

## Annex 2:

# Proposed Glyndŵr National Park (Designation) Order: 2025 Statutory Consultation

## Analysis summary document

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## Appendices (*separate documents*)

Appendix 1: Consultation response form

Appendix 2: Coding matrix

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

# 1 Introduction

## 1.1 Previous engagement

Welsh Government commissioned Natural Resources Wales (NRW) to evaluate the case for a new National Park based on the existing Clwydian Range and Dee Valley National Landscape (formerly Area of Outstanding Natural Beauty).

NRW will make an independent recommendation based on the evidence gathered and implications for the citizens of Wales. The statutory process and tests will be applied.

Before any formal Designation Order is made, the relevant legislation specifically requires that for National Parks, all county councils, National Park Authorities and community councils, that have land within the area to be designated, or in the existing National Park or to be varied, must be consulted prior to a Designation Order being made. NRW is legally required only to undertake a statutory consultation. As a matter of good practice, NRW has also sought engagement with key stakeholders and the public.

## 1.2 Overview of 2025 consultation

This report is prepared as a summary of the responses received in relation to the 2025 statutory consultation on the proposed Glyndŵr National Park. Following feedback from the 2023 public engagement period and 2024 public consultation on the proposed National Park, a series of supporting assessments relating to nature, health, Welsh language, economy, equality and planning have been completed, in order to inform decision-making and address concerns raised by stakeholders.

The 2025 consultation sought feedback on the supporting assessments and the proposed Glyndŵr National Park boundary change, which has been refined to better capture a coherent area of natural beauty within the area's uplands, intersecting valleys and coastal edge. Gronant and Talacre Dunes is now included and a large area of settled lowlands within Powys is excluded.

The 2025 consultation was open for 12-weeks, from 15 September 2025 until 8 December 2025. This Analysis summary document has been prepared in January 2026 to ensure the NRW board are fully informed prior to making its decision on designation. A further Statutory Consultation Report will be made available in February, both to provide transparency to stakeholders, of the consultation process, and to further inform Welsh Government ahead of its decision on designation.

Representations, objections or comments could be submitted by completing the online response form via the project website or by returning a paper copy to the project freepost address or via email.

A total of 1,678 consultation responses were received during the consultation, of which 1,647 were received via the online feedback form survey, and 31 were received via email. Natural Resources Wales (NRW) appointed Ove Arup and Partners (Arup) in November 2025 to analyse the responses, which consisted of coding and grouping into themes for

open text responses and summary statistical analysis for closed option responses. Arup appointed specialist Grasshopper Communications (Grasshopper) to support delivery.

This report summarises the type of consultation responses, information on respondents, summary of views on the National Park by type of respondent and from NRW's response to the findings is included within this report.

NRW's responsibility is in relation to issues that relate directly to the statutory tests and the criteria for designation. This alone must be the basis for NRW's decision. With a wide range of issues affecting the area, inevitably most responses did not relate directly to the statutory tests for designation and will properly be considered by Welsh Government or as part of a local public inquiry. Responses that relate to the statutory tests are those that are relevant to NRW's responsibilities

The statutory tests are set out under section 5 of the National Parks and Access to the Countryside Act 1949, namely that by reason of:

- natural beauty; and
- opportunities the area affords for open-air recreation, having regard both to its character and position in relation to centres of population;
- it is especially desirable that necessary measures are taken to:
- conserve and enhance the natural beauty, wildlife and cultural heritage of the area specified; and
- promote opportunities for the understanding and enjoyment of the special qualities of those areas by the public.

## 2 Summary of consultation responses

### 2.1 Submitted response emails

A total of 31 email responses were provided, from 9 individuals, 3 local authorities, 1 National Park Authority, 13 organisations and 2 elected representatives. Email responses were analysed in the same way as the feedback form responses using the pre-agreed coding matrix.

### 2.2 Feedback form

The consultation feedback form consisted of 14 questions, of which three were open-text response, and 11 were closed-option response.

8 of the questions related to demographic data and Welsh language ability, 3 questions related to the relationship the respondents had to the area, with 3 questions relating to respondents' position and thoughts/feedback on the proposals and their associated impact on the Welsh language (including potential ways to improve outcomes). The feedback form is attached as *Appendix 1*.

## 3 Information on respondents

### 3.1 Overview

Of the 1,647 respondents who completed the feedback form, 92.9%<sup>1</sup> (1530) responded as an individual, 5% (82) responded on behalf of an organisation, 1% (20) responded on behalf of a group or community, with 1% (15) not providing an answer. 109 respondents specified which organisation, group or community they were responding on behalf of.

When asked to describe themselves in relation to the area, 52% (1001) respondents identified as local residents, 12% (238) were farmers or landowners, 20% (386) were visitors or tourists, 7% (126) were business owners, 4% (72) were organisation or group representatives, while 5% (93) stated an alternative identification. Please note that respondents were able to select as many options as were applicable, and so the combined percentages exceed 100%. The roles of respondents who selected organisation/group representative included Chair (14), Manager (13), Officer (8), Director (6), Secretary (6), Clerk (5), Councillor (3), Trustee (3), Volunteer (2) and others which could not be grouped (20).

Feedback was received from the five statutory local authorities: Powys, Denbighshire, Wrexham, Flintshire and Gwynedd.

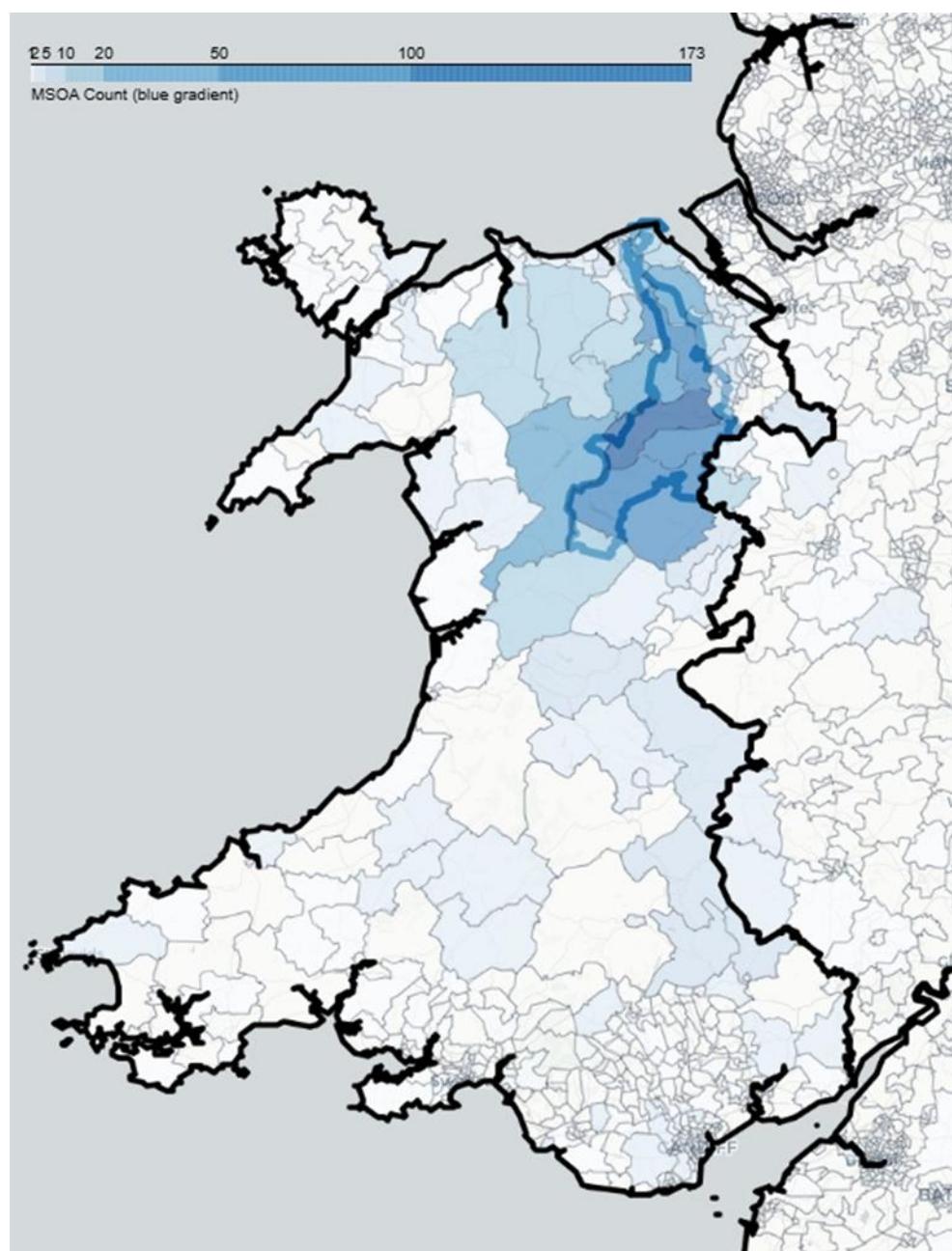
### 3.2 Location of respondents

Figure 1 below shows the postcodes for the respondents to the feedback form. Although there were respondents from across the UK, within Wales the highest concentration of respondents were from Powys and Denbighshire, with slightly lower concentrations from Flintshire and Gwynedd.

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<sup>1</sup> All percentages have been rounded up to the nearest decimal place.

Figure 1: Respondent location by Middle-layer Super Output Area (MSOA)



## 4 Equalities, Diversity and Inclusion data

Of the respondents who provided information on Welsh language ability, the largest proportion reported that they understand and speak some Welsh (31%, 507). This was followed by those with no understanding of Welsh (30%, 492), those learning Welsh (19%, 314), and those who are fluent (19%, 307). A total of 2% (27) did not provide a response.

Of the respondents who provided age information, the largest proportion were aged 65+ (35%, 584), followed by those aged 55–64 (25%, 409). Respondents aged 45–54 accounted for 14% (236) and those aged 35–44 for 10% (163). Younger age groups were less represented, with 6% (100) aged 25–34, 2% (25) aged 18–24 and 0.5% (7) under 18. A total of 6% (92) preferred not to say, while 2% (31) did not provide an age response.

Of the 96% of respondents identifying their ethnicity, 72% stated they were white – Welsh, English, Scottish, Irish or British and only 1% identified as non-white. Of the 87% of respondents identifying what their religion, just under 50% stated that they have no religion and 47% stated they were Christian.

