

Powys County Council

Formal Response to Statutory Consultation on the Proposed Glyndwr National Park

Powys

Dear Sir/Madam,

Our ref: JB/ks/MS051225
Your ref: Statutory Consultation on Proposed Glyndwr National Park

Thank you for consulting Powys County Council (PCC) on the above, which we received on the 15 September 2025. The Council notes the supporting documentation which has been published on the NRW website in respect to the consultation.

Having considered the published evidence, PCC writes to formally **OBJECT** to the proposed designation of the Glyndŵr National Park under the National Parks and Access to the Countryside Act 1949, as applied in Wales. While the Act's purpose is to conserve and enhance natural beauty and promote public access, the proposal does not meet key statutory tests and raises significant practical concerns for communities and planning authorities.

Parameters for Objection

Under Section 5 of the 1949 Act, National Parks must comprise *"extensive tracts of country… distinguished by natural beauty and opportunities for open-air recreation"*. Welsh Government's Programme for Government (2021–2026) and NRW's GN010 Procedural Guidance require robust evidence of exceptional landscape quality and accessibility. 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.

Coherency of Area

The Council maintains that 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 such as Bannau Brycheiniog/Brecon Beacons, Eryri or Pembrokeshire Coast national parks in Wales, or for that matter, any other national park within the United Kingdom, such as the Yorkshire Dales, Dartmoor, Cairngorms national parks etc., all of which possess a distinct physiographic identity.

This lack of distinct physiographic identity, highlighted by the use of the "Glyndwr National Park" name, based on a historical personage rather than any outstanding distinguishing feature, highlights the reality that the proposed national park area is a number of disparate, individual areas of natural beauty that each have their own individual characteristics and their only association is that they can be grouped along a north - south corridor.

Landscape and Natural Beauty

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. Designation risks diluting the meaning of "natural beauty" and misallocating resources away from genuinely exceptional landscapes.

Unlike the Clwydian Range, already identified as a National Landscape, and majority of the Berwyn Mountain massif to the north, the Powys section of the proposed area is largely much

less distinctively upland in character than Bannau Brycheiniog/Brecon Beacons or Eryri national parks, although it is acknowledged the highest point of the Berwyns (Cadair Berwyn / Moel Sych at 827m aOD) is on the Powys border. However, these features form a single ridge feature with south-east facing crags extending over a relatively small area (c.6-8km^2) of the wider Berwyn massif which is otherwise a rolling upland plateau area; it is not clear which aspects of 'natural beauty' are being used as a basis for identifying this whole landscape area worthy of national park status.

Landscape Character Assessment

The published Powys Landscape Character Assessment (2022) indicates that the proposed national park impinges on 10 landscape character areas, as identified in Table1.

Table 1: Powys Landscape Character Areas Impacting by Proposed National Park

Local Character Area ID	Local Character Area Name	Total Area of LCA (Ha)	Area Within LCA (Ha)	Percentage
LCA 1	Berwyn Foothills	7623.439	7465.524	97.929%
LCA 2	Berwyn Mountains	10935.738	10820.101	98.943%*
LCA 3	Llanrhaeadr	4256.310	3042.455	71.481%
LCA 4	Llyn Efyrnwy / Lake Vyrnwy	1932.096	1932.096	100%
LCA 5	Dyfnant Forest/Llanbrynmair Moors	14423.664	6558.960	45.474%
LCA 6	Tanat Valley	1722.514	504.411	29.283%
LCA 7	Llanfyllin Farmlands	9529.388	135.272	1.420%
LCA 9	Pont Llogel	8870.231	22.734	0.256%
LCA 12	Tregynon/Llanerfyl	16786.768	787.551	4.691%
LCA 14	Banwy Valley	1887.830	23.324	1.235%

* remainder within Snowdonia National Park

Guidance Note GN010 states that:

*"....areas are defined using **landscape character assessment**...".*

However the proposed National Park boundary appears not to have had regard to the detailed work prepared and published by Powys. Table 1 identifies that other than LCA 2 and LCA 4, the proposed National Park cuts across identified distinctive landscape units. In some instances, such as LCA 3 and LCA 14, the Landscape Character Area is separated with non-contiguous areas within the proposed National Park boundary, whilst extensive tracts are excluded.

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.

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.

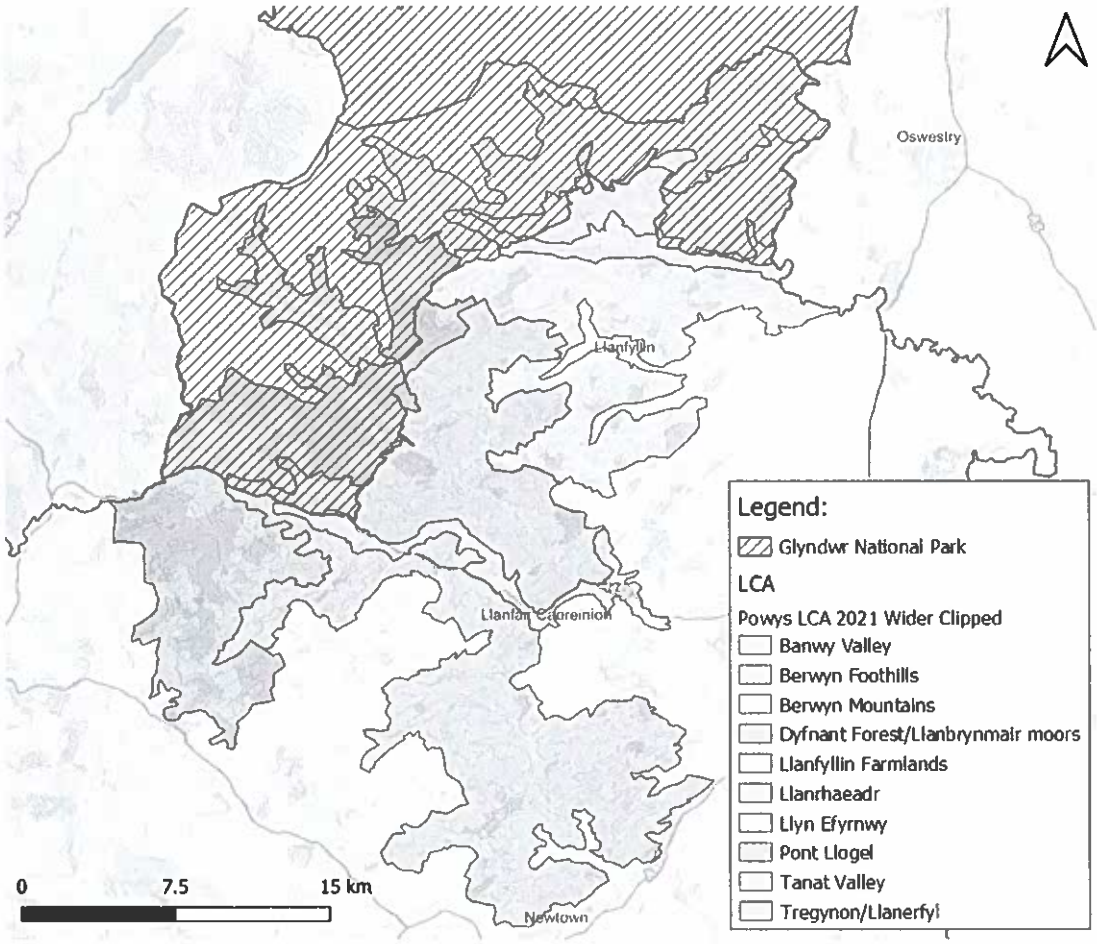
In contrast, LCA3 is identified as:

> *".....an elongated landscape running west to east between the Berwyn Foothills to the north and the Tanat Valley to the south, and includes the settlements of Llanrhaeadr-ym-Mochnant in the west and Llansilin in the east. The area is dominated by undulating, pastoral farmland, however the topography of this landscape is less pronounced than the neighbouring Berwyn Foothills LCA to the north".*

It is noted that the settlement of Llanrhaedr-ym-Mochnant is excluded from the proposed National Park area whilst the more lowland and farmed area around Llansilin, in the separated eastern part of LCA3 appears to have been drawn in to the proposed National Park area. It is presumed this has been done to include the birthplace of Owain Glyndwr, and so to provide justification to the proposed name, although it cannot be justified on landscape grounds.

The Council therefore 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.

Figure 1: Areas of Powys Landscape Character Areas impacted by the Proposed National Park



Access to the Proposed National Park Area

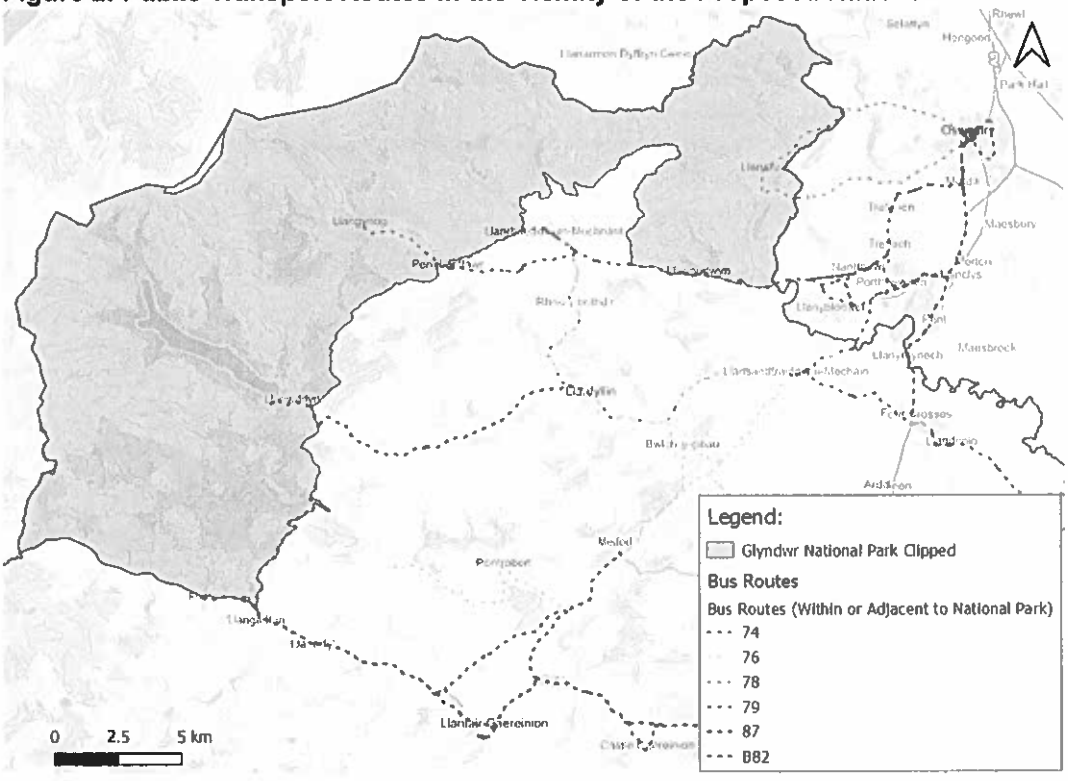
The Act emphasizes securing access to open country and public paths. However:

- The proposed area has limited public transport links, making access inequitable and contrary to the Act's social purpose of enabling enjoyment by all.
- Existing rights of way are fragmented, and there is no clear plan for significant improvement.
- Increased visitor numbers without robust infrastructure will exacerbate congestion and environmental degradation, undermining the very purpose of designation.

Public Transport

The public transport access to the Powys section of the proposed National Park is extremely limited, which would limit equal access for all and increase reliance on the private vehicle. The nearest railway station is at Gobowen, north-east of Oswestry and so reliance for public transport is limited to buses. The route maps and timetable frequency of buses are shown in Figure 2 and Table 1.

Figure 2: Public Transport Routes in the Vicinity of the Proposed National Park in Powys



Whilst there are buses which access the area, frequencies ate limited. Only services 78, 79 and B82 enter the proposed National Park area itself, and frequencies are limited as highlighted in Table 1.

