Berwyns and connect with the Ceiriog Valley promoted routes.

Collectively this demonstrates to NRW that there is sufficient opportunities for outdoor recreation to meet the Statutory Criteria. There are also opportunities to develop community miles – promoted short walks from villages designed for communities and visitors; and an extension to the Pererindod Melangell way, linking Llangynog with Llanrhaedr Ym Mochnant, Sycarth and Llansilin.

Powys raise a concern about the management of public rights of way going forward should a National Park be designated, with a suggestion that it could disrupt the management and promotion of Glyndŵr's trail (less than 8% of the trail would lie within the proposed National Park). They also note that their current core funding is over stretched with very little revenue for maintenance work.

Should a National Park be designated, a statutory management plan for the area would be required. The policies and actions for managing public access would be developed with partners and local communities. At which time the issues, responsibilities and efficiencies of collaborative working could be worked out.

### **Conclusion**

In conclusion, NRW is satisfied that it has followed best practice in evaluating Natural Beauty and Opportunities for Outdoor Recreation (the statutory tests) and has applied boundary setting considerations consistently in defining the extents and location of the proposed Glyndŵr National Park boundary.

## Galileo Empower

The respondent challenges NRW's assessment of Natural Beauty and the validity for including the Berwyn, Berwyn Foothills and Ceiriog Valley within the proposed National Park

the key points:

We are strongly of the view that not all the of the PGNP Boundary meets this test of 'great natural beauty' as defined in the Hobhouse Report. (The Hobhouse 1947 report Section III).

Having analysed the LANDMAP Visual & Sensory Evaluation for the PGNP, we note that a significant proportion of the area outside and to the south of the CRDVNL is identified as being of 'Moderate' value ('locally valued') with only a very small area of 'Outstanding' value found within the upper reaches of the Tanat valley. Unlike the CRDVNL (which has 'Outstanding' value across large areas of uplands), much of the uplands in this southern part of the PGNP is identified as being of 'High' or 'Moderate' value which according to the LANDMAP guidance indicates the area to be of 'regional' or 'local' importance.

Table 1 LANDMAP calculations includes a comparative analyse of LANDMAP visual and sensory evaluations for Eryri National Park, the proposed National Park and the area currently not within the National Landscape designation.

| Area Considered                                 | Area Size (ha) | LANDMAP Visual and Sensory - % of designated area attributed for each evaluation category. |      |          |     |
|---|----------------|--|------|----------|-----|
|   |                | Outstanding  | High | Moderate | Low |
| Eryri NP  | 213940.3       | 22.6   | 51.0 | 26.3     | 0.1 |
| CRDVNL (including the WHS which lies within it) | 38927.7        | 43.4   | 41.1 | 12.4     | 3.1 |
| Denbighshire AOB                                | 6687.2         | 0.0  | 67.5 | 28.9     | 3.7 |
| Wrexham SLA                                     | 3016.1         | 0.1  | 91.9 | 8.0      | 0.0 |
| PGNP  | 92663.0        | 20.4   | 52.5 | 25.5     | 1.5 |
| PGNP outside of CRDVNL                          | 45615.0        | 3.7  | 60.8 | 35.1     | 0.5 |

The respondent makes the following points:

- 43.4% of the CRDVNL has been identified as having an 'Outstanding' LANDMAP Visual and Sensory evaluation.
- The AOB and the Wrexham SLA have a negligible amount of 'Outstanding' evaluation.
- The remainder of the PGNP (largely the southern area not including the CRDVNL) has only 3.7% identified as 'Outstanding' with the entire PGNP Candidate Area having 20.4% identified as 'Outstanding'.
- Therefore, if designated, the PGNP represents an area which has 23% less 'Outstanding' value (and of National importance) than that of the CRDVNL alone.

The Craggatak Special Qualities Report 2024 falls well short of following the NatureScot guidance. There has been no fieldwork undertaken to support this study, an important omission

given the guidance advocates multiple rounds of fieldwork at various stages to inform the development and refinement of the special qualities.

the report is reliant on limited levels of desk-based review which in itself lacks any detailed analysis of the varied landscapes in the PGNP search area.

The identification of special qualities for the PGNP will require much more detailed analysis and the undertaking of detailed fieldwork to fulfil the objectives set out in special qualities NatureScot guidance.

**NRW's Response:**

NRW has carried out the assessment of Natural Beauty and Opportunities for Outdoor Recreation in accordance the NRW Procedural Guidance GN010. These are the 2 statutory tests for identifying an area that meets criteria for designating a National Park. GN010 also sets out considerations that apply, following the planning inquiry for the South Downs National Park. The guidance also sets out the boundary setting considerations.

LANDMAP visual and sensory assessment contributed to the evaluation process, but so did other data:

**NRW's Area of Search report 2023**

LANDMAP thematic mapping of a scenic quality, tranquility, wildness; GIS mapping of habitats with strong contributions to 'natural' perceptions of landscape e.g. heathlands, broadleaved woodlands, water bodies; topography – to understand landscape physiography, which is a consideration in how landform might shape and extents of National Park and its boundary.

**Gillespie's Evaluation report 2024**

Evaluation of Natural Beauty considered 6 factors (NRW Procedural Guidance GN010): Landscape condition; scenic quality, relative Tranquility, relative Wildness, Natural Heritage, Cultural Heritage. LANDMAP provides some baseline information, but the pattern, variation and strength of Natural Beauty, and presence of detracting features can only be judged in the field. The Natural Heritage evaluation included GIS mapping of protected sites of national significance. The cultural heritage element was researched by Fiona Fyfe Associates and provided place specific detail on features of national and regional significance.

NRW's Benefits of Nature Report 2025 reinforced our understanding of the Natural Heritage value of the Berwyn and plateau above the Ceiriog Valley.

NRW's Final Assessment of Land for Designation September 2025 explains the boundary changes and reason for land included within the proposed National Park.

Table 1 LANDMAP calculations provided by the respondent, explains that designated National Parks in Wales include landscape across the LANDMAP values. In analysing Eryri National Park, we have detected there are notable pockets of outstanding landscape supported by high and moderate areas that are linked physiographically, visually, and contain elements of Natural Beauty such as tranquility, wilderness and natural heritage.

The evaluation of Natural Beauty is much wider than Scenic Quality and Distinctiveness, and landscape of national significance is also demonstrated by natural and cultural heritage designations.

The Hobhouse Report 1947 mapping in Powys provided some interesting historical context to landscape designations in Wales, but it is through Gillespie's evaluation of the statutory criteria, applying current guidance (NRW's Procedural Guidance GN010 follows that of Natural England), that the current area has been assessed to contain sufficient Natural Beauty to be proposed for = National Park designation.

The Craggatak Special Qualities Report 2024 was developed through a systematic process of baseline evidence gathering and workshops with a range of local stakeholders held in two locations i) the existing National Landscape and ii) the area outside the National Landscape. The following reports were produced:

- Final report
- Annex 1 Cultural Associations
- Annex 2 Report of Workshops
- Annex 3 Reported Characteristics and Features

A rich record of natural and cultural features and associations was captured, some of which were site or area specific and others about a region. Given this broad range of information the special qualities were written as overarching themes.

NRW considers the process and resultant reporting to be a valuable contribution to the project library of evidence, and provided a sufficient definition of the area's Special Qualities, both as themes and the components to inform the following project steps.

In conclusion NRW is satisfied that the evidence it has collated, demonstrates the landscapes included within the proposed Glyndŵr National Park meet the statutory requirement for designation.

## **NLA**

### **Boundary coherence and fragmentation**

- NRW's own analysis notes that habitats and natural beauty in the excluded Powys lowlands are "more fragmented and scattered", leading to the decision to pull the boundary back towards Y Berwyn but include an outlying coastal component (Gronant–Talacre) that is geographically separated from the upland core is questioned;
- Certain communities are excluded because the "overall coherence" of natural beauty is not judged strong enough, while a geographically distinct outlier is added for ecological reasons. Is the resulting configuration truly the single, coherent "extensive tract of country"?
- The evidence on boundary coherence, especially around Powys and Gronant–Talacre, is re-examined and re-consulted on alongside alternative designation models

### **Explaining Boundary options considered**

- A transparent, detailed explanation of how alternative boundary options were considered, including those that might better support Welsh-speaking rural communities through an enhanced National Landscape rather than a National Park has not been presented;
- Options that might better support Welsh-speaking rural communities via a strengthened National Landscape rather than a National Park should be considered;

### **NRW's Response:**

The boundary was drawn following boundary setting considerations set out in NRW's Procedural Guidance GN010. The process is guided by areas identified as containing extensive and intact areas of Natural Beauty. The areas removed from the Candidate Area 2024 are the result of the final review of Natural Beauty, and drawing these areas together within a coherent area based upon physiographical extents and physical features on the ground. The boundary setting considerations require settlements that lie on the boundary to be excluded from the designation.