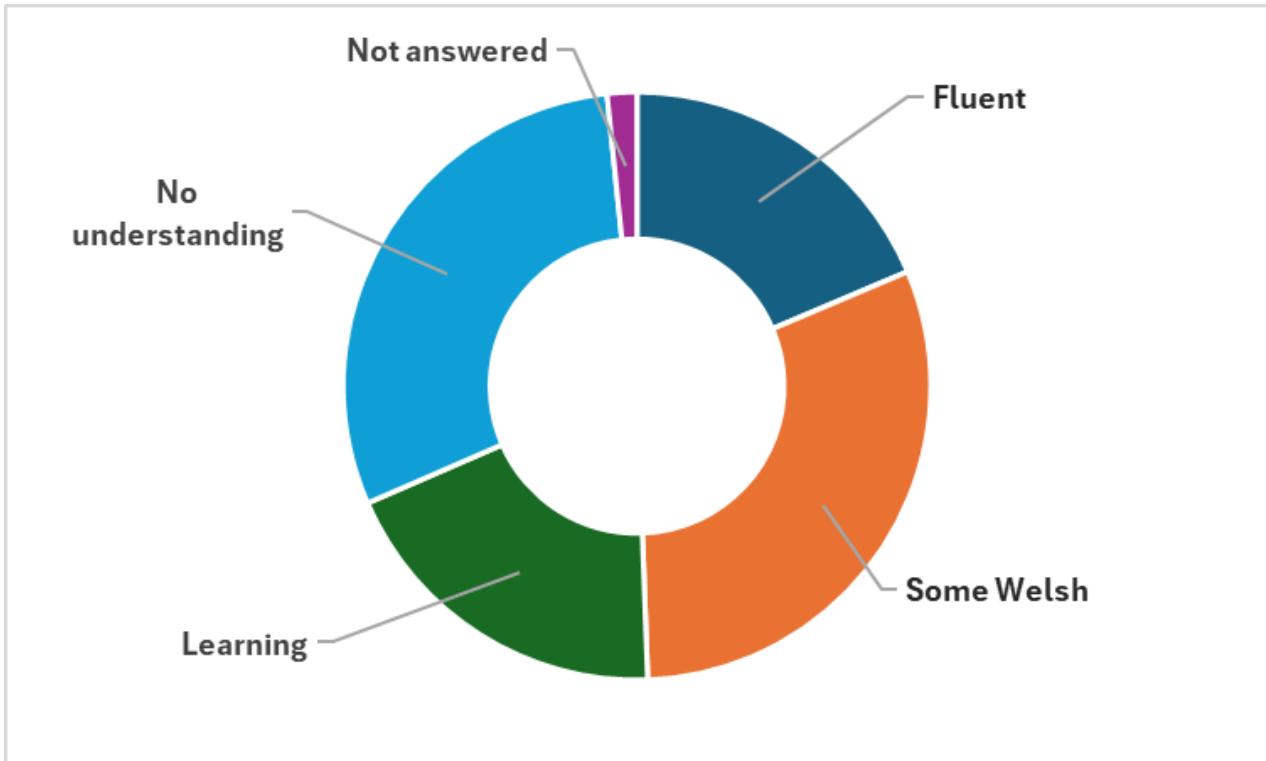
Of the 96% of respondents identifying their sexual orientation, 78% stated they were heterosexual / straight and 17% preferred not to say and 5% were gay or bisexual. Nearly a third of those responding to the survey had a disability or long-term health issue and 11% were currently responsible for caring for an adult relative/partners/disabled child or other.

## 5 Sustainability of the Welsh Language

As part of the consultation, respondents were asked two questions on the sustainability of the Welsh language, specifically asking about what perceived impacts there may be, how the positive impacts can be amplified and negative impacts mitigated, and how the proposals could be formulated or changed to have positive effects and/or no negative impacts.

*Figure 2: Respondents Welsh language abilities*

18.64%	<b>Able to speak Welsh fluently</b>
30.78%	<b>Able to understand and speak some Welsh</b>
19.06%	<b>Learning Welsh</b>
29.87%	<b>No understanding of Welsh</b>
1.64%	<b>Not answered</b>



In answers to these questions, 181 respondents believed that the National Park designation would have a positive impact on the Welsh language, while 133 respondents believed it would have a negative impact on the Welsh language. Additionally, 132 respondents raised neutral perspectives and comments on the Welsh language. Of those who were positive about the potential impacts on the Welsh language, there were beliefs that the creation of a new National Park would be an opportunity to further/better showcase the Welsh language, especially to a broader audience throughout the rest of Wales and the UK. Of those who were negative about the impact on the Welsh language, a consistent theme was the perceived impacts of overtourism, second homes and increased house prices on local communities, which would lead to a dispersing of Welsh speakers from their communities.

## 6 Views on the proposed National Park

### 6.1 Analysis approach

Respondents were asked to choose one of five options as part of their response to help identify whether and how they support the proposal or not. Respondents were asked to indicate if:

1. I/We support the current proposal for a new National Park
2. I/We support the principle of a National Park but suggest a boundary change (please provide details below)

3. I/We support the principle of a National Park subject to certain points being appropriately addressed or clarified
4. I/We object to the proposal for a new National Park
5. I/We remain undecided / don't know

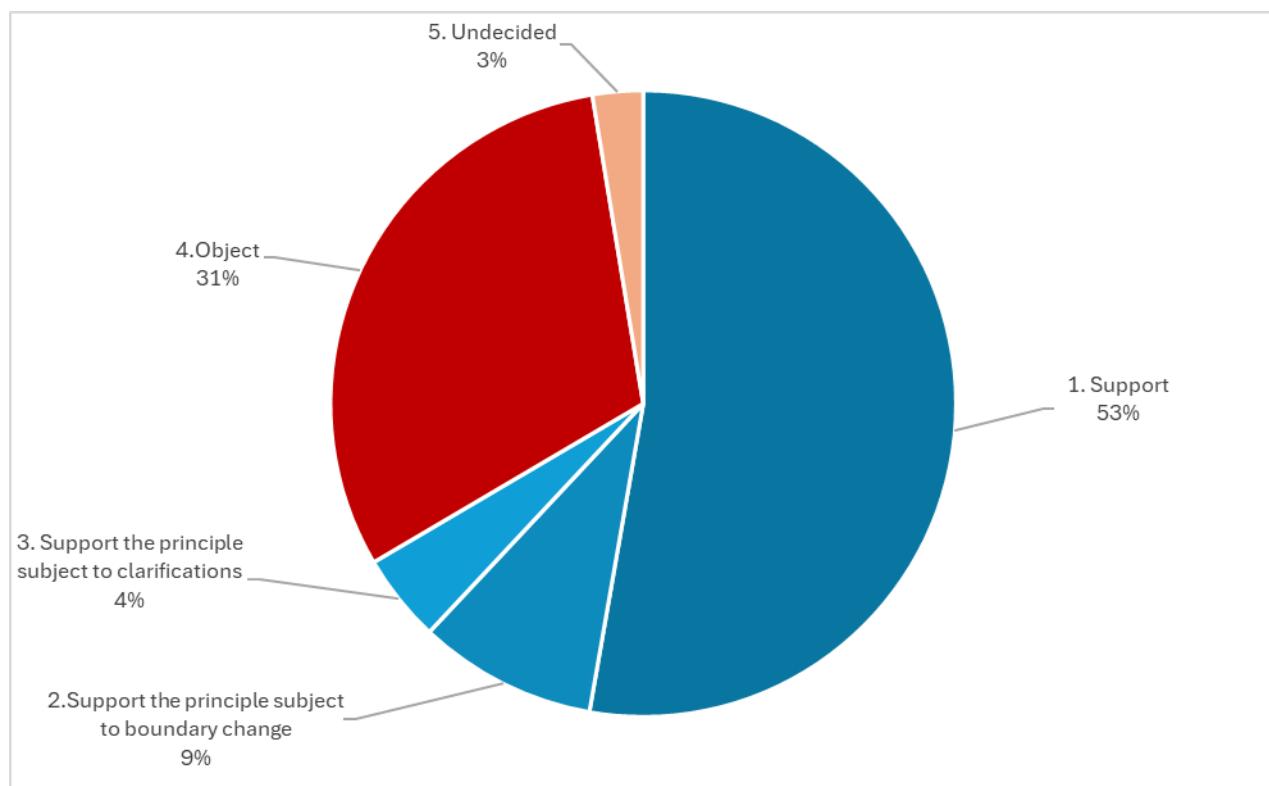
In addition, they were asked to give further details to explain their response to the question. The open responses to this question on the feedback form and email responses were coded using the coding matrix (*refer to Appendix 2*) to understand which key issues were raised generally and by each of the categories of stakeholders:

- Local residents
- Farmers / landowners
- Visitors / tourists
- Business owners
- Other

## 6.2 Overview of responses

Figure 3 below gives an overview of how respondents to the feedback form would like to make a representation.

*Figure 3: Representations on the National Park*



From the responses to the feedback form, 53% (869) of respondents stated their support for the current proposals, with 9% (152) stating support but suggesting a change to the boundary<sup>2</sup> and 5% (75) stating support subject to clarification – totalling 67% (1096) of respondents stating at least conditional support.

31% (508) of respondents stated an objection to the new national park.

3% (43) stated that they were either undecided, did not know or did not provide a response.

### 6.3 Overview of feedback from all respondents

Please note that some respondents selected more than one option, and so priority identification was given to objections and contingent support.

Of the high-level themes, the most raised themes were Questioning the necessity (~18%), Management of tourism and public infrastructure (~16%), Local people, communities and local economy (~14%), Culture and Heritage (~13%) and Boundary changes (~13%). A breakdown of the overall frequency and relative percentage of issues raised is provided below.

Theme	Frequency	% of respondents
1. Questioning	295	17.90%
2. Management of tourism and public infrastructure	270	16.38%
3. Local people	232	14.08%
4. Culture and Heritage	217	13.17%
5. Boundary changes	213	12.92%
6. Wildlife	182	11.04%
7. Housing implications	128	7.77%
8. Landscape conservation	126	7.65%
9. Agriculture	117	7.10%

<sup>2</sup> Please note this figure refers to respondents chosen designated response to the consultation, which is different from the number of times boundary change issues were raised by respondents within their responses.

10. Access issues	107	6.49%
11. Planning implications	106	6.43%
12. Renewables	96	5.83%
13. Process	77	4.67%

## 1. Questioning the necessity

Most of the issues raised were negative with the following being raised the most: value for money, the current position of local authority finances, long-term funding and commitment and funding for the management of the National Park and other associated costs.

