Llywodraeth Cymru
Welsh Government

From: [Redacted - Regulation 13 - Personal data]

Cleared by: [Redacted - Regulation 13 - Personal data]

Date: 1 September 2026

MINISTERIAL ADVICE

For decision by: Dafydd Trystan Davies, Cabinet Minister for Government Effectiveness & the Constitution

Copied to: Cabinet Minister for Rural Resilience and Sustainability

Subject	Designation Order for Glyndŵr National Park Next Steps
100 word summary	This advice sets out the options available to respond to the Glyndŵr National Park Designation Order submitted by Natural Resources Wales (NRW). It summarises the background and the merits and risks of the three available options: 1. Proceed with a public local inquiry (as announced by the previous Administration) before deciding whether to confirm, modify or refuse the Order. 2. Be minded to refuse to confirm the Order and provide opportunity for further evidence and representations. 3. Refuse to confirm the Order without holding a public local inquiry. Either Option 2 or 3 is recommended as the lower-cost approach, while allowing Welsh Ministers to consider alternative mechanisms for delivering the relevant outcomes.
Timing	Routine. NRW submitted the Glyndŵr National Park Designation Order in January 2026, and the former administration had previously announced that a public local inquiry would be held. There is an expectation that a decision would be made on the next steps within a year of submission. A timely decision will provide greater certainty for local authorities, farmers, communities and businesses affected by the proposed designation.
Recommendation	The CMGEC is asked to:

	1. Agree the next steps for Glyndŵr National Park Designation Order submitted by NRW by selecting one of the following options: Option 1 - Hold a public local inquiry to consider the representations and objections raised to the Designation Order. Option 2 – Be minded to refuse to confirm the Order, providing an opportunity to test stakeholder views before making a final determination and allow a further opportunity for evidence and representations to be submitted. Option 3 - Refuse to confirm the Designation Order now based on existing evidence. Officials recommend either Option 2 or 3. 2. Agree to publish a written statement outlining your decision (draft statements are attached, Doc 10). 3. Agree to officials exploring alternative options to respond to issues identified by NRW.
Decision report	This decision does require a Decision Report, which may be published after the written statement has been issued.

ADVICE

Background

1. A Programme for Government commitment from the previous administration led Welsh Ministers at that time to commission NRW, as the statutory environmental adviser, to assess the case for a new National Park in parts of north east Wales and north Powys.

2. Following submission of the Glyndŵr National Park Designation Order (DO) (Doc 1), the previous administration announced a public local inquiry would be held to consider it further. While work on establishing an inquiry has commenced, this could be stopped if desired (as outlined below).

Background to the Designation Order

3. Under section 5 of the National Parks and Access to the Countryside Act 1949, NRW must consider whether an area possesses natural beauty and offers opportunities for open-air recreation. NRW must also assess whether designation as a National Park is especially desirable.

4. NRW undertook a detailed evidence-based assessment designed to meet the statutory requirements for National Park designation between 2023 and 2026. This was supported by extensive engagement and consultation with local authorities, communities and wider stakeholders.

5. Following completion of this work, NRW concluded that the area met the relevant statutory tests. On 12 January 2026, NRW's Board approved the Glyndŵr National Park Designation Order, covering approximately 927 km² across parts of Denbighshire, Flintshire, Wrexham, Powys and a small area of Gwynedd, and submitted it to Welsh Ministers. The designation will take effect only if the DO is confirmed by Welsh Ministers.

Designation Order and notification period

6. In accordance with statutory requirements, the making of the DO by NRW triggered a 28-day statutory notification period, which closed on 15 February 2026. The Welsh Government received more than 430 responses, mainly from individuals, but also local authorities, community councils and other representative bodies.

7. Of responses to the statutory notification, 55% supported the proposal. Respondents suggested additional areas that should be included, with more than 100 requesting that the Mynydd Mynyllod, Llandderfel area should be included.

8. All five local authorities within the proposed National Park area formally objected to the DO. The objections from the statutory local authority consultees mean that Welsh Ministers cannot confirm the DO, either with or without modifications, without first holding a public local inquiry.

9. On this basis, on 26 March 2026, the previous administration announced its intention to hold a public local inquiry and planned to appoint Planning and

Environment Decisions Wales (PEDW) to manage the process. Since then, officials have undertaken preparatory work, including developing draft National Park public local inquiry guidance (Doc 2). While this announcement may have created an expectation that a public local inquiry would take place, Plaid Cymru has made no commitment to this approach in either its manifesto or its First 100 Days plan.

Impact Assessments and Stakeholder Views

10. Officials have completed a Regulatory Impact Assessment (RIA) (Doc 3) and Integrated Impact Assessment (IIA) (Doc 4), to assess the implications of designating the proposed Glyndŵr National Park. The IIA concludes that, subject to adequate funding, designation is likely to deliver overall positive outcomes.

11. The RIA estimates £11.6 million in establishment costs and a Benefit-Cost Ratio (BCR) over a 15-year period ranging from a low estimate (BCR 0.12), middle estimate (0.69) to high estimate (BCR 0.73). It is important that the BCR of a project is not considered in isolation and that unmonetisable benefits and costs are also factored into the assessment of social value. [Redacted - Regulations 12(4)(d) and 12(4)(e) - Internal communications and Information in the course of completion – Incomplete internal information].