Table 1: Frequency of Bus Services within and in proximity to the Proposed National Park

Bus Routes	Relation to the National Park	Days	Frequency
74	~800m away at terminus	Mon - Sat	6 round trips per day
76 *	~800m away.at terminus **on request**	Mon - Sat	5 round trips per day
78	Route goes through the park.	Two Days a Week (Wed and Fri)	2 round trips per day
79A/B *	~3.4km enters the park **on request** (~2.8km, ~1.3km, ~0.77km, ~0.22km. Borders the National Park)	Mon - Sat	1 round trip per day
87 *	~0.47km through the park. (~7.2km. Borders the National Park)	Mon - Sat	4 round trips per day (Foel section is only twice per day)
B82 *	~1.75km through the park (~1.05km. Borders the National Park) **Pre-Booking Required**	Two Days a Week (Wed and Fri)	1 round trip per day

*** Notes:**
Service 76 routes only continues to Llanrhaeadr on request only (see timetable for details).
Two of the service 79A/B routes only continues to Llanrhaeadr Square on request (see timetable for details).
Service 87 have some routes in which the bus will operate to points on request to the driver (see timetable for details).
Service B82 only operates if the journey is pre-booked. Booking must occur two hours before the journey (see timetable for details).

As indicated in Table 1, only one bus route (Service 74) offers a regular timetabled service, and that only to Llanrhaeadr village. Other services are less frequent, are on request or require pre-booking.

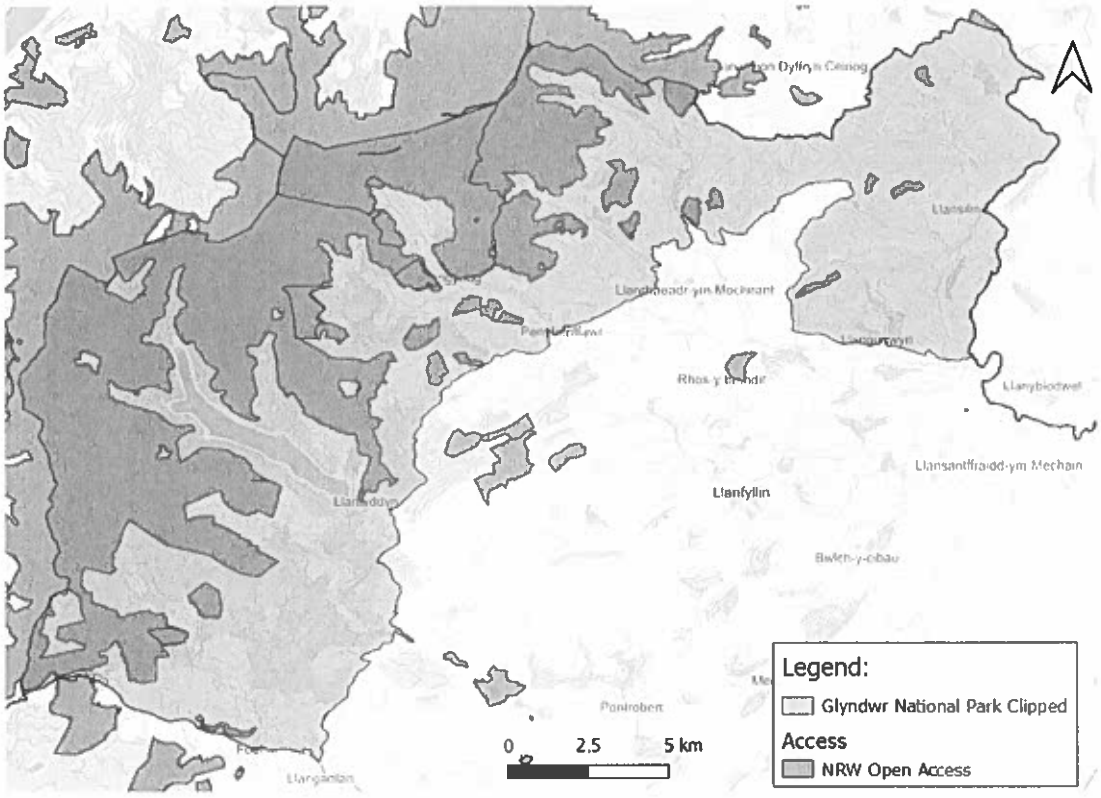
Access Land and Rights of Way

The proposed National Park includes 416km of Rights of Way, approximately 4.5% of the total Powys network. In addition there are 12,316.30ha of Open Access land which provide the right of access on foot only to upland areas and some forestry tracts (Figure 3).

Access Land

All open access land within the proposed National Park is CRoW (Countryside Rights of Ways) Access Land. Access Land covers 39.40% of the proposed National Park and is primarily located in the upland Berwyn Mountains and Lake Vyrnwy areas. As Figure 3 indicates, there is limited Access Land in the eastern part of the proposed National Park within Powys.

Figure 3: Areas of Open Access land within Powys that is within the proposed National Park.