Whilst supporting Welsh-speaking rural communities is of high importance, it is not a factor that guides the location of the proposed National Park boundary.

Alternative boundary options were tested by the project team, based upon Natural Beauty, Landscape analyse and consistency in applying the boundary setting considerations.

| 2. Requests for changes to the boundary to include additional areas   |
|---|
| ANON-XRE3-VJWZ-K  |
| There is no cohesion between the valley water designation and the <b>area north of the A55 running up to Talacre</b> . Remove it from the proposal. It is also very narrow and pointless.   |
| <p><b>NRW's Response:</b></p> <p>Much of this area currently lies within the existing Clwydian Range and Dee Valley National Landscape. Gillespies evaluation report 2024 of Natural Beauty and opportunities for outdoor recreation (the statutory criteria for National Park designations) confirms this area meets the criteria for designation. NRW's Benefits of Nature Report 2025 provided additional evidence of the wildlife importance of Gronant and Talacre dunes.</p> <p>On review of Gillespies evaluation report, NRW concluded that the reasons given for excluding Gronant and Talacre dunes did not outweigh the public's experience of natural beauty.</p> <p>National Parks do not need to be one type of landscape. There are many examples within Eryri, and Pembroke Coast National Park of uplands and coastal areas.</p> <p><b>NRW proposes to make no changes to the National Park boundary in this location.</b></p> |

|  |
|--|
| ANON-XRE3-VJST-9   |
| <p>On the boundary where you have scrapped a semi circle down to include <b>Talacre</b>, you have missed out <b>significant field which become wetlands in winter</b> and we personally look out on a winter population of up to 300 Curlew. With how threatened that species are, I'm astounded that those fields aren't included. We have ancient woodlands that also just miss out, yet they are full of rare warblers in the spring and summer and a haven for native species in the winter, including a hibernating bat colony. That is just the fields and woods between Talacre and Tan Lan.</p> <p>Also missing out by the bizarre scrape is the <b>Big Pool Wood NWWT nature reserve</b> which is another fabulous community asset.</p> <p>It seems to me that by setting these boundaries it will give carte blanche for illegal development to carry on destroying wildlife habitats outside of the boundary; wildlife doesn't know where specific boundaries are and it is important to set up wildlife corridors. By the nature of the map you are squeezing wildlife protected areas into a narrow corridor which isn't ideal unless you protect wildlife across all of North Wales.</p> |
| <p><b>NRW's Response:</b></p> <p>The boundary has been drawn to capture areas with strongest evidence of Natural Beauty (please see NRW Operational Guidance Note 001 for details on the designation criteria that was used for identifying land for inclusion). The boundary has been drawn to avoid locations where caravan parks and the Point of Ayr gas terminal strongly influence the public's experience of Natural Beauty i.e. with impact on scenic quality, landscape condition, tranquillity and wildness attributes. In doing so we acknowledge there are some fields inland of the dunes, designated as SSSI, that aren't included within the National Park boundary.</p> <p>Welsh Government's commitment to Nature Recovery (Biodiversity Deep Dive and 30x30 target) requires National Parks to prioritise nature recovery action. The nature value of this location and importance of developing resilient ecological networks is well understood both by NRW environment specialists and the Clwydian Range and Dee Valley National Landscape. Going forward, should a National Park be designated, the importance of the sites mentioned would</p>                                 |

factor in the new NP's Nature Recovery Action Plan and its ways of working collaborative - on important habitats outside and adjacent to the boundary. In this respect, and as pointed out in the NRW's Benefits of Nature Report, working beyond the boundary of the National Park is something it can do in support of nature recovery.

In conclusion, NRW is satisfied that the location of the boundary meets the statutory criteria for designating National Parks. The concerns raised regarding nature conservation are already addressed to some degree by SSSI designation, land use planning and statutory wildlife and environmental protection duties. The National Park if designated would also consider the opportunities to support resilient ecological networks beyond its boundary, in developing its Nature Recovery Action Plan.

**NRW proposes to make no changes to the National Park boundary in this location.**

ANON-XRE3-VJEP-Q

More of the **Prestatyn coast** area should be in. If it wasn't for public pressure the Gronant dunes would have been left out

**NRW's Response:**

NRW reviewed the case for including larger sections of the north Wales coastline at the Area of Search project stage (please see the Area of Search report 2023). We concluded that Gronant and Talacre dunes are the only remaining natural section of the north east Wales coastline. Edges of the Dee estuary to the east are similarly free of concrete sea defences, but the presence of Mostyn Docks limited a national park extending eastward. Extending westwards was limited by the developed nature of the coastal edge in the vicinity of the Nova leisure centre.

**NRW proposes to make no changes to the National Park boundary in this location.**

ANON-XRE3-VJSZ-F

Perhaps encompass the **whole of Prestatyn coastal area and town**. As there are historic sites within the boundaries. Eg Rhuddlan Castle, the Roman baths in Prestatyn. Independent shopping area. Plus it's the start of the Offa's Dyke walk.

**NRW's Response:**

The National Park is a landscape designation. Only settlements that lie within a wider tract of landscape that meets the designation criteria are included (e.g. Llangollen). Settlements on the edge of the designation are normally excluded. Please see NRW operational Guidance Note 001 for boundary setting considerations.

**NRW proposes to make no changes to the National Park boundary in this location.**

ANON-XRE3-V55F-8; 713

The **boundary should be extended to incorporate the coastal waters of Liverpool Bay**. This is appropriate from a landscape, ecological and recreational point of view, and would bring the 1940s legislation up to date. It would also be a valuable example of Wales taking a lead.

**NRW's Response:**

The national park programme has been developed within the UK framework for terrestrial and marine statutory designations. The boundary of the proposed National Park can only extend as far as the mean low tide level along coastal edges.

**NRW proposes to make no changes to the National Park boundary in this location.**

ANON-XRE3-VJ2W-B

Include **Dyserth Waterfall** and the whole of the **village** to bring visitors and hikers to the village with benefits to local pubs, farmshop and ice cream shop.

**NRW's Response:**

Dyserth Waterfall and the village of lower Dyserth is a special place with strong historic character. NRW did investigate how this area could be connected to the National Park, but linkages were problematic given the pattern of settlement and quarrying which removed a large section of Mynydd Hiraddug. The features and scale of the landscape are also more local than national in significance.

**NRW proposes to make no changes to the National Park boundary in this location.**

1569

Adjust the boundary around EA02 (**Prestatyn-Dyserth** Scarp and Trelawnyd Plateau) so that all of the **Maes Hiraddug SSSI** is within the boundary rather than severed in two.

The proposed National Park Boundary follows the line of the AONB (National Landscape) boundary, which in this instance follows a series of straight lines over Y Foel, creating a buffer between the excavated extents of Dyserth quarry to the north and the AONB designation. Maes Hiraddug SSSI boundary follows the upper quarry edge. Approximately 75% of the SSSI has been captured within the National Park boundary.

**NRW's Response:**

The proposed National Park includes much of the SSSI and if designated a National Park Authority can work beyond its boundaries to support consistent approach to its management. We propose to make no changes to the National Park boundary in this location.

ANON-XRE3-VJ28-C; ANON-XRE3-VJBR-P

We are very disappointed village of **Trelawnyd** isn't included. We'll have all the disadvantages of extra parking etc with none of the advantages of being in the park. The boundary would split the community council area. Trelawnyd doesn't lose out and can promote dark sky policy etc as one area, something Flintshire seems to resist.

The current National Landscape eastern boundary signage is already to the east of Trelawnyd.

**NRW's Response:**

The boundary setting conventions for designated landscapes (NRW Procedural Guidance GN010), excludes settlements that lie on the boundary. Settlements that lie within a wider tract of landscape meeting the designation criteria can be included.

South Downs National Park Inspectors Report Vol 1 2008 - The splitting of parishes is not, in itself, a reason to include land which does not otherwise satisfy the criteria (South Downs National Park Inspectors Report Vol 1 2008 para 81). NRW infers from this that local units of electoral division (Wards) would be treated the same way as local units of government (Parishes).

Trelawnyd is not included within the existing Clwydian Range and Dee Valley (CRDV) National Landscape. The proposed National Park boundary follows the line of the CRDV boundary here along the western edge of the village.