12. There has been significant public and stakeholder interest in the proposals during their development, both for and against the creation of a new National Park. In terms of stakeholder views, sectors generally in support have included the environmental, tourism and recreation sectors and Menter Iaith Cymru, while those generally opposed include farming, minerals, and renewable energy sectors. All five Local Authorities in the proposed area of the new National Park (i.e. statutory consultees) have opposed the DO.

13. Considerations in favour of and against designation that emerged during the process can be summarised as:

    Potential benefits of designation

- NRW's evidence indicates the proposed area meets the statutory tests for National Park designation.
- A National Park Authority (NPA) could provide strategic leadership and coordination for landscape management and action.
- Potential benefits for nature recovery, climate resilience, landscape conservation and biodiversity objectives.
- Opportunities to support recreation, tourism, cultural heritage and local communities.

    Potential disbenefits of designation

- Questions over the effectiveness of establishing a new National Park/National Park Authority with a planning function.
- Affordability concerns, as well as uncertainty regarding economic benefits/value for money (noting low BCR values).

- Potential impacts associated with visitor pressures, housing, Welsh language and culture, infrastructure, and energy generation and transmission proposals.

Decision Options and risks

14. The Glyndŵr National Park Designation Order requires a decision by Welsh Ministers. There are three options available regarding the next steps in responding to the DO.

Option 1 – Proceed with a public local inquiry

15. As objections were received from all five local authorities during the statutory notification period, Welsh Ministers are legally required to hold a public local inquiry before confirming the DO, either with or without modifications. If subsequently confirmed, a new National Park would be designated and a National Park Authority would be established.

16. An inquiry would enable objections and representations to be examined in detail (see Doc 2 for further information on a public local inquiry). An Inspector would be appointed to conduct the inquiry. Ministers would then consider the Inspector's report before making a final decision on the DO. The Inspector will recommend that the DO is confirmed or confirmed with modifications or refused. Ministers can consider the Inspector's report but are not bound by any recommendation.

17. This public local inquiry approach was announced by the previous administration and is the usual next step where objections remain outstanding. Preparatory work has begun but could be halted should Ministers decide not to proceed.

18. PEDW has advised (Doc 5) [Doc 5 reviewed and not within scope of request] that existing resource pressures, including major infrastructure consent applications and Local Development Plan examinations, may affect the timing of an inquiry. [Redacted - Regulations 12(4)(d) and 12(4)(e) -Internal communications].

19. This option would keep open the possibility of designating a new National Park with the associated benefits and disbenefits (see para 13). It would require funding of the inquiry and potential future costs of a new National Park (see Financial Implications Section). [Redacted - Regulations 12(4)(d) and 12(4)(e) - Internal communications].

Option 2 – Minded to refuse to confirm the Designation Order

20. Welsh Ministers could indicate they are minded not to confirm the DO. This would allow stakeholder views to be tested before making a final decision.

21. This approach would allow Welsh Ministers to indicate a provisional view that the DO should not be confirmed and that a public local inquiry should not proceed, while ensuring interested parties have a final opportunity to submit representations before a final decision is taken. This may assist in demonstrating that Ministers have remained open to further evidence and argument and have provided procedural fairness before reaching a final determination.

22. Representations would be invited from NRW, local authorities, other stakeholders and members of the public. Following the closing date, officials would prepare a summary of responses and provide further advice to Ministers before a final decision is taken. The initial estimate is that this process would take 6 to 8 weeks from the publication of the minded-to statement.

23. In considering this option, Ministers should note that NRW has already undertaken both informal and statutory consultations, followed by a statutory notification period during which objections and representations could be made. Further Legal advice on this option is provided in Doc 6.

24. This option would keep open the possibility of designating a new National Park with the associated benefits and disbenefits (see para 13), while not committing to it immediately. [Redacted - Regulation 12(5)(b) - Legal advice] Alternative mechanisms may be required/beneficial to address the issues leading to the DO (see para13), which may align more closely with the priorities set out in Plaid Cymru's manifesto and 100 day plan.

Option 3 – Refuse to confirm the Designation Order now based on existing evidence

25. This option would enable Welsh Ministers to reach a final determination on the DO immediately without asking for additional representations and without proceeding to a public local inquiry. In doing so, Ministers would be making a decision based on the substantial body of information already available, including NRW's statutory assessment, supporting evidence and consultation responses, Welsh Government's RIA and IIA, representations received during the statutory notification period, and objections submitted by local authorities and other stakeholders. Ministers may conclude that this evidence provides a sufficient basis on which to determine the DO and that a public local inquiry is not required in order to reach a decision.

26. [Redacted - Regulation 12(5)(b) - Legal advice]

27. This option would close the possibility of designating a new National Park with the associated benefits and disbenefits (see para 13). [Redacted - Regulation 12(5)(b) - Legal advice] (see Legal Section). It would remove the requirement for funding of the inquiry and potential future costs of a new National Park (Financial Implications). Alternative mechanisms may be required/beneficial to address the issues leading to the DO (see paras 30-33), which may align more closely with the priorities set out in Plaid Cymru's manifesto and 100 day plan.