## 2. Local people, communities and local economy

The most raised negative perceptions were the infrastructure impact on local communities, and the impact on young people and housing. The most raised positive perceptions were benefits to the local economy and impact on local jobs.

## 3. Management of tourism and public infrastructure

The most raised negative perceptions were impact on traffic, parking and road network, public funding and infrastructure, and over tourism eg. litter, fires and vandalism.

## 4. Culture and Heritage

The most raised negative perceptions were the impact of tourism on culture and heritage and the impact on the sustainability of the Welsh language. The most raised positive perceptions were the perceived impacts from tourism and the potential for positive outcomes for the sustainability of the Welsh language.

## 5. Boundary changes

The most raised issues were requests for additional areas to be included in the National Park boundary, and requests to remove certain areas.

## 6. Wildlife and conservation

The most raised positive perceptions were the impact on conservation and enhancement of the environment, and indigenous species. The most raised negative perceptions were the impact of visitor interference, and on conservation and enhancement of the environment.

## 7. Housing implications

The most raised issues were negative perceptions of the impact on property prices in the sense of becoming less affordable, the number of second homes, and the availability of housing to local communities. This theme had a high degree of correspondence with the

perceived impact on the sustainability of the Welsh language and the impact on local communities (especially young people). Where these issues were raised together, respondents were concerned that the National Park designation would negatively impact the availability of local housing both through price increases and planning restrictions, which was seen as disproportionately negatively impactful on young people and Welsh language communities. There was also concern from business owners (particularly agriculture and hospitality) that it may lead to a shortage of appropriate workers.

## **8. Landscape conservation**

The most raised issues were both positive and negative perceptions of the impact on landscape conservation. There were also positive perceptions of the recognition of the area.

## **9. Agriculture**

The most raised issues were positive and negative perceptions of the impact on planning implications. Other issues included negative perceptions of the potential for conflict with tourism, and the impact on sustainable farming schemes.

## **10. Access Issues**

The most raised issues were positive perspectives on sustainable access and neutral perspectives on signage. In terms of negative perspectives, the main issues were the impact on highway infrastructure, the upkeep of bridleways and footpaths, adherence to the countryside code, and conflict between farmers and visitors.

## **11. Planning Implications**

The most raised issues were positive and negative perceptions of the impact on planning controls. Another key issue was the negative perspectives on introducing additional layers of bureaucracy.

## **12. Renewables**

The most raised issue was positive and negative perceptions of the impacts on wind and other green energy developments. In particular, respondents perceived the National Park would reduce the likelihood of wind and other renewable developments being consented.

## **13. Process**

The most raised issues were negative comparisons to other National Parks, requests for other reports or additional assessments and analysis to be conducted. Others perceived the process as positive, making comparisons to other National Parks.

## **6.4 Stakeholder category analysis**

The responses have been grouped by self-identified stakeholder categories to understand each group's views on the proposed National Park.

## Local residents

Of the **local residents** who expressed a view:

- The largest proportion indicated support (47%, 471), while 4% (43) stated their support subject to clarifications and 11% (114) supported a boundary change – totalling 63% of said respondents.
- A further 35% (346) objected, while.
- A smaller proportion of those were undecided (3%, 27).

Local resident responses correspond with the overall total figures, however slightly more object (35% vs 31%) and overall support (including those who have supported subject to clarification and boundary change) is slightly lower (63% vs 67%).

The most raised high-level themes for local residents were management of tourism and public infrastructure, questioning the necessity, boundary changes, and local people, communities and local economy. The most raised sub-themes and corresponding sentiment are detailed below:

### Negative

The negative perspectives that were raised related primarily to:

- impact on traffic, the road network, parking and over-tourism.
- impacts on infrastructure for local communities.
- cost of living and house prices. housing and young people.
- perceived value for money.
- local authority finances, funding for the National Park and funding commitments.

### Positive

- Positive and neutral perspectives on additional areas to include within the National Park.
- benefits to the local economy.

Local residents were more likely to suggest boundary changes than all other respondent types except those replying on behalf of a group or organisation.

## Farmers/landowners

Of the **farmers/landowners** who expressed a view:

- 23% (55) indicated support, while 9% (21) supported a boundary change and 2% (5) would support subject to clarifications – totalling 34% of said respondents.
- The majority of said respondents objected (64%, 153).

A smaller proportion reported that they were undecided (2%, 4). Subsequently, farmers/landowners were significantly more likely to object than overall respondents (64% vs 31%) and significantly less likely than overall respondents to express non-contingent support (34% vs 53%).

The most raised high-level themes for farmers and landowners were questioning the necessity, management of tourism and public infrastructure, and local people, communities and local economy. The most raised sub-themes and corresponding sentiment are detailed below:

### **Negative**

The negative perspectives that were raised related primarily to:

- concerns for long-term funding commitments and local authority finances.
- concerns for impacts on the road network, parking and litter.
- infrastructure impacts on communities.

Approximately 68% of Farmers/Landowners provided comments, of which the majority of sentiment was negative. However, the high-level themes which Farmers/Landowners commented most positively on were Agriculture (20%) and Culture and Heritage (17%).

Farmers/landowners were more likely than all other types of respondents, except those replying on behalf of groups/organisations, to raise issues questioning the necessity of designating the National Park.

### **Visitors/tourists**

Of the **visitors/tourists** who expressed a view:

- The largest proportion indicated support (46%, 461), while 12% (125) supported subject to boundary changes and a smaller proportion indicated that their view was subject to clarifications (5%, 45) – totalling 63% of said respondents
- A further 33% (312) objected,
- A further 2% (7) were undecided.

A higher percentage of visitor/tourists supporting the project compared with total respondents (63% vs 53%).

Excluding culture and heritage, the most raised high-level themes for visitors/tourists were landscape conservation, wildlife conservation and questioning the necessity. The most raised sub-themes and corresponding sentiment are detailed below:

### **Positive**

- Recognition of the area.

- Conservation and enhancement of the environment.

Of the Visitors/ tourists who provided comments (48%), the significant majority expressed positive sentiment. The high-level theme which was commented on most negatively was Questioning the necessity (11 of 25 responses).

Visitors/tourists made significantly fewer comments and raised fewer issues than all other types of respondents. The only issue on which they commented and a similar frequency to other types of respondents was landscape conservation. Alongside other, they were the only respondent group to comment significantly less on culture and heritage.

### **Business owners**

Of the **business owners** who expressed a view:

- 34% (43) indicated support, while 13% (17) supported a boundary change, and a smaller proportion would support subject to clarifications (4%, 5) – totalling 52% of respondents.
- 45% (57) objected to the proposal.
- 3% (4) said that they were undecided (3%, 4).

Subsequently, more business owners objected than overall respondents (45% vs 31%) and similarly expressed non-contingent support (52% vs 53%).

Excluding culture and heritage, the most raised high-level themes for business owners were local people, communities and local economy, management of tourism and public infrastructure and questioning the necessity.

The most raised sub-themes and corresponding sentiment are detailed below:

### **Negative**

The negative perspectives that were raised related primarily to:

- impact on traffic, the road network and parking/
- impacts of over-tourism on infrastructure for local communities.
- Additional layers of bureaucracy, perceived value for money and long-term funding commitments.

Of the Business Owners that provided comments (71%), the majority expressed negative sentiment. The high-level themes commented on with the most positive sentiment were Culture and heritage (27%) and Local people, communities and local economy (26%).

Business owners were more likely than any other type of respondent to raise issues relating to culture and heritage, local people, communities and local economy and Renewables. A notable theme within hospitality business owners was the perception that

the National Park designation would protect the local landscape from renewable energy developments being consented, which was perceived as good for continued business.

## Others

Of the **others** (which included elected representatives, second homes owners and regular visitors in the proposed National Park boundary and residents from across Wales and the United Kingdom) who expressed a view:

- The largest proportion indicated support (55%, 52), while 11% (10) supported a boundary change and 7% supported the proposal subject to clarifications – totalling 73% of said respondents.
- A further 26% (25 objected) to the proposal.
- Only one respondent (1%) was undecided.

The others are significantly more in overall support (including those who have supported subject to clarification and boundary change) (73% vs 67%).

## 6.5 Local authority responses

Local authorities are the sole statutory consultees in relation to the designation of National Parks. Five local authorities have submitted responses to the consultation and the position of each Local Authority is set out below:

- Flintshire-not able to support pending further detail.
- Denbighshire-rejects the proposal pending further detail.
- Powys-objection.
- Gwynedd-objection.
- Wrexham-objection.

The local authorities raised the following issues:

### Powys County Council

- Comment about the area lacking the coherence as an extensive area of natural beauty or landscape character, compared to Bannau Brycheiniog, Eryri or Pembrokeshire Coast
- Concerns about socio-economic impacts of a designation, citing increased house prices and affordability pressures, and reduced ability to delivery housing.
- States the proposed area has limited public transport links and a fragmented rights of way network, whilst increased visitor numbers will exacerbate congestion.
- Concerns that additional resources would be required to support amended replacement local authority ICT systems needed to accommodate the establishment of a National Park Authority

- Concerns that the designation has the potential to adversely impact development plan preparation and development management decision-making, with lack of clarity around any transitional arrangements and funding / loss of income.
- States the Council already faces planning restrictions through having two national parks in its county.
- Concerns the potential influx of visitors would strain waste collection and management infrastructure, as well as place additional requirements on the Mid Wales Fire & Rescue Service and the Council to provide essential rescue and support services in rural areas.
- Concerns around any clear benefits for local communities, risks to housing affordability, local democracy, and economic resilience, as well as lack of transparency on costs and governance.
- Raises that the new National Park Authority, if formed, would automatically become the access authority for the common land and open access land. Concerns were expressed around how the Commons Registration duty is highly likely to remain with the County Council, as splitting the registers would be very complex.

