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# Building Capacity and Good Practice in Registered Historic Landscapes (GAT)

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Gwynedd Archaeological Trust

Report No 338

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## 1. Crynodeb Gweithredol

## 2. Executive Summary

Natural Resources Wales and the four Welsh Archaeological Trusts have signed a Memorandum of Understanding which outlines how the organisations will work together for the mutual benefit of Wales' historic and natural environments. The work of the Welsh Archaeological Trusts under this agreement includes the provision of advice in development matters affecting Registered Historic Landscapes and provision of training relating to Registered Historic Landscapes.

This report summarises the work undertaken by Gwynedd Archaeological Trust for north-west Wales for the review period April 2018 to March 2019. This is the third annual report since the Memorandum of Understanding was agreed.

Gwynedd Archaeological Trust recorded instances where a Registered Historic Landscape was a trigger for direct consultation by the local planning authority or where a Registered Historic Landscape was specifically mentioned in a planning response. The number of consultation responses relating to Registered Historic Landscape was consistent with those in previous years – a total of 25, one more than the previous year, compared with 21 in 2016-17. Only four of these cases raised concerns about impact on a Registered Historic Landscape: two of these related to pre-existing casework and all remain ongoing.

The limited dataset restricts the identification of clear trends. The data recorded even distribution of consultation responses between Registered Historic Landscape areas. The three cases where historic landscape concerns were raised were in different Registered Historic Landscapes.

The most frequent development type where responses were made was energy and infrastructure. This reflects the popularity of hydroelectric schemes in the Snowdonia National Park and the strategic work programmes of the National Grid and energy providers.

Planning Policy Wales (10<sup>th</sup> edition, December 2018) includes specific references to the Register and encourages its consideration at a strategic level. It is too early to conclude whether this has had any impact on development management within Registered Historic Landscapes.

### 3. Introduction

The Register of Landscapes of Historic Interest in Wales (henceforth ‘the Register’) was published in 1998 by Cadw, ICOMOS and the then Countryside Council for Wales. Its objective was to identify the best surviving historic landscapes in Wales, in order to spread appreciation of landscape heritage and to support those engaged in activities that interact with the historic landscape in taking account of historic landscapes in their decision making and land management processes.

The successor body to the Countryside Council for Wales, Natural Resources Wales (NRW), maintains, and will continue to maintain, a shared interest in the Register with Cadw and the four Welsh Archaeological Trusts (WATs).

A primary influence on areas on the Register (henceforth referred to as Registered Historic Landscapes) is development. As principal sponsors of the Register, NRW and Cadw have an interest in ensuring that arrangements for providing planning advice relating to the Register are robust.

The curatorial sections of the four WATs provide historic environment planning advice to the local planning authorities for their respective regions. This includes the provision of advice relating to the Register. Cadw funding provides the base level initial advisory service of this work.

Continuing the partnership philosophy that has been embedded in the Register since its inception, NRW and the four WATs have signed a Memorandum of understanding (MoU) that outlines how the organisations will collaborate and co-operate for the benefit of Wales’ historic and natural environments.

The MoU embodies the principles of the *Well-Being of Future Generations (Wales) Act 2015*. The Act establishes the ‘sustainable development principle’ by which public bodies (including NRW) must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. The Act emphasises the need for an integrated approach to actions, objectives and approaches, and promotes collaboration with other parties who may have an interest, or may be able to assist with the achievement of identified well-being goals and objectives. The Act sets out seven well-being goals to which public bodies have a duty to contribute. The historic environment, and the Register in particular, can support each of these goals, but the most directly relevant is:

*A Wales of vibrant culture and thriving Welsh language:  
A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.*

This report forms part of the ongoing body of evidence of the integrated management of Wales’ natural and historic environment by which NRW and its partners endeavour to meet the stated well-being goals. It provides an annual account of development matters that have arisen in relation to Registered

Historic Landscapes in north-west Wales and the responses made. It discusses difficulties that have arisen, lessons learned and makes observations about any emerging trends, threats or opportunities. Finally, it reports on measures taken to foster collaboration including the delivery of training and sharing of best practice between the partner organisations, and makes recommendations for future practice.



