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PLANNING | LANDSCAPE | ENVIRONMENT

Tywyn Trewan Common, Anglesey

Management Plan

CONSULTATION DRAFT

for

THE BOARD OF CONSERVATORS

October 2022

3213

RML

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M O O R E H E A D & L A I N G L T D

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TYWYN TREWAN COMMON, ANGLESEY

MANAGEMENT PLAN

CONSULTATION DRAFT

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The Common Conservators

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CONTENTS

Page no.

LIST OF FIGURES AND APPENDICES III

Figures iii

Appendices iii

LIST OF TABLES IV

1 INTRODUCTION 1

1.1 Purpose of this management plan 1

1.2 Location 2

1.3 Description 2

1.4 Legal Status 4

1.5 Other relevant Acts of Parliament 8

1.6 Land Tenure 9

1.7 The Board of Conservators 9

1.8 Size, areas and land uses 12

1.9 Public access 13

2 BIODIVERSITY EVALUATION 17

2.1 Biodiversity value of sand dune habitat 17

2.2 Description of the habitats 17

2.3 Plant species 19

2.4 Protected and priority species 21

2.3 Invasive non-native / problematic species 25

2.4 Conclusions regarding biodiversity 25

3 HERITAGE, LANDSCAPE AND HISTORICAL CONSIDERATIONS 26

3.1 Recorded History 26

4 CONSULTATIONS 30

4.1 Introduction 30

4.2 Reporting on the Stage 1 consultation 30

5 CURRENT MANAGEMENT 38

5.1 State of Commoning Report 38

5.2 Human activity 40

5.2 Current management regimes 41

5.3 Explanation of the following section 45

5 PROPOSED MANAGEMENT 54

5.1 Objectives of the Management Plan 54

5.2 The Vision for the Management Plan 54

5.4 Implementing the vision 55

5.4 Scrub management (Point A in paragraph 5.3.4) 57

5.5 Grazing and animal management (Point B in paragraph 5.3.4) 59

5.6 Protecting the Golf Course (Point C in paragraph 5.3.4) 62

5.7 Public access (Point D in paragraph 5.3.4) 63

5.8 Saltmarsh management (Point E in paragraph 5.3.4) 64

6 MANAGEMENT UNITS 66

7 MANAGEMENT STRATEGY AND PRESCRIPTIONS 67

Table 5.5: Management Strategy and Prescriptions 67

8 INDICATIVE PROGRAMME BASED ON A 5 YEAR CYCLE 70

9 PHOTOGRAPHS RECORDING THE SITE IN MARCH 2022. 71

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LIST OF FIGURES AND APPENDICES

Figures

Section1 of report

1.1 Location of Tywyn Trewan

1.2 The subdivisions of the Tywyn Trewan Common

1.3 Access points and routes across the common

1.4 1889 OS six inches to the mile extracts for Tywyn Trewan

Section 4 of report

4.1 NRW Development Advice Map extract for the common

4.2 Flood Maps: surface water flooding

4.3 Flood Maps: flooding from rivers

4.4 Flood Maps: flooding from the sea

Section 5 of the report

5.1 Areas where a particular management regime currently applies

5.2 Main areas if gorse scrub in the eastern Cyttyr Tywyn Trewan

5.3 Scrub in the Crygyll Dunes

5.4 Scrub in Cymyran

5.5 Management Areas

5.6 Management Areas 2 and 3 Scrub Clearance

5.7 Management Areas 8 and 9 Scrub Clearance

Appendices

1 Byelaws and regulations with respect to Towyn Trewan Common

2 Limitation Imposed by Open Access Regulations

3 Commonland Consent guidance from Welsh Government

4 Flood Risk activities permit

5 Details of plants species found on the common

LIST OF TABLES

1.1	Land use and areas	12
1.2	Access points and circulation	13
2.1	Summary of Priority Habitats	19
2.2	Invertebrates recorded on the common	22
2.3	Bird species records within 1km of the site	23
5.1	Current management, problems, threats, conflicts and opportunities	47
5.2	Objectives and targets	55
5.3	Potential grazing capacity of the common	60
6.1	Characteristics of the Management Units	66
7.1	Management Strategy and Prescriptions	67
8.1	Indicative 5-year programme	70

1 INTRODUCTION

1.1 Purpose of this management plan

1.1.1 The Conservators of Tywyn Trewan have responsibility for regulating and managing the common, protecting the rights of graziers and other users and conserving the natural beauty of the common. Use and activity on the common has changed over the years and as a result there are conflicts between users and insufficient management to control the development of gorse scrub. Richards, Moorehead & Laing Ltd were commissioned by the Board of Conservators to consider the how the common should be managed in the future. This document sets out the plans for future management.

1.1.2 The Conservators of the Common have commissioned Richards Moorehead & Laing Ltd to prepare the management plan to address the various uses and propose measures that would help to resolve conflicts and encourage cooperation in the management of vegetation, grazing, the golf course and other authorised land uses and activities.

1.1.3 The plan will be the starting point of a progressive management process. Regular reviews by the commissioners and their advisors should be undertaken and changes agreed as required to meet the vision and objectives.

1. **Introduction:** set out why the Board of Conservators need a management plan, provides a description and location of the area, its location, and sets out the legal basis for the common.
2. **Biodiversity:** a brief description of the site to set out the main characteristics of the existing habitats and native species
3. **History:** a summary of the more recent history of the common to indicate how the current situation has come about.
4. **Consultations:** the statutory consultees that have been consulted in the preparation of the draft Management Plan, and their views expressed in writing.
5. **Current management of the common:** summary of the baseline constituents of the common the starting point that can be identified: current ownership, designations, habitats, access, circulation, easements, rights, uses and misuses, conflicts and opportunities.
6. **Proposed management:** a statement of how the common could be in the future. The vision should be the adopted goal, representing a reasoned and balanced view developed in response to the various opinions expressed by key stakeholders such as the Board of Commissioners, Graziers, statutory consultees and the golf course. This

stage will require a degree of consultation and discussion. Within this last section of the management plan are considered the constraints and opportunities that the common provides: how will the known constraints and opportunities be addressed? This is a broad description of the tasks that are then set out in technical detail as management prescriptions. This section would list any consents, protected species derogation licences, further surveys of the baseline, dates when this conservation management plan should be reviewed and if necessary updated. Opportunities to obtain external fundings are also set out.

1.2 Location

1.2.1 The location of the common is shown in **Figure 1.1**. Access can only be obtained via a limited number of entrances, at Carnau, Dowyn, Tyn Llidiart, Rhosneigr and from Public Footpaths and the Anglesey Coastal Path.

Figure 1.1: Location of Tywyn Trewan

1.3 Description

1.3.1 The common was formerly a single large are of coastal land defined by the Afon Cymyran, the outflow stream from Llyn Dinam and Llyn Penrhyn to the north, the southern end of the

Inland Sea to the northwest, Traeth Cymyran and Traeth Crigyll to the west, Afon Crigyll to the east and gently rising agricultural land and low rock outcrops to the northeast. A historic map of the common is included in **Figure 1.4.**

1.3.2 The topography is on gently undulating former coastal sand dunes and marine and riverine sediments, which ranges in elevation from sea level to 9m AOD, although the railway is raised on embankment to a height of 11m AOD. Part of the RAF Valley site also rises to a height of 11m AOD and this may be the result of the extensive earthworks required for the runways.

1.3.3 The airfield, the railway and an unclassified road linking Llanfihangel yn Nhowyn to RAF Valley and Llanfairyneubyll are engineering interventions that have changed the form of the common, taken more than 280 hectares of commonland and left four isolated areas as shown in **Figure 1.2**.

1.3.4 The four subdivisions of the common are:

Northern area (Valley access road triangle) 0.8 hectares

1.3.5 A small area of separated from the eastern area of the common by Minffordd Road. The difference between this land and the adjacent land within the RSPB reserve is barely visible with grassland progressing to gorse, bramble and blackthorn scrub. There is a substantial masonry wall dividing the area from the land to the north and there appears to have been no effective grazing in the area for a considerable period. The land is adjoining the Llynnau y Fali Site of Special Scientific Interest (SSSI). Llyn Dinam, which lies 1km to the north of the triangle is a Special Area of Conservation (SAC).

Eastern area (Main inland area) 161.08 hectares

1.3.6 This is the largest block of the common extending from Minffordd Road in the north to the Afon Crigyll in the south. A block of land to the southwest of the area is taken for the golf course. The remaining land is former sand dunes which have stabilised and developed a dense grassland cover with gorse scrub well established throughout, except where the golf club keep the grass mown. The boundaries of this area are mainly field hedges and cloddiau banks and railway boundary fences.

Southern area (Traeth Crigyll shore, dunes and riverside) 49.46 hectares

1.3.7 An area of sand dunes and banks of the Afon Crigyll. The area appears to be relatively undisturbed and free of gorse scrub. The dunes retain some topographical variation and appear fully vegetated with grassland. There are worn pedestrian routes across the area and in one location a circuitous track has been formed. This may be the area where scrambling motorbikes are reported to have caused damage. A block of land in the southeast corner is taken for the golf course.

Northwestern area (Cymyran shore and dunes) 13.37 hectares

1.3.8 The coastal strip of coastal dune sand facing onto the estuary of the Afon Cymyran to the west with RAF Valley to the east. At its widest the area is no greater than 200m. The dunes have stabilised and have developed a vegetation cover of gorse and other coastal scrub species. There are larger grassed patches to the south and a track worn by vehicles extends as far south as Plas Cymyran which is a group of residential properties sitting on an former island outcrop of rock. The area at the south end has more exposed sand and obvious vehicle damage.

Figure 1.2: The subdivisions of the Tywyn Trewan Common

1.4 Legal Status

1.4.1 Definition of commonland

1.4.1 Section 22(1) of the Commons Registration Act 1965 defines Common land as: '*land subject to rights of common, whether exercisable at all times or only during limited periods, and waste land of a manor not subject to rights of common but does not include a town or village green or any land forming part of a highway*.'

1.4.2 Common land is land that is owned by one party over which another party has certain rights for example right to graze cattle. Common land is not owned by the public however it may have a right of public access, or the public may be allowed to use it.

Tywyn Trewan Order 1908 and the Commons Regulation (Tywyn Trewan) Provisional Order Act 1908

1.4.3 Tywyn Trewan Common was originally regulated by this order, which was subsequently confirmed by the Commons Regulation (Tywyn Trewan) Provisional Order Act in 1908. Subsequently the common has been subject to a series of Acts of Parliament. The 1908 Order and Act were made to protect the common from Inclosure of land under the Enclosure Act 1899.

Tywyn Trewan Act 1950

1.4.4 After the commencement of the second World War between 650 and 700 acres of the common was taken for the purposes of establishing an airfield. land within the common was acquired by the Crown for military purposes and a new airfield, RAF Rhosneigr, was completed in 1941 by levelling the sand dunes and infilling a lake and low-lying land. The airfield name was subsequently changed to RAF Valley. In 1942 an additional 55 acres of the common was taken to extend the runways and to level more dunes to the northeast and southwest of the airfield. This loss of land from the common and associated rights of way, were regularised by the extinguishment of the 1908 Act by the Tywyn Trewan Act 1950. This act also addressed the need for compensation for the use of land as an airfield and allowed public use of an access track known as The Burma Road which extends from Tyn Llidiart to Trewan Sands Crossing.

Tywyn Trewan Act 1963

1.4.5 The Local Tywyn Common Act of 1963 further amended the Commons Regulation (Tywyn Trewan) Provisional Order Act 1908 to allow the compulsory purchase of the land and the extinguishment of rights of common, private rights of way and other rights in respect of land taken for the airfield. Compensation was paid in respect of the extinguishment. Public right to use a track from the Afon Crigyll bridge across the common to Trewan Sands Railway Crossing was included. The powers of the Conservators of the Common were created. A drain was also required from the airfield extending to the Afon Crigyll.