28. Consideration of how to communicate a decision not to proceed with a public inquiry, including potential mitigation of legal challenge, is outlined further in the Legal Section and in more detail in Doc 7.

Alternative mechanisms for delivery of key policy outcomes

29. In developing the evidence base that led to the DO, NRW identified a series of interconnected challenges affecting the proposed area (Doc 8 – NRW's Board

Paper 12 January 2026). Key issues are set out above (see paras 12 and 13). Many of these challenges are systemic, cross-boundary issues that extend beyond the scope of any single designation or organisation.

30. The principal benefit identified by the evidence is the integrated governance and management framework that an NPA could provide for environmental management, recreation and strategic planning across the area. Designation could make a contribution towards Wales' commitment to protect 30% of land and sea by 2030 (30 by 30), with the proposed NP covering an additional 537km^2, equivalent to around 2.5% of Wales' land area.

31. Many of the environmental, social and economic issues identified in NRW's work could be addressed through existing and emerging policy frameworks, including the Environment (Principles, Governance and Biodiversity Targets) (Wales) Act 2026, forthcoming Climate and Nature Action Plan, peatland restoration and Nature Networks programmes, the Sustainable Farming Scheme, Ffermio Bro, the Integrated Natural Resources Scheme, rural proofing and planning reforms, housing initiatives and investment in sustainable tourism, active travel and public transport.

32. Should Ministers decide not to proceed with designation, alternative approaches could be explored with partners to respond to the issues raised. [Redacted - Regulations 12(4)(d) and 12(4)(e) - Internal communications and Information in the course of completion – Incomplete internal information].

33. These approaches could deliver some of the intended benefits of designation while avoiding the costs and long-term financial commitments associated with establishing a new NPA. Engagement with key partners on alternative approaches may support stakeholder understanding should a decision be taken not to designate, and may help to reduce the risk of challenge.

Advice

34. This proposal was inherited from the previous administration and does not form part of Welsh Ministers' published commitments in the Manifesto or First 100 Days programme. Alternative approaches (see Doc 9) are available to address the issues identified in NRW's work.

35. Key considerations from the designation process are summarised in paragraph 13 and examined in more detail in the RIA (Doc 3) and IIA (Doc 4). Alongside the absence of a current Welsh Government commitment to progress the proposal, there are several reasons why Ministers may decide not to proceed with designation at this stage. These include affordability and future funding, potential effects on existing National Park Authority budgets, objections from all five local authorities, potential impacts on infrastructure and communities, and the relatively low benefit-cost ratio identified in the RIA. These factors may support a decision not to confirm the DO at this stage. However, Ministers should note that such a decision would forgo the potential benefits of a new National Park, [Redacted - Regulation 12(5)(b) - Legal advice].

36. On this basis, officials **recommend either Option 2 or 3**.

37. Should option 2 or 3 be chosen, **officials also recommend that Ministers agree to further exploration of alternative measures** (see Doc 9) to address the issues identified in NRW's work on the study area.

38. Once an option is selected, officials recommend that Welsh Ministers issue a **written statement** outlining the Government's next steps in responding to the DO (draft statements are attached for each option, Doc 10).

Financial implications

[Regulations 12(4)(d) and 12(4)(e) - Internal communications and Information in the course of completion]

Legal Considerations

[Redacted - Regulation 12(5)(b) - Legal advice].

Annex 1: ASSURANCE AND COPY RECIPIENTS

CLEARANCE TRACKING

Aspect	Tracking	Yes	No	N/A	Clearance no.
Finance	Financial implications over £50,000?	☒	☐	☐	
	Cleared by Group Finance?	☒	☐	☐	[Redacted - Regulations 12(4)(d) and 12(4)(e) -Internal communications]
	Cleared by Budget & Government Business Division?	☐	☐	☒	
	Cleared by Local Government Finance?	☐	☐	☐	
Legal	Legal issues?	☒	☐	☐	
	Cleared by relevant lawyers?	☒	☐	☐	
Governance	Novel and contentious issues?	☐	☒	☐	
	Cleared by Corporate Governance Centre of Excellence?	☐	☒	☐	

DEPUTY DIRECTOR, STATEMENT OF ASSURANCE

In clearing this MA, I confirm that I, [Redacted - Regulation 13 - Personal data] have quality assured this advice, ensuring it is provided on the basis of evidence, accurately presents the options and facts and I am accountable for the recommendations made

I am satisfied that the recommended decision or action, if agreed, would be lawful, affordable and comply with all relevant statutory obligations. Welsh Government policy priorities and cross portfolio implications have been fully considered in line with delivery of the government objectives.

I have fully considered the statement of assurance contained in the MA guidance to ensure all relevant considerations have been taken into account, appropriate impact assessments have been undertaken and that the actions and decisions take account of regularity, propriety and value for money.

COPY LIST

All mandatory copy recipients (as indicated in the guidance). Additional copy recipients specifically interested in this advice:

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