## 4. Review of Registered Historic Landscapes Casework

### 4.1. Planning Context

Gwynedd Archaeological Trust's curatorial region comprises the historic county of Gwynedd, today composed of the local planning authorities of the Isle of Anglesey, Gwynedd, western Conwy, and the Snowdonia National Park. Seventeen Registered Historic Landscapes fall within this region, fifteen of which are on Part 2:1 of the Register ('outstanding') and two on Part 2:2 ('special') (see Appendix 7.1).

Under the current planning framework, Registered Historic Landscapes should be taken into account where development proposals are subject to Environmental Impact Assessment or, if on call in, in the opinion of the Welsh Ministers, the proposals would have more than local impact on an area on the historic landscape (Planning Policy Wales 10<sup>th</sup> edition, December 2018, paragraph 6.1.21). In other circumstances, Registered Historic Landscapes may be considered to form part of the wider archaeological resource; the conservation of archaeological remains is a material planning consideration whether or not those remains hold scheduled status (PPW paragraphs 6.1.2; 6.1.23). In addition, the Welsh Government has a stated objective to protect areas on the register of historic landscapes in Wales (PPW paragraph 6.1.20).

All four local planning authorities served by Gwynedd Archaeological Trust (GAT) have local planning policies referring to the Register.

### 4.2. Casework analysis, interpretation and trends

Of 3094 planning applications and pre-application enquiries registered in the reporting period April 2018-March 2019, 1226 were located within a Registered Historic Landscape – almost 40% of proposals.

Figure 4.1 illustrates the proportion of the 1226 cases within each Registered Historic Landscape. A quarter of applications in Registered Historic Landscapes were within Llŷn and Ynys Enlli, with Creuddyn and Conwy receiving 19% and Dinorwig receiving the third highest proportion, with 11%.

These illustrate the difficulties in identifying trends and threats associated with development in Registered Historic Landscapes. The high percentage of cases within Llŷn and Ynys Enlli reflect the size of the Registered area, with the area remaining strongly rural in character and the majority of applications being of a householder level. Similarly, Creuddyn and Conwy includes the residential areas of Llandudno, Deganwy and Conwy, where the level of householder applications is concentrated in a relatively small area. In addition, both Conwy and Llandudno have conservation areas and a high number of listed buildings, necessitating both listed building consent and conservation area consent in addition to standard planning requirements, so that a certain amount of duplication is inevitable in statistical compilation. The result is a misleading impression that both Registered areas are at risk from a high level of development.

Fig. 4.1 Proportion of planning applications and pre-application enquiries within each Registered Historic Landscape