### **Denbighshire County Council**

- States that “a designation could, on balance, be largely positive to the environment and nature recovery, on Welsh language and culture and the communities of Denbighshire. However, the opportunities associated with a designation rely on the establishment of a well-resourced National Park Authority (NPA), which would need to proactively address the benefits, risks and potential pressures, and not come at the expense of existing services or communities.”
- Stated it “does not believe that this has been demonstrated as there is no detail on the governance, form or wider function of a National Park that would give confidence that these opportunities and risks could be adequately addressed.”
- Denbighshire County Council feels that Welsh Government should delay a decision on the designation until after the Senedd elections in May 2026, when there may be greater clarity and certainty around resourcing.
- The Council suggest a designation could be largely positive to the environment and nature recovery, on Welsh language and culture and the communities of Denbighshire, if there is a well-resourced National Park Authority (NPA), which would need to proactively address the benefits, risks and potential pressures, and not come at the expense of existing services or communities. At this stage, the Council does not believe that there is sufficient detail on the governance, form or wider function of a National Park that would give confidence that these opportunities and risks could be adequately addressed.
- Concerns around timescales, transitional arrangements, and future arrangement for planning services and Local Development Plans, and that that a New National Park with full planning powers could undermine local democratic representation in respect of planning decisions within the boundary of the National Park in Denbighshire.
- Concerns around how a designation would impact future funding for key services and housing and exacerbate pressures on existing infrastructure.
- A concern around increased second home ownership, which would change the current cohesion of local communities, many of whom have families that will be priced out of their area should property prices increase.

## **Wrexham County Borough Council**

- States that "local authorities and other public bodies will need to deliver statutory duties within the National Park Boundary such as highway maintenance, public transport, public toilet provision and refuse collection. Additional pressures from the growth of visitor numbers will impact on the demand for services and budgets of Local Authorities and other public bodies which isn't covered by Welsh Governments full funding for a national park."
- States "there is no clarity in respect of the impact on the Welsh language, housing affordability and planning service delivery".

## **Flintshire County Council**

- The Council also acknowledge some benefits of the proposals as recognised in their earlier response to the 2024 public consultation, including legal safeguards, a coordinated approach to climate and biodiversity, increased access to funding, increased tourism and countryside access.
- Concerns around lack of details about funding mechanisms or financial support required to create and operate the National Park.
- Concerns about governance arrangements particularly in relation to the Development Management function of a new National Park, and risk of duplication of resource and increased costs involved.
- Highlights the lack of assurance from Welsh Government in terms of level of support it can provide.
- Highlights the requirement to immediately review the Local Development Plan and the associated resource / financial cost involved in the additional strategic planning work needed.
- Highlights that without appropriate mitigation measures, an increase in visitor numbers could place increased pressure on local infrastructure and the environment. Whilst it has been explained that a mitigation plan could be implemented, the details and the financial cost of this remains unknown at this stage.
- Concerns that "an increase in demand for housing by non-Welsh speakers along with an associated increase in house prices... could reduce the ability of some local Welsh speakers to afford a home within the National Park".

## **Gwynedd Council**

- States the Council objects to the proposal for a new National Park.
- Highlights the Welsh language is prominent in the part of the proposed National Park boundary in Gwynedd , and fears that it will negatively impact on the language, in its everyday use and "could risk weakening the focus on Welsh language considerations in planning and policy".
- Concern about the lack of clarity of the type of planning service will operate in the National Park and the potential negative impact on existing planning services.
- Concerns that settlements such as Llandderfel are currently identified in the Joint Local Development Plan and proposed to be identified in the New Gwynedd LDP. The Council states 'there is a risk of including Llandderfel in the plan if the area falls outside the Gwynedd Planning Authority in the future. The wait for the decision to designate the new national park or not may have an impact on the Gwynedd LDP timetable."

- Concerns around Welsh Government is not receiving any additional funding for the National Park and there is lack of clarity as to where additional funding for the national park is coming from. Concerns around the lack of detail about how the new National Park will be governed.
- Queries the justification for including the area of Gwynedd now proposed for inclusion in Glyndŵr National Park as previously it had been identified as potential AONB land for Y Berwyn, rather than for inclusion in Snowdonia National Park.

## 6.6 Independent survey undertaken by two Wrexham councillors

Two councillors in the Wrexham area undertook an independent survey and submitted 1017 responses to NRW. This was not part of the NRW consultation, the surveys were completed on a range of different forms that differed fundamentally in methodology from NRW's consultation. NRW had methodological and data protection concerns which meant that these separate surveys could not be fairly integrated as individual responses, into the statutory consultation. However, NRW did review the non-sensitive data and content of the responses prior to returning them to the originator. The themes raised broadly reflected those already expressed in the NRW consultation, and referred to cost and affordability relative to other service areas such as the NHS and public toilets, additional bureaucracy and planning and regulatory restrictions, implications of increased visitor numbers on settlements and infrastructure, lack of maintenance of the existing road infrastructure, public access and 4x4 use, implications for farming and impact on housing affordability, for young people in particular. Existing visitor pressure in Llanrhaeadr-ym-Mochnant, Llangollen and the Froncysyllte World Heritage site were specifically highlighted. Comparisons were also made with pressures in existing National Parks such as Eryri. The probable impact of a National Park, and a National Park Authorities Management Plan on these and other issues will be further considered as part of a Welsh Government Integrated Impact Assessment and or a Local Public Inquiry, (See '*Wider considerations*' in section 7.4 below)

## 7 NRW's initial response to the consultation findings

NRW thanks Arup & Grasshopper for their work in processing and analysing the consultation responses, with this assistance NRW has been able to review and consider all representations, objections and comments submitted as part of the consultation.

To emphasise again, NRW's responsibility is in relation to issues that relate directly to the statutory tests and the criteria for designation. This alone must be the basis for NRW's decision. Other issues that do not directly relate to the statutory tests, are to be properly considered by Welsh Government as part of an Integrated Impact Assessment, and/or a Local Public Inquiry, and to inform a broader, final decision on designation by Welsh Government.

With a wide range of issues affecting the area, inevitably most responses did not relate directly to the statutory tests for designation. NRW did undertake several assessments to

help address and inform discussions in relation to these wider themes and issues beyond the statutory tests. This work is outlined in *Section 7.4* below. Responses that relate to the statutory tests are those that are relevant to NRW's responsibilities and are therefore relevant considerations to NRW's decision.

## **7.1 Relevant Considerations – The statutory tests for designation**

The relevant considerations for NRW in respect of whether to designate a National Park are as set out in section 5, of the National Parks and Access to the Countryside Act 1949 (the 1949 Act), hereafter referred to as the statutory tests, are namely, that by reason of:

- Natural beauty; and
- Opportunities the area affords for open-air recreation, having regard both to its character and position in relation to centres of population;
- Whether it is especially desirable that the necessary measures are taken to: conserve and enhance the natural beauty, wildlife and cultural heritage of the area specified; and promote opportunities for the understanding and enjoyment of the special qualities of those areas by the public.

NRW have considered all representations, objections and comments submitted to us against the designation criteria.

## **7.2 Analysis of local authorities' response**

The Local Authorities raised common themes relating to uncertainty about future funding and resourcing of services, governance, planning arrangements, infrastructure and visitor management, housing affordability and impact on the Welsh language.

Denbighshire considered that Welsh Government should delay a decision on the designation until after the Senedd elections in May 2026 when there may be greater clarity and certainty around resources.

These issues are not within NRW's remit and must be considered as part of the Welsh Government's integrated impact assessment or a local public inquiry, or during the establishment process or potentially within a National Park's Management Plan.

Some statutory consultees did raise objections that directly relate to the statutory tests.

Powys County Council challenged the evaluation of Natural Beauty and Opportunities for Outdoor Recreation. We have reviewed these comments and the evidence. We are satisfied that the points raised by Powys do not materially alter our evaluation and evidence, or how areas that meet the statutory criteria have been drawn together within a coherent area for National Park designation. To explain our conclusions, we have set out a detailed response in *Appendix 3*.

If there are objections from a statutory local authority which are not withdrawn prior to submission of an Order for confirmation, Welsh Ministers must hold a local public inquiry.

## **7.3 An analysis in relation to the proposed boundary**

Several consultation themes emerged in relation to the proposed boundary.

## **Challenges to the assessment, evidence and in turn the landscapes included for designation**

Comments were raised by Powys County Council and Gwynedd County Council, the National Landscape Association, representative groups such as the Minerals Product Association, Renewables UK Cymru, individual developers - Tarmac and representatives of landowners within the area – Haven Leisure Limited and Nantclywd Estate.

Having reviewed the evidence NRW are satisfied that the points raised by Powys and Gwynedd as statutory consultees, or representative groups, individual developers and the representatives of estates within the area, do not materially alter our evaluation and evidence of Natural Beauty and Opportunities for Outdoor Recreation or how areas that meet the statutory criteria have been drawn together within a coherent area for National Park designation. Our detailed responses are set out in *Appendix 3*.

## **Requests for Changes to the boundary to include additional areas**

Comments were raised by individuals, members of the community and councillors with particular interest in their local area and include:

- Fields adjacent to Gronant and Talacre Dunes
- The potential remnants of Offa's Dyke (Aberwheeler valley)
- Ysceifiog Valley (Aberwheeler valley)
- Halkyn Mountain
- Park in the Past, Caergwrle Castle and Ffridd Valley (Hope Mountain)
- Vale of Clwyd
- Clocaenog Forest
- Clywedog Valley (Coedpoeth)
- Fields at Chirk Aqueduct
- Mynydd Mynnyllod
- The Upper Dee Valley, Llandrillo and Rug Estate
- The Tanat Valley
- The Cain, Vyrnwy, Banwy and Meifod Valleys

NRW have carefully considered all submissions, carried out a detailed review of the evidence submitted, reviewed this against the designation criteria and in the case of larger sites evaluated this in the field. Our detailed responses are set out in *Appendix 3*.

## **Requests for Changes to the boundary to protect landscape from development**

Comments came from local action groups such as the Dee Valley Environmental Network and Montgomery against Pylons.

NRW's response: the fact that landscapes are at risk of development, is not something which designation can be used to address as there is no scope to consider factors outside the statutory tests. NRW's detailed responses are set out in *Appendix 3*.

Overall, having taken the consultation responses into account, NRW are satisfied that the proposed boundary delineates an appropriate and justifiable boundary for a Glyndŵr National Park. NRW therefore do not propose to amend the proposed boundary.

## Representation made in relation to alternative management mechanisms

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

## 7.4 Wider Considerations

The majority of issues raised in consultation responses did not relate directly to the statutory tests required to justify the designation order. There were also many that could reasonably be expected to be managed by, or benefit from the integrated management and security of long-term funding provided by a National Park Authority. Although beyond the statutory tests and therefore outwith the relevant considerations for NRW’s decision, they may be relevant to Welsh Government’s final decision. Therefore NRW did undertake a number of assessments to help better inform the public debate on these issues. These assessments included:

- Health Impact Assessment
- Welsh Language Impact Assessment
- Benefits for Nature Report
- Economic Impact Report
- A Review of Planning in the context of a National Park
- Equalities Impact Assessment.