1.4.6 It is reported that the airfield suffered from wind-blown sand and so, in May 1942, silt was dredged from the nearby Llyn Cerrig Bach, to spread over the airfield to encourage stabilisation of the sand dunes. This dredging activity led to the discovery of the Lyn Cerrig Bach Iron Age hoard.

The Commons Registration Act 1965

1.4.7 This Act required each county council to establish a Register of Common Land and to administer the registration of common land and town and village greens.

1.4.8 Each of the 22 current local authorities in Wales is a Commons Registration Authority and they hold the Registers established under the 1965 Act. Published advice implies that they offer support and advice on common land issues and are the first point of contact for the majority of common land queries. In Isle of Anglesey County Council, the responsibility for maintaining the Commonland Register is with the Land Charges Manager Mr Elwyn Evans, Solicitor (Property & Highways). However, a response to an enquiry received the response that the Council's only responsibility is to keep the Common Land Register and would not be able to provide any legal advice. Contact: Mr Evans via landcharges@ynysmon.llyw.cymru.

1.4.9 The main functions of Commons Registration Authorities today, of relevance to Tywyn Trewan include removing common land from registers, conducting searches of the register, handling applications for amendments, and maintaining the registers for public inspection.

Countryside and Rights of Way (Crow) Act, 2000

1.4.10 The CROW Act introduced a public right of access on foot on areas of open country and registered common land across Wales and England. However, there was a pre-existing legal right of access over Tywyn Trewan (1908 Act). The common therefore fall under Section 15 of the CROW Act because they are '*an area with public access rights under a local or private Act, or under a scheme of regulation made under the Commons Act 1899*', therefore the CROW rights and restrictions do not apply, and this land category is managed by 'bylaws or other statutory controls'.

Commons Act 2006

1.4.11 The law in relation to common land is largely governed by the Commons Act 2006. The Welsh Ministers have responsibility for implementing the Act in Wales. The Act makes provision about the registration of rights of common to include the deregistration and exchange of common land, the establishment of commons councils as well as other provisions such as undertaking of restricted works on common land. The Act sets out the matters to which the Welsh Ministers must have regard in deciding whether to grant consent and makes provision for enforcement powers where works are carried out without consent.

1.4.12 In Wales, a person must not, without the Welsh Ministers' consent, carry out certain restricted works on land which is defined in section 38(5) of the 2006 Act. The Act does not prohibit works that are allowed under other Acts, for example the fencing and barrier works set out in the Crow Act.

1.4.13 The Planning Inspectorate in Wales (PINS Wales) is responsible for the procedural work in relation to common land in Wales as well as determining, applications for consent under section 38(1) of the 2006 Act. The Deputy Minister for Agriculture and Fisheries retains responsibility for the Welsh Government's policy in relation to the management and protection of common land and greens.

1.4.14 Welsh Government policy for protecting commons include reversing the decline of and securing the resilience of our biodiversity by focusing on ecosystems as a whole and their connection with our economy and our communities; and through sustainable use of our resources the opportunity to drive growth and exploit new markets, increase efficiency, and improve the resilience, safety and prosperity of our communities, our economy and our environment.

1.4.15 Within the policy objectives there are aims for the:

- Sustainable management of soil and land.
- Safeguarding and enhancing biodiversity,
- Understanding and care for the natural environment and people's enjoyment.
- Improvement to the quality of the local environment.
- Protection of sites through designation to maintain or improve condition.
- Conservation of the best features in sustainable, living landscapes.

1.4.16 The Welsh Government consent/approval process should ensure the following outcomes:

A. The stock of common land and greens is not diminished, and any deregistration of registered land is balanced by the registration of other land of at least equal benefit.

B. Works take place on common land only to maintain or improve the condition of the common or, in exceptional circumstances, where they confer some wider public benefit and are either temporary in duration or have no lasting impact.

C. any use of the common or green is consistent with its status or (as common land or green) in accordance with the criteria set out in Part 3.5 Sections 16(6) and 39(1) of the 2006 Act set out the criteria to which the Welsh Ministers must have regard when assessing an application.

1.4.17 The considerations which must be taken into consideration are:

- the interests of persons having rights in relation to, or occupying the land (and in particular persons exercising rights of common over it)
- the interests of the neighbourhood

- the public interest
- any other matter considered to be relevant

1.5 Other relevant Acts of Parliament

Wildlife and Countryside Act, 1981

1.5.1 The Wildlife and Countryside Act is the primary legislation which protects animals, plants, and certain sites in the UK. This protection means that some land management has to be done in a certain way in compliance with this Act. Many species that are present on Trust land and, in some cases, their dwelling places too are protected by this legislation. Adequate planning, survey, timing and execution of tasks is needed to avoid intentional or reckless harm to protected species.

1.5.2 This Act (as amended by the Countryside and Rights of Way Act (CROW), 2000) also places a duty upon section 28G authorities regarding Sites of Special Scientific Interest (SSSI). 'The duty is to take reasonable steps, consistent with the proper exercise of the authority's functions, to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest'.

1.5.3 SSSI is a formal conservation designation that describes an area that's of particular interest to science due to the rare species of fauna or flora or important geological or physiological features that may lie in its boundaries. Tywyn Trewan Common overlaps with the Beddmanarch – Cymyran SSSI Site of Special Scientific Interest (SSSI) which covers that Inland Sea and some coastal land. The SSSI is designated because it has four special features. These include marine biological interest, Salt marsh vegetation, coastal dune heath, comprising heather with sand sedge, at Cymyran, and overwintering water birds. The northern triangle, separated from the rest of the common by Minffordd Road, shares a boundary with the LLynnau-y-Fali SSSI.

1.5.4 The Cymyran area of the common is within the SSSI. Natural Resources Wales undertake some management work on the SSSI to sustain the scientific interest. There are several activities that should be avoided that would interfere with the scientific interest. These are addressed later in this management plan.

Occupier's Liability Acts, 1957 and 1984

1.5.5 These Acts impose on all landowners, a duty of care both to legitimate visitors and to trespassers.

Equality Act, 2010

1.5.6 This Act legally protects people from discrimination in the workplace and in wider society. It also contains a 'public sector equality duty' that applies to public bodies and those carry out a public function. This duty is to have due regard to the need to: '*eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act; advance equality of opportunity between people who share a protected characteristic and people who do not share it; and foster good relations between people who share a protected characteristic and people who do not share it*'. This '*ensures that public bodies consider the needs of all individuals in their day-to-day work – in shaping policy, in delivering services, and in relation to their own employees*'. This process could involve making reasonable adjustments to meet the need of disabled people.

Health and Safety at Work Act, 1974 & Regulations, 1999

1.5.7 All operations carried out on the common must comply with this Act. This will include the completion of hazard identification, assessments and reviews, and specific activity risk assessments (generic or site specific) will be completed for all activities.

1.6 Land Tenure

1.6.1 This management plan is not a legal document. Please refer to the original tenure documents before taking any decision or any action which may have legal implications.

Land ownership

1.6.2 The common is in divided ownership. The Golf Club own the land they occupy and are classified as 'Owners of the Soil'. The remaining areas are owned by others (not named here) who are represented on the Board of Conservators.

1.7 The Board of Conservators

1.7.1 The common is managed by the statutory Board of Conservators. The Conservators are appointed according to the terms of the 1963 Act and include representatives of various local bodies and have the power to manage the land, and the trees, plants and animals on it, to provide recreation facilities, to control activity within their area, regulate navigation on waterways and to make byelaws.

1.7.2 The Board of Conservators was established on the 1st May 1913 under the 1908 Act, with the Conservators representing the landowners, appointed from the Parishes of Llanfihangelynhowyn Llechylched and Llanfaelog, and the Community Councils of Llanfairyneubwll, Bodedern, Bryngwran and Llanfaelog.

1.7.3 The 1963 Act also gave powers to conservators to allow them to permit additional works on common at the request of Crown and these may relate to maintenance of the Burma Road and the storm drain.

1.7.4 The 1908 Act sets out the powers of the Conservators to:

- make, alter or revoke regulations for grazing by animals[1] of any class.
- appoint officers to enforce the regulations.
- constitute and regulate a committee of graziers.
- delegate to the grazier committee '*such of the powers exercisable by resolution under the Act*'.

1.7.5 The Act also includes a clause regarding Conservator's powers to make byelaws unless any local Act removes that power. The local Acts of 1950 and 1963 do not remove the powers to regulate with bylaws. A key word in the byelaws is '*unauthorised*', which is defined in the first clause of the bylaws, '*any person not for the time being duly authorised by the Conservators in writing for any purpose connected with the management of the Common, and not being a person acting legally by virtue of some estate or interest in over or affecting the Common, or any person duly authorised in writing by any person entitled to act as aforesaid*.'

1.7.6 An unauthorised person may not, for example, '*erect any post, railing, fence, booth, stand, building or other structure for any purpose on the Common*'. It is not unreasonable to assume, therefore, that an authorised person may *erect any post, railing, fence, booth, stand, building or other structure for any purpose on the Common.* Many of the actions that require authorisation by the Board of Conservators allow greater freedom to manage the common to improve its condition.

1.7.7 A copy of the Byelaws is included in Appendix 1.

1.7.8 A document prepared for the Conservators as guidance explains that their powers include:

(i) To drain manure and level the Common where necessary for the purpose of improving the Common for the pasturage of sheep or the purpose of recreation.

(ii) To make byelaws and regulations (subject to any such confirmation as is by law required) for:

a. preventing nuisances on the Common or protecting it therefrom or for keeping order thereon.

[1] In this Act the expression "animals" means horses, asses, cattle, sheep, goats, and swine.

b. preventing malicious or wanton injury to property therein or thereon.

c. regulating the exercise of lawful rights of common substituting thereon or of the right reserved to the labouring poor of the said parishes as hereinafter mentioned.

d. regulating the exercise of the privileges hereinafter reserved of recreation and playing of games on the Common.

e. Generally, to manage the Common.

1.7.9 There are provisions for the benefit of the neighbourhood:

(i) A right of free access at all times to the common and the privilege of recreation by walking, horse-riding and enjoying air and exercise thereon.

(ii) A privilege of playing games other than golf on such parts of the Common as may be appointed by the Conservators.

(iii) Setting out allotments for the labouring poor[2].

1.7.10 The Conservators shall have power:

(i) To acquire by gift or purchase freehold land forming part of the Common

(ii) To permit golf to be played on the Common and to receive pecuniary consideration for the same

(iii) To permit temporary encampment of H M Forces on the common and to receive pecuniary consideration therefore[3].

(iv) To permit the formation of a rifle range

1.7.11 Execution of works: the Conservators may execute any works of draining, manuring and levelling the common when necessary for purposes of improving the Common for the pasturage of sheep or for the purposes of recreation and to that end may permit the erection of temporary fences for the protection of newly sown grass.

[2] The setting up of allotments requires permanent fencing.
[3] The current use of the common by the RAF might be a useful source of income.

1.8 Size, areas and land uses

Table 1.1: Landuse and areas

Area of common	Total area in hectares	Observed land uses (excluding nature conservation)	Areas in hectares
Northern area (Minffordd Road and Valley access road triangle)	0.8	No known use	0.8
Eastern area (Cyttir Tywyn Trewan)	161.08	Sheep grazing,	161
		Informal 'Open Access', public rights of way, access road to Trewan Crossing, recreation	161
		Golf course	41.5
Southern area (Traeth Crigyll shore, dunes and riverside)	49.46	Informal 'Open Access' recreation, Coastal Path	49.5
		coastal protection	49.5
		salt marsh and tidal river	2
		Golf course	3.5
Northwestern area (Cymyran shore and dunes)	13.37	Informal 'Open Access', Coastal Path, recreation, part of the Beddmanarch to Cymyran Site of Special Scientific Interest (SSSI) and access track to properties at Cymyran.	13.5
Total area of common	284.71		

1.9 Public access

1.9.1 The whole 224.7 hectares of the common is classified as Open Access land. Table 1.2 sets out the main entry points and routes. These are shown in the map in **Figure 1.3**.