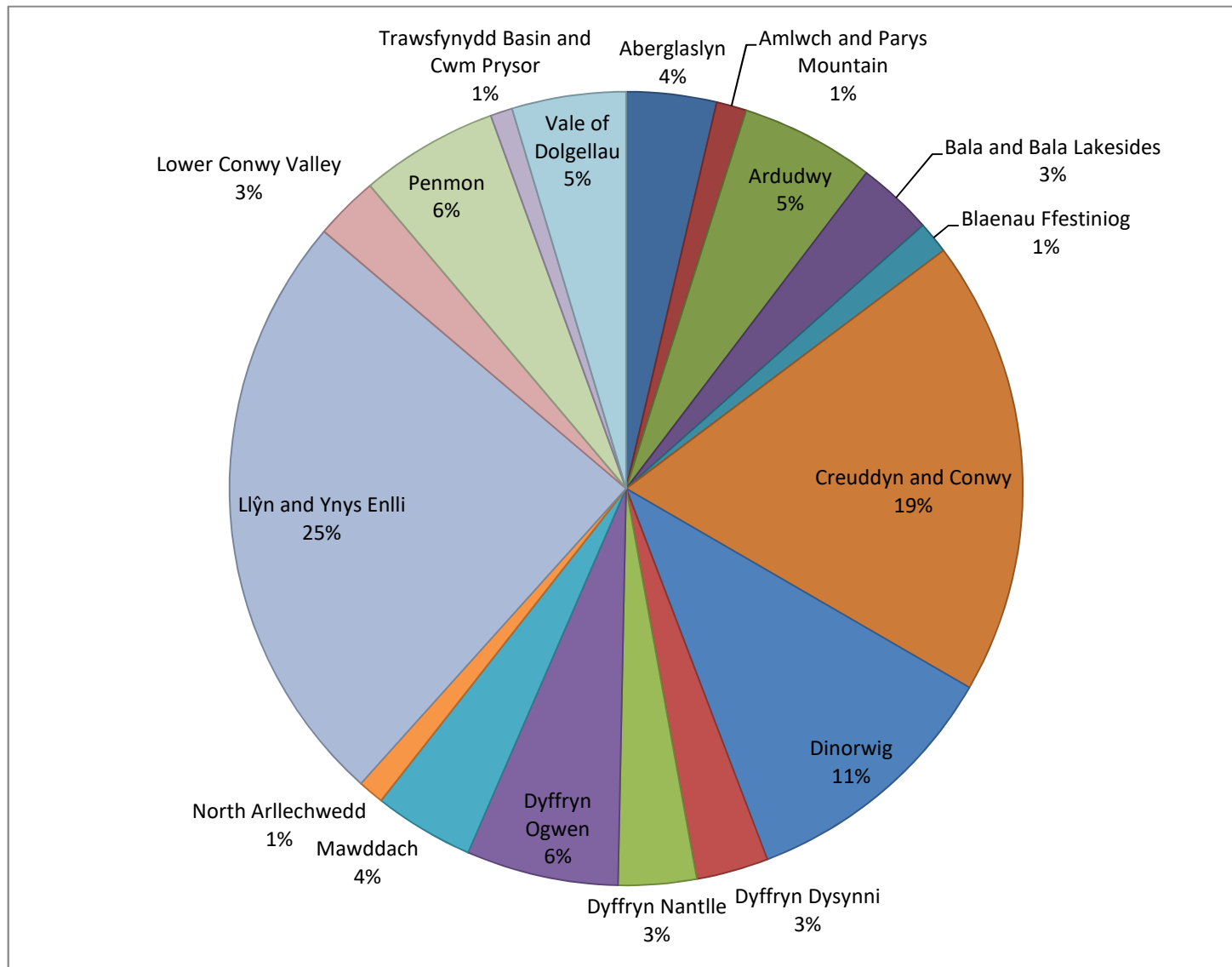


Fig. 4.2 Total number of planning applications and pre-application enquiries within each Registered Historic Landscape