These assessments generally identified risks and opportunities; they did not indicate any negative impact that we can reasonably assume a National Park would not be able to manage and many of the opportunities are within the realistic capacity of a properly funded and governed National Park Authority to positively address.

However, NRW is not the Welsh Government's advisor on all of these areas, and the assessments are therefore not intended to be the sole basis for a decision, only as a means to better inform the public debate during NRW's consultations. Welsh Government will make use of its own integrated Impact assessment to inform subsequent decision-making should NRW submit a designation order.

For this reason, NRW have reviewed all responses, including those that do not relate to the criteria to which NRW must limit its considerations. If NRW's Board decides to submit a designation order, based on the relevant considerations for *its* decision, then all consultation feedback and representations related to these wider issues will also be shared with Welsh Government to further inform the integrated assessment and/or Local Public Inquiry and a final decision.

## 7.5 Summary

The evidence demonstrates that there is an extensive tract of land that meets the statutory criteria for designation as a National Park. Overall, having taken the consultation responses into account, the NRW team responsible for the assessment is satisfied that the proposed boundary delineates an appropriate and justifiable boundary for the proposed Glyndŵr National Park.

The evidence collated during the designation process including the Special Qualities report, Forces for Change report and response to the periods of public engagement and consultation identifies a range of issues and pressures that currently, or may in the future, present a threat to the special qualities of the landscape. The Management Options 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.

Throughout the process NRW have worked to help address concerns and uncertainties around a proposed National Park relating to considerations not directly relevant to NRW's decision. For example, the ARUP reports on economic impact and review of planning services and the various impact assessments prepared to help inform the public debate on these issues. The Deputy First Minister provided a statement aimed at providing clarity

and certainty around future funding for local authorities and existing National Park Authorities should designation take place.

However, there remains a disparity of opinion between respondents on the potential role of a National Park and a National Park Authority. The statutory consultees, representative bodies, developers and some members of the public raised concerns in relation to, for example, implications relating to funding, resourcing, planning, farming and land use, visitor management and infrastructure, housing affordability and implications for the Welsh Language. Responses from bodies representing environmental, recreation and heritage interests were supportive, recognising potential benefits for nature, climate adaptation, improved countryside access and visitor management.

## 8 Closing remarks

NRW is grateful to all those who took the time to respond to the consultation and to Arup and Grasshopper for their work in processing and analysing the consultation response data.

This report has been jointly prepared, to ensure that NRW's Board members are aware and fully informed of the consultation findings and relevant insights, ahead of a decision on the making and submitting of a Designation Order. A further public facing report will be prepared and published in February to provide a more accessible format and information that may be of interest to a wide range of stakeholders.

Should a Designation Order be made and submitted to Welsh Government the evidence prepared in relation to the statutory designation criteria and wider considerations, together with this analysis of the consultation responses and individual representations, will be made available to inform the Welsh Government decision making process where the issues can be considered in the round. The evidence will also be available to inform any future local public inquiry and subsequent establishment period.



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Wales

## Respond to the Statutory Consultation

15 September - 8 December 2025

Proposed Glyndŵr National Park  
(Designation) Order 2025



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# Introduction

This document is separated into two parts.

## PART 1

The first part presents a brief summary of the assessments undertaken and evidence gathered by Natural Resources Wales (NRW) in evaluating the case for a proposed New National Park.

## PART 2

The second part is where you can respond to the statutory consultation on the Proposed Glyndŵr National Park (Designation) Order.



### Accessibility:

If you would like this document in a different format, please email [designated.landscapes.programme@naturalresourceswales.gov.uk](mailto:designated.landscapes.programme@naturalresourceswales.gov.uk) and we will do our best to help.

# Background to the Proposal

In its Programme for Government (2021-2026), Welsh Government set out its commitment to designate a new National Park for Wales. NRW is Welsh Government's statutory advisor on landscape and the designating authority for any new National Parks or Areas of Outstanding Natural Beauty.

Welsh Government commissioned NRW to evaluate the case for a new National Park based on the existing Clwydian Range and Dee Valley National Landscape (formerly Area of Outstanding Natural Beauty).

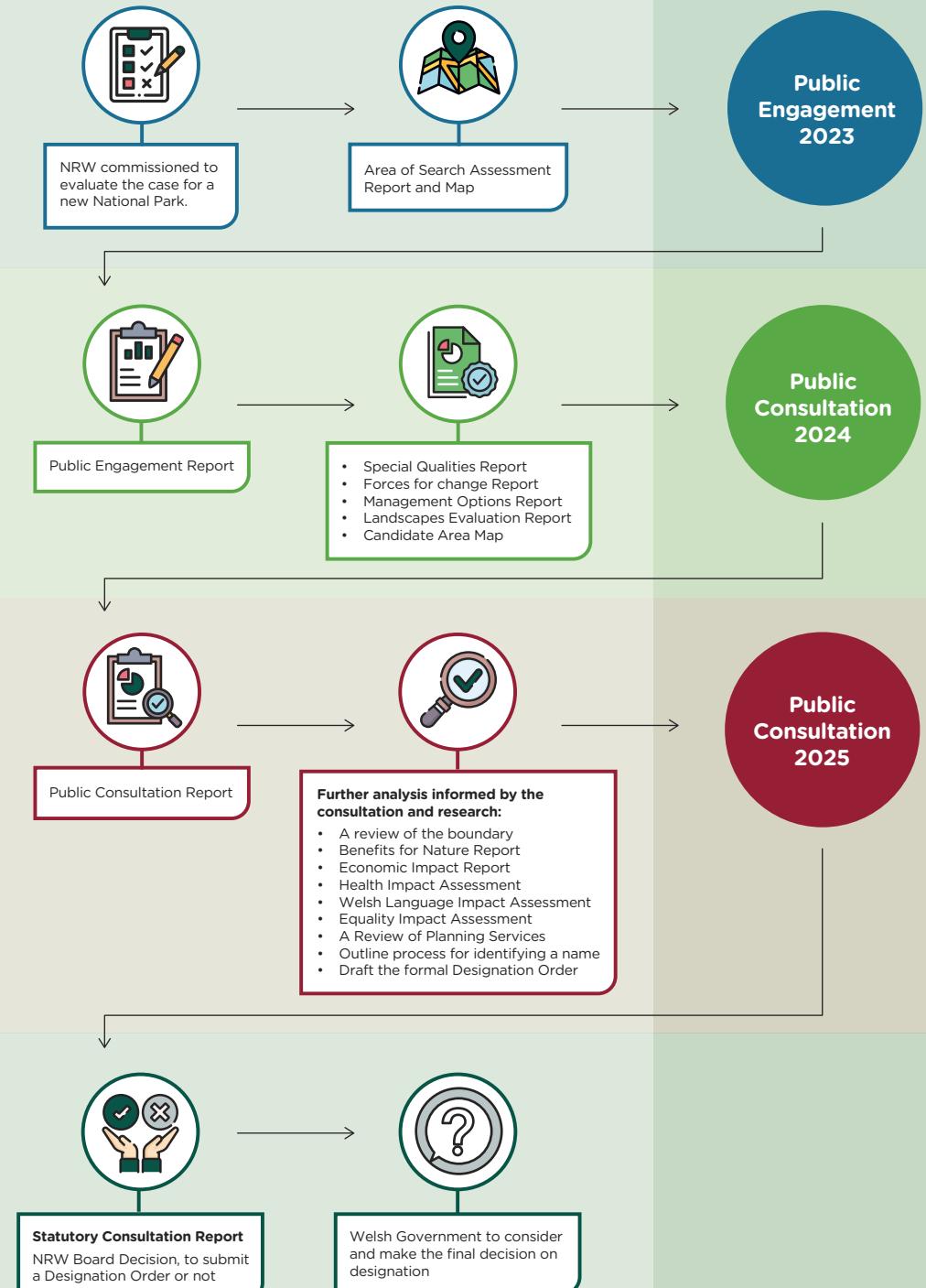
NRW is an independent organisation and will make an independent recommendation based on the evidence gathered and implications for the citizens of Wales. The statutory process and tests will be applied.

Over the last two years, NRW has been evaluating the case for a new National Park in Wales. Work has included undertaking data and evidence gathering, consultation and engagement with local communities and other stakeholders.

NRW's Procedural guidance: GN010 has informed the assessment procedure. Please see the *Procedural Guidance* document for full details (available at the events or on the website).



## NRW's National Park Evaluation Process



## Area of Search for a Potential New National Park

In 2023, we identified an Area of Search for a potential new National Park, beginning with the Clwydian Range and Dee Valley National Landscape, already recognised for its Natural Beauty. We applied spatial analysis, and mapping including the LANDMAP dataset to identify areas that could possibly merit being included.

Please see the *Area of Search Report* for full details (available at the events or on the website).

## Public Engagement Period 2023

We ran a 7-week public engagement period in 2023 which consisted of online and drop-in events for the public and targeted stakeholders. This was intended to build understanding of local issues, and involved sharing the initial Area of Search Map. There were 966 questionnaire responses, and a narrow majority of respondents were in favour of a new National Park.

The most frequently mentioned themes identified from analysis were:

1. Landscape conservation, Recognition for the area, Tranquillity.
2. Wildlife, Agriculture and Land management, Environment and Sustainability.
3. Tourism, Public services, and Infrastructure.
4. Necessity for change, Management and Controls, Costs, Funding, Bureaucracy.
5. Local people and communities, Local economy.
6. Access issues and Outdoor recreation.
7. Housing.
8. Culture and Heritage.
9. Planning implications.
10. Boundary queries.
11. A need for more information.

As a result of stakeholder feedback, a number of areas were added for further assessment to inform the Candidate Area for public consultation in 2024.

Please see the *Public Engagement Period Report 2023* for full details (available at the events or on the website).

## The Special Qualities of the Area of Search

We commissioned Craggattack Consulting to identify the special qualities of the Area of Search. The process drew on desktop research, workshops, cultural engagement, historical reports, LANDMAP data, local strategies, and public input.

Six defining qualities were identified:

- An inspiring space that promotes mental, physical, and spiritual health and wellbeing.
- A place with cohesive communities and distinctive settlement patterns.
- A story of human interaction with the landscape over millennia.
- A home to internationally and locally important species and habitats.
- A distinctive, complementary, and contrasting landscape.
- A landscape providing benefits beyond its borders.