Table 1.2: Access points and circulation (described in a clockwise manner starting in the north)

Ref	Route	Status	Comments
Northern area (Minffordd Road triangle)			
1	Footpath from Llanfihangel yn Nhowyn to RAF Valley railway bridge enters the norther triangle beside the railway.	Public footpath (right of way)	The footpath stops at the railway bridge and public road. There may be a route under the railway bridge. An informal path leads to the RSPB car park further east along Minffordd Road.
2	Access from the RSPB car park on Minffordd Road and across intervening RSPB land.	Informal route	A meandering and informal path has been worn through scrub from the car park.
Eastern area (Cyttir Tywyn Trewan)			
3	Access from Minffordd Road with a dropped kerb, through field gates with Bylaw sign.	Informal or grazing access	There is an area prone to flooding by the gate and a concrete path has been laid in parallel with the RAF accommodation compound boundary fence.
4	Access track from Dowyn	Farm access apparently used by vehicles	A worn route with a gap in the boundary clawdd. No signs of public use as a footpath
5	Footpath from Llanfihangel-yn-Nhywyn and Llyn Traffwll to Trewan Railway Crossing. Access is through a clawdd on the north side of the common.	Public footpath (right of way)	Little evidence that the route is used visible on the ground.
6	Road, known as Burma Road, shown on the OS maps as an unclassified public road from the Crigyll Bridge at Ty Llidiart.	Unknown, although public use is allowed. It is mapped as a public footpath.	Maintenance of this road appears to be informal with a loose surface which is slightly raised above the general ground level. There is uncertainty about the status of the path at the railway crossing. The owner of Trewan Caravan Park and the railway state they there is no right across their land/railway.

Ref	Route	Status	Comments
Southern area (Traeth Crigyll dunes)			
7	Footpath from Crigyll Bridge for 260m to meet the Burma Road to the west.	Public footpath (right of way)	No evidence of use on the ground with the northern end passing through flooded land. There are several private houses and the Trewan Sands Caravan Park using Burma Road.
8	Golf course access road from the A4080 Station Road in Rhosneigr and extending north to meet Burma Road after 1.65 kms.	public footpath (right of way) with the southern part also a private road.	This route Passes across the front of the golf course club house and across a private road bridge over the Afon Crigyll. The route passes through a railway underpass and through the golf course and crosses at least 2 fairways.
9	Access track extending northwest from beside the golf course to a secure access gate to the RAF Valley runway.	Private road with branches that enter the common on both sides of the Afon Crigyll	The route includes a vehicle bridge over the Afon Crigyll. Branches extend into the sand dune area of the common to the west as well as north into the area of common beside the RAF security fence. The route eventually meets the Trewan railway crossing.
10	The Anglesey Coastal Path from Warren Road in Rhosneigr to Llanfair-yn-neubwll	Permissive path negotiated by the county council	Crosses the Afon Crigyll on a footbridge and enters the common on the north bank of the Afon Crigyll. It continues into the sand dunes to the west and then follows the top of the beach at Traeth Cymyran. This route, which extends the full length of the shoreline gives access to Traeth Cymyran.
Northwestern area (Cymyran shore and dunes)			
11	The Anglesey Coastal Path from Lon Felin Wen Road in Rhosneigr to Llanfair-yn-neubwll	Permissive path negotiated by the county council	Extends south into the area from Lon Felin Wen, which is a narrow winding unclassified in Llanfair-yn-neubwll. Access to vehicles is now restricted at the northern end, but the track extends to the residential properties at Plas Cymyran. The track also serves as the coastal path

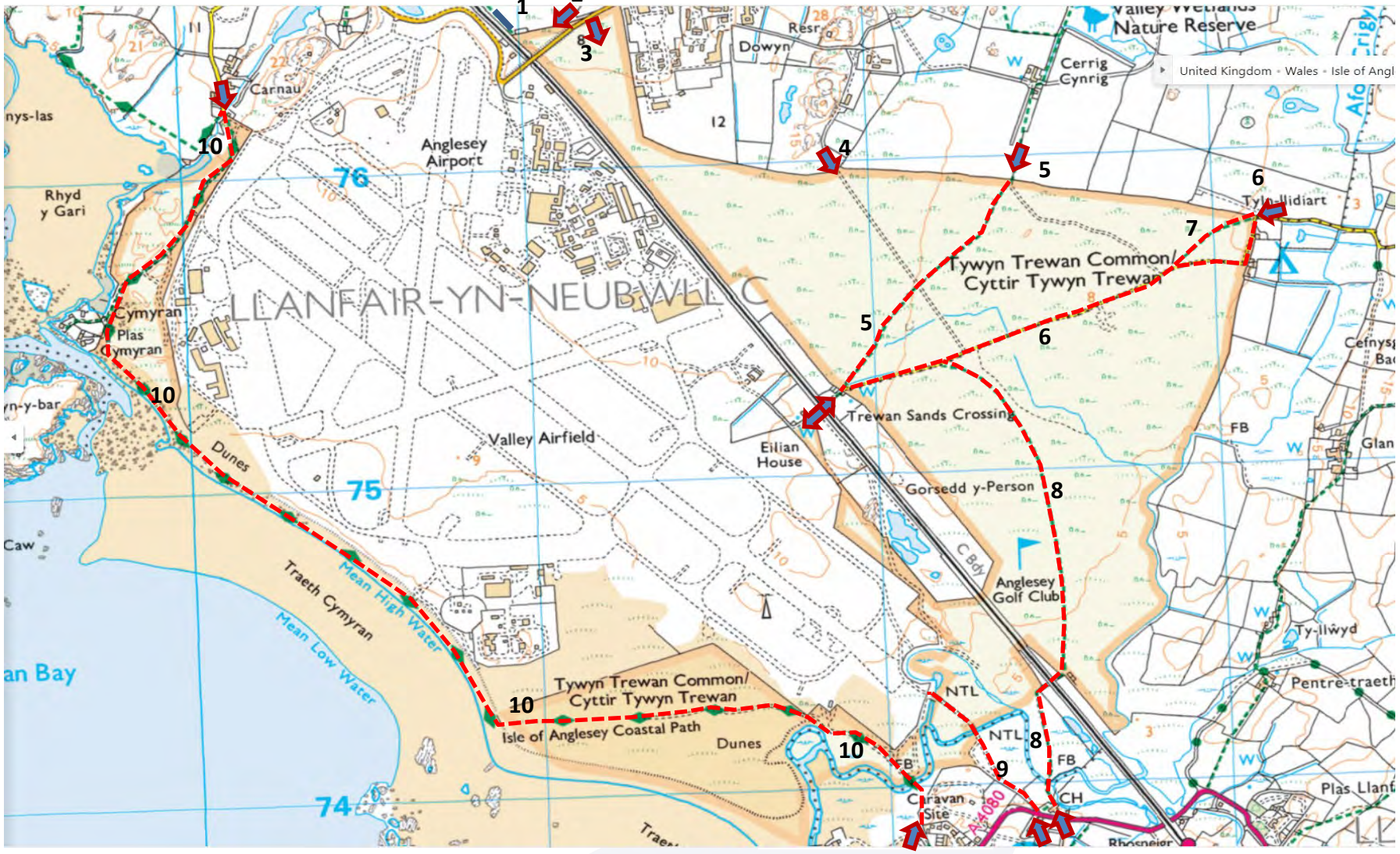
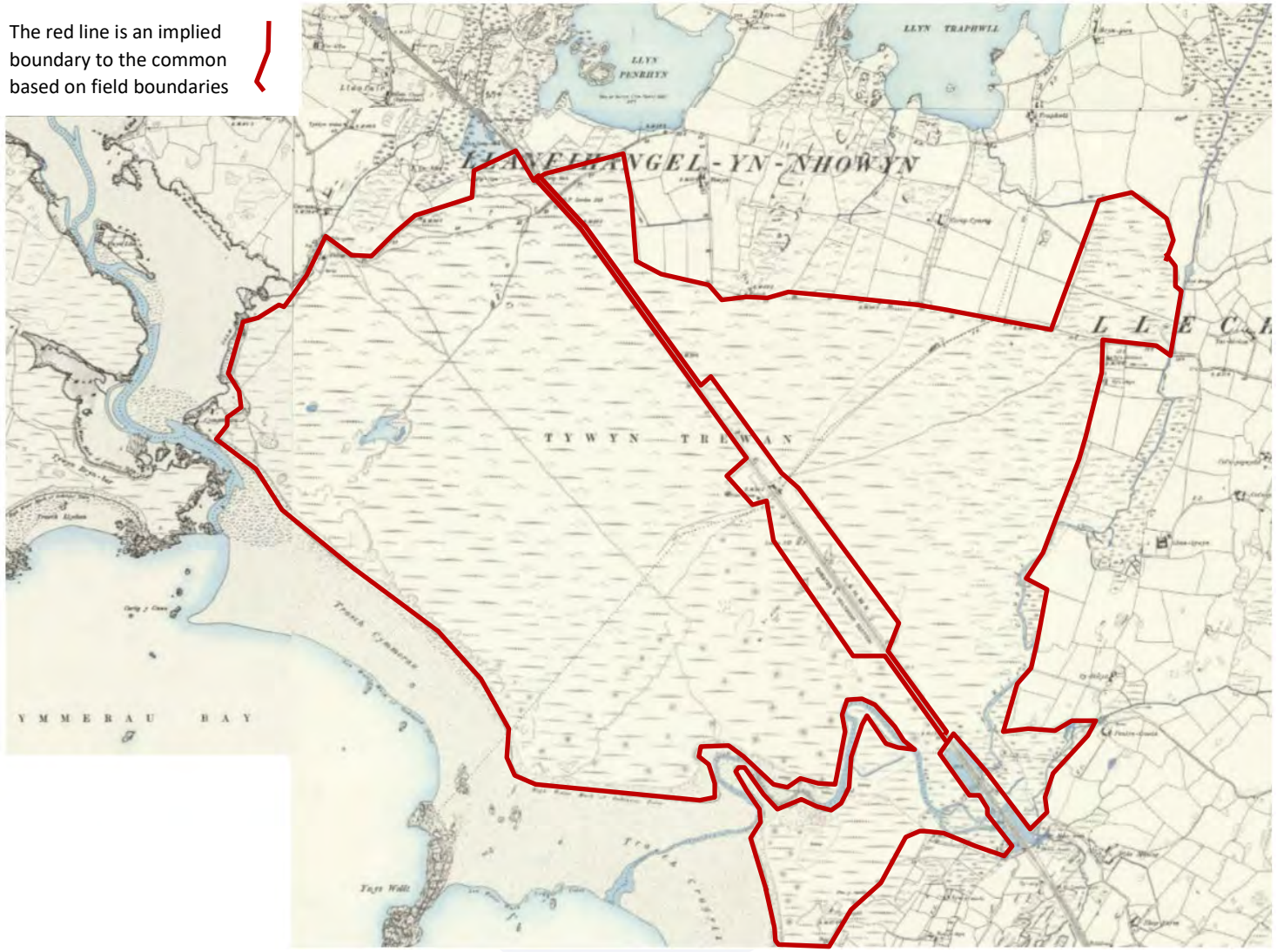


Figure 1.3: Access points and routes across the common (enlarged extract from the OS 1:25,000 scale map. (do not scale))

Figure 1.4: 1889 OS six inches to the mile map extracts for Tywyn Trewan



2 BIODIVERSITY EVALUATION

2.1 Biodiversity value of sand dune habitat

2.1.1 The Wales Coastal Ecosystem Group (WCEG) have prepared a plan setting out what actions are required to restore biodiversity to sand dunes in Wales. Cyttyr Tywyn Trewan is a large area of sand dunes that were adversely affected by the construction and extension of RAF Valley airfield. In the plan WCEG state that: '*Sand dunes represent one of the most natural and species-rich habitats in Wales, supporting vast numbers of plants, fungi and invertebrates. The total floristic assemblage for Welsh sand dunes amounts to some 945 species, with vascular plants representing about 439 of these (Rhind 1999). Fungi unexpectedly form the next most important group with approximately 289 species, followed by bryophytes (171 species) and terricolous lichens (66 species). They are also extremely rich in invertebrates (Howe et al. 2010), with 454 species restricted or mostly confined to sand dunes in Wales including 156 beetles, 117 flies, 65 bees & wasps, 50 bugs and 25 spiders. Whilst the largest dune systems inevitably support the largest numbers of species, some of our smaller sites support rare vegetation communities, (Morfa Dinlle and Crymlyn Burrows) or key species. For example, Morfa Conwy supports the only Welsh population of the belted beauty moth Lycia zonaria.*

2.1.2 WCEG are concerned that sand dunes are facing many threats to their conservation of these vulnerable landscapes. As one example '*most of the Natura 2000 sand dunes features in Wales are now considered to be unfavourable and declining*.' Declining quality of landscape and habitat are the result of changes. The major concerns for sand dunes include stabilisation, loss of sand supply, nutrient enrichment, changes to water supply to habitats as a result of drainage schemes, conifer plantations, scrub development, inappropriate grazing intensity. A number of these apply to Cyttyr Tywyn Trewan and recent records indicate a much-reduced species list. This could be the result of low-level of recording, or a result of deteriorating habitats.