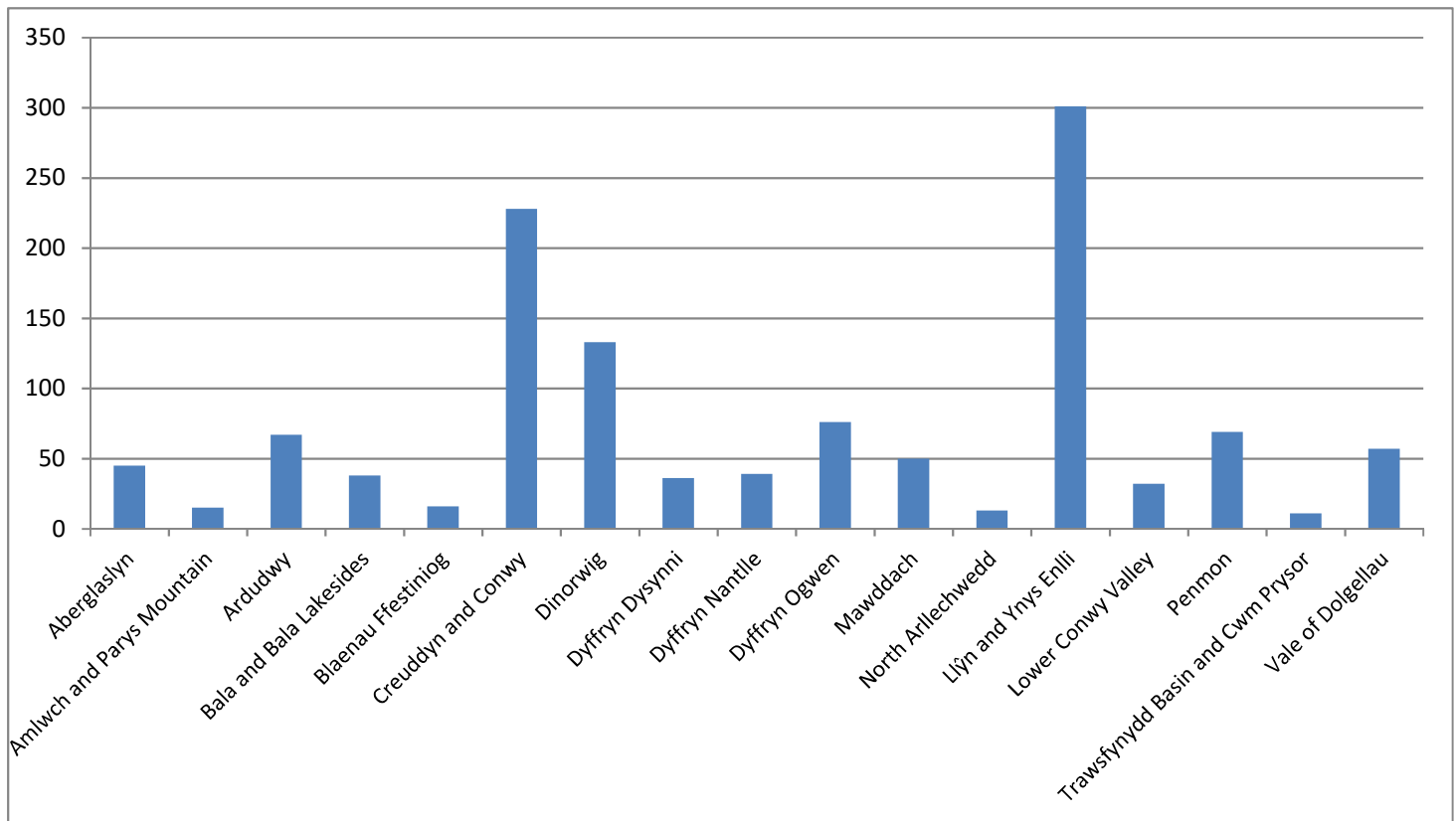


Figure 4.2 gives a clearer presentation of the actual frequency of applications within each Registered Historic Landscape. This simplified data needs to be regarded with caution however, as it does not for instance record how many of these applications represent new proposals and how many are duplicates, resubmissions, or administrative matters relating to existing cases. For example, of all applications registered in north-west Wales, approximately 13% were applications to discharge planning conditions. The totals above are therefore likely to be markedly higher than the actual numbers of new proposals, and the effect of this on the variations between Registered Historic Landscapes is unknown.

Apart from the strikingly higher figures for the two Registered Historic Landscapes with the greatest proportion of applications, the other areas display broadly comparable levels of activity. Although settlement density may be a factor in the differences between the areas returning mid and lower figures, this cannot be confirmed, with the possible exception of Penmon: here the total is likely to be influenced by the inclusion of Beaumaris, which, like Llandudno and Conwy, receives a high proportion of double applications.

GAT gave comments relating to the Register on 25 development proposals (see Appendix 9.2). This comprises only those cases where comments specifically mentioned Registered Historic Landscapes, or where that

appeared to be the trigger for direct consultation by the local planning authority.

The 25 applications where GAT comments were related to the Register encompassed a mix of schemes belonging to the residential, tourism, minerals, commercial and environmental sectors. The only notable trend is in the predominance of energy and infrastructure proposals, which accounted for ten of the 25 cases. This reflects the popularity of hydroelectric schemes in the Snowdonia National Park and the strategic work programmes of the National Grid and energy providers, contributing three and five cases respectively.

Consultations were distributed between fourteen of the seventeen Registered Historic Landscapes: North Arllechwedd, Dyffryn Dysynni and Amlwch and Parys Mountain being the areas for which no relevant consultation responses were made. The generally even distribution of responses and the overall low figures preclude the drawing of any meaningful conclusions; while some correlation might be expected between the overall number of applications within a particular landscape and the number of responses, the schemes in question are unrelated to the factors attributed to relative proportions above (e.g. density of residential areas).

Approximately a third of the cases recorded have not yet been determined, are still at pre-application stage, or the outcome is unknown. None of the cases recorded have been refused planning consent or have been withdrawn for reasons related to the historic environment. Using the data to assess the efficacy of safeguards for Registered Historic Landscapes within the planning process is thus problematic.

The majority of cases were considered not to have significant implications for the Registered Historic Landscape, being of a scale that would have only local impact, if any. The four instances where historic landscape concerns were raised all remain active and comprise:

- extension to Penrhyn Quarry, Bethesda (Dyffryn Ogwen);
- flood management scheme at Porthmadog (Aberglaslyn);
- the replacement of the 400kV underground cable between Dinorwic and Pentir (Dinorwig); and
- creation of additional mountain bike tracks at an existing course (Blaenau Ffestiniog).