Trelawnyd would still be able to promote itself as a gateway to the new national park. A national park if designated would have a duty to manage access by visitors and local communities and seek ways to address local impacts. This would extend to Trelawnyd given its proximity to the designation.

**NRW proposes to make no changes to the National Park boundary in this location.**

ANON-XRE3-VJSG-V; ANON-XRE3-VJMA-G; ANON-XRE3-VJD3-S; ANON-XRE3-VJDM-K; ANON-P47N-6GWW-M; 717; 822; 924; 965 ; 1574; 1061; 1083; 212; 1494

I would like to see parts of **Halkyn Mountain** included in the park. The unimproved grassland is a rare habitat. The common land grazing is a great historic legacy but needs controlling to preserve the grassland. The quarrying and interests of the Grosvenor estate are probably difficulties here. But I wonder if part of the mountain could be included.

Should include Halkyn mountain. Range of rare plants, and fungi, birds. Rich in wildlife, some specialised to be attracted by old lead works Scenic value too.

The Friends of the Clwydian Range and Dee Valley wish to express wholehearted support for the creation of a Glyndwr National Park, based on the area of the existing CR and DV National Landscape but with significant and very welcome additions to both the north and south. We support the re-inclusion of Caergwre, **Halkyn Mountain** and Mynydd Mynyllod. We would like to see these areas given further consideration.

**NRW's Response:**

The boundary of a National Park needs to draw together and include areas that strongly meet the assessment of Natural Beauty, provide opportunities for outdoor recreation and are largely intact and free from intrusive inharmonious development. In the case of Halkyn Mountain, NRW recognises the landscape, habitats, industrial heritage and recreational value of this area. There are however a number of detracting elements within this landscape - electricity and telecoms infrastructure along the skyline; quarrying and associated buildings; 20<sup>th</sup> century settlement edges facing open common land, which impact on the integrity of this landscape.

In addition, landscape further to the west doesn't have sufficient natural beauty. This compromises the coherence and linkage to the National Landscape

**NRW proposes to make no changes to the National Park boundary in this location.**

1595; 1617; 1621

Include the **Ysceifiog valley, lake** and land up towards **Caerwys and Pen y Cefn**

Concern about EA5 Assessment: The inclusion of a 1km buffer diluted the evaluation, leading to medium/low scores. The central part of EA5 (Caerwys Lowlands) is considered highly scenic and should be revisited.

We suggest the Inclusion of **Caerwys and Bryn Gwyn Estate Parkland** near Pen y Cefn for their landscape quality to strengthen the narrow northern strip of the proposed National Park.

Over £400k was recently invested in hedgerow improvements, water quality initiatives, and riparian zones in EA03 and western EA05. The two quarries (Maes Mynan and Fron Haul) are closed, and a third dormant for 20+ years. These should not prevent designation; they offer opportunities for nature and recreation and Maes Mynan is transitioning to a North Wales Amphibian and Reptile Conservation nature reserve.

**NRW's Response:**

The **Ysceifiog Valley** has elements of Natural Beauty - Ddol Uchaf SSSI nature reserve, Llyn Ysceifiog, semi natural ancient woodland within a narrow steep sided valley. Sense of place and experience of scenic quality is limited given the woodland enclosure along the valley. Opportunities for outdoor recreation are present with public rights of way along one side of the Llyn and one valley side. A 5 mile promoted circular walk starts in Caerwys and takes in a section of the valley along its route, suggesting the valley is more a point of interest along walks than a place offering opportunities to explore.



In summary, the valley contains elements of natural beauty and some public access. However NRW consider this landscape does not have sufficiently high evidence of Natural Beauty to be included within the proposed national park.

The land towards **Caerwys and Pen y Cefn** covers an extensive area of undulating farmland plateau, woodland and parkland, with attractive traditional farmland characteristics and pockets of distinctive landscape. It doesn't however have strong evidence of Natural Beauty at the landscape scale.

The inclusion of **Caerwys and Bryn Gwyn Parkland**:

The village of Caerwys is particularly attractive with heritage character and scenic views to the northern Clywdian Hills. The boundary setting conventions for designated landscapes (NRW Procedural Guidance GN010), excludes settlements that lie on the boundary. Settlements that lie within a wider tract of landscape meeting the designation criteria can be included.

Bryn Gwyn Hall is a notable building within views from its front lawn. The wider estate however reads less as a parkland and more as farmland with woodland blocks with a high proportion of coniferous trees. The site is recorded on CADW's register of historic parks and gardens which affords the site some protection. Scenic quality and distinctiveness (elements of Natural Beauty) are however limited.

For the above reasons, Gillespie's evaluation report 2024 concluded the existing AONB/National Landscape boundary remained the appropriate location for the proposed National Park boundary.

**NRW proposes to make no changes to the National Park boundary in this location.**

ANON-XRE3-VJSF-U

To ensure the seamless quality and continuity of the designated area's landscape, I think this park should **go no further north than the B5430 near Graianrhyd**.

**NRW's Response:**

This submission appears to suggest the exclusion the Clwydian Range, Gronant and Talacre Dunes, limestone landscapes of Bryn Alyn and Loggerheads from the proposed area. Much of this area lies within the existing Clwydian Range and Dee Valley National Landscape. Gillespie's evaluation report 2024 confirmed this landscape still meets the test of outstanding natural beauty, so remains of high enough quality for inclusion within the proposed National Park designation.

**NRW proposes to make no changes to the National Park boundary in this location.**

**Reinstate a small part of area EA05** along the A541 between Melyn y Wern and Ddol - to include **potential remains of Offa's Dyke**, the Nature Reserve at Ddol, a section of the Pilgrim's path to Holywell and ancient wells along the river Wheeler.

Sarn Farm and Swan Wood - just to the north of the A541 close to the Ddol Nature Reserve contain embankments associated with the original Offa's Dyke, recently been surveyed by Professor Keith Ray (Cardiff University). They are largely still intact and of significant archaeological interest.

'Offa's Dyke – Encounters & Explanations' – Follow ODA friend Professor Keith Ray's journey along Offa's Dyke – Offa's Dyke Association [link]

Offa's Dyke Path at 50 - News - Cardiff University [link]

Walking the Line: Offa's Dyke from Shore to Shore in 2023 [link]

Professor Keith Ray - People - Cardiff University [link]

**NRW's Response:**

Our review of sites and monuments records (CADW - scheduled monuments; The Archaeology and Historic information databases of Heneb – Archwilio; and Royal Commission of Ancient and Historical Monuments - Cofelin) shows the archaeological finds have yet to be formally recorded. Records for Watt's Dyke and Whitford Dyke have been recorded on Archwilio.

As a small extant feature in a location where the rest of the dyke has been substantially removed and lost, the archaeological find adds to the historic and cultural story of this borderland location, but has very little evidence in the landscape. Linking the heritage features and Ddol Nature Reserve between Melyn y Wern and Ddol within a coherent area is made problematic by several quarries that are in various stages of restoration and natural regeneration.

In this particular case **NRW proposes to make no changes to the National Park boundary.**

**876; 960; The CR&DV National Landscape**

The proposal advocates incorporating **Caergwrle Castle, Park in the Past, Nant Y Fridd valley and the River Alyn valley** footpath within the Glyndŵr National Park boundary to strengthen cultural, historic, ecological, and community value and extend benefits to an underserved region.

**Evidence:****Caergwrle Castle**

- Built in 1277 by Edward I and Dafydd ap Gruffudd; a symbol of Welsh–English history and a Scheduled Ancient Monument of archaeological significance.

**Park in the Past**

- 120-acre restored site with lake, woodlands, meadows, and wetlands.
- Biodiversity hotspot; now home to a bonding pair of Eurasian Beavers (*Castor fiber*), a keystone species that adds substantial conservation value.
- Recreation hub offering wild swimming, kayaking, fishing, and walking.
- Heritage interpretation through Roman and medieval living history.
- Community-led management and part of the National Forest for Wales.

**Connecting Features**

- Nant Valley and River Alyn Footpath: a scenic cultural corridor linking nature and heritage, featuring the historic Packhorse Bridge (Grade II listed, Scheduled Monument).

**Outdoor Recreation**

- Pen Llan y Gŵr (near Bwlch Gwyn) – promoted woodland walk along part of the Nant Y Fridd Valley with opportunities for expansive views south and westwards into the National Landscape.
- Waun y Llyn Country Park (Hope Mountain) with expansive views back across to the National Landscape to the West and out to England towards Frodsham Edge.