2.2 Description of the habitats

2.2.1 Data has been purchased from the Cofnod database and is summarised in this section. Further information has been derived from consultations with NRW and RSPB as well as from a field visit in early May 2022.

Designated site: Beddmanarch - Cymyran Site of Special Scientific Interest (SSSI)

2.2.2 The SSSI extends from the north on the coast close to Llanfwrog, south through the inland sea and its tidal inlets and onto the dunes and salt marsh at Cymyran, within the Tywyn Trewan Common. The Citation for the SSSI states that the dunes at Cymyran should be

maintained with short heather and small bare patches of dune sand conducive to dwarf dwarf rush (Juncus capitatus).

2.2.3 The SSSI is regarded as an excellent place for wildlife but warns that it will only remain so if the necessary management continues. NRW intend to ensure that this management is carried out. In particular they consider the following matters to be key considerations:

- **Grazing:** coastal heath areas should ideally be lightly grazed to remove accumulated vegetation and encourage the regeneration of heather. Where this is not possible, selective mowing or occasional planned small patch-controlled burning may help rejuvenate areas of old heather. Paths and tracks provide bare wet ground habitat for dwarf dwarf rush (Juncus capitatus) germination.
- **Nutrient (fertiliser) levels**: dune soils are characterised by low levels of nutrients (N,P,K,). Fertilisers, including atmospheric Nitrogen (NOx) pollution, encourage the growth of coarse grasses at the expense of the desired species. Supplementary feeding, e.g. with silage, has a similar impact. Use of artificial fertiliser should be avoided. Wind erosion and rabbit burrowing ensures that calcareous (shelly) sand is regularly brought to the surface to replace acid soil layer.

Designated Site: Llynnau-y-Fali SSSI

2.2.4 Adjoining the Minffordd Road triangle in the north of the common is the Llynnau-y-fali SSSI, which is a complex of lakes and associated habitat designated for the standing water habitats with a high nutrient level, reed swamp, marsh fen, unimproved grassland, ditches and rock outcrops. These habitats are used by overwintering birds and support a range of invertebrate species. The SSSI forms the Royal Society for the Protection of Birds (RSPB) Valley Reserve and is managed to conserve species that include Chough, Lapwing, Stonechat, Linnet and other species, including plant species associated with the habitats provided within the reserve.

Priority habitats

2.2.5 Table **2.1** lists the Priority Habitats identified in Section 7 of the Environment (Wales) Act 2016.

Table 2.1. Summary of Priority Habitats

Habitat Ref	Habitat Description	Priority Habitat	Site Context/Justification
G2.2	Running water	Yes	Afon Crigyll, the outflow stream from Llyn Dinam and Llyn Penrhyn
H2.6	Dense continuous saltmarsrh	Yes	Along the shore of the Afon Crigyll estuary The shore at Cymyran is outside the common
H6.5	Sand dune grassland	Yes	In all areas of the common
H6.8	Open sand dune	Yes	Once throughout the common, this habitat is now more limited with the Crigyll dunes area providing the largest area.

2.3 Plant species

2.3.1 The Cofnod records show that the common has, or had, considerable botanical diversity, although much of this lies within the Cymyran and Crigyll Dunes area. There has been greater botanical diversity in the past within the eastern area (Cyttyr Tywyn Trewan), although some diversity is retained within the margins of the Afon Crigyll and in the saltmarsh. The loss of botanical diversity is likely to have arisen from vegetation changes resulting from reduced grazing intensity which allows rank overgrowth of dune grass and a succession to scrub dominated by gorse or blackthorn.

2.3.2 Cofnod data indicates that a range of plant species associated with sand dunes, saltmarsh and wet and dry grassland are present in the grasslands and these include species indicative of a range of western grassland hedgerow species, some of which are very scarce and unusual and others quite ubiquitous for example:

Early marsh orchid	Field gentian
Northern marsh orchid	Bluebell
Common mouse ear chickweed	Yellow birdsnest orchid
Chamomile	Large hook moss
Common scurvygrass	Mullien
Prickly saltwort	Sea thrift

A more comprehensive list of species is included in Appendix 5.

Observations from field visits to the four areas

Northern Area (Minffordd Road)

2.2.1 This area is dominated by rank grassland and by developing coastal/dune scrub including gorse, bramble and blackthorn. There do not appear to have been any management interventions in the recent past.

Eastern Area (Cyttyr Tywyn Trewan)

2.2.2 In line with the area to the north of Minffordd Road, the dune vegetation is gradually changing from dune grassland to scrub. Much of the area appears to be lightly grazed, or ungrazed. Grazing appears a little more intense along the golf course and the corridor of the Afon Crigyll, which forms the eastern boundary of the common. The vegetation is dominated by Rank dune grasses, including marram grass with large areas of gorse scrub developing. These conditions do not favour the kind of plant diversity that would be expected.

2.2.3 Other species noted to occur sparsely through the area include creeping willow, creeping buttercup, sheep's fescue and red fescue, mouse-ear hawkweed, a sandwort. Along the banks of the Afon Crigyll are common kidney vetch, lyme grass, stonecrop and occasional plants of alexanders alongside plants that are typical of grassland such as wild carrot (Daucus carota) and creeping bent (Agrostis stolonifera).

Southern Area (Crigyll Dunes)

2.2.4 The area is made up of several habitat types including semi-stabilised sand dunes, salt marsh and some stable, grassed dunes with developing coastal scrub of gorse, blackthorn, bramble.

2.2.5 The relict salt marsh habitat is a continuation of the intertidal substrate and dunes which lie to the south and north of the Afon Crigyll and have characteristics of restricted entrance embayment marsh. Restricted-entrance embayment marshes are typically mixed sandy-muddy systems, with the embayment partially closed off at the mouth by one or more spits or promontories. However, the inundation zone that typifies saltmarsh habitats, which lies between the Mean High Water of Spring Tides (MHWST) and the Mean Low Water Spring Tide (MLWST) is absent to the south and south-east of the river.

2.2.6 Most saltmarsh plants have adapted to a semi-marine environment. Basic physiological processes such as the uptake of nutrients by osmosis are intermittently stymied by tidal submergence. Saltmarsh plants have evolved various ways of coping with this challenge There are no saltmarsh obligate halophytes (salt loving plants) present, so in the absence of competition most saltmarsh plants can thrive in ordinary soil. Alongside the river within the intertidal zone the areas of grassland and intertidal habitat are heavily grazed by rabbits and

suffer from visitor pressure with obvious desire line footpaths. These bring with them dogs, litter and sometimes vehicles too.

2.2.7 Numerous plants indicative saltmarsh are along the fringes of the presumably brackish Afon Crigyll, including common scurvy grass, sea purslane, sea beet, sea thrift, sea rush and sea holly. The sandy areas outside the intertidal zone contain plants such as common kidney vetch, lyme grass, stonecrop and Alexanders alongside plants that are typical of grassland such as wild carrot (Daucus carota) and creeping bent (Agrostis stolonifera).

2.2.8 A small area of sea-buckthorn is recorded in the dunes to the south of the Afon Crigyll. This shrubby species is native to the British Isles, but not to Anglesey. It is highly invasive and NRW policy is to try and remove the plant from coastal habitat in Anglesey.

Northwestern Area (Cymyran Dunes)

2.2.9 This strip of coastal and intertidal land is part of the Beddmanarch-Cymyran SSSI and includes habitats that include mudflats, sandbanks, species rich muddy gravels, tidally swept areas of bedrock, rock outcrops, shingle bars, coastal grassland and scrub. The diverse habitats are important for wildlife. Saltmarsh vegetation is present in the intertidal zone where it is sheltered from the tidal current. Species include common saltmarsh-grass, thrift, lax-flowered sea-lavender, sea rush and cord-grass. Golden samphire occurs in these saltmarsh communities. The dunes contain areas of heath, coastal scrub and dune grasslands of marram grass, sheep's fescue, red fescue and common bent with some gorse, blackthorn, and bramble. The extremely rare dwarf rush occurs in suitable habitat of disturbed ground.

2.4 Protected and priority species

2.4.1 The following section presents the findings of the desk study (species records within 1 km of the site within the last 10 years), provided from public records provided by COFNOD.

2.4.2 Where a species or species group has been omitted, this is due to there being no records and/or no suitability on site to support the species and as such are not considered to be affected by the schemes proposals.

2.4.3 There were numerous records of species within 1 km, mostly associated with the lakes to the north of the site, where some of the terrestrial habitats are like the common. Very often records of species are made because the observer is influenced by factors such as scarcity of the species, its visibility, its size, the accessibility of the land and the frequency of visits to the land by a qualified recorder. Lists of species tend to be more an indicator of suitable habitat rather than being a comprehensive catalogue. Table 2 shows the list of invertebrates, of which five different species have been recorded within the common.

Table 2.2 Invertebrates recorded on the common

Scientific name	English Name	Distance	Habitat
Coenonympha pamphilus	Small heath butterfly	On-site	Habitats such as salt marshes, wetland grassland, meadows. Grasses are the larval host
Enallagma cyathigerum	Common blue damselfly	On-site	Freshwater bodies as fens and eutrophic ponds with good water quality
Boloria selene	Small Pearl-bordered Fritillary	On-site	Grassland. Violets are the larval host.
Speyeria aglaja	Dark green fritillary	On-site	Grassland, pastures, and flowery banks. Dog violet and Heath violet are the larval host.
Pamponerus Germanicus	Pied-winged robberfly	On-site	Coastal and permanent dunes
Bombus pascuorum	Common carder bee	684m	Gardens, farmland, hedges and heaths
Bombus lapidaries	Red-tailed bumblebee	331m	Gardens, farmland, hedges and heaths
Lasiommata megera	Wall Brown butterfly	932m	Woodland margins and clearings, shrubby areas river valleys, coastal areas
Brachytron pratense	Hairy Dragonfly	1km	open sunny areas with dense vegetation for protection on ponds, lakes, fens, ditches.
Arctia caja	Garden tiger moth	605m	Wild areas from grassland to woodland.
Eugnorisma glareosa	Autumnal rustic moth	776m	woodland fringes, moorland and sandy or chalky soils
Sympetrum striolatum	Common darter	369m	Still waterbodies

Reptiles

2.2.5 There were fifteen records for reptiles; all of them are associated with the Crigyll Dunes. There were six further records within 1km of the site.

2.2.6 Within the site there were records for:

- Six records for adder *Vipera berus*
- Three records for common lizard *zootoca vivipara* and
- Nine records for slow worms *Anguis fragilis*

2.2.7 Natural Resources Wales staff have observed the three species in the Cyttyr Tywyn Trewan recently and have carried out work within this area to provide basking habitat.

2.2.8 Whilst the common is subject to intermittent grazing, by sheep, there are substantial areas that receive little or no grazing and are developing rank cover and gorse scrub. This habitat is suitable for reptiles.