Please see the *Special Qualities Report* for full details (available at the events or on the website).



# Forces for Change in the Area of Search

In 2024, NRW commissioned Land Use Consultants to assess the forces for change, both current and emerging, that are impacting the special qualities within the Area of Search.

Five main change categories were identified:

- 1. Climate change** – a cross-cutting force influencing all others, including both impacts and adaptation/mitigation efforts.
- 2. Built development and infrastructure** – encompassing housing, industry, transport, renewable energy, minerals, and waste.
- 3. Land management and the natural environment** – including agriculture, forestry, income diversification, and environmental stewardship.
- 4. Sustainable communities and cultural heritage** – addressing demographic shifts, housing, employment, cultural traditions, and Welsh language use.
- 5. Visitor management and tourism** – covering increased recreation, its pressures on local communities and nature, and the infrastructure needed to support it.

Please see the *Forces For Change Report* for full details (available at the events or on the website).



# Evaluation of Management Options

Land Use Consultants were also commissioned to compare five management options for addressing the forces for change identified:

- 1. Business as usual** – no change to current arrangements.
- 2. Valleys Regional Park** – an example of a partnership model aimed at environmental and social enhancement.
- 3. South Pennines Regional Park** – an example of a prospective National Park taken forward as a regional park through a partnership approach.
- 4. National Landscape Conservation Board** – an enhanced Area of Outstanding Natural Beauty model with its own governance and recreation duties, e.g. the Chilterns and Cotswolds.
- 5. National Park** – offering broader powers, statutory backing, and greater funding security.

The comparative analysis concluded that both a National Park and an enlarged National Landscape with Conservation Board were the only viable frameworks for managing the forces for change. The National Park being more robust due to its statutory planning powers, secure government funding, and proven management structures.

Please see the *Management Options Report* for full details (available at the events or on the website).



## Evaluation of Landscape Areas

To establish if there is a suitable and extensive tract of land meeting the statutory criteria for designation, we commissioned Gillespies LLP (in partnership with Ffiona Fyfe Associates Ltd and Countryscape) to undertake a detailed landscape evaluation. This involved extensive

site visits and analysis of remote data which resulted in some areas, within the initial Area of Search being excluded and some areas added to create the Candidate Area.

Please see the *Evaluation Areas Report* for full details (available at the events or on the website).

## Candidate Area

The Candidate Area Report and map provided the detail for a proposed National Park draft boundary and formed the basis for the public consultation in 2024.

Please see the *Candidate Area Report* for full details (available at the events or on the website).

## Public Consultation 2024

We ran a 10-week public consultation in 2024, on the Candidate Area and received 1,960 responses. There was strong recognition of the qualifying criteria for a National Park although this did not always translate into support for designation. There was an approximate 10% majority of respondents in favour of a new National Park.

Key issues were broadly similar to those identified in 2023. Feedback informed much of the following assessments and triggered a review of the evidence relating to the boundary.

Please see the *Public Consultation Report 2024* for full details (available at the events or on the website).

## Boundary Analysis 2025

In response to the feedback received at the 2024 public consultation we reviewed Gillespie's Landscape analysis, the findings of the Benefits of Nature report and undertook a series of site visits.

As a result, the proposed Glyndŵr National Park boundary:

- Now includes Gronant and Talacre Dunes.
- Has been refined to better capture a coherent area of natural beauty within the area's uplands, intersecting valleys and coastal edge.
- Excludes a large area of settled lowlands within Powys.

The 2025 proposed National Park boundary represents a higher bar for meeting the statutory criteria. We consider that the revisions improve the coherence and defensibility of the proposed boundary and enhance alignment with statutory designation requirements.

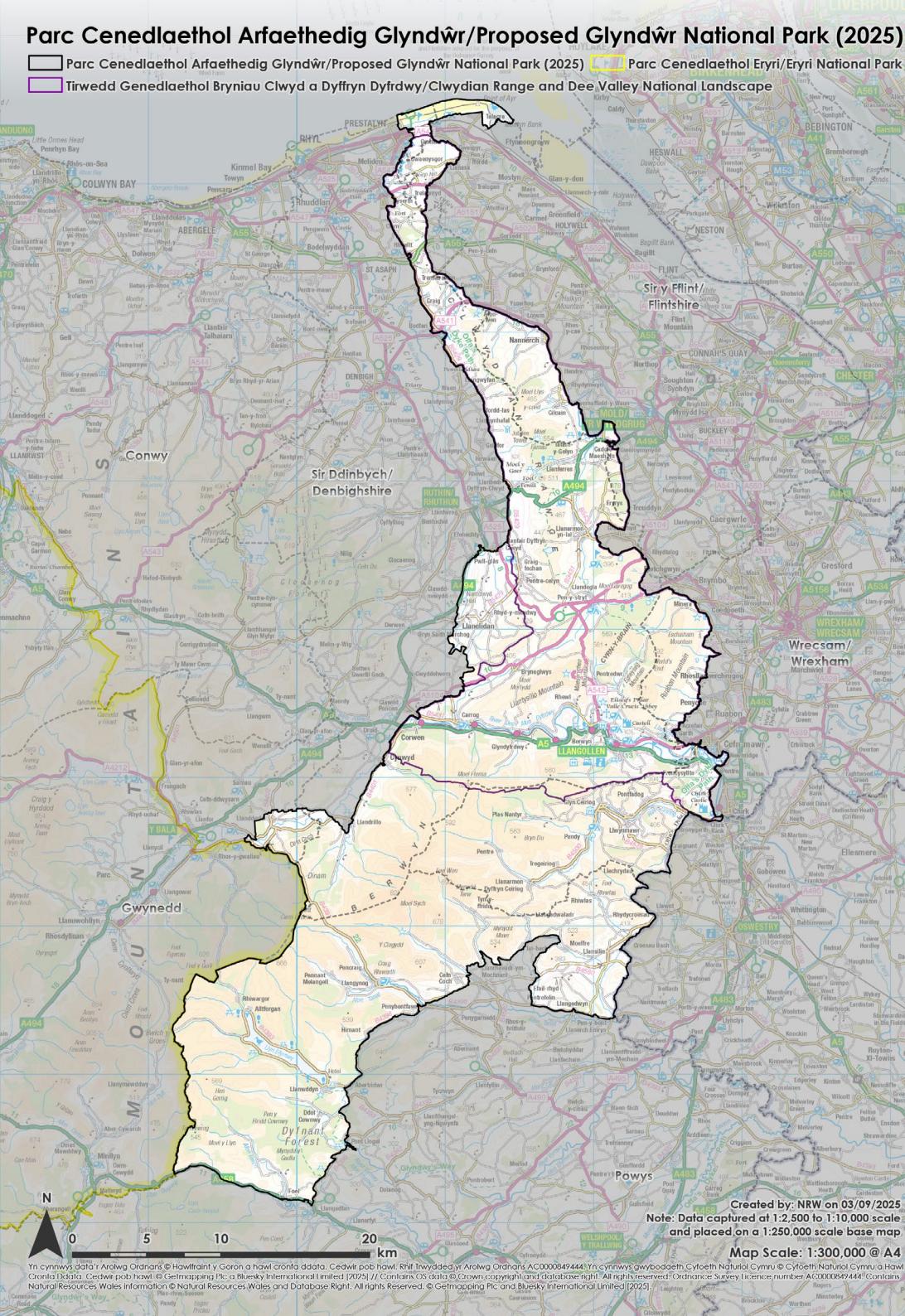
Please see the *Final Assessment of Land for Designation Report* for full details (available at the events or on the website).



## Parc Cenedlaethol Arfaethedig Glyndŵr/Proposed Glyndŵr National Park (2025)

■ Parc Cenedlaethol Arfaethedig Glyndŵr/Proposed Glyndŵr National Park (2025) ■ Parc Cenedlaethol Eryri/Eryri National Park

■ Tirwedd Genedlaethol Bryniau Clwyd a Dyffryn Dyfrdwy/Clwydian Range and Dee Valley National Landscape



# A Name for the Proposed Designation

If designation goes ahead, then NRW must include a name in the Designation Order. Therefore a thorough process of consultation on a suitable name has taken place. This has included:

- NRW's 'Naming sites and places & List of Historic Placenames' group
- The Royal Commission on the Ancient and Historical Monuments of Wales
- Welsh Government (CADW, Visit Wales and Welsh Language Policy)
- The Welsh Place Names Standardisation Panel
- Public consultation 2024

Feedback from advisors, and the majority of respondents to the 2024 public consultation were in favour of:

## Glyndŵr - National Park

We have therefore used this name for the purpose of preparing a Draft Designation Order.

Please see the *Naming the proposed new National Park in Wales Report* for full details (available at the events or on the website).



# Supporting Evidence

A series of supporting assessments have been completed in order to inform decision-making and address concerns raised by stakeholders.

## Nature

We assessed how a new National Park could support biodiversity, nature recovery, and ecosystem services within Welsh policy frameworks. With only 31% of land as semi-natural habitat and over 60% of key features currently in decline, urgent action is needed in the area to halt and reverse this worrying trend. The area includes vital habitats and species of concern. National Park status

This work is briefly summarised here, the full reports are also available on our webpage.

offers a legal platform to deliver coordinated recovery, climate resilience, and well-being, supported by a Nature Recovery Plan, funding, and governance. Case studies illustrate how success in restoration, farming, and conservation are achievable with National Park status.

Please see the *Benefits of Nature Report* for full details (available at the events or on the website).

## Health

The Health Impact Assessment explores how National Park designation could impact public health, environmental quality, and economic opportunity, supporting Welsh policy goals. Benefits include better access to nature, climate resilience, job creation, and cultural preservation. Challenges include risks of social exclusion, housing pressures, and strain on infrastructure and emergency services.

While many of the issues already exist, a well-managed National Park offers a strategic tool to coordinate solutions, support sustainable agriculture, and deliver more integrated health and environmental outcomes. Success depends on effective, inclusive implementation of appropriate policies in a National Park Management plan.

Please see the *Health Impact Assessment* for full details (available at the events or on the website).

## Welsh Language

A Welsh Language Impact Assessment found that National Park designation could enhance the visibility and use of Welsh through bilingual services, employment, and cultural promotion. A Welsh Language Strategy will be a legal requirement for a National Park Authority and this could help sustain Welsh-speaking communities. However, risks include increased tourism and second homes reducing Welsh language use.