Of these, only the cycle tracks have progressed to planning application stage, and these have received consent. An archaeological assessment concluded that they would not have a notable impact on the Registered Historic Landscape and therefore no recommendations were made on this aspect.

The proportion of consultations that were considered to have possible Registered Historic Landscape concerns is a slight decrease on the figures for 2017-18. In 2017-18, 24 consultation responses were made, of which five had possible Registered Historic Landscape concerns; this had in turn been a decrease compared with the previous year.

As in previous years, the limited dataset restricts the identification of trends. Variation in scale of scheme is disguised by pure numbers, so that the geographical extent of individual and cumulative proposed development within Registered Historic Landscapes is not apparent. General planning statistics maintained by Gwynedd Archaeological Trust for Cadw indicate that casework tends to be relatively constant year on year and it may be inferred that this will also apply to work associated with Registered Historic Landscapes, given the proportion of the region covered by this designation. The consistency between the figures for the past three years offers tentative support to this assumption.

### Glastir screening advice provided

Consultation Type	EIA Screening/ Scoping (Agriculture Regs)	Glastir Woodland Creation	Glastir Woodland and Restoration	Glastir Small Grants	Felling Licence Application Screening*	Other NRW casework (Forestry)
<i>Total no processed by GAT 2018-19</i>	22	7	3	32	19	
Within HLW (Gw) 6 – Dinorwig					1	
Within HLW (Gw) 8 – Lleyrn and Bardsey Island	3			6	1	
Within HLW (Gw) 10 – Ogwen Valley	1			2		
Within HLW (Gw) 12 – North Arllechwedd						1
Within HLW (Gw) 13 – Vale of Dolgellau					1	
Within HLW (Gw) 16 – Bala and Bala Lakesides					1	

\*FLA screening January – March 2019 only.

Due to the difference between the HLCAs and the RHLs there were another 2 Felling Licence Screening consultations within HLCAs outside the RHL boundaries (1 within GAT Ffestiniog HLC; 1 within GAT Caernarfon-Nantlle HLC).

## 5. Advising on and assessing the appropriate use and findings of ASIDOHL2 assessments

No recommendations have been made for ASIDOHL2 assessment this year and there are thus no suitable examples to present as case studies in this report.

### 5.1. Case Studies: update on 2017-2018 projects

Two case studies were discussed in the 2017-2018 report. Of these, one, the reworking of tip material at a slate quarry in Rhosgadfan, near Caernarfon (Dyffryn Nantlle), received planning permission and will be subject to archaeological mitigation. The other, a medium scale residential development at Llandudno Junction (Creuddyn and Conwy) was successful at appeal and is currently the subject of archaeological field investigation prior to the start of development.

A third scheme for which ASIDOHL2 had been recommended in 2017-2018 was the Wylfa-Pentir overhead transmission line (Parys Mountain and Dinorwig). This scheme has been aborted following the withdrawal of the proposed Wylfa B development.

### 5.2. Advising on and assessing the appropriate use and findings of the historic landscape elements of a historic environment assessment

Anecdotal evidence indicates that commercial archaeologists and curators find the ASIDOHL2 process to be appropriate in only exceptional cases, as the lengthy scoring system does not always correlate readily with the salient aspects of the historic landscape in question. Where archaeological or historic environment assessment is required, however, the historic landscape is considered as one of the aspects of the historic environment that may be affected by the proposed scheme.

At the time of writing data is unavailable about the number and location of instances where Registered Historic Landscapes have been considered within historic environment and archaeological assessments produced within the past 12 months.

## 6. Training and Capacity Building

### 6.1. Contributing to training and workshops relating to historic landscapes, the Register of Historic Landscapes and matters relevant to the MoU that may have a bearing on landscape character and quality

GAT attended the RHL workshop on 21 February, having assessed the boundaries of the RHL and HLC areas. A number of points were discussed in addition to the boundary review, including communicating change, updating the boundaries, and identifying additional potential areas.

### 6.2. Reviewing and contributing to joint guidance

GAT has contributed to Welsh Government guidance on Maritime Heritage,

### 6.3. Sharing specialist knowledge

Under the grant aid GAT receives from Cadw, GAT's curatorial section have provided initial screening and advice for a number of NRW internal projects, primarily relating to reservoir maintenance, and have provided ongoing specialist advice as the proposals progress to pre-planning and implementation stage.