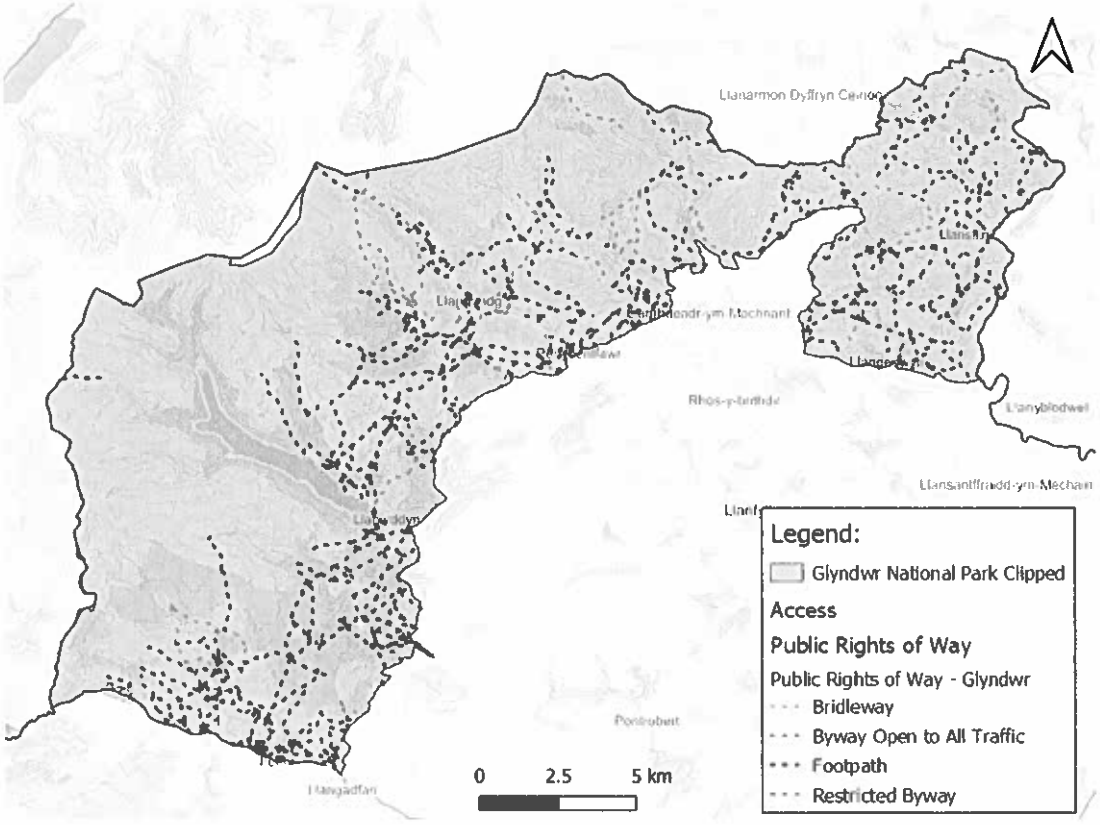
Public Rights of Way

Powys has a network of over 9,250km of public rights of way. Of this, 416km would fall within the boundary of the proposed new National Park, comprising:

- Footpaths – 312km
- Bridleways – 72km
- Restricted byways – 27km
- Byway open to all traffic – 5km

This represents approximately 4.5% of the Powys public rights of way network. It includes part of one National Trail (the Glyndwr's Way) and parts of two recreational trails, the Pererindod Melangell and Ann Griffiths walks. The rights of way are most densely clustered at the southern and eastern edges, becoming sparse on the western and northern parts of the proposed new National Park where the land is predominantly open moorland (Figure 4).

Figure 4: The Public Rights of Way network within the Powys section of the Proposed National Park



It is of concern that the proposed National Park is primarily accessible only on foot, and with regards other forms of Public Rights of Way access, the network compares less favourably than with the Brecon Beacons National Park to the south (Table 2). This potentially restricts the access for a wider range of users than would be expected within a National Park environment.

Table 2: Comparison of Rights of Way Network in Powys Areas of National Parks

Description of Public Rights of Way	Percentage – Glyndwr National Park	Percentage – Brecon Beacons National Park
Bridleway	17.297%	23.982%
Byway Open to All Traffic	1.367%	0.159%
Footpath	74.904%	61.914%
Restricted Byway	6.432%	13.945%
All	100%	100%

Table 2 highlights that that there are fewer bridleways and byways in the proposed National Park area, limiting scope to promote alternative forms of access such as horse riding and cycling unless permissive rights are obtained.

Management of the Public Rights of Way network rests with PCC. That encompasses all legal and practical work, such as enforcement and maintenance of assets such as path surfaces and

bridges. The core funding to do that is now very stretched, broadly covering officer time only with small revenue area maintenance budgets, equating to just over £3.50 per km of rights of way. The Council is reliant on its countryside volunteer programme, grants and other external funds to carry most of its practical work on the network. An internal Council capital allocation has been secured for a bridge replacement programme; this is being prioritised towards the highest use paths i.e. those closest to towns and villages and on well-known promoted routes.

It is fair to say that little PCC resource is currently allocated to managing public paths in the areas around Lake Vyrnwy and the Berwyn, being remote, trackless hill country for the most part, with walking that is commensurate with this. Known honeypot sites are Lake Vyrnwy itself, where Hafren Dyfrwdy and the RSPB manage large tracts of land and have secured significant funds to provide access opportunities; Dyfnant Forest, which is NRW managed with a variety of permissive horse riding Trails; and Pistyll Rhaeadr waterfall which is on private land. The waterfall itself is generally accessed from the county road over a permissive path; the rights of way involvement is broadly limited to the footbridge immediately below the waterfall.

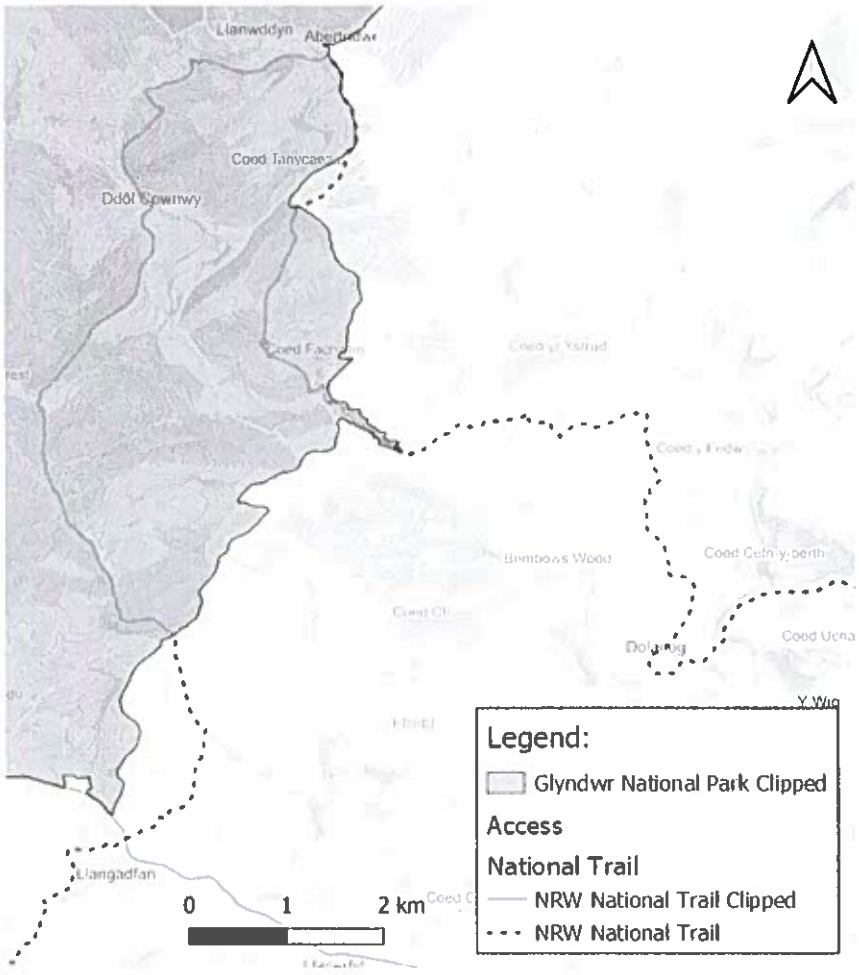
Management of the rights of way network can be delegated by the County Council to a National Park Authority, but that is not a given; it varies across the existing National Parks of Wales. It is an active decision based on the business case for doing so. The fact that the paths in the proposed new Glyndwr National Park area are predominantly on open country that is lightly accessed due to the remote and challenging terrain, or in areas where major public or third sector organisations (RSPB, Hafren Dyfrdwy and NRW) are already actively managing the honeypot sites would need to be considered.