To mitigate this, a Park Authority should adopt strong planning policies, promote Welsh in public life, and support local housing. With effective management, the Park could align fragmented efforts and support long-term linguistic and cultural resilience.

Please see the *Welsh Language Impact Assessment* for full details (available at the events or on the website).

## Economy

NRW commissioned Arup to assess the potential economic impacts of a proposed National Park. The area already draws an estimated 3.3 million visits annually; designation could increase this by 10-40%, potentially adding £26 million in tourism revenue, though infrastructure strain is a concern. Designation may boost jobs in tourism and conservation but could restrict some sectors.

Farming, key to the local economy, offers diversification potential. Housing affordability and car dependency are risks, but National Park Authorities have the means to manage these through planning tools. Success depends on proactive governance, investment, and strategic implementation.

Please see the *Economic Assessment Report* for full details (available at the events or on the website).

## Equality

An Equality Impact Assessment (EqIA) was undertaken to ensure NRW's National Park designation process meets legal equality obligations and engages protected groups. Public consultations in 2023 and 2024 were accessible, bilingual, and inclusive. No negative

impacts were identified; the process showed strong representation across demographics. Actions are proposed to enhance youth and minority engagement.

Please see the *Equality Impact Assessment* for full details (available at the events or on the website).

## Planning

NRW commissioned Arup to assess the potential impact of creating a new National Park Planning Authority. The report explores implications for five local planning authorities, including funding, service delivery, and resource pressures. Concerns include disruption to Local Development Plans, staff shortages, and possible displacement of housing and renewable energy development. Alternative planning models were reviewed, stakeholders

are divided on a preferred approach. While designation could enhance policy consistency and landscape protection, it risks fragmenting current planning functions and increasing demand on already limited planning expertise unless carefully managed.

Please see the *Review of Planning Report* for full details (available at the events or on the website).

## Potential Pros and Cons of a New National Park

Following the public engagement period (2023) and public consultation (2024), we have developed a detailed understanding of the complex issues surrounding the potential designation of a new National Park in Wales.

NRW have commissioned independent assessments and engaged with a wide range of stakeholders to examine both the benefits and implications of designation. Feedback has been gathered through thousands of responses and hundreds of in-person conversations, revealing a wide spectrum of views, often shaped by varying assumptions, access to information, and personal priorities.

Before outlining the potential pros and cons, it is essential to clarify three key assumptions that have consistently influenced opinions:

- 1. The Current Situation**
- 2. What a National Park Is (and Isn't)**
- 3. What Are We Trying to Achieve?**



## 1. The Current Situation

Many people, both supportive and opposed, recognise the challenges facing the area. Some assume the status quo will remain unchanged if nothing is done. However, it is clear from the assessment process that the area is already experiencing significant pressures.

In 2024, we commissioned Land Use Consultants to identify key “Forces for Change.” The resulting report grouped these as follows:

- Climate Change
- Built Development and Infrastructure
- Land Management and the Natural Environment
- People, Communities, and Cultural Heritage
- Recreation, Tourism, and Access

These are not static, many are worsening. For instance, climate change is intensifying and will increasingly impact biodiversity, flood risk, and agriculture in future. Local communities have also raised concerns over traffic congestion, erosion of cultural heritage, and a perceived lack of control over change.

Although some fear a National Park may increase these pressures, few suggest credible alternatives.

While designation may introduce the risk of new pressures (e.g., more visitors), it also offers enhanced planning powers, funding, and statutory responsibilities to manage them. Without reform, current systems, already stretched, may prove increasingly inadequate or untenable as these intensify in the future.



## 2. What a National Park Is (and Isn't)

There is confusion around what a new National Park would actually do. Based on the 1949 National Parks and Access to the Countryside Act, the two statutory purposes are:

- **To conserve and enhance the natural beauty, wildlife, and cultural heritage of the area.**
- **To promote opportunities for the public to understand and enjoy its special qualities**, provided this does not conflict with the first purpose (the Sandford Principle).

These core purposes are now being interpreted in the context of modern challenges such as biodiversity loss, climate change, sustainable development, and post-Brexit agricultural reform.

National Parks are increasingly seen not just as protected landscapes but as delivery mechanisms for public goods, especially aligned with recent Welsh legislation such as

- Well-being of Future Generations Act (2015)
- Environment (Wales) Act (2016)
- Agriculture (Wales) Act (2023)
- Environment (Wales) Bill (2025)

These frameworks position National Parks as central to delivering Wales' goals around sustainability, net zero, and nature recovery in future.

### 3. What Are We Trying to Achieve?

In discussions with residents, farmers, developers, environmentalists, and councillors, one consistent pattern emerges: despite surface-level disagreements, most people broadly want the same things, thriving communities, healthy landscapes, and a sustainable future.

The designation of a National Park should be seen as a means to an end, not an end in itself. It offers a structure to integrate environmental, social, cultural, and economic goals in a coherent way, which has not happened in the area to date.

Having understood these assumptions, and having undertaken extensive analysis the following is what NRW now believe are the potential pros and cons of a new National Park:

## Potential Pros of a New National Park

### 1. Enhanced Protection of Landscapes

Provides legal safeguards for natural beauty, wildlife and cultural heritage, protecting them from inappropriate development.

### 2. Boost Climate and Nature Recovery

A National Park can support long-term climate adaptation and ecosystem restoration efforts, backed by existing, and emerging policies, funding, and strategic planning. The '30x30 framework for Wales' sets out Welsh Government priorities for Wales and includes an enhanced nature recovery role for Designated Landscapes.

### 3. Agricultural Opportunities

Post-Brexit funding reforms promote "public money for public goods." Designation aligns farmers in the area with new schemes and grant opportunities (e.g., Local Farming, Sustainable Farming Scheme, Peatland Restoration Fund etc). Recent boundary changes better reflect upland farming and suitability for such opportunities.

### 4. Secure Long-Term Funding

National Parks receive direct, recurring funding from Welsh Government and are better positioned to secure match funding and large-scale grants. This creates a consistent and strategic investment pipeline. It is significantly more than the available funding for an Area of Outstanding Natural Beauty (National Landscape) and supplements rather than replaces other regional funding such as the local authority allocation.

### 5. Planning Powers

Statutory planning functions enable National Parks to better manage land use. Local authorities will work with the Park to ensure decisions are transparent, balanced, and aligned with community and environmental needs.

### 6. Economic Growth & Tourism Benefits

Sustainable tourism can drive local business, boost job creation, and support services. Our assessment suggests designation could add in the region of £26m in revenue to the local economy. (Please see the *Economic Impact Review* for further details).

### 7. Access and Health Benefits

Improved countryside access supports physical and mental well-being, and investment can ensure this is done sustainably. (Please see the *Health Impact Assessment* for full details).

### 8. Enhanced Cultural Heritage Protection

Designation would support conservation of Welsh language, traditions, and historic landscapes, buildings and archaeology through dedicated planning and community initiatives. (Please see the *Welsh Language Impact Assessment* for further details).

### 9. Opportunity for more Community Engagement & good regional Governance

National Parks are required to involve local stakeholders, creating platforms for inclusive, place-based decision-making and local representation.

### 10. A Long-Term Legacy for Future Generations

The cumulative effect of funding, planning, and conservation over decades ensures ongoing benefits that will accumulate over time so that they particularly benefit young people and future generations facing climate and biodiversity crises.

# Potential Cons of a New National Park

## 1. Tourism Pressures

There are existing localised strains on infrastructure and existing infrastructure that is not designed to take large numbers of visitors. A management plan will need to proactively address parking, congestion, and protecting sensitive ecosystems as an immediate priority.

## 2. Housing Affordability

There is concern that property prices could increase. While analysis of the evidence suggests limited impact in this area, a new Park would need to actively manage housing policy with local councils through such levers as local planning policies and Article 4 to limit holiday homes if necessary, alongside wider measures such as council tax premiums and supporting opportunities to enhance availability of non-residential tourist accommodation. (Please see the Economic Impact Report for further details).

## 3. Planning Restrictions

For most residents already within the Clwydian Range and Dee Valley National Landscape (Area of Outstanding Natural Beauty) there will be no substantive change in the planning framework. However for those currently outside the Area of Outstanding Natural Beauty, national planning policy relating to major development will apply together with changes to permitted development right. Some view this as a benefit (preventing inappropriate development), but to others it may feel like a constraint and make the process of gaining planning permission more onerous. However comparative analysis of local planning authority approval rates demonstrate National Parks across Wales have similar or slightly better approval rates than other Local Planning Authorities, which indicates that it is more a matter of making applications appropriate rather than stopping development altogether, but the process will still seem more rigorous to those beyond the existing National Landscape.

## 4. Perceived Loss of Local Control

Some communities fear decisions which are perceived as being made by outsiders with no local input. Despite extensive engagement in 2023 and 2024, concerns remain in some areas. If established a new National Park Authority would need to make appropriate efforts to encourage local participation as it provides a mechanism to boost the influence of local people.

## 5. Access Conflicts

Issues related to trespass and irresponsible visitor behaviour is already an issue irrespective of designation, and is not unique to the area. Balancing the need to preserve and maintain the existing public access with conservation and farming will require appropriate and sensitive management by a National Park Authority. It is likely that strong actions to promote and enforce more responsible visitor behaviour will be appropriate.

## 6. Transition

It will take time to establish the National Park Authority and deliver visible results. Change will not happen overnight even after establishment. Unrealistic short-term expectations could lead to frustration or disappointment from some sections of the community and this should be minimised and managed with clear communication.

## 7. Administrative Complexity

New governance structures will need to be carefully designed and implemented to minimise the risk of overlap and provide for clear roles and collaboration between organisations.



## Concluding Remarks

It is apparent from the assessment process that, as in many parts of the country, there is no “no change” option. The status quo is not stable, unmanaged change is already happening and it is eroding the area’s special qualities year after year. With the best intentions, current arrangements have proven to be inadequate for managing this change that is underway.

A National Park offers a, well-funded, and legally robust mechanism to manage these changes.

While designation cannot solve the existing problems overnight, and may even bring its own challenges, it does at least provide the tools and structure needed to respond strategically and in a regionally coordinated way, to the pressures facing the landscape and its people.



## Respond to the Statutory Consultation

Advice on making representations upon or objections to the proposed Designation Order.

### Representations

Any person or organisation wishing to make representations concerning the proposed Designation Order can do so online or in writing. This may include support or qualified support for the proposed Glyndŵr National Park.



### Objections

Any person or organisation may object to the proposed Designation Order in writing using this paper form or the online version.