**Landscape Connectivity and Visitor Experience**

- The River Alyn footpath ties these sites into a coherent corridor blending heritage, recreation, and ecology.
- Linking Caergwrle Castle to Park in the Past via natural routes strengthens the Park's green infrastructure and creates a unified visitor experience.
- The riverbank walk offers tranquillity and scenic beauty, often praised by visitors.

**Biodiversity and Ecosystem Value**

- The River Alyn supports diverse habitats, including riparian woodland, wetlands, and species-rich grassland.
- Park in the Past adds large-scale habitat creation and water-based ecology, complementing existing nature reserves.
- The presence of Eurasian Beavers is a game-changing discovery, aligning with Welsh Government biodiversity priorities and legal protections.
- Potential for a North Wales Beaver Project, complementing initiatives at Cors Dyfi Nature Reserve and Green Gates Nature Reserve, enhancing ecological connectivity and climate resilience.

#### Contribution to National Park Aims

- Conservation: Protects natural beauty, wildlife, and cultural heritage.
- Understanding & Enjoyment: Promotes access via trails and heritage interpretation.
- Sustainable Communities: Supports volunteering, education, and wellbeing.

#### Community and Wellbeing

- These sites are well-used by local people, serving as accessible gateways into the National Park.
- Park in the Past provided vital mental health support during the Covid-19 pandemic and continues to offer opportunities for outdoor exercise and social connection.

#### Educational Opportunities

- Park in the Past delivers hands-on heritage education, re-creating aspects of Roman and prehistoric life.
- Caergwrle Castle provides a focus for medieval history and archaeology.
- The River Alyn and Packhorse Bridge offer environmental education, creating a diverse outdoor classroom experience.

#### Tourism and Economic Benefits

- Inclusion would make the National Park attractive not only for its scenery but also for heritage tourism, drawing visitors interested in castles, ancient bridges, and immersive history experiences.
- This could bring significant benefits to nearby communities through sustainable tourism and local business growth.

#### Strategic Importance

- Provides regional balance for north-east Wales.
- Creates a heritage–landscape cluster combining history and nature.

Enhances Wales's global reputation through unique cultural and ecological assets.

#### **NRW's Response:**

The submission draws attention to several features of heritage, natural environment and recreational value within the vicinity of Caergwrle that could 'strengthen the National Park's unique blend of history, landscape, nature, and community engagement'. These include Caergwrle Castle, Pack horse bridge, Park in the Past and the Nant Valley.

NRW concurs that it confirms that there are historical and natural features of heritage value, and the submission presents an argument for how these small sites, features and linear corridors could be linked physically and culturally in the telling the story of this borderland location. The investment that a National Park designation could bring to Caergwrle is evident.

**NRW's Response:**

Gillespie's report 2024 evaluated Hope Mountain Evaluation Area 14, which included Nant y Fridd Valley, Hope Mountain, Caergwrle Castle and Park in the Past. The assessment concluded that much of the area didn't meet the natural beauty criteria, (incongruous elements affecting scenic quality are present, relative wildness and natural interest / protected sites are limited) and that opportunities for outdoor recreation were limited.

Waen y Llyn country park provides opportunities for Outdoor Recreation and a very strong experience of natural beauty and highly scenic distant views. Access via steep narrow country lanes however curtails the sites potential to fulfil recreational opportunities beyond local communities.

Consultation comments 2024 invited NRW to review the area again and we undertook site visits to Caergwrle Castle and Park in the Past during the summer 2025.

We found Caergwrle Castle to be of notable heritage value, with attractive woodland setting. Park in the Past a success story in how a partly restored/ naturalised former sand and gravel quarry has been repurposed for people and heritage through vision and determination.

We had already noted the wooded corridors of the Nant y Fridd and Cegidog Valleys and pockets of ancient semi natural woodland as valuable wildlife corridors and contributors to landscape character. Scenic quality, distinctiveness and sense of place are however limited when within the wooded valley floor. Pen Llan y Gŵr and its steep valley sides at the western end of the Nant y Ffirth provides opportunities for expansive views as does Wyn y Llyn country park. Access and opportunities for outdoor recreation are otherwise limited with several sections of the valley between Caergwrle and the current National Landscape with no public rights of way.

In conclusion the sites of Caergwrle Castle and Park in the Past both have elements of natural beauty and opportunities for outdoor recreation. They are small sites at some distance from the National Landscape – the location of the proposed national park. The Nant Y Ffridd valley is the essential link between the proposed national park and the Caergwrle sites. It however does not sufficiently meet the natural beauty and opportunities for outdoor recreation criteria.

Whilst the inclusion of these sites and woodland corridors within a national park would help support the opportunities highlighted within the submission, the statutory criteria for including land within the proposed National Park is based on the evaluation of Natural Beauty and opportunities for Outdoor Recreation.

For these reasons **NRW proposes to make no changes to the National Park boundary.**

ANON-XRE3-VJXK-5;1389

**The Vale of Clwyd**

The boundary should be extended southwards to include Ruthin, Rhewl, Hendrerwydd, Gellifor and Llandyrnog (and possibly Llanrhaedr and Denbigh). The section of the Vale of Clwyd that is currently shown to be included will encourage an increase in visitors to the area, the Clwydian Range in particular, who might be unlikely to contribute proportionately to local businesses and employment in the Vale whilst increasing public access maintenance costs for footpath erosion etc

**NRW's Response:**

Parts of the Vale of Clwyd were considered at the initial Area of Search stage of the project (please see NRW's Area of Search Report 2023). The Gillespie's evaluation of Natural Beauty and opportunities for outdoor recreation (Gillespie report 2024) concluded this area only partly

met the designation criteria, so it was removed from further consideration, with the National Park boundary drawn to follow the current National Landscape boundary.

NRW reviewed the option of including Ruthin, the castle, parkland and woodland, and extending this southwards to Pwll Glas. Boundary setting conventions<sup>2</sup> for designated landscapes however require settlements that lie on the boundary to be excluded and the landscape here did not fully meet the designation criteria.

The Vale of Clywd and Clwydian Hills have a strong visual relationship and sense of place. Irrespective of where the National Park boundary is drawn – settlements, local business and visitor facilities within the Vale, would be able to use the National Park within their marketing.

**NRW proposes to make no changes to the National Park boundary.**

834

I would like to see **Clocaenog Forest** included

**NRW's Response:**

Clocaenog Forest was considered as part of NRW's evaluation of north Wales, in establishing the Area of Search for the National Park project in 2023 (see NRW Area of Search report 2023). Whilst the forest and Llyn Brenig meet the Opportunities for Outdoor Recreation statutory designation criteria, they don't collectively meet the Natural Beauty criteria due to wind farm development.

**NRW proposes to make no changes to the National Park boundary.**

ANON-XRE3-VJ14-7: ANON-XRE3-VJ1F-S; 614; 615; 868; 1076; 1365

**Clywedog Valley (Coedpoeth)**

The Clwydian Range and Dee Valley National Landscape and Clywedog Valley Partnership support extending the Glyndŵr National Park boundary beyond Minera Lead Mines to include exceptional areas of natural and industrial heritage at Plas Power Woods, Nant Mill and Bersham Heritage centre.

Evidence:

Outstanding heritage value:

- Outstanding heritage value - national significant heritage telling the story of beginnings of Britain's industrial revolution with particular links to John Wilkinson.
- An impressive and well-preserved section of the Offa's Dyke adds to the rich heritage contained within the valley.

Natural Heritage:

- Ancient semi natural woodland, water and cascades – strongly tranquil

Significant opportunities for outdoor recreation:

- The Clywedog Trail following the river valley from Bersham Heritage Centre, through Plas Power Woods, (Woodland Trust site), Nant Mill Country Park to Mineral Lead Mines Country Park.

Opportunities:

- There is an active community partnership seeking to realise the potential that this area offers and the benefits that could be delivered from it.

<sup>2</sup> NRW Procedural Guidance GN010

- Its proximity to the communities of Wrexham and the potential that it offers for outdoor recreation.
- Inclusion aligns with the aims of the Heritage Lottery Bid and National Park purposes, particularly in community engagement and education.

**NRW's Response:**

NRW considers the Plas Power Woods and Nant Mill sections of the Clywedog valley meet the Natural Beauty criteria and the opportunities for Outdoor Recreation criteria. However, landscape condition where the upper Clywedog valley meets Ruabon Mountain is greatly affected, limiting the ability to draw a coherent area of landscape of national value together within the proposed National Park.