Amphibians

2.2.8 There were no records of amphibians on the common, which might reflect the salt and brackish nature of any waterbodies present. There were records within 1km of the site in the last 10 years. The records were for a common toad *Rana temporaria* in 2013, near Llyn Traffwll and a common frog *Bufo bufo* in 2014, near Llyn Penrhyn.

Birds

2.2.10 Many bird species were recorded within 1 km of the site. Due to the mobility of bird species many of the species present, in particular small passerines, could occur within the surveyed area. The areas of scrub and trees and hedges along the boundaries of the common provide suitable nesting habitat for birds. The rank grassland would also be suitable for ground nesting birds.

Table 2.3: Bird species records within 1 km of the site.

Scientific Name	English Name	Habitat
Buteo buteo	Buzzard	Most habitats, woodland, moorland, scrub, pasture, arable land, marsh.
Pyrrhocorax pyrrhocorax	Chough	Short-grazed grassland and coastal heathland, nesting in rock crevices, ledges and cliffs
Numenius arquata	Curlew	Feeding on mud and very soft ground along shorelines, wet coastal grassland, heath and moorland.
Larus argentatus	Herring Gull	Coastal areas

Scientific Name	English Name	Habitat
Delichon urbicum	House Martin	Migratory bird that nests on buildings and feeds in farmland, preferably near water.
Falco tinnunculus	Kestrel	Open ground and farmland where small mammal prey are plentiful.
Vanellus vanellus	Lapwing	Farmland and wetland with nests on the ground in mud or sand.
Corvus corax	Raven	Rural areas where carrion is available. Nesting on cliffs, ledges and on the coast
Turdus illacus	Redwing	Migratory species that arrives in winter in the UK frequenting hedges, orchards, parks and woodland edges where berry-laden plants are present.
Emberiza schoeniclus	Reed Bunting	Reedbeds, wetlands and farmland, nesting in dense vegetation
Alauda arvensis	Skylark	Farmland, grasslands, saltmarsh and moorland. Ground nesting.
Sturnus vulgaris	Starling	Farmland, gardens, nesting in holes in trees and buildings
Columba oenas	Stock Dove	Woodland edges, parkland and farmland nesting in holes in trees and buildings
Apus apus	Swift	Migratory bird arriving in UK is late spring and feeding over grassland, farmland.

Bats

2.2.11 There were no records of bats within the site, there was one record from 2013 of a Soprano pipistrelle *Pipistrellus pygmaeus* 429 m south east of the common.

Badger

2.2.12 No badgers *Meles meles* were recorded within 1 km of the common.

Hedgehogs

2.2.13 No hedgehog *Erinaceus europaeus* records were within the common, but the species has been recorded to the south of the site associated with Rhosneigr.

Otters and water voles

2.2.14 There were several records for otters *Lutra lutra* within 1km of the common and a single record for a dead otter. Spraint have been recorded.

Water vole

2.2.15 No records of the water vole *Arvicola amphibious*.

2.3 Invasive non-native / problematic species

2.3.1 There were no invasive non-native or problematic species noted within the common, but NRW have recorded Sea buckthorn (*Hippophae rhamnoides*) located at the southern end of the site and have taken measures to eradicate the species from the dunes area.

2.4 Conclusions regarding biodiversity

2.4.1 The four areas of the common provide dune and saltmarsh habitat which supports a representative range of plant, invertebrate and bird species. There are some unusual species that are dependent on very specific conditions. Changes to the vegetation mean that many species will be relics surviving in the few places where conditions remain suitable. The gradual loss of species, and the gaining of other species is a result of reduced grazing and the gradual change to scrub. The common is likely to have supported much greater biodiversity in the past and much of this might be recoverable if a suitable management regime can be implemented.

3 HERITAGE, LANDSCAPE AND HISTORICAL CONSIDERATIONS

3.1 Recorded History

3.1.1 The sand dunes are formed of blown sea sand which varies in depth below the existing surface and is overlaid on the underlying bedrock of metamorphic Mica Schist. During the last Ice Age the whole of Anglesey would have been under and ice sheet which scoured the bedrock. The sand dunes formed in a shallow valley when sea levels rose after the ice sheet melted. Before then, the valley would have been too high above sea level for blown sand to have gathered in overwhelming quantities. It is possible that the original valley was partly flooded by the sea and developed first as a salt marsh on estuarine and marine sediments and sand, and subsequently as sand dunes.

3.1.2 There are no records available of use of the area during the Mesolithic or Neolithic. Evidence of human activity starts in the Iron Age. The Castellor Hut Group, is a group of hut circles, designated as a Scheduled Ancient Monument, which lies to the east of the common on beside the Afon Crigyll on slightly elevated ground just to the north of Ty'n Llidiart. The Cadw summary description describes the site as including, '*remains of a group of hut circles that probably date to the Iron Age or Romano-British period (c. 800 BC - AD 400), two pasture fields divided by a wall, the western one bounded by the Afon Crigyll and the eastern by another wall. Along the edge of the west field, above the river, is some outcropping rock, the line of which is continued southwards by an intermittent row of boulders, singly and in groups, possibly the remains of a boundary wall. In the northern part of the east field, and just outside it to the south, are clear remains of hut circles. There are also some ploughed-over circles in the east field just to the NW of the better-preserved ones. Most of the area, particularly the east field, shows undulations suggestive of enclosures of various shapes and sizes, although there are no other clear features. The monument is of national importance for its potential to enhance our knowledge of later prehistoric domestic construction practices. The monument retains significant archaeological potential and there is a strong probability that structural evidence has survived, together with internal and external floor surfaces. The scheduled area comprises the remains described and areas around them within which related evidence may be expected to survive.*'

3.1.3 What is significant about the presence of the hut circles is that the inhabitants would have used the land now within the common for grazing animals, hunting, fishing and foraging for shellfish on the shoreline. Evidence that the area at that time held some significance for Iron Age people was the Llyn Cerrig Bach Hoard. This archaeological discovery was made in a bog on the fringes of the lake during construction of the airfield in the 1940s. The hoard of 180 iron and copper objects included primarily military finds, including eleven swords, eight spearheads and parts of a parade shield. Equipment from 22 chariots were also present,

both the harness and parts of the structure. Archaeological study has shown that some items were locally manufactured, a few came from Ireland but a great many originated from southern England. This has been taken to show that trade took place, or that plunder captured in war was brought there. Alternatively, the deposits may have been brought to the site by people from the areas of origin. If that was the case, Llyn Cerrig Bach, lying at the edge of the common, was a shrine of such importance that people travelled from around Britain and Ireland to deposit goods in the water.

3.1.4 The Llyn Cerrig Bach assemblage is one of the most important collections of La Tene metalwork discovered in the British Isles. The RCAHMW[4] have indicated that *'These Iron Age finds are an example of a phenomenon well known on the Continent and described by Caesar as a sacred lake in which the spoils of war were thrown by the Celts as offerings to their gods. Some of the swords are of types current in the 2nd century BC, others are of later designs, but nothing later than AD 60 can be identified. This suggests that the lake developed its importance in the latter half of the Iron Age, and it was the Roman invasion of Anglesey in AD 60 that put a stop to the flow of offerings'*[5].

3.1.5 Human presence during the Middle Ages are less common, although there are said to be field patterns that are the result of multi-period development. One recorded feature that stood within once boggy ground within the common is Murddyn Eglwys. This is alleged to be the site of a church. The records state that the site was a disturbed mound, composed of sand set in marshy ground, amongst the sand hills of Tywyn Trewan. The site is a roughly circular mound, about 10m across and 1.3m high. A smaller mound, 5m to 6m across and about 12m to the south-east, marked the boundary between Llanfihangel-yn-nhowyn and Llechylched. Both have been levelled for Valley Airfield. The mound is shown on the 3rd edition OS County series (Anglesey XVII.5 1924), but not before. Local traditional is that the mound was the site of a church or chapel, where walls had stood 100 years before the airfield was constructed, although no services had been held for two centuries or more.

3.1.6 The common as a legally defined area came into being as a result of Inclosure Acts which enclosed the fringes of the common. Before that time the land would have been 'Waste' accessible from the surrounding parishes for people to use in accordance with long established rights. This could have included fish from the waters, peat from the bogs, trapping of fowl and grazing for domestic animals. The Inclosure of the outer fringes of the common would have incorporated the more fertile land within the surrounding farms. The

[4] RCAHMW: Royal Commission for the Ancient and Historic Monuments of Wales
[5] https://coflein.gov.uk/en/site/401097/

result was a small. Low lying area of the remaining land was of low value to agriculture which protected it from further Enclosure until the land was given protected status as a Common.

3.1.7 On the western edge of the common and sited to make use of the Afon Cymyran is the ground level remains of a tidal water-powered corn mill called Felin Carnau, associated with the parish of Llanfair -yn-Neubwll. This site is designated as a Scheduled Ancient Monument. The building is thought to have originated before 1666, when it is referenced in legal documents. These mills were important to the economy from the 16th century onwards but may have been demolished because of the airfield in the 1940s. Dames extended both sides of the rock island on which it stood to contain a reserve of water at high tide. In 1975 the corner and wheelpit of a stone building could be seen, with the wooden axle and cast-iron hubs of a seven-spoked waterwheel or around 4 metres diameter. The presence of the mill suggests that corn was produced in the parish, perhaps in the Inclosed fields around the common. Various known land points along the estuary side suggest that ships were berthed and perhaps carried milled products away to markets.

3.1.8 By November 2008 the adjacent land surface had been raised to the level of the top of the surviving mill walls, distinguished by the ivy growing on them. Water flows from the millpond to the north-east, through a sluice in the brick-built mill dam and into a steep-sided gully through the former wheelpit. One of the waterwheel hubs still appears to be in situ.

3.1.9 Llidiart Bridge over the Afon Crigyll is a Grade II Listed building and is the only Listed building on the common. It was built in the early 19th Century of mortared rubble masonry as three spans to carry the road over the river, with a central arch larger than the flanking flood arches. Each arch has roughly shaped stone voussoirs and a roughly capped rubble parapet wall of small stones over a dripcourse just above the central arch.

3.1.10 The Common has been changed through various Acts of Parliament. The presence of the railway running northwest–southeast through the common suggests that a further Act of Parliament was passed to allow the land to be taken commoners. The railway divided the common into two areas with crossings provided to link them.

3.1.11 The construction of the airfield and its subsequent extension and the flattening of dunes occurred between 1940 and 1944. Large areas of the coastal sand dunes were levelled to create the runways and the bogs were drained and backfilled. Because of windblown sand, silt was dredged from the nearby marshes and lakes to spread over the airfields to stabilise the sand from the dunes. The presence of the airfield and the railway broke up the common into four areas and made concerted grazing management very difficult.

3.1.12 The Tywyn Trewan 1950 and 1963 Acts of Parliament were concerned with regularising the remaining area of common after the construction of the airfield. This was delayed until after

the war. The road, originally known as Burma Road, connected the houses and river bridge at Ty'n Llidiart to the Trewan Sands Railway Crossing, and a large storm drain were added following the 1963 Act. These Acts confirmed that sheep, cattle, goats, pigs and horses could be grazed on the common.

3.1.13 The historical; evidence suggests a well-used and much-frequented area with a strong agricultural function until the airfield was built. Much of the archaeological evidence though is sited on the higher land around the common, on the coast or scattered in the area now beneath RAF Valley. The latter finds may be the result of discovery during construction with the remaining area to the east of the railway undisturbed. The presence of the remaining archaeological sites should not be a barrier to changes in grazing/cutting regimes or to other forms of non-intrusive land management.

3.1.14 In conclusion, the records of archaeology on the common suggest that they must have been used by humans for millennia and that the absence of records on the common is likely a reflection of the lack of investigation. Experience of similar landscapes elsewhere on Anglesey and Gwynedd suggests that there are likely to be unrecorded heritage sites in the commonland.

4 CONSULTATIONS

4.1 Introduction

4.1.1 This management plan is being developed in two stages.

Stage 1: the first stage has involved consultations with the main regulatory bodies and other organisations who do or could influence aspects of the management of the common. The advice and comments received have provided the basis for the draft plan.