GAT's Memorandum of Understanding with Natural Resources Wales has been reviewed and a contribution to the remaining appendices has been provided.

GAT arranged a meeting with Local Authority Planning and Conservation Officers to discuss HER input and consultation, including advice on RHL's.

### 6.4. Meetings and events

GAT attended the Registered Historic Landscape Workshop, arranged the meeting with Local Authority Planning and Conservation Officers, and attended an annual MoU review meeting, all of which provided an opportunity for discussion of matters relating to the Register.



## 7. Conclusions and Recommendations

Although there are difficulties in identifying trends and threats associated with development in Registered Historic Landscapes, we conclude that most applications within RHL's are relatively small, and that the system is working well. Despite that, there are some concerns regarding the effectiveness of ASIDOHL 2, and perhaps the guidelines for undertaking an assessment could be reviewed.

## 8. Appendices

### 8.1. List of areas on Parts 2:1 and 2:2 of the Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales within Gwynedd Archaeological Trust's curatorial boundary

#### Part 2:1 Landscapes of Outstanding Historic Interest

- HLW (Gw) 1 Amlwch a Mynydd Parys, Ynys Môn
- HLW (Gw) 2 Ardudwy, Gwynedd (majority SNPA)
- HLW (Gw) 3 Blaenau Ffestiniog, Gwynedd (partly SNPA)
- HLW (Gw) 4 Pen Isaf Dyffryn Conwy/Lower Conwy Valley, Conwy (partly SNPA)
- HLW (Gw) 5 Creuddyn a Chonwy/Creuddyn and Conwy, Conwy (partly SNPA)
- HLW (Gw) 6 Dinorwig, Gwynedd (partly SNPA)
- HLW (Gw) 7 Aberglaslyn, Gwynedd (partly SNPA)
- HLW (Gw) 8 Llŷn ac Ynys Enlli/Lleyn and Bardsey Island Gwynedd
- HLW (Gw) 9 Dyffryn Nantlle/Nantlle Valley, Gwynedd (partly SNPA)
- HLW (Gw) 10 Dyffryn Ogwen/Ogwen Valley, Gwynedd (partly SNPA)
- HLW (Gw) 11 Bro Trawsfynydd a Chwn Prysor/Trawsfynydd Basin and Cwm Prysor, Gwynedd (SNPA)
- HLW (Gw) 12 Gogledd Arllechwedd/North Arllechwedd, Gwynedd and Conwy (partly SNPA)
- HLW (Gw) 13 Bro Dolgellau/Vale of Dolgellau, Gwynedd (SNPA)
- HLW (Gw) 14 Mawddach, Gwynedd (majority SNPA)
- HLW (Gw) 15 Penmon, Ynys Môn

#### Part 2:2 Landscapes of Special Historic Interest

- HLW (Gw) 16 Y Bala a Glannau Tegid/Bala and Bala Lakesides, Gwynedd (majority SNPA)
- HLW (Gw) 17 Dyffryn Dysynni/Dysynni Valley, Gwynedd (majority SNPA)