In order to assist with the processing of representations and objections it is important that objectors clearly give the reason(s) for the objection.

Objections to the Order must relate to the criteria used for the designation of National Parks. The criteria set out in law can be summarised as being:



an extensive tract of country



natural beauty



it offers opportunities for open-air recreation

## Submitting objections, representations and comments

Representations, objections or comments must be duly made and received no later than Monday the 8 December 2025.

You can respond to the statutory consultation by:

- Completing and submitting the response form via the project website. Scan the QR code



- Completing and returning this response form to Freepost Plus RTJJ-AAKE-HKKU, Wales's New National Park Proposal, Natural Resources Wales, Maes y Ffynnon, Penrhosgarnedd, Bangor, Gwynedd, LL57 2DW

Wherever possible this form should be used, it will help the efficiency of processing representations and objections.



# About your Feedback

The questions in this section help us to understand who is responding to this consultation.

## **Q1 Are you responding to this statutory consultation as:**

Select only one

- An individual?
- On behalf of an organisation? (please specify which):

- On behalf of a group or community? (please specify which):

## **Q2 Which of the following best describe you?**

Select all that apply

- Local resident
- Farmer/landowner
- Visitor/tourist
- Business owner
- Other (please specify):
- Organisation/group representative (please specify your role):

- Any further comments?

**Q3 What is your postcode? We would like to capture how many respondents live within the proposed National Park boundary or outside.**

Postcode

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# Proposed Glyndŵr National Park

## Q4 I/we would like to make representation on the following.

Please select the option(s) that are most appropriate:

- I/We support the current proposal for a new National Park
- I/We support the principle of a National Park but suggest a boundary change (please provide details below)
- I/We support the principle of a National Park subject to certain points being appropriately addressed or clarified (please provide details below)
- I/We object to the proposal for a new National Park
- I/We remain undecided / don't know

Please provide further details as appropriate:

# Welsh Language Considerations

## Q5 What is your Welsh language ability?

Select one only

- Able to speak Welsh fluently
- Able to understand and speak some Welsh
- Learning Welsh
- No understanding of Welsh

We have completed a Welsh Impact Assessment (document available in full at the events and on the website). Do you have any further comments to add? If so, please answer the following questions.

## Q6 What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We would like to know your views on the effects of this proposal might have on the Welsh language, as follows:

- Opportunities for people to use Welsh language
- Treating the Welsh language, no less favourably than the English language

## Q7 Please also explain how you believe this proposal could be formulated or changed to have:

- Positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language
- No adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

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# About You

In answering the below questions you are consenting to the Designated Landscapes Programme collecting specific personal data for the purposes of monitoring how well we are reaching all the stakeholders and communities in the area. This data will be held in accordance with GDPR, more information can be found in our privacy statement (available at events or on the website).

## Q8 How old are you?

Select one only

- Under 18
- 18 - 24
- 25 - 34
- 35 - 44
- 45 - 54
- 55-64
- 65+
- Prefer not to say

## Q9 What is your gender?

Select one only

- Male
- Female
- Prefer not to say
- Other (please specify);

## Q10 What is your religion?

Select one only

- No religion
- Christian
- Buddhist
- Hindu
- Jewish
- Muslim
- Sikh
- Another religion or belief
- I prefer not to say

## Q11 What is your ethnicity?

Select one only

- White
- Welsh, English, Scottish, Northern Irish or British
- Irish
- Gypsy or Irish Traveller
- Roma
- Any other White background (please specify);
- Mixed or Multiple ethnic groups
- White and Black Caribbean
- White and Black African
- White and Asian
- Any other Mixed or Multiple background (please specify);

- Asian, Asian Welsh or Asian British

- Indian

- Pakistani

- Bangladeshi

- Chinese

- Any other Asian background (please specify);

- Black, Black Welsh, Black British, Caribbean or African

- Caribbean

- African background

- Any other Black, Black British or Caribbean background (please specify);

- Arab

- Any other ethnic group (please specify);

#### **Q12 How do you self-identify your sexual orientation?**

Select one only

- Bisexual
- Heterosexual/straight
- Gay man
- Gay woman/Lesbian
- Other
- I prefer not to say

#### **Q13 Do you consider yourself to have any of the following?**

Select all that apply

- Hearing Impairment
- Physical Impairment
- Visual Impairment
- Learning Disability
- Cognitive Disability
- Sensory Disability
- Mental Health
- Health Condition (lasting 12 months or more)
- Other (please specify):

#### **Q14 Are you currently responsible for caring for an adult relative partner, disabled child or other?**

Select one only

- Yes
- No
- Prefer not to say

**Thank you for completing this feedback form.**





## Appendix 2: Coding Categories for NRW New National Park Survey

Parent code	Child Codes
Landscape conservation	<ul style="list-style-type: none"> <li>• Landscape conservation</li> <li>• Responsible people/organisations for conservation</li> <li>• Recognition of area</li> <li>• Tranquillity and peacefulness</li> </ul>
Wildlife, environment and sustainability	<ul style="list-style-type: none"> <li>• Indigenous species</li> <li>• Visitor interference</li> <li>• Designation of wildlife conservation</li> <li>• Nature recovery</li> <li>• Conserve and enhance environment</li> </ul>
Agriculture and land management	<ul style="list-style-type: none"> <li>• Sustainable Farming schemes</li> <li>• Farming practises</li> <li>• Conflict with tourism</li> <li>• Planning implications</li> <li>• Farming land use</li> <li>• Farming infrastructure</li> <li>• Roads and logistics</li> <li>• Food self-sufficiency</li> <li>• Increased costs</li> <li>• Impact on wildlife/biodiversity/environment</li> <li>• Sustainable farming</li> </ul>
Management of tourism, public services, and infrastructure	<ul style="list-style-type: none"> <li>• Public transport</li> <li>• Road network</li> <li>• Emergency services</li> <li>• Litter</li> <li>• Parking</li> <li>• Public toilets</li> <li>• Public Right of Way</li> <li>• Trespass</li> <li>• Tourism</li> <li>• Livestock</li> <li>• Funding for public services/infrastructure</li> <li>• Over tourism</li> <li>• Traffic</li> <li>• Driving skills</li> <li>• Conflict with farmers</li> <li>• Pollution</li> <li>• Tourism accommodation</li> <li>• Local population transport</li> </ul>
Questioning the necessity for change, management and controls, costs, funding, bureaucracy	<ul style="list-style-type: none"> <li>• Funding for NP management and costs</li> <li>• Long-term funding and commitment</li> <li>• nature recovery</li> <li>• Environment restoration</li> <li>• Cost v necessity, value for money</li> <li>• Return on investment</li> <li>• Cost of living, house prices</li> <li>• Another tier of government/bureaucracy</li> <li>• Planning implications</li> <li>• Councils' finances</li> <li>• NP management plans</li> </ul>

	<ul style="list-style-type: none"> <li>• Emergency services</li> <li>• Central control v land owners/managers continuing as they have.</li> </ul>
Local people, communities and economy	<ul style="list-style-type: none"> <li>• Young people and housing</li> <li>• local jobs</li> <li>• infrastructure impact on communities</li> <li>• tourism businesses/jobs</li> <li>• Benefits to the local economy</li> <li>• impacts on the local economy</li> <li>• tourist economy</li> <li>• development of local economy with and without major 'green' development</li> <li>• high paid/high skilled jobs</li> <li>• Connecting communities/transport/services</li> <li>• active communities</li> <li>• Economic &amp; tourism and resilience</li> </ul>
Access issues & outdoor recreation	<ul style="list-style-type: none"> <li>• Public Right of Way</li> <li>• Highway infrastructure</li> <li>• Sustainable access</li> <li>• Walking trails</li> <li>• Conflict with farmers/livestock</li> <li>• Countryside code</li> <li>• Shared access (walking, cycling, equestrian, green lanes)</li> <li>• Health and wellbeing</li> <li>• New hobbies (drones etc)</li> <li>• Recreational hobbies and activities</li> <li>• Upkeep of footpaths/bridleways</li> <li>• disabled access</li> <li>• Signage.</li> <li>• Recreation jobs / accommodation</li> </ul>
Housing implications	<ul style="list-style-type: none"> <li>• Development of new housing stock, shortage of housing stock</li> <li>• Property prices</li> <li>• Second homes</li> <li>• AirBnB</li> <li>• Impact of housing availability and cost on local communities</li> </ul>
Culture and Heritage	<ul style="list-style-type: none"> <li>• Historical buildings</li> <li>• Monuments</li> <li>• Conservation</li> <li>• Access to buildings and monuments</li> <li>• Maintenance of buildings and monuments</li> <li>• Tourism</li> <li>• Signage</li> <li>• Interpretation</li> <li>• Industrial heritage</li> <li>• Poets, artists</li> <li>• Sustainability of Welsh language &amp; culture</li> <li>• Education</li> <li>• Rural communities</li> <li>• Traditions</li> </ul>
Planning implications	<ul style="list-style-type: none"> <li>• Planning authority</li> </ul>

	<ul style="list-style-type: none"> <li>• Planning officers</li> <li>• Planning controls</li> <li>• Bureaucracy</li> <li>• Costs</li> <li>• Timescales</li> <li>• Challenges</li> <li>• Restrictions</li> <li>• Limitations</li> <li>• Permitted development</li> </ul>
Boundary changes	<ul style="list-style-type: none"> <li>• Keep landscapes together</li> <li>• Boundary locations splitting communities.</li> <li>• Include other areas.</li> <li>• Questions about the suitability of areas to be designated.</li> </ul>
Other	<ul style="list-style-type: none"> <li>• EDI</li> <li>• Naming of National Park</li> <li>• Consultation and engagement process</li> <li>• Other</li> </ul>
Process	<ul style="list-style-type: none"> <li>• Comments about the question</li> <li>• Comparison to other NP's</li> <li>• Other reports/analysis needed/requested</li> </ul>
No to the National Park	<ul style="list-style-type: none"> <li>• Objections to the existence or concept of the national park</li> </ul>
Boundary location – remove area	<ul style="list-style-type: none"> <li>• Suggestions to remove areas from within national park</li> </ul>
Renewable energy and associated developments	<ul style="list-style-type: none"> <li>• Wind</li> <li>• Solar</li> <li>• BESS</li> <li>• Transmission</li> <li>• 'Green' energy</li> </ul>
Health and Wellbeing	<ul style="list-style-type: none"> <li>• Health and Wellbeing</li> </ul>