Stage 2: the second stage commences with the current period of further consultations. The Graziers and the public, as well as the regulatory bodies, will have the opportunity to comment on and influence the second and final draft of the management plan.

4.2 Reporting on the Stage 1 consultation

Natural Resources Wales (NRW)

4.2.1 Natural Resources Wales was formed in April 2013, largely taking over the functions of the Countryside Council for Wales, Forestry Commission Wales and the Environment Agency in Wales, as well as certain Welsh Government functions. The NRW role is to advise government, protect the environment, designate sites requiring protection and statutory consultee.

4.2.2 Two approaches have been made to NRW, one through the official North Wales Planning email address and a second a Senior Environment Officer (Conservation and Biodiversity), who is responsible for aspects of conservation management in the Beddmanarch – Cymyran SSSI, which includes land within the common.

4.2.3 The NRW Development Planning Advice Service indicated that a management plan was outside their remit but passed on the RML enquiry correspondence to the Development and Flood Risk Team who responded by indicating that the Afon Crigyll is classified as Main River[6]. This watercourse has a fluvial/river floodplain. The extent of the flood risk is approximated in **Figures 4.1 to 4.4.** Work on the floodplain and in or on the river may be subject to a Flood Risk Activity Permit. The Details of works that require a permit, or which are exempt are set out in Appendix 4.

[6] **Main River**: usually larger streams and rivers but also some smaller watercourses. In Wales, main rivers are legally designated by Natural Resources Wales. If works in, over, under or near a main river, or in a flood plain or flood defence a Flood Risk Activity Permit is required. Every other open watercourse in Wales is known as an 'ordinary watercourse' and these are the responsibility of the local authority (as the lead local flood authority) or Natural Resources Wales (as the internal drainage board) to carry out maintenance, improvement or construction work on ordinary watercourses in Wales to manage land drainage.

4.2.3 The Afon Crigyll has a flood plain which is mapped on the Development Advice Maps (DAM), as C2, which is 'land without significant flood Defence infrastructure', see **Figure 4.1**.

Figure 4.1 NRW Development Advice Map extract for the common

Blue areas: without significant flood defence infrastructure
Yellow areas: known to have flooded in the past

4.2.4 The Flood Maps for Planning show more detailed information and set out the source of the flooding, i.e., surface water and small watercourses, flooding from rivers and flooding from the sea.

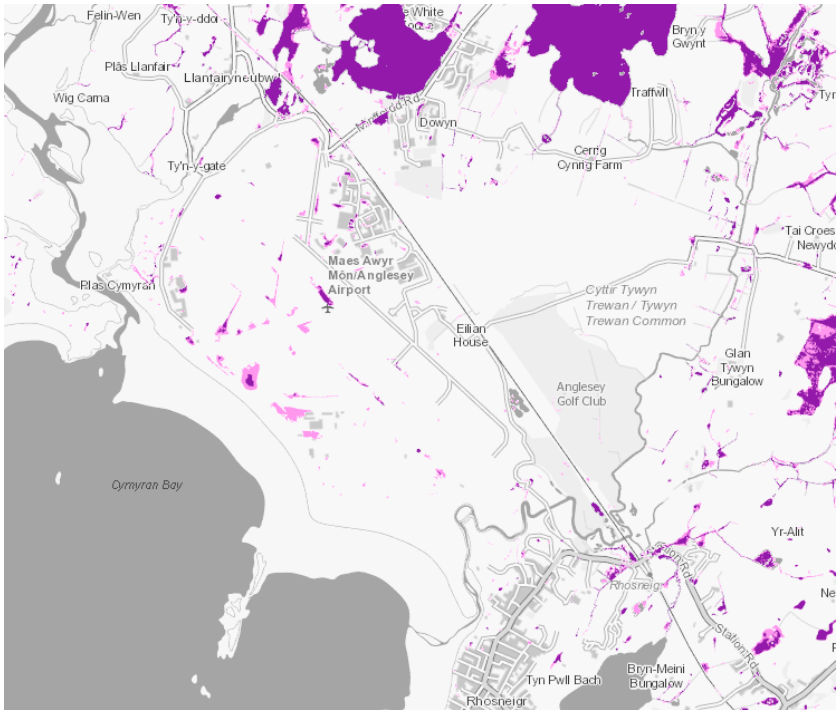
4.2.5 **Figure 4.2 to 4.4** refer to flood Zones 2 and 3, although there are 4 zones in all. These are:

Flood Zone 3: Land with a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding. (Land shown in dark colour on the Flood Map)

Flood zone 2: Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding. (Land shown in light colour on the Flood Map)

Flood Zone 1: Land having a less than 1 in 1,000 annual probabilities of river or sea flooding. (Shown as 'clear' on the Flood Map – all land outside Zones 2 and 3).

Figure 4.2 Flood Maps: surface water flooding

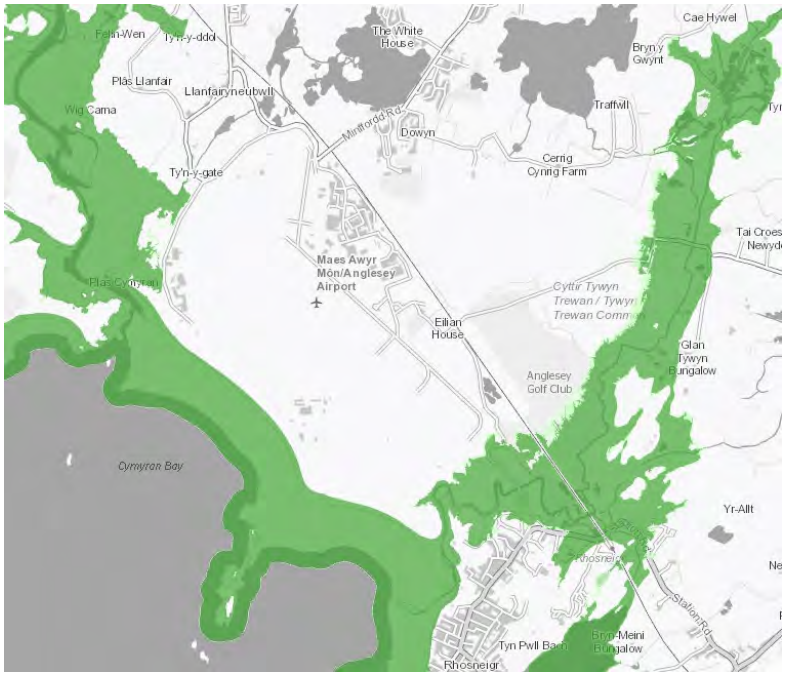


Surface Water and Small Watercourses: Pink is Flood Zone 3
Pale pink is Flood Zone 2

Figure 4.3 Flood Maps: flooding from rivers

Flooding from Rivers: Dark blue Flood Zone 3
Pale blue Flood Zone 2

Figure 4.4 Flood Maps: flooding from the sea



Flooding from the Sea: Dark Green Flood Zone 3
Pale green Flood Zone 2

4.2.6 A Senior Environment Officer, responsible for aspects of conservation management in the Beddmanarch – Cymyran SSSI, has experience of management work on the Cymyran Dunes area of the common because NRW have the right to intervene in SSSI to undertake vegetation management. He has also implemented plans to cut gorse and create shallow scrapes in Cyttyr Tywyn Trewan under agreement with the Board of Conservators.

4.2.7 The Cymyran area of the common is home to a rare Dwarf rush (Juncus capitatus) species that requires wet ruts to survive. The area is also used by adder, which is a protected species. He would like to see grazing of the whole common, but Cymyran in particular, by cattle because they create conditions suited to the rush and would help to reduce the extent of scrub within the dunes. The Anglesey Grazing Partnership provide a link between graziers and farmers who can supply suitable grazing stock for the benefit of wildlife, landscape and cultural heritage sites.

4.2.8 There are concerns within NRW that there is not sufficient grazing of the common and that is why gorse is spreading so quickly. NRW recently (2021) undertook some cutting of gorse following a successful lottery bid to open blocks of grassland and soil. The NRW are keen to encourage the cutting gorse on a regular basis. They would like to see cattle, such as Welsh Blacks, grazing on the land to help control the regrowth of gorse and to graze the coarser

rank grass. The result would open better grazing for sheep and greater biodiversity. 'Mob grazing' by cattle would only be required for short periods and could be contained within temporary electric fences. The Anglesey Grazing Partnership (PONT) might be able to assist with grazing animals and advice. Several, unsuccessful attempts to contact this organisation were made during the preparation of this plan. They hold significant experience and expertise.

4.2.9 When flooding in the flood plain of the Afon Criggyll occurs the railway underpass which links the two parts of the golf course and the common is also inaccessible[7]. The approaches are under up to 1m of flood water. Flooding makes the current location of the sheep pens unsuitable. A plan to provide a new pen at the north end of the common, by Minffordd Road, has not been implemented due to a risk of surface water flooding in that location. NRW have advised that the Graziers are been broadly supportive of moving the pens northwards towards Minffordd Road or Tyn-y-Llidiart.

Cadw

4.2.10 Cadw, who are primarily responsible for designated heritage sites, were pleased to be consulted at an early stage in the development of the management plan, but suggested that Gwynedd Archaeological Trust, who maintain the Historic Environment Record (HER) would be better placed to advise on archaeological aspects of the site in the first instance.

Gwynedd Archaeological Trust (GAT)

4.2.11 This organisation was invited to comment but did not take up the opportunity. They have commented that the common contains a number of sites of interest and that there may be other undiscovered sites in less disturbed areas of the common.

Royal Society for the Protection of Birds (RSPB)

4.2.12 The RSPB is a charitable body with a remit of conservation of wild birds and other wildlife and the environemnt on which they depend, of protecting, restoring, and recreating habitat.

4.2.13 The RSPB were consulted because they manage the adjacent Valley Reserve, which occupies the Llynnau-y-Fali SSSI, to the north of Towy Trewan. These areas share a common boundary just to the north of Minffordd Road. The North Wales Manager of RSPB responded. He advised that the Valley Reserve is primarily managed for the benefit of Lapwings and

[7] Anecdotal information from the Club Golf Course Manager of Anglesey Golf.

Choughs. Stonechat, Linnet and Short-eared owl are also present and some of these used Tywyn Trewan previously, but the vegetation is not suitable now.

4.2.14 RSPB have experience of managing dune sand within the Valley Reserve. This experience indicates that it would not be realistic to remove gorse scrub completely. A cyclical regime of cutting the gorse and cutting or grazing the grass would create a mosaic of habitat ranging from scrub to rang grass, grazed grass and open sand.

The Anglesey Golf Club

4.2.15 The club is the only links course on the island of Anglesey. The club own the land on which the course is laid out and have a licence from the Board of Conservators.

4.2.16 The Golf Course Manager responded to the consultation and identified the use of the course by the Graziers as the biggest concern to the Golf Club. The Graziers have a sheep pen to load and unload animals onto the common grazing. The pen floods in the winter making it inaccessible to the Graziers. In gaining access to the sheep pens the Graziers drive quadbikes and larger vehicles across the golf course and often cause considerable damage which could be avoided by moving the pens further away.

4.2.17 Moving the sheep pens towards Minffordd Road, or any other location further from the golf course and with a separate road access route would reduce the damage caused by vehicles around the golf course and encourage sheep to graze the land to the north.

4.2.18 An alternative site for the sheep pens was suggested, located on a hard standing midway along Burma Road between Pont Crigyll and Trewan Sands Railway Crossing. However, the RAF use this area for helicopter training and might have concerns about changes in the area. The RAF have been contacted to discuss this matter, but they have not responded. They are likely to be unaware that they may be due to pay a fee to the Board of Conservators.

4.2.19 There is no conflict between the Golf Club and walkers on the PRoWs. However, there is a shared concern that walkers are in danger from flying golf balls. A signposted Permissive Path has been provided as an alternative to avoid walkers having to risk crossing the golf course fairways. Other permissive routes have been agreed previously but not implemented.