The reasons for this area's exclusion from the National Park boundary is the result of the following contextual issues:

At the head of the Clywedog Valley where it connects with Ruabon Mountain and Minera Lead Mines (within the proposed National Park), National Grid pylons, overhead wires and the settlement edge of Coedpoeth dominate the landscape (detracting elements affecting landscape condition - integrity, relative tranquility, wildness and scenic quality).

The principle of 'wash over' (the inclusion of land that is of lesser quality where it lies within a wider tract that does) is difficult to apply here given the scale of detracting elements. The narrow linear nature of Plas Power Woods and Nant Mill is also a scale of landscape that is more local than national, albeit with nationally important heritage.

**NRW proposes to make no changes to the National Park boundary.**

**ANON-XRE3-VJP9-B**

Include **Chirk** within the boundary though considering it is the supporting community to Chirk Castle that is within the proposed park, as well as the Telford Aqueduct Viaduct and the traditional entrance to North Wales along the original route of the A5.

**NRW's Response:**

The boundary setting conventions for designated landscapes, excludes settlements that lie on the boundary. Settlements that lie within a wider tract of landscape meeting the designation criteria can be included.

**NRW proposes to make no changes to the National Park boundary.**

**ANON-XRE3-VJ3E-T**

The boundary near **Chirk** does not include **the whole of the World Heritage Site**, leaving out the area of the canal in Chirk.

**NRW's Response:**

The boundary has been guided by the location of the Welsh English border that cuts across the floodplain. The sections of the Chirk Aqueduct and canal basin that lie within Wales have been included.

**NRW proposes to make no changes to the National Park boundary.**

**Mynydd Mynyllod, the Upper Dee Valley, Llandrillo and Rug Estate**

A number of submissions comment on one or more of these areas. Given their interrelationship we have captured and summarised the key points within a single response.

**Responses Received**

ANON-XRE3-VJ2D-R; ANON-XRE3-VJNK-U; ANON-XRE3-VJHM-Q; ANON-XRE3-VJSU-A; ANON-XRE3-VJCU-T; ANON-XRE3-VJ9X-K; ANON-XRE3-VJ5K-2; ANON-XRE3-VJ2D-R;

ANON-XRE3-VJT2-8; ANON-P47N-6GWV-K; ANON-XRE3-VJC1-P; ANON-XRE3-VJBD-8; ANON-XRE3-VJRT-8; ANON-XRE3-VJHF-G; ANON-XRE3-VJSU-A; ANON-XRE3-VJSH-W; ANON-XRE3-VJT4-A14; 666; 669; 973; 1565; 1606;1635; 1005; 1014; 1016; 1017; 1018 ;1021;1024; 1025; 1245; 1246; 1028; 1035; 1280;1238; 1070; 1129; 1199; 1345; 1373; 1401; 1427; 1441; 1475 ; 1496 ; 1053; 1558; 1296; 1303; 1319; 1399; 1401; 1444; 1475; 1453; 1448; 1457; 1464; 1472 ; 1473 ;1474 ;1475 ;1510 ;1532 ;1545 ;1564 ;1571 ;1576 ;1577: 1581; 1582; 1588 ;1606 ;1616: 1635 ;1638 ;1639 ;1640

The respondents support the creation of the Glyndŵr National Park but raise a strong objection to the exclusion of **Evaluation Area 20 (EA20) Mynydd Mynyllod, Llandrillo, and the Upper Dee Valley** from the proposed boundary. Excluding EA20 undermines the coherence of the proposed National Park and leaves an area of high scenic, ecological, and cultural value vulnerable to industrial development.

#### **Evidence submitted:**

- Recreational Value: EA20 offers extensive bridleways and footpaths, scenic views, and tranquil spaces for walking, horse riding, and water-based activities such as wild swimming and paddle boarding.
- The old railway line between Dolgellau and Rhyl is an opportunity to develop a multi-use safe travel route for all types of users, from one village and town to another. With potential to increase income for businesses such as the Bryntirion in Llandderfel and the Blue Lion in Cynwyd.
- As a keen horseman, I deeply value the access to Mynydd Mynyllod. The miles of bridleways provide vital links to the Llandrillo and Cynwyd valleys. I am also an avid walker and frequently hike along the footpaths and open access land in this area. It offers peace, tranquility, and easy access to spectacular scenery, ranging from Y Berwyn in the south to the mountain ranges in the north.
- While the landscape of Y Berwyn is magnificent, Mynydd Mynyllod has always been our destination of choice during challenging weather. It provides epic, far-reaching views and feels remote and wild, yet is safe and accessible when the high peaks are not.
- One of the main reasons for including the Mynyllod area is that it is one of the most impressive locations in the area with spectacular views of the Snowdonia mountains, the Berwyn mountains, and the entire Clwydian Range.
- The Berwyn and the Dee Valley from Corwen to Llandderfel form an intact historic and scenic treasure. This upper part of the Dee Valley is, to me, the ideal landscape, broader than the craggy and tight lower stretch to Llangollen, with longer views over gentler pastures across the beautiful Dee towards the Berwyn and the rolling shapes of Mynydd Mynyllod.
- Ecological Importance: The area provides a vital habitat mosaic supporting species like Curlew, Lapwing, Goshawk, and Peregrine Falcon, and acts as a wildlife corridor between major Special Protection Areas.
- Llyn Mynyllod is one of the best lakes in north Wales for native brown trout.
- Mynydd Mynyllod has a patchwork of interesting and valuable semi-natural habitats such as water springs, dry heath, fen and lake. Here there are 5-8 pairs of curlews trying to nest annually (within Important Curlew Area 5), and important numbers of lapwings nesting and feeding. Goshawks also nest and feed here, along with other red/orange list birds such as the kestrel, white harrier, wood harrier, gorse creak, finch, willow warbler, little spinster, lark, hedge gray and hornbill. Peregrine falcons are found here nesting and hunting regularly. It is true to say that Mynydd Mynyllod is a 'leaping' habitat for other birds such as the tinwen,

little kestrel, the peregrine falcon and the red kite which are features of the Special Protection Areas of Y Berwyn and Migneint-Arenig-Dduallt on either side of it. In some years the short-eared owl hunts here during the winter.

- As a keen birdwatcher, I can attest that Mynydd Mynyllod and the surrounding valley provide a vital mosaic of habitats that support a rich diversity of birdlife. The transition from the riverine ecosystem of the Dee—home to Dippers and Kingfishers—up to the open moorland creates a unique corridor for wildlife. The area is a hunting ground for raptors, including Red Kites and Buzzards, and serves as an essential buffer zone for the fragile populations of ground-nesting birds found on the adjacent Berwyn range. Granting National Park status here would ensure the preservation of these distinct habitats.
- Connectivity: The area acts as a vital ecological “stepping stone” between major Special Protection Areas, supporting biodiversity and resilience.
- Commercial Landscape and Visual Impact Assessments (LVIAs) confirm that EA20 is of high scenic and cultural value. LANDMAP evaluations rate Mynydd Mynyllod as “High” for visual and sensory qualities and the Upper Dee Valley as “exceptional natural beauty.” The area also functions as a visual screen, reducing the impact of existing wind farms. These findings contradict NRW’s claim that the landscape lacks sufficient quality.
- NRW’s Final Assessment acknowledges EA20’s strong sense of place and high scenic quality but excludes it due to temporary visual detractors (wind turbines). Respondents argue this is inconsistent with NRW’s duty to enhance landscapes and illogical given that Llandderfel is included while its scenic backdrop, Mynydd Mynyllod, is excluded.
- Cultural & Heritage Significance: Historic features, traditional landscapes, and strong Welsh cultural identity make EA20 an integral part of the region’s heritage.
- This area has deep history: this is the valley of Edeirnion, one of the last Welsh areas where a native-style baron and locally focused manorial court, with its own records, continued to function into the 17th century. Plas Uchaf was the baronial hall in the 15th century until it moved to Gwerclas; both are intact at the northern end of EA20, along with many other associated buildings and farms.
- Strategic Role: Llandrillo is highlighted as a natural gateway to the Berwyn uplands, with existing infrastructure to support visitor management and economic regeneration.
- Continuity & Coherence: Excluding EA20 creates an illogical break in the Dee Valley catchment and undermines the integrity of the proposed National Park.
- The inclusion of EA20 will create a Park boundary that makes sense. It will protect the Berwyn and create a viable and usable landscape on the western side of the Park instead of simply ending on the slope down from the Berwyn. The lovely Dee Valley with its intact villages is a natural base for long walks up into the Berwyn and Mynydd.