Glyndwr's Way National Trail

Glyndwr's Way National Trail, is a 218km (136 mile) National Trail which lies wholly within Powys. It was designated in 2002 but barely impacts within the proposed Glyndwr National Park. Approximately 17km (<8%) is located within the proposed National Park boundary, although some of this is on county roads. It is not a contiguous section of the trail within the proposed National Park as indicated by Figure 5.

The Council manages the Glyndwr's Way, hosting the NRW-funded role of Glyndwr's Way National Trail officer; again this work is wholly reliant on external grants. The grant covers one full time officer and annual management costs on a formula-based allocation per kilometre of National Trail. It would not be cohesive to split the management of this Trail through a delegation of Rights of Way responsibilities, in view of the very small proportion within the new National Park area.

Figure 5: Location of Glyndwr's Way National Trail in relation to the proposed National Park

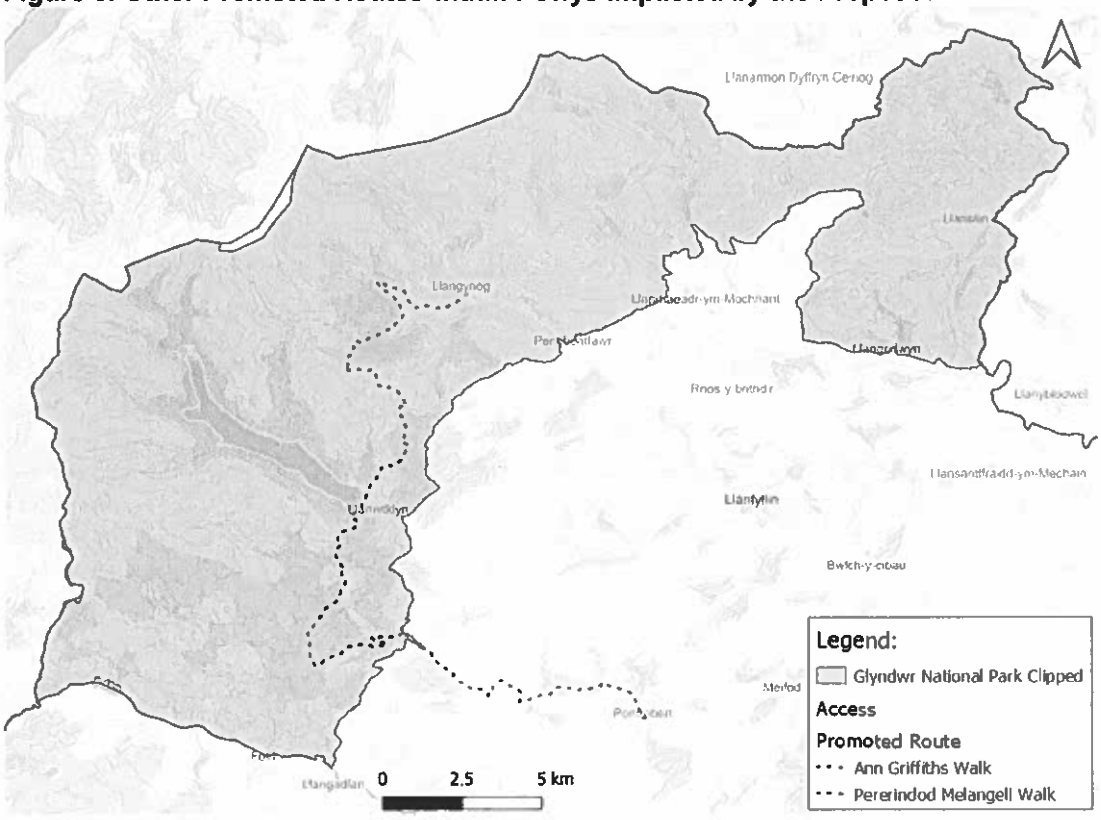


As a consequence, a fragmentation of responsibilities of the National Trail has potential adverse implications for its long-term management and promotion. It is currently wholly maintained by Powys County Council and voluntary groups supported by the Council. National Park designation has the potential to disrupt these working practises to the detriment of the Trail.

<u>Other Promoted Routes</u>

PCC promotes and maintains two recreational trails, these being, the Pererindod Melangell and Ann Griffiths walks (Figure 6).

Figure 6: Other Promoted Routes within Powys impacted by the Proposed National Park



Whilst the Pererindod Melangell walk is wholly within the proposed National Park area, just one kilometre of the Ann Griffiths walk is within the proposed boundary, and so again has the potential to adversely impact its longer-term management.

Common Land

There is approximately 1,944 hectares of registered common land and village green within the proposed boundary, being 2.5% of the total common land in Powys. There is a further 10,372 hectares of open access land that is not registered common, noting that one unit of over 6,800 hectares crosses the county boundary into Denbighshire. The new National Park Authority, if formed, would automatically become the access authority for the common land and open access land. However, the Commons Registration duty is highly likely to remain with the County Council, as splitting the registers would be very complex.

Planning

Designation of the proposed National Park has the potential to adversely impact development plan preparation and development management decision-making.

Clarity over future responsibilities and statutory duties in relation to the delivery of planning services is essential should designation proceed. Powys already includes a large area of Brecon Beacons National Park and a small area of Snowdonia National Park.

PCC acknowledges the circulation of the Briefing Note of October 2025, but is concerned that there is still no clarity with regards any transitional arrangements should the proposed National Park be designated.

Planning Policy

All existing local planning authorities and the two Corporate Joint Committees (North Wales and Mid Wales) within the proposed National Park area would be affected by the designation of a new National Park in terms of the preparation of their Local Development Plans, Strategic Development Plans and Local Development Plans-Lites.

Designation would require amendments to planning legislation, regulations, national planning policy and guidance.