4.2.20 land on either side of the railway underpass and the path to the west, as well as to the east are flooded between 1 to 3 times a years when tides and rainfall combine to raise the water level in the flood plain. Up to 3 ft of water can lie over the path, which could be dangerous. The golf course is closed in these circumstances. Often walkers cross the common from the

north and find that the flooding blocks the route. In these circumstances they often continue by trespassing onto the railway and walking along the lines to Rhosneigr Railway Station. So far, despite warnings from the golf club no action has been taken to prevent this.

Isle of Anglesey County Council footpaths

4.2.21 The Footpaths Officer and Coastal Path Officer provided comment on the common and the current situation. They are keen to remain involved in the management plan. The Coastal Path Officer indicated that there are problems with motorbikes in the dunes that cause damage. Scrub encroachment is a problem for the Open Access objectives and PRoW and they would like to see this scrub controlled.

4.2.22 The Footpaths Officer has a team of volunteers who work on path maintenance on Fridays each week. He could organise a group to assist with gorse cutting along the route of the path.

4.2.23 There is an aspiration to upgrade the Coastal Path through the Common as a Bridleway. Another aspiration would be to divert the PRoW through the common to follow the banks of the Crigyll more closely. An alternative Permissive Path along this route could be considered.

4.2.24 There is currently a difference of opinion about the rights for walkers on the PRoW and the Burma Road to cross the railway at the Trewan Sands Railway Crossing. Network Rail are concerned about safe public use of the crossing because it is regarded as sub-standard. The crossing was recently assessed as an unprotected passive location (no fixed phones or warning of train movements). The crossing has been recently assessed as a risk with an ALCRM Risk score of D7[8]. Landowners at the crossing have been warned by Network Rail not to take vehicles across the crossing.

4.2.25 It is understood and two landowners living on either side of the crossing have locked a kissing gate to stop public access. Deterrent notices have been erected at the crossing and parked

[8] **Active Level Crossing Risk Model** (assessment method) used by Network Rail. Rating of D7 was obtained from Network Rail in 15th July 2022. ALCRM then calculates the risk associated with the level crossing. This is based on many calculations around factors such as; the crossing type, probability of an accident, likely consequences of an accident. The alphabetic score of D is the 'individual risk' which applies only to crossing users. The score is presented as a letter ranging from A to M where A is the highest value and M is the lowest.
The numerical score is for 'collective risk' which considers the total risk for all people who use the crossing, including: pedestrians, road vehicle drivers, train staff and passengers. The score is presented as a number ranging from 1 to 13 where 1 is the highest value and 13 is the lowest. This 'collective risk' score is the most important part when prioritising crossings. Crossings with a risk score of 'M13' have been assessed as having zero risk. D7 is therefore roughly mid range.

vehicles placed to block the path. Legal opinion on this has been sought by the Isle of Anglesey County Council at the request of the Footpaths Officer.

4.2.26 Anglesey County Council, in conjunction with the Ministry of Defence, were intending to erect information boards either side of the crossing to advise the public where access was possible. These plans are on hold in view of Network Rail's position.

RAF Valley

4.2.26 No response received

5 CURRENT MANAGEMENT

5.1 State of Commoning Report[9]

5.1.1 The report provides a useful view of commonland in Wales, both upland and lowland and it contains useful information that is applicable to Towyn Trewan. Research into commons throughout Wales was undertaken on behalf of the Foundation for Common Land, the European Forum on Nature Conservation and Pastoralism and the European Commission, with a report published in 2015. The research, using questionnaires and interviews identified that the traditions of Commoning remain through successive generations, but younger farmers tended not to take up their rights until later in life. Often the sale of a farm, amalgamation of farms, or changing farming practices results in the overall number of graziers with rights decreasing and active graziers also decreasing.

5.1.2 Commoners who used their rights to graze on lowland commons tended to use sheep. Cattle were only a small proportion of the total animals but were most commonly on commons in the summer. Clearly, cattle grazing is not seen at Tywyn Trewan. The research throughout Wales found that Commoners indicated that the presence of ticks, the risk of cattle contracting redwater disease, disturbance by dogs, public access, the value of the animals and their condition when grazing on the common were disincentives to exercising cattle rights.

5.1.3 When asked about the condition of commonland that they had rights to graze, the responses included:

- difficulties in shepherding due to scrubby ground.
- too much bramble and gorse.
- overgrowth of wild scrub.

5.1.4 The general perception of commoners in Wales is that the condition of commons is deteriorating. The development of scrub is partly a consequence of inadequate grazing. Half (50%) of the commoners consulted stated that stocking rates were sufficient, while almost half (47%) said that stocking levels were insufficient. At Tywyn Trewan the decline in the condition of the common reflects the reduced number of grazing animals as a result of fewer graziers choosing to take up their rights. It is understood that only two commoners release sheep onto the common. The limits on grazing numbers at Tywyn Trewan may be a barrier.

[9] State of Commoning Report December 2015; Sion Brackenbury & Gwyn Jones

Grazing at Tywyn Trewan

5.1.5 It is understood that on Tywyn Trewan byelaws impose an overall density of 1 sheep to 4 acres (1 to 1.62ha) but the basis for these rule is unknown; it is assumed that it is derived from long experience. There is little evidence that grazing extends to a greater area that the eastern Cyttyr Tywyn Trewan and the Golf Course, but with gorse scrub cover the total area of available grazing is rather less. The byelaws allow other grazing animals other than sheep, but it is understood that habitually, only sheep are used.

5.1.6 Matters raised concerning the quality of the environment on the commons were set out in the State of Commoning report:

A. The environmental change (increases in scrub, bracken and rank grassland) that is occurring is felt to be beyond the capacity of graziers to control or manage.

B. There is frustration that grazing conditions created through the efforts of successive generations of graziers is being lost.

C. There is frustration that there is no appropriate funding mechanism available to graziers to address the change in condition at the scale required.

D. Insufficiency of funding for works in Glastir Advanced and regulations, which limit the use of burning as a management tool were cited.

E. Concerns were expressed about the increase in the fuel load on the commons, in particular areas of over dominant purple moor grass.

F. Uneven grazing pressure is impacting on the in-by land where scrub and bracken is encroaching from the common into fields and over shading areas of grassland.

G. There was underlying concern over the purpose of Glastir and what it is aiming to achieve by placing controls on livestock numbers against the background of declining graziers and perceived increases in scrub and bracken.

H. With the expansion of scrub and bracken, grazing is being concentrated into gradually reducing areas.

5.1.7 One concern of graziers was regarding farm support. Some graziers claim payments based on their grazing rights but do not actively graze the land.

5.1.8 The Glastir scheme would assist in some aspects of common management, but it appears that there are no claims made for Tywyn Trewan. Graziers on commons within the scheme tended to have had a positive experience of Glastir. Comments included '*Scheme is good but should be targeted at the active graziers*'.

5.1.9 The Anglesey Grazing Partnership (PONT) was cited in the report as being an organisation that brings together landowners and grazers to allow sustainable grazing schemes on wildlife sites across Anglesey. The produce is sold under the AGAP quality standard into markets in Anglesey and elsewhere.

5.2 Human activity

5.1.1 Being divided into several portions by Valley Airport, human activity varies considerably between areas. **Figure 5.1** maps the broad pattern of use, showing how the different areas are variously accessible or isolated from points of access. Points of access and routes across the common are shown in **Figure 1.3.**

5.1.2 The most active use is the Anglesey Golf Club which controls and manages an area of the common to the west of the railway. The golf clubhouse and car park are accessible from Rhosneigr and the golf players can be expected to limit their access to the tees, fairways, and greens, with an underpass through the railway embankment.

5.1.2 Public Rights of Way and the Coastal path encourage public access through each of the three main areas.

5.1.3 Excepting the golf course, the eastern area appears to receive only limited use by walkers along the three public rights of way, along the so-called Burma Road and by users from the adjacent Trewan Sands Caravan Park. The public right of way south from Cerrig Cynryg receives low levels of use, with much of the route constrained by gorse scrub. There is sparce evidence of activity on land away from these paths. Part way along Burma Road there is an area of tarmacadam which suggests that a car park has been provided in the past, although there are no signs of recent use other than some fly-tipping. This car park may have formed part of an RAF facility.

5.1.4 By contrast, there is more intensive informal recreation occurring within the Cymyran dunes and Crigyll dunes and this appears to be a result of the ready access to the sea, sandy beaches and the signposted Coastal Path. In these two areas wear and tear from pedestrians and vehicles movement have causing damage to the dune and salt marsh vegetation. Motorbikes are reported to use both areas, and there is a scrambling circuit worn into the dunes at the north end of the Crigyll dunes.

5.1.5 Reports off camping and camping vehicles using the beach and dunes at Cymyran have been lodged with the police and locked vehicle gates that allow pedestrians have recently been installed close to the car park at Carnau.

5.2 Current management regimes

5.2.1 Management regimes vary as much as human activity across the common. The presence of RAF Valley, occupying the centre of the common, limits ease of movement from one area to another, resulting in each area being isolated with different factors influencing the condition of the dunes and the level of human activity. In a similar way each area appears to receive different management, perhaps reflecting differing environmental and physical factors and the access constraints.

Grazing regime

5.2.2 The byelaws of the common set out very precisely the details of grazing (full exhibited byelaws are included in Appendix 1):

- Graziers must be from the surrounding parishes.
- Graziers must be authorised by the Board of Conservators and a record of the authorisation kept in a register. Each year, in October, the authorised graziers must, in writing, set out the number and description of stock they intend to turn out on the common.
- No unauthorised person shall turn out cattle, sheep, horse, ass or mule or other animal of a commonable nature to graze.
- All animals shall be marked so that the owner can be identified. The markings are non-transferable.
- All lambs and the young of any stock upon the common must be removed once they reach the age of four months or must be marked with the owner's registration mark.
- The maximum number of sheep that can be turned out on the common to graze must not exceed 1 sheep per four acres.
- The Conservators, by Notices, can set aside land on a temporary basis, or otherwise, for preserving the grass for the benefit of game.

5.2.3 It is understood that the overall density of 1 sheep to 4 acres (1: 1.62 ha) is allowed in the Byelaws. The total number of sheep that can be grazed divided by the acreage of the common gives an approximation of around 30 sheep per authorised grazier, the basis for these rule is unknown. There is little evidence that grazing extends to a greater area that the eastern Cyttyr Tywyn Trewan and the Golf Course.

Grazing on the eastern area (Cyttyr Tywyn Trewan)

5.2.4 Cyttyr Tywyn Trewan is fully enclosed by surrounding field boundaries or roadside fences. All entrances are controlled by gates and cattle grids. The current practice is for the Graziers to deliver sheep by road vehicles and to turn them out to graze from sheep pens which are located to the east of the railway underpass. Anecdotal evidence is that the sheep spread out to graze on the better grass, which tends to be within or close to the golf course fairways, tees and greens. In other words, the presence of the better grass on the golf course has influenced historical patterns of grazing. The perception of grazing by golf club staff is that the common is intensively grazed.

5.2.5 Sheep are reluctant to spread further east or north across the common because the grass there has grown coarse and unpalatable. The inadequate grazing allows scrub species, primarily gorse, to colonise rapidly.

5.2.6 There are records of rabbits being present around the golf course to the extent that the character of the grass has changed. A large population is reported, and periodic culling is carried out by the golf club to control the numbers.

5.2.7 There are aspects that need to be considered under the current grazing regime:

- Why are only sheep grazed on the common when other types of animals such as cattle or horses are permitted?
- How was the location of the sheep pens established and is this the best place for sheep to be turned out into the common?
- How was the limit of 30 sheep for each Grazier determined?
- Do all Graziers take up their rights of common?
- Are 30 sheep for each Grazier sufficient to achieve the objective of grazing down the grass and encouraging fresh new growth?
- If not, should the limit be increased?
- How was the spread and growth of scrub controlled in the past?
- Giving notice to protect grazing for game on a temporary or permanent basis would require a means to exclude grazing animals. Would this have been done by using fences?
- Are fences allowed on the common on a temporary or permanent basis?