**Concerns:**

- NRW’s rationale for exclusion is seen as flawed, unclear and inconsistent, especially given the area’s high scenic quality and biodiversity value. The decision rests on incorrect assumptions about landscape coherence and temporary visual detractors, such as wind turbines, while disregarding the area’s geomorphological integrity and ecological importance.
- The whole river Dee catchment area should be included, including the section between Pont Cilan and Corwen. The river is a vital habitat for features such as salmon, seine, bream, eels, eels, and freshwater mussels.



- The National Park Paradox. NRW opposes the Gaerwen Wind Farm proposal because of its significant adverse effects on the landscape, yet excludes the same area from the National Park boundary.
- Legal Precedent. Recent High Court rulings (e.g., RWE v Welsh Ministers, 2025) confirm that protecting the setting of a National Park can outweigh renewable energy benefits. Full designation of EA20 would provide stronger legal certainty than relying on “setting” status alone.
- Exclusion leaves EA20 vulnerable to industrial development (e.g., Gaerwen Wind Farm), which respondents argue contradicts the purpose of National Park designation.
- Respondents stress that designation would provide permanent protection and opportunities for nature recovery, cultural preservation, and sustainable tourism.

#### **Requested changes:**

1. The whole of Llandrillo is included within the boundary.
2. The area west of the B4401, originally considered, is reinstated.
3. Any infrastructure improvements are supported by the National Park, not local authorities.
4. Logical Boundary Adjustment: Use the A494 or Gwynedd/Denbighshire county boundary to incorporate Mynydd Mynyllod, ensuring a coherent and natural park boundary while addressing concerns about existing turbines.
5. Extend the boundary to reach the A494 and extend to the Gwynedd border near Bethel.
6. Coed y Castell/Coed y Galchog/Graig Lom lime pavement on the edge of Efenechtyd should be included.
7. Include Llandrillo village and river basin of the Dee between Llandrillo and Rhug including the historic parkland.
8. Include the upper Dee Valley at Cynwyd and Llandrillo, Mynydd Mynyllod, the A494 corridor and Glan-yr-afon, and part of the Arenig mountain range not within Eryri (Foel Goch at Llangwm).

#### **NRW Response:**

In drawing up the boundary of the National Park, Gillespies and NRW has evaluated the statutory criteria for designation (natural beauty and opportunities for outdoor recreation).

We note that considerable evidence has been submitted to support respondents view that Evaluation Area 20 Mynydd Mynyllod (which includes Mynydd Mynyllod and the Upper Dee Valley) contains sufficient Natural Beauty and opportunities for Outdoor Recreation for it to be included within the proposed National Park.

#### **Mynydd Mynyllod**

NRW concur that there is strong evidence of Natural Beauty and opportunities for Outdoor Recreation within the open uplands of Mynydd Mynyllod. The presence of the 3 Braich Ddu turbines and 3 smaller turbines near Syrion are however detracting features that negatively affect perceptions of wildness and tranquility. Their influence does not extend entirely across Mynydd Mynyllod and their remain areas where views are unaffected.

It has been suggested that these features are temporary and nearing the end of their operating life. It has been the experience of NRW’s Development Planning Advisory Service that the repowering of turbine sites commonly happens at the end of their operational life.

We have investigated options for drawing a national park boundary in such a way as to include the most intact and undisturbed areas of natural beauty, but we haven’t identified a way that is

consistent with boundary setting considerations (NRW Procedural Guidance GN010) or has logic on the ground.

For these reasons we have not been able to include this area within the proposed National Park.

### **The western valley hillslopes**

The western hillslopes of the Upper Dee Valley, between Cynwyd and Llandrillo, comprise a mix of enclosed farmland, semi-upland pasture (above Tyfos), remnants of ancient woodland, and forestry plantations. There are scattered farmsteads (some have grown beyond traditional small sites), a solar farm, and three small wind turbines on the skyline. While the area offers moderate to high scenic quality with some attractive elements and high tranquillity, it lacks a strong unifying character. Wildness is moderate, and natural heritage is moderate to high (no protected sites but includes part of an Important Curlew Area). Cultural heritage is limited (Tyfos Stone Circle), with notable features mainly in the uplands above. Based on this evaluation this area of landscape does not consistently demonstrate the high level of natural beauty required for inclusion within the proposed National Park. This area is therefore not included within the proposed National Park.

### **The Upper Dee valley near between Llandrillo and Cynwyd**

High Landscape Condition: Predominantly intact rural character with extensive mature tree cover that integrates scattered farmsteads. Localised visual impacts occur near a caravan park and storage areas. Western valley fields are larger and less structured, reflecting constraints of floodplain.

High Scenic Quality: A strong wooded valley impression created by frequent mature trees and copses, along the eastern side of the valley extending onto Berwyn hillslopes. River meanders and tree patterns south of Cynwyd are notably scenic, though western valley floor is more open and less visually structured.

High Tranquillity: sense of peace with limited roads and settlements, though some farmsteads and a caravan park remain partially visible.

Moderate Wildness: The area is a lowland farmed landscape close to settlements and roads.

High Natural Heritage: Significant ecological value with the River Dee SSSI, wet woods, riparian trees, and Important Curlew habitat. Floodplain dominates valley floor, influencing land use.

Recreation Opportunities: Limited by flooding, but existing roads and footpaths allow access. Potential enhancements include a cycle route along the western lane and an “access for all” trail on the dismantled railway between Llandrillo and Cynwyd, offering community wellbeing benefits.

Based on this evaluation we consider the statutory tests are met within much of the valley floor, although west of the river the openness of valley floor is less distinctive and there is some transition in strength of Natural Beauty.

Boundary setting considerations here:

- The location of the National Park boundary along its length has been guided by physiographic - topographical landscape units within which Natural Beauty of national significance has been evaluated;
- Procedural Guidance GN010 advises that in areas of transition the boundary should be drawn ‘conservatively’ i.e. towards areas with higher expression of Natural Beauty; and
- The boundary should be drawn following physical features on the ground – roads; field boundaries; water courses as a last option given they can move; and straight lines between permanent reference points can be followed within open country.

The inclusion of the Dee Valley and valley sides to the skyline is not possible between Llandrillo and Cynwyd. Natural Beauty of sufficient quality and extent has only been identified within the Berwyn mountains and eastern side of the Dee Valley floor. This differs to the section of the valley at Llandderfel, where Natural Beauty is present across the full extent of the valley viewshed.

The proposed National Park boundary has therefore been drawn here to include the Berwyn Mountains and to follow a physical boundary (the B4401) 'conservatively' towards areas with higher expression of Natural Beauty.

**NRW proposes to make no changes to the National Park boundary.**

Respondent reference number is already captured above

The boundary relating to the **River Dee and valley floor** does not appear to have been dealt with consistently across the proposed NP. In the existing Clwydian Range and Dee Valley National Landscape it is all included, even where there are detractors. However, in the area south of Corwen, a very different approach appears to have been taken and not really explained, except to the extent of being drawn to exclude detractors, and resulting in exclusion of the section around Cynwyd and Llandrillo. It would be useful to have a clarification as to how the river Dee and its valley floor have been evaluated to ensure consistency across the proposed NP.

**NRW's Response:**

The inclusion of landscapes within the proposed National Park is based upon it having (in the main) consistently high evidence of Natural Beauty.

The two examples cited are of the river Dee, but within different valley contexts that have differing evidence of Natural Beauty. The section of the river Dee within the Vale of Llangollen sits within the context of a complete valley setting that strongly meets the Natural Beauty criteria. The designation of the AONB/ National Landscape therefore extended to the viewshed of the valley.

The Upper Dee lies on the edge of the Berwyn mountains which has been established as meeting the Natural Beauty criteria. The evaluation of the valley floor and western valley sides is set out above. Whilst it would be logical to include where possible the complete valley viewshed, this can only be done where the evaluation of Natural Beauty supports this.

ANON-XRE3-VJCD-9: ANON-XRE3-VJSH-W

Leave the Clwydian Hills NL/AONB as it is and promote the **Berwyns into The Eryri/Snowdonia NP**.

Exclude the unattractive entirely coniferous **Dyfnant forest** and the unremarkable valley to the south west

**NRW's Response:**

A variation to the Eryri National Park boundary to take in the Berwyns is not under consideration here.

Dyfnant forest sits within the south western corner of the Berwyn uplands and is part that landscape. The forest is seen to sit well in the landscape along many of its edges. There are highly scenic parts, particularly to the east and along the River Vyrnwy corridor. The interplay between the intimate valley floor and rolling valley sides with a backdrop of uplands, provides a highly scenic and distinctive composition of contrasting landscapes with a strong sense of place.