In the short-term, existing development plan preparation including the preparation of the Powys Replacement Local Development Plan (2022-2037) must not be interrupted or impacted by any proposed National Park designation and preparation must be allowed to continue unhindered to adoption. The October 2025 Briefing Note does not provide that certainty referring to:

> *"Transitional arrangements will be put in place while the new National Park Authority is being established, and this will help avoid unintended impacts on Local Development Plans. Welsh Government is aware of the risks involved and intends to avoid duplication or unnecessary costs. A constructive dialogue between local planning authorities and the Welsh Government will be essential and the above-mentioned advisory group will help to steer discussion in this respect."*

Welsh Government's steer on joint working is of interest but lacks any detail. It clearly sees that joint arrangements built in from the outset, but several joint LDPs does not sound plausible.

Notwithstanding the above, Development Plans must be kept under review by a Local Planning Authority and it is anticipated that the designation of a National Park would constitute a trigger event for a development plan review. This has the potential to halt the preparation of the Powys Replacement Local Development Plan (2020-2037) and other development plans being prepared across Mid and North Wales. It may also trigger a review of Future Wales, the National Development Framework.

Any delays to the preparation of on-going development plans, including the Powys Replacement Local Development Plan, must be avoided because any delay to adoption as a consequence of designation would impact the whole of a Local Planning Authority's area and its communities and not just the area proposed for designation as a National Park. This would adversely impact the Authority area and its communities in meeting current and future housing, economic, infrastructure and community needs. It would necessitate a review of the Delivery Agreement for the Replacement Local Development Plan, revisions to the supporting evidence base and could ultimately result in the Authority having to re-start the plan preparation process as it would impact on the Plan's Preferred Strategy which has completed its statutory period of public consultation.

Designation of a National Park would also restrict the types of development that would be acceptable within the National Park area in line with legislation, regulations and national planning policy as the Sandford Principle would apply, such as mineral extraction or large-scale

renewable energy projects. This could cause the displacement of those types of development to non-designated areas resulting in development plans outside the designated National Park area having to make sufficient provision to accommodate and meet those needs. This would impact all tiers of development plan in Wales.

Designation would also have implications for the Mid Wales and North Wales Corporate Joint Committees in meeting their statutory duties to prepare Strategic Development Plans. A new National Park Authority would have to be accommodated within both Corporate Joint Committees, which would have legislative and constitutional implications, and funding implications for any future National Park Authority in order support the preparation of Strategic Development Plans.

PCC is concerned that the *Planning Services Review in the context of a proposed National Park in Wales* document prepared by Ove Arup & Partners Limited to consider planning matters does not reflect the true cost of preparing a Local Development Plan. For forward planning work, the evidence uses a comparator figure of £283,000 informed by the costs of the Snowdonia National Park Authority (SNPA) for the Eryri National Park Local Development Plan. However, PCC understands that this figure does not reflect the true cost as the SNPA undertook a "short form" plan review rather than a full review, with the commensurate reduction in costs.

To date, to prepare the informing evidence and Preferred Strategy to enable work to progress to Deposit Stage (Regulation 17) has cost PCC approximately twice the amount of the SNPA comparator figure, and it is anticipated that a further £6-700,000 will be expended before the Replacement LDP is adopted. With the lack of certainty around the transitional arrangements, it remains the case that the costs of the proposed National Park forward planning, and implications for costs of the surrounding Local Planning Authorities obliged to carry out a Plan review if Designation occurs, could be considerable to the detriment of the public purse.

Development Management

Increasing the number of Local Planning Authorities in Wales from 25 to 26 must be avoided as this would increase public sector costs across Wales at a time of reducing budgets. There are already capacity issues affecting the resilience of planning services in Wales, as evidenced by Audit Wales, so adding to these issues should be avoided: https://www.audit.wales/sites/default/files/planning-services-2019-full-report-english_5.pdf.

Designation of the proposed National Park has the potential to adversely impact the communities and economy of North-west Powys. Whilst representation on the County Council will remain (through County Councillors), the LPA will lose influence over development decisions to the detriment of communities where the tenets of conservation as enshrined in the Sandford Principle will take precedence. As a dominantly rural area with no major centres included within the proposed National Park in Powys, this is likely to have adverse impacts on future housing provision and economic development.

The loss of planning application fees, including pre-application fees, to the local authority would also be unacceptable to Powys County Council. For the financial year 2024/25, the eight Town and Community Council areas directly impacted by the proposed National Park (Table 4) had 72 planning applications submitted, providing planning fees of £28,270.

The *Planning Services Review in the context of a proposed National Park in Wales* document prepared by Ove Arup & Partners Limited suggested that alternative models of providing Development Management services should be considered, such as the "South Downs" model. However, it is apparent from the typical fee income highlighted above that such fees would not support the cost of maintaining dedicated officer support for the planning function within the Powys area of the proposed National Park.

Additional resources would also be required to support amended replacement local authority ICT systems that would be needed to accommodate the establishment of a National Park Authority (e.g. planning, land charges, etc.). A full regulatory impact assessment which fully considers the cost and resource implications for local authorities should be undertaken to inform the proposed Designation.

Tourism

Powys County Council has tourism priorities, similarly to the wider Wales priorities, with the aim of growing tourism from a qualitative rather than a quantitative perspective. As such, the Council is looking to grow visitor spend, increase dwell time, extend the traditional summer tourism season and convert days visitors into staying visitors.

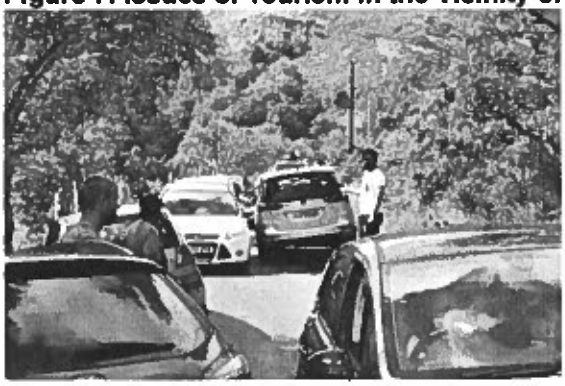
However, from visitor data from Bannau Brycheiniog/Brecon Beacons National Park, the national park sees a disproportionately high volume of day visitors, attracted by a quick visit into a national park, but not staying, and often spending little in the local economy.

The prospect of a new national park taking in a small, very rural area in north Powys, is a major concern. It would most likely see an increase in day visitors from the very accessible and captive West Midlands audience, almost certainly by private vehicle, resulting in all the visitor management problems that increasing numbers of day visitors bring to rural areas of Powys.