## 8.2. Summary of Registered Historic Landscapes casework undertaken by GAT in 2018-2019

GAT ref	Local Planning Authority	Response Date	Application ref	Development	Registered Historic Landscape	RHL concerns	NRW scheme	GAT Response	Current Status	Total responses by Registered Historic Landscape	
										Registered Historic Landscape	Total
D3250	Gwynedd	05/04/2018	C18/0230/22/MW	Minerals	Dyffryn Nantlle	No	No	Mitigation	Permitted development	Dinorwig	3
D3247	Gwynedd	06/04/2018	C18/0204/38/TR	Energy & Infrastructure	Llŷn and Bardsey Island	No	No	Mitigation by design and fieldwork	Approved with advisory note	Dyffryn Nantlle	2
D3248	Gwynedd	06/04/2018	C18/0217/45/TR	Energy & Infrastructure	Llŷn and Bardsey Island	No	No	Mitigation	Approved with advisory note	Dyffryn Ogwen	1
D3254	Gwynedd	17/04/2018	n/a	Energy & Infrastructure	Dinorwig	Yes	No	DBA and evaluation	Pre-Application	Creuddyn & Conwy	3
D2140	SNPA	02/05/2018	n/a	Energy & Infrastructure	Dinorwig	No	No	DBA. RHL impact is positive	n/a	Lower Conwy Valley	1
n/a	Conwy	14/05/2018	0/45094	Camping/Caravan Sites	Lower Conwy Valley	No	No	No implications	Unknown	Llŷn and Bardsey Island	3
D3269	Gwynedd	21/06/2018	C18/0389/45/AM	Residential/ Holiday cottages	Llŷn and Bardsey Island	No	No	Mitigation	Approved with arch condition	Bala and Bala Lakesides	1
D3271	Ynys Môn	22/06/2018	12C405/SCR	Environmental	Penmon	No	No	Advice	Pre-Application	Blaenau Ffestiniog	1
D3076	Ynys Môn	22/06/2018	35C327A	Barn conversion	Penmon	No	No	Mitigation record	Approved	Aberglaslyn	3
D1324	Gwynedd	tbc	tbc	Minerals	Dyffryn Ogwen	Yes	No	tbc	Pre-Application	Arduwy	1
n/a	Gwynedd	15/08/2018	n/a	Utilities & Telecoms	Aberglaslyn	No	No	No implications	n/a	Mawddach	1
D3284	Conwy	15/08/2018	0/45404	Other	Creuddyn and Conwy	No	No	DBA	Unknown	Vale of Dolgellau	1
n/a	Conwy	16/08/2018	0/45441	Commercial	Creuddyn and Conwy	No	No	Advice	Unknown	Penmon	3
D3246	Ynys Môn	ongoing	tbc	Residential/ Holiday cottages	Penmon	No	No	Advice	Pre-Application	Trawsfynydd	1
n/a	SNPA	06/09/2018	NP5/72/LB143H	Other	Bala and Bala Lakesides	No	No	No implications	Approved	<b>Total</b>	<b>25</b>
D3290	Gwynedd	19/09/2018	C18/0738/23/LL	Barn conversion	Dyffryn Nantlle	No	No	Mitigation record	Approved with arch condition	Total responses by Development Type	
n/a	SNPA	02/10/2018	NP5/62/404	Utilities & Telecoms	Arduwy	No	No	No implications	Approved	Development	Total
D3302	Gwynedd	11/10/2018	n/a	Environmental	Aberglaslyn	Yes	Yes	DBA	Pre-Application	Barn conversion	2
D2157	SNPA	12/10/2018	NP5/78/537	Energy & Infrastructure	Trawsfynydd	No	No	DBA	Approved with arch condition	Residential/Holiday cottages	2
n/a	SNPA	13/11/2018	NP5/65/355B	Energy & Infrastructure	Mawddach	No	No	Advice	Unknown	Environmental	3
n/a	Gwynedd	14/11/2018	C18/0992/05/TR	Energy & Infrastructure	Aberglaslyn	No	No	No implications	Approved	Commercial	2
D3322	Gwynedd	18/12/2018	C18/1075/03/SC	Commercial	Blaenau Ffestiniog	Yes	No	DBA	Approved with arch condition	Camping/Caravan Sites	2
n/a	SNPA	08/01/2019	NP5/54/567	Energy & Infrastructure	Vale of Dolgellau	No	No	No implications	Approved	Minerals	2
n/a	Gwynedd	11/01/2019	n/a	Environmental	Dinorwig	No	No	No implications	n/a	Utilities & Telecoms	2
n/a	Conwy	26/03/2019	0/46069	Camping/Caravan Sites	Creuddyn and Conwy	No	No	No implications	Unknown	Energy and Infrastructure	8
										Other	2



### 8.3. Data Archive Appendix

Data outputs associated with this project are archived in [NRW to enter relevant corporate store and / or reference numbers] on server-based storage at Natural Resources Wales.

The data archive contains:

- [A] The final report in Microsoft Word and Adobe PDF formats.
- [B] Summary table in Microsoft Excel and Adobe PDF formats forming Appendix 7.2 of the above report.

Metadata for this project is publicly accessible through Natural Resources Wales' Library Catalogue <https://libcat.naturalresources.wales> (English Version) and <https://catllyfr.cyfoethnaturiol.cymru> (Welsh Version) by searching 'Dataset Titles'. The metadata is held as record no [NRW to insert this number]



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