Overall, recreational provision and the associated opportunities for the enjoyment of the landscape is assessed as high. With Forest Recreation Areas; promoted tracks and trails for

horse riding and carriage driving; Open Access Public Forest Land; and Open Access Open Country.

Given the relationship of Dyfnant Forest with the Berwyn uplands (it's character has a bearing on the Berwyn), evidence of highly scenic views and interplay between landform and forest edges, and the high recreational value, the area is included within the proposed National Park. This is not dissimilar to areas of forestry included within Eryri National Park.

**NRW proposes to make no changes to the National Park boundary.**

ANON-XRE3-VJWS-C; ANON-XRE3-VJSS-8; ANON-XRE3-VJV6-E; ANON-P47N-6GWJ-7; 12901; 386; 1573

#### **Tanat Valley**

- I would like the Tanat Valley included.
- Why has half of the Tanat Valley been removed?
- Why has the area around Llanrhaeadr-ym-Mochnant been removed from the proposed Park boundary? It would appear to be a gateway community into the areas of the Berwyn, especially Pystyll Rhaeadr, and the foothills leading over to Llanarmon.

The area of North Powys has been excluded from the proposed NP offers opportunities for easier walks - for families, people who are just starting to enjoy the countryside, and for those with limited mobility. Restricting the southern part of the NP to essentially upland areas will limit its appeal and the type of outdoor recreational opportunities it can offer.

This is not consistent with the approach taken in the northern part of the proposed NP, in the existing National Landscape, where significant valley and valley-side areas are included and which offer some of the most popular recreation opportunities.

Why the exclusion of the triangle of land northeast of **Llanrhaeadr ym Mochnant**, bounded by **Afon Iwrch**, **Llanarmon Mynydd Mawr**, north end of **Llyn Moelfre**, **Efail Rhyd**, and **Pentrefelin**

Key Features: Includes Moel Loran and the plateau enclosing the north end of Llyn Moelfre (approx. 300m elevation), with upland and transitional upland character.

Comparison: Landscape is similar to, and arguably more upland than, nearby areas in the Cynllaith Valley and between Moelfre and Llansilin, which are included in the proposed boundary.

Issues with Exclusion: Creates an area bounded on two sides by the NP, leading to management and planning challenges and an unnecessarily long edge.

Recreation Opportunities: Comparable to adjacent areas within the NP.

#### **NRW's Response:**

The boundary was revised after receiving comments submitted to the Candidate Area Consultation 2024 by Powys County Council and the community council. NRW's review of Natural Beauty within the Powys area led to changes in the boundary – these are set out and explained in NRW's Final assessment of landscape designation report September 2025. In the case of the Tanat valley EA 26:

##### **Western Features**

The steep-sided, U-shaped valley east of Pen-y-Bont Fawr with dramatic peaks and cwms cutting into the rising uplands of the Berwyn. The shape of the valley draws the eye to the Berwyn skyline. Evolving sequential views and sense of arrival are very impactful.

#### Eastern Features

Rounded hills of Mynydd-y-briw and the scarp edge of Craig Orllwyn and ancient semi natural woodland form attractive rolling hills and secluded valleys with strong visual presence from the B4396 between Pentrefelin and Llangedwyn. Within this area lies Sycharth (Owain Glyndŵr's ancestral home). Tranquillity is strong, with attractive views towards the Berwyn Foothills (Gryn Moelfre) within EA24 to the north.

#### The valley floor

An area of traditional settled farmland character, improved grasslands and more intense agricultural activity with limited recreational opportunities. Whilst features are generally intact, scenic quality and sense of place comes largely from the enclosing hillslopes and skylines. Expression of Natural Beauty isn't as strong within the valley floor.

In applying the boundary setting considerations (NRW Procedural Guidance GN010) a boundary was drawn to follow roads, lanes and field boundaries in a location that best captured the upper Tanat valley; follow roughly the break of slope between the Berwyn foothills and the valley lowlands (as far as physical features allow) eastwards; extending southwards to take in Craig Orllwyn, then follow the B4396 eastwards to Pen-y-bont Llanerch Emrys and the Welsh/English border. Settlements on the boundary were excluded – which follows NRW Procedural Guidance GN010.

The above approach resulted in triangle of land northeast of Llanrhaeadr-ym-Mochnant, referred to by the respondent. This boundary lies in an area of transition i.e. the boundary is not a sharp distinction between areas of differing quality (NRW Procedural Guidance GN010 page 27).

If established, the National Park would have a statutory duty to develop a management plan. This would include recreation, managing access, signage & parking. Settlements that form a gateway to the National Park but lie just beyond the boundary would be included in these considerations and involve local communities.

**NRW proposes to make no changes to the National Park boundary.**

#### ANON-XRE3-VJEF-D

The boundary looks appropriate but would suggest including the **oldest part of Penybontfawr** and the Railway Inn.

#### NRW's Response:

The boundary was revised after receiving comments submitted to the Candidate Area Consultation 2024 and was drawn closer the most distinctive landscapes – in this case the scenic quality is particularly notable within the steep side U shaped section of the Tanat valley to the east of Pen-y-Bont Fawr. The boundary setting conventions for designated landscapes (NRW Procedural Guidance GN010), excludes settlements that lie on the boundary.

**NRW proposes to make no changes to the National Park boundary.**

#### ANON-XRE3-VJSH-W

Exclude the unremarkable block of forestry **south west of Llansilin** - it just isn't high quality landscape.

#### NRW's Response:

There are few small blocks of coniferous plantation to the south west of Llansilin. Most fit well with the rolling landform, skylines and field pattern. There will be occasions where landscape elements don't fit quite so well within an area that otherwise on balance meets the natural beauty criteria.

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| <b>NRW proposes to make no changes to the National Park boundary.</b>   |
| ANON-XRE3-VJN6-6  |
| Any national park should exclude any part of the <b>Llanfair Caereinion ward</b> . The council does not wish to see some of its ward in the national park and half not.   |
| <p><b>NRW's Response:</b></p> <p>The splitting of parishes is not, in itself, a reason to include land which does not otherwise satisfy the criteria (South Downs National Park Inspectors Report Vol 1 2008 para 81).</p> <p>This would also apply to wards within the proposed National Park.</p> <p><b>NRW proposes to make no changes</b></p>   |
| ANON-XRE3-VJPH-T; ANON-XRE3-VJWE-X ; ANON-XRE3-VJNH-R; ANON-XRE3-VJ52-9; ANON-XRE3-VJSA-P; 1415; 1330; 1333; 1363; 1384; 1398; 1405; 1415; 1542   |
| <p>I was hoping that <b>Llanfyllin</b> (EA 30) would be part of the National park</p> <p>The boundary should extend to include the <b>Meifod Valley</b> and areas to the west of the A483.</p> <p>Include the <b>Meifod valley</b> (EA32), <b>Dolanog and Vyrnwy</b> valley (EA 29)</p>   |
| <p><b>NRW's Response:</b></p> <p>Comments submitted to the Candidate Area Consultation 2024, led NRW to review the lowland farmland valleys and surrounding hills in Powys, beyond the Berwyn. Building on Gillespies evaluation 2024, we found that whilst there were notable areas of Natural Beauty within EA's 30, 32 and 29, they were limited in extents and at scattered intervals. This fragmented pattern made drawing together areas that met the criteria together, within a contiguous area of landscape for designation, difficult to achieve. EA's 30, 32 and 29 were therefore removed from the proposed national park boundary 2025, with the exception of a small section of EA29 that contributes to the Berwyn.</p> <p><b>NRW proposes to make no changes to the National Park boundary.</b></p> |
| Respondent reference number is already captured above   |
| <p><b>Pont Logel and Dolganog and Allt Dolanog</b></p> <p>We disagree with the exclusion of this area.</p> <p>The outdoor recreation opportunities here are much better than nearby areas, with both Glyndwr's Way and Ann Griffiths Walk and excellent walking along the river Vyrnwy.</p> <p>Recommendation:</p> <p>We recommend that the SE boundary of the proposed NP be extended to include more of the upper valley of the river Vyrnwy and adjacent high ground upstream of Dolanog. This would include more of Glyndwr's Way.</p>  |
| <p><b>NRW's Response:</b></p> <p>As set out in our comments immediately above, the fragmented pattern of Natural Beauty led us to remove EA 29 (within which Dolanog and the Vyrnwy valley lie) from the proposed national park boundary 2025.</p> <p>During site visits to the Vyrnwy Valley in 2025 we assessed the area as containing attractive tranquil rural farmland and wooded valleys. The availability of scenic views were infrequent due to the effect of topography and tree cover, which in turn limits the sense of place and distinctiveness. In this regard, we consider the Vyrnwy valley doesn't present strong enough evidence of Natural Beauty along its length for inclusion.</p> <p><b>NRW proposes to make no changes to the National Park boundary.</b></p>                               |