The proposed National Park, if designated, is likely to have a similar impact to the reopening of the countryside after the Covid-19 pandemic. This resulted in increased inward volume to the Pistyll Rhaeadr/ Lake Vyrnwy area, with thousands of day visitors from the Midlands, travelling in and out of Powys in the same day and contributing little to the local economy.

This is exemplified by the ongoing issues in north-west Powys, particularly around the privately owned Pistyll Rhaeadr waterfall, which is regularly promoted on social media and video streaming platforms, The inaccessibility of the waterfall along very narrow B- and C-class roads with limited car parking has seen roads blocked, local residents inconvenienced and the police and highways services regularly receiving complaints about the volume of traffic and antisocial behaviour in terms of parking in particular (Figure 7).

Figure 7: Issues of Tourism in the Vicinity of Pistyll Rhaeadr



It has become such an issue that as a local authority, PCC does not promote Pistyll Rhaeadr in visitor marketing, as the overall visitor experience at the site is so dependent on volume of cars, and a positive experience for visitors is not guaranteed.

Designated Sites

The Powys Landscape Character Assessment recognises that:

> *"The Berwyn mountain range is the largest Site of Special Scientific Interest (SSSI) in Wales covering 24,321ha and comprising of a mosaic of habitats. They also form part of the Berwyn & South Clwyd Mountains Special Area of Conservation (SAC) and Berwyn Special Protection Area (SPA). There are large tracts of upland heathland and blanket bog as well as a large block of managed heather moorland which extend into the LCA area and are included in the Berwyn National Nature Reserve (NNR). The SSSI supports nationally scarce plants and rare invertebrates including a number of important associated upland breeding birds, including the hen harrier, merlin, red grouse and black grouse. Active management to protect and enhance biodiversity adds significant value to this area."*

The Council declared a Nature Emergency in October 2022 acknowledging the decline in biodiversity and increasing pressures upon the County's natural habitats. PCC considers that increasing recreational pressures to this area as part of the proposed National Park has to potential to undermine the conservation objectives of the SSSI, SAC and SPA designations.

Infrastructure and Services

Highways

Unlike the Brecon Beacons National Park, which is served better by highways and has three trunk roads partially crossing the area (A470, A40, A479) linking from centres of population to close proximity to one of the main focal points of interest [Pen y Fan], the area of Powys within the proposed Glyndwr National Park is served only by standards of road of lower quality, being B-class at best.

As Powys will remain the Highways Authority within the proposed National Park area, management of the network and parking will potentially result in disproportionate cost increases in an otherwise rural area.

In the Pistyll Rhaeadr area, temporary clearways have previously been imposed and due to ongoing problems, the Council has been going through the motions of making the temporary clearway order permanent.

Other attractions with the proposed National Park tend to be even more isolated, like St Melangell's Church near Llangynog (The Shrine Church of Saint Melangell) which sometimes becomes a large tourism draw because of a press article, news story or a social media feed. The roads to that Church are as bad if not worse than those leading to Pistyll Rhaeadr.

Similarly, increasing promotion of the castle mound at Llansilin associated with Owain Glyndwr raises the prospect of increasing issues along minor B and C Class highways for the Highways Authority, to the detriment of local residents.

As a consequence, due to the nature of the road network, a similar restrictive approach to highway management to that at Pistyll Rhaeadr may have to be applied elsewhere within the proposed National Park area, resulting in increased road markings and streetside furniture and attendant costs. It would also become necessary to enforce such changes. During the post Covid-19 pandemic recovery period, additional grants funded enforcement of the clearway at Pistyll Rhaeadr. These grants are no longer available and the likelihood of effective enforcement with current resources is minimal.

Waste

Waste collection is the responsibility of PCC. The potential influx of 100,000+ visitors annually would strain waste collection and management infrastructure in this rural area.

Other Non-Council Services

The area of North-west Powys has limited access to other services. Hospitality is not well-developed and there is limited access to NHS services.

Unlike the Brecon Beacons National Park to the south, which has four Mountain Rescue teams covering the National Park area, there is only the North-east Wales Search and Rescue (NEWSAR) service based in Mold providing voluntary rescue services in the area of the Berwyn Mountains (Table 3). Increasing promotion of the area as a National Park will place additional requirements on the Mid Wales Fire & Rescue Service an the Council to provide essential rescue and support services. Much of Powys relies upon the services of retained fire crew to provide Fire and Rescue services.

Table 3: Mountain Rescue Services

Glyndwr National Park	Brecon Beacons National Park
North-east Wales Search and Rescue	**Western Beacons Mountain Rescue Team**
	Brecon Mountain Rescue Team
	Central Beacons Mountain Rescue Team
	Longtown Mountain Rescue Team

Socio-Economic Impacts

Designation will transfer planning powers to a National Park Authority, imposing stricter controls under the Environment Act 1995. This will:

- Constrain local authorities' ability to deliver housing targets and economic diversification.
- Risk inflating house prices and creating affordability issues, contrary to Welsh Government's housing strategy.
- Apply the Sandford Principle, prioritising conservation over socio-economic needs, reducing flexibility for rural communities.

Housing Market Impacts

- **Affordability Pressure**: Evidence from existing national parks, such as the Brecon Beacons, shows that designation often accelerates house price inflation due to increased demand for second homes and holiday lets. Properties within National Parks can be inflated compared to surrounding areas. During the Covid-19 pandemic, Brecon Beacons experienced significant rises in property prices linked to urban flight and flexible working trends, compounded by limited housing supply and planning restrictions.
- **Supply Constraints**: National Park status introduces stricter planning controls, reducing opportunities for new housing development. Similar restrictions in Glyndwr would exacerbate existing rural housing shortages in Denbighshire, Flintshire, Wrexham, and Powys.
- **Risk of Displacement**: Rising prices and limited development capacity will likely displace local residents, particularly younger households, undermining community sustainability.

National Park designation is likely to increase pressure for second homes and holiday lets, compounded by environmental constraints on development. As has occurred in the Brecon Beacons National Park, these issues have required complex interventions, as allocations are insufficient to deliver sufficient affordable homes for communities within the BBNPA planning area. These strategies include affordable housing strategies and commuted sum policies:
Affordable Housing Strategy

Economic Development Costs

- **Planning and Regulatory Burden**: National Park designation adds a new layer of bureaucracy, complicating planning processes for businesses, land based enterprises and infrastructure.
- **Infrastructure Strain**: Designation could impose additional costs on already stretched services, with no clear funding plan disclosed by Welsh Government. While ministers have promised future financial provision, details remain vague.
- **Tourism Dependency**: Other National Parks, such as the Brecon Beacons have demonstrated that their economy increasingly becomes reliant on tourism as a primary economic driver. This tends to create seasonal employment patterns and vulnerability to external shocks. Community development initiatives tied to tourism have struggled to deliver inclusive benefits.