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| ANON-XRE3-VJHV-Z; ANON-XRE3-VJYS-E  |
| <p>I am very supportive of a national park to protect the special characteristics of Wales. <b>A mid-Wales national park (e.g. Cambrian Mountains)</b> would be more suitable to establish a protected belt (along with Eryri &amp; Bannau) through the heart of Wales. A mid Wales national park will provide mid Wales communities with equal opportunities for tourism and economic growth. I would like to see more than one option for a new National Park in Wales. A second North Wales National Park is likely to be a mistake and cause additional pressures in a region, in comparison to a mid-Wales national park.</p> <p>The Cambrian mountains should be made a national park</p> <p><b>NRW's Response:</b><br/>NRW is assessing the case for a new National Park, taking the Clwydian Range and Dee Valley National Landscape as a starting point. The southern boundary of that designation includes the northern edge of the Berwyn. NRW has sufficient evidence to support the inclusion of the Berwyn Mountains within the proposed National Park.</p> <p>An assessment of the Cambrian mountains is not within the scope of this project.</p> |
| 769; 770; 776; 783  |
| <p>Extend the boundary to include Cefn-y-bedd, Alyn waters country park and Oak Alyn Court LL12 9YT.</p> <p><b>NRW's Response:</b><br/>The Area of Search 2023 didn't include Cefn y bed, Alyn Waters Country Park or extend to Sydalit and Windy hill. The northern extents of Wrexham's urban villages start to influence the valleys and ridgelines and countryside edges of this area. The road network also carries much traffic-affecting tranquility. There are elements of natural beauty and opportunities for outdoor recreation here, but not to a sufficiently high degree for inclusion within a National Park.</p> <p><b>NRW proposes to make no changes to the National Park boundary.</b></p>   |
| 1046  |
| <p>It should include the entire Clwyd catchment so as to protect the Clwyd river from pollution etc. and facilitate and preserve wildlife</p> <p><b>NRW's Response:</b><br/>The proposed national park encompasses areas that have been evaluated to contain sufficient Natural Beauty and Opportunities for Outdoor Recreation, that it is desirable to designated as a National Park. Whilst we understand the benefits of taking a catchment approach to conserve and enhance nature, water and wider ecosystem services, we are working within the statutory framework for designated landscapes.</p> <p><b>NRW proposes to make no changes to the National Park boundary.</b></p>  |
| 1274  |
| <p>The long thin shape will be impractical to manage and confusing for residents and visitors. I suggest cutting off the top section and having the northern boundary along the A5104.</p> <p><b>NRW's Response:</b><br/>The current AONB (National Landscape) north of the A5104 includes Moel Famau, Loggerheads and the Clywdian Hills. AONB officers have carried out much positive work in this area over the past 40 years and the area is very well known locally and further afield.</p> <p><b>NRW proposes to make no changes to the National Park boundary.</b></p>   |

### 3. Changes to the boundary to protect landscape from development

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| Respondent reference number is already captured above  |
| Include Mynydd Mynyllod to protect the area from Gaerwen Wind Farm.  |
| <p><b>NRW's Response:</b></p> <p>South Downs National Park Inspectors Report Vol 2 2008 para 4.64</p> <p>Land is not included in a National Park simply to protect it from development. Inclusion, rather, depends on the ability of the land to meet the statutory criteria</p>   |
| <p>1445</p> <p>Montgomeryshire Against Pylons (≈500 members) formed to oppose National Grid's 400kV pylon line and industrial-scale wind farms in mid-Wales. The excluded areas (Evaluation Areas 29, 30, 32) should be reinstated in the National Park to protect them from large-scale industrialisation (wind farms and pylons).</p> <p>Criticism of NRW's Rationale:</p> <ul style="list-style-type: none"> <li>• NRW excluded these areas citing insufficient scenic beauty and limited recreation opportunities.</li> <li>• Respondents argue scenic beauty is subjective; Gillespie's report found these areas beautiful.</li> <li>• NRW's approach seems to favour rugged, rocky landscapes over wooded hills and farmland.</li> </ul> <p>Landscape Value:</p> <ul style="list-style-type: none"> <li>• Steep, wooded hills, lush green fields, rivers, and historic farmsteads are considered "heart-stoppingly beautiful" by respondents.</li> </ul> <p>Recreation Opportunities:</p> <ul style="list-style-type: none"> <li>• Poor condition of PROWs should be addressed through NP funding, not used as exclusion criteria.</li> <li>• Suggest creating circular walks and linking routes, complementing Glyndŵr's Way.</li> </ul> <p>Cultural Heritage at Risk:</p> <ul style="list-style-type: none"> <li>• Meifod's St Mary &amp; St Tysilio Church (Grade I listed, burial site of Welsh royalty) and Mathrafal Castle/Eisteddfod site are threatened by proposed pylons.</li> <li>• These nationally significant sites merit NP protection.</li> </ul> <p>Additional Points:</p> <ul style="list-style-type: none"> <li>• Many other cultural sites in EAs 29, 30, and 32 offer recreation and heritage value but were overlooked in NRW's revised proposal.</li> </ul> <p><b>NRW's Response:</b></p> <p>Comments submitted to the Candidate Area Consultation 2024, led NRW to review the lowland farmland valleys and surrounding hills in Powys, beyond the Berwyn. Building on Gillespies evaluation 2024, we found that whilst there were notable areas of Natural Beauty within EA's 30, 32 and 29, they were limited in extents and at scattered intervals. This fragmented pattern made drawing together areas that met the criteria together, within a contiguous area of landscape for designation, difficult to achieve. EA's 30, 32 and 29 were therefore removed from the proposed national park boundary 2025, with the exception of a small section of EA29 that contributes to the Berwyn.</p> <p>South Downs National Park Inspectors Report Vol 2 2008 para 4.64</p> |



Land is not included in a National Park simply to protect it from development. Inclusion, rather, depends on the ability of the land to meet the statutory criteria.

NRW is satisfied with the process and justification for the removal of EA's 30, 32 and 29.

#### **4.Representation made in relation to alternative management mechanisms**

##### **NLA**

- In our view, the pattern of evidence is more naturally and flexibly accommodated within an expanded National Landscape designation, which is explicitly conceived as a network of lived-in working landscapes of high natural beauty, than within a single, tightly-defined National Park;
- public consultation on different designation models has not been invited;
- NRW does not convincingly demonstrate that a National Park is “especially desirable” compared to an expanded National Landscape;
- NRW should examine the case for a National Park against a strengthened and expanded Clwydian Range and Dee Valley National Landscape (including the Berwyn and key coastal elements).

##### **NRW's response:**

As part of our assessment, we considered whether there are alternative management mechanisms. A review by Land Use Consultants (LUC) evaluated five alternative mechanisms in the Forces for Change report. These were business as usual, landscape partnerships such as the Valleys Regional Park and the South Pennines Regional Board, a National Landscape with / without a Conservation Board and a National Park.

The LUC report concluded that the management mechanisms, powers and duties which come with a statutory National Park offer the most robust mechanism for effective long term management of current and future issues over and above current arrangements, through security of long term funding, planning functions and its management plan.

##### **A National Park versus National Landscape designation, and the ‘desirability’ to designate**

In determining whether a National Park or a National Landscape should be proposed, NRW has carried out a sequential test; and considered whether the case for designation is ‘desirable’ or ‘especially desirable’.

The sequential test relates to the statutory designation criteria. For an area to be considered a National Landscape – evidence of Natural Beauty of national significance needs to have been established. For an area to be considered a National Park - evidence of Natural Beauty of national significance and opportunities for Outdoor Recreation need to have been established. Against this sequential test, NRW is satisfied that the proposed area meets the statutory criteria of a National Park.

In considering whether it is ‘desirable’ or ‘especially desirable’ to designate - the significance of the area's Natural Beauty, its special qualities, the forces for change, the areas conservation and enhancement needs and the effectiveness of management mechanisms available, all have a bearing.

As outlined above, LUC's report concluded that a statutory National Park offered the most robust mechanism. NRW considers it is ‘especially desirable’ to designate a National Park.

In conclusion, NRW's process adhered to the statutory procedure and followed legal advice. This has meant that, where the statutory tests for designation of a National Park are satisfied, then a

National Park is the designation considered, designation of an AONB (National Landscape) would only be considered if the statutory test for a National Park had not been satisfied.