Detailed research within the Brecon Beacons National Park (Isaacs, 2017*) has highlighted that top down, usually time-limited, grants for isolated community-led initiatives are unlikely to be conducive to effective rural development. Instead of treating the community as another delivery partner, community-led action should be enabled to perform for the long-term.

Despite decades of experience, existing National Parks still grapple with balancing conservation and socio-economic needs. Replicating this model in Glyndwr without robust mitigation measures risks repeating these challenges on a larger scale, putting increasing strain on surrounding areas which will remain the responsibility of Local Authorities.

* Isaacs, E.M. (2017). *Community Development, Tourism and the Sustainable Development Fund within the Brecon Beacons National Park*. London South Bank University.

Local Governance

The Glyndwr National Park proposal currently provides no clear governance arrangements. There is also uncertainty about how planning powers would be delegated and how local voices—particularly town and community councils—would be represented in decision-making. This absence of clarity risks creating a democratic deficit and undermining local accountability.

Unlike Brecon Beacons, where governance arrangements are codified and subject to Welsh Government oversight, the proposed National Park offers no clear assurance on funding or transition planning. Without guarantees, local authorities risk being financially disadvantaged, and communities could lose influence over land-use decisions.

Until a governance model comparable to existing national parks is defined - ensuring local representation, planning clarity, and financial safeguards - the Glyndwr National Park proposal should not proceed. The current ambiguity poses significant risks to democratic accountability, service delivery, and community well-being.

T&CC Engagement

The County Council has engaged with each of the Community Councils which are either directly impacted by the proposed National Park or are in close proximity to it.

Overall, Town and Community Councils within Powys believe the proposed National Park:

- Fails to demonstrate clear benefits for local communities.
- Introduces significant risks to housing affordability, local democracy, and economic resilience.
- Lacks transparency on costs and governance.

The responses of two Community Councils which are directly impacted and fall within the proposed National Park area are presented in Appendix 1:

Table 4 –Town and Community Councils within or in close proximity to the proposed National Park

Town and Community Council	Impacted or Adjacent
Banwy	Impacted
Llanfihangel	Impacted
Llangedwyn	Impacted
Llangynog	Impacted
Llanrhaeadr-ym-Mochnant	Impacted
Llansilin	Impacted
Llanwddyn	Impacted
Pen-y-Bont-Fawr	Impacted

Llanbrynmair	Adjacent
Llanerfyl	Adjacent
Llanfechain	Adjacent
Llanfyllin	Adjacent
Llansantffraid	Adjacent

Overview

For the reasons highlighted - insufficient natural beauty and regard to landscape character, poor accessibility, impacts on designated sites, unclear governance arrangements and disproportionate socio-economic impacts - the proposed designation does not align with the intent of the National Parks and Access to the Countryside Act 1949 or Welsh Government's sustainable development principles.

It is essential that more detailed assessments are carried out on the cumulative impacts on housing, rural economies and resilience, and on local governance, drawing on lessons from other National Parks both within Wales and the wider United Kingdom.

Alternative mechanisms, such as strengthening the existing National Landscape (AONB) designation, would better achieve conservation and community objectives without imposing the rigid framework of National Park status and so impose disproportionate socio-economic costs.

Yours faithfully,

County Councillor Jake Berriman
Leader
Powys County Council

Appendix 1 – Responses from Town & Community Councils

Llanrhaedr-ym-Mochnant Community Council- OBJECT

Llanrhaeadr ym Mochnant Community Council held a public meeting on Friday 1st November 2024 at 7pm in the village hall, to discuss the New National Park Proposal. The meeting was well attended with 250 in the audience. The meeting was chaired by [redacted] At the end of the meeting, the chair invited the panel for a closing statement. The chair then asked the audience to vote FOR or AGAINST the National Park. With over 250 present at the meeting , there was an overwhelming objection to the new National Park. The message was loud and very clear - NO to the Park, it is not wanted or needed.

Llangedwyn Community Council - OBJECT

As a community council we represent a diverse community with the majority of our residents being in generational farming and country sports along with a significant population of retired people from across the UK. Employment opportunities are limited to agricultural and country sports activities with a very small hospitality offering. light industrial and commercial activities are limited to a handful of opportunities. We have recently faced the closing of two village schools in our area and support and education of the children in our community is under increasing pressure. We are based on the borders and all too often young people from our area leave the area whether for schooling, college and employment with many then moving over the border to Shropshire. With this in mind, investing significant funds in a project that is likely to harm the development of our community is at best undesirable.

Further details are provided below:

FAO Cllr Jake Berriman, Leader of Powys County Council

Dear Cllr Berriman,

RE: The value of a new National Park in Wales

I am writing to you as the current chair of Llangedwyn Community Council regarding the proposed new Glyndŵr National Park.

As a community council we represent a diverse community with the majority of our residents being in generational farming and country sports along with a significant population of retired people from across the UK.

Employment opportunities are limited to agricultural and country sports activities with a very small hospitality offering. light industrial and commercial activities are limited to a handful of opportunities.

We have recently faced the closing of two village schools in our area and support and education of the children in our community is under increasing pressure.

We are based on the borders and all too often young people from our area leave the area whether for schooling, college and employment with many then moving over the border to Shropshire. With this in mind, investing significant funds in a project that is likely to harm the development of our community is at best undesirable.

Please accept this letter as confirmation that I and the majority of my fellow councillors must oppose the development of the Glyndŵr National Park.

Having carefully studied the materials provided and spoken to friends and colleagues in the existing Eryri National Park regarding the opportunities and limitations that having a national park as part of you community can present we feel that this along with the cost implications for our Country are suitable grounds for our opposition.

Adding to our opposition is the increased pressures of additional visitor numbers on our fragile infrastructure e.g. roads and bridges that are currently under long-term repair, the loss of the Air

Ambulance service in Welshpool and local NHS provision being already over subscribed all being legitimate concerns.

Yours sincerely

Dawn Cochrane – Chair

For and On Behalf Of

Llangedwyn Community Council