Grazing on the southern area (Crigyll Dunes)

5.2.8 The area is divided into the saltmarsh and beach intertidal zone along the edge of the Crigyll estuary and the dunes to the west of the Afon Crigyll. There are no indications that the area is grazed by cattle, sheep or horses. There are records of rabbits being present, although the

size of the population is unknown, and the consequences of burrowing and grazing were not visible during a field visit.

5.2.9 It is quite possible that no grazing of any significance takes place in the area. The field visit took place on a warm afternoon in May and people were seen walking along the Coastal Path, on the beaches and saltmarsh bordering the Afon Crigyll. The intensity of use by people is affecting the vegetation and possibly discourages rabbits and agricultural grazing animals. The more intensively used areas of the golf course lies between the sheep pens and this area and the boundary fences of RAF Valley block entry from the north. The boundary to the east of the Afon Crigyll is formed by fences around the caravan site and boundaries to residential properties in Rhosneigr.

5.2.10 The seaward dunes appear to be more active than those to the east of the railway and perhaps this maintains a balance between open sand and stands of marram grass. The intertidal zone does not require grazing to be sustained as saltmarsh

5.2.11 There are aspects that need to be considered under the current regime:

- Are Graziers permitted to allow their animals to graze this area, or are there barriers or other reasons why animals are discouraged?
- Is the vegetation just too poor for sheep or other grazing animals?
- Is grazing necessary to manage the vegetation?
- Do the RAF undertake any management works to the area?

Northwestern area (Cymyran dunes)

5.2.11 This area of common does include a small, embayed area of saltmarsh along the intertidal zone of the estuary of the small watercourse that discharges from Llyn Cerrig Bach. Beaches along the coast towards Plas Cymyran are outside the boundary of the common. Most of the area is composed of former dunes now stabilised under coastal scrub vegetation. There may be small numbers of rabbits present, but the consequences of burrowing and grazing were not visible during the May field visit. The presence of people and cars has caused damage to the dune vegetation but since locked gates were installed vehicles are less able to access the commonland, except for those requiring access to private property at Plas Cymyran. This narrow strip of commonland is enclosed to the east by the RAF Valley boundary fence and grazing sheep and cattle could only gain access by following the coastal strip northwards from the Crigyll Dunes area to the south, or through the locked vehicle gates near to Carnau.

5.2.12 There are no indications that the area is grazed by cattle, sheep or horses and the development of coastal scrub indicates that grazing levels are too low to sustain open dune grassland. The presence of the Coastal Path means that there is a steady flow of people

through the area which does ensure that areas of bare sand and soil along the path are sustained.

5.2.13 Cymyran has one of the largest remaining sites for dune heath in Anglesey and is considered of high conservation value, it supports most of the population of a rare and vulnerable species, Dwarf Rush *Juncus capitatus*, which is one of the designated features of the SSSI. Conservation of the species is managed under the Dwarf Rush Project Fossil. The current lack of management of this area is of considerable concern to the project because bramble and scrub species are invading the entire dune system. These areas are becoming shaded by scrub growth and the total area of dune heath is threatened, as is the *J. capitatus*. Viable seed of this species can remain dormant for at least 29 years and the reappearance of the species Cymyran demonstrates that it can persist unnoticed for over 50 years.

5.2.14 Cutting and removing scrub and bramble should be a priority to protect the remaining areas of heath. Grazing management would appear to be extremely difficult on this site due to the open boundaries along the shore and at the entrance to the track. The proximity to RAF valley and the Coastal Path may also present barriers to grazing livestock due to regular disturbance. Conservation of the Dwarf Rush requires disturbance of the sand and a degree of compaction in the soil. Cutting of the heathland vegetation was carried out several years ago, possibly by the NRW or Wildlife Trust and this work had some success. Under Project Fossil the idea of stripping back areas of dune sand to allow re-colonisation has been proposed. As this is a small site this could be done by hand. In the long-term it may also be worth considering some form of shepherded grazing. The cutting back of Scrub is also a priority to reduce the area covered and to discourage further spread.

5.2.15 There are aspects that need to be considered under the current regime:

- Would the Graziers be interested in turning out their animals into this area?
- Would animals remain in the presence of walkers, cars and overflying aircraft?
- Is the gradual change to coastal scrub considered to be a problem?
- What management would best contribute to conservation of species within the SSSI?
- Do the RAF undertake any management works to the area?
- Unauthorised vehicles, mainly wanting access to the beach at the south end of this area are excluded. Does this need to be sustained?

5.3 Explanation of the following section

5.3.1 The core of this section of the management plan is a large table setting out, for each area of the common (see Table 5.1, following):

A. Human activity

Separate rows in the table are provided with each one titled with one of the main activities noted as taking place, for example: 'Golf Course', 'Grazing'.

B. Current management, which has been described previously for the 4 areas of the common.

This column of the table provides a brief statement setting out the main management under each of the categories of human activity.

C. Observed problems, threats, risks, and conflicts in current management

The main problems, threats, risks and conflicts are listed and briefly described.

D. Views of statutory consultees (NRW, Cadw, GAT, IoACC, RAF and others)

Summary descriptions of the points made by the statutory consultees listed in Section 4 of this document.

E. Views of stakeholders (as above, but also the Community Councils, Graziers, those living on the border of the common).

These will be added to the table in the second phase of the development of the draft management plan, when all relevant stakeholders will be consulted.

F. Opportunities

This is a brief description of a range of potential management solutions that appear to resolve problems, conflicts and threats and reduce risks. These will be revised and enhanced once the stakeholders have provided their views on the draft management plan. Some solutions may not, alone, be a complete resolution and so several may be required to successfully achieve the objective.

Figure 5.1: Areas where a particular management regime currently applies

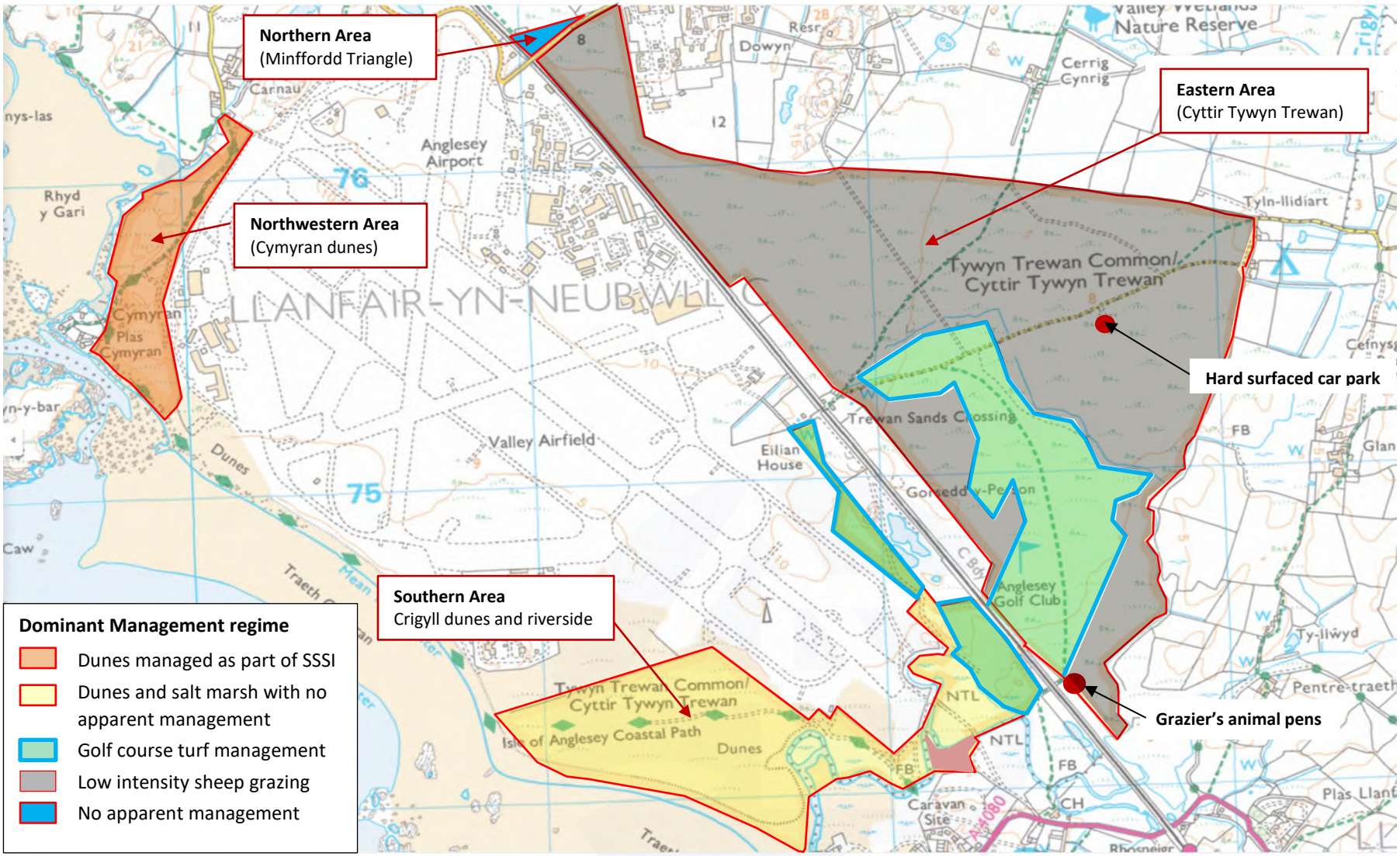


Table 5.1: Current management, problems, threat, conflicts, and opportunities

Area	A. Human Activity and natural events	B. Current management regime	C. Problems, threats, risks, and conflicts	D. Views of statutory consultees	E. Opportunities and remaining conflicts
Northern Area (Minffordd Road triangle)	No current signs of activity and no obvious route of access	Abandonment with no signs of grazing by sheep or cattle occurring	Health and safety risks associated with public access Gradual reversion to coastal scrub No obvious point of access off the public road. **Conflict:** between scrub development and grazing/informal recreation.	No views expressed RSPB have no view on the area, although it is of value as scrub for nesting and foraging birds.	**Opportunity:** 1. Retain inaccessible land and allow continued development coastal scrub for synergy with RSPB reserve. 2. Allow RSPB to undertake management interventions to serve their wider conservation objectives for the Valley Reserve. 3. Undertake clearance of scrub and rank grass and reintroduce grazing as a self-contained field.
Eastern area (Cyttyr Tywyn Trewan)	Grazing	Pastoral sheep grazing with some areas more intensively grazed than others.	Some areas of common appear completely ungrazed with rank grassland and extensive gorse encroachment. Sheep pens, where sheep are released onto the common and where supplementary feeding occurs, is close to the railway and perhaps does not encourage sheep to graze further north and west. Not all farmers in the parishes who are entitled to graze the common place sheep on the land. There are strict limits on sheep numbers from each grazier. Sheep grazing a current level is not sufficient to manage the common and so gorse encroachment is likely to continue without intervention. The tough thatch of the rank grassland cannot be reduced by sheep and so cattle or horses are required. Absence of adequate grazing is reducing biodiversity of the common **Conflicts:** Gorse scrub development and grazing/ informal recreation. sheep grazing and the development of gorse and rank grassland and loss of biodiversity Common grazing limits and need for periodic increased grazing. Limits on use of fences and control of grazing animals, particularly with regard to invasion of the golf course. The behaviour of uncontrolled dogs with grazing stock.	NRW want to see gorse managed in a rotation and consider that cattle grazing could follow gorse cutting to control gorse, reduce the grass thatch and create better grazing for sheep, encourage more diverse biodiversity and create a mosaic of habitats. Also, the location of the sheep pens should be moved further north to encourage sheep to graze more widely. Golf Club would like to see the sheep pens moved north, away from the golf course, with a different route for access by road that would avoid crossing the course. GAT would like to see scrub growth controlled and grazing improved to expose heritage sites and allow better visual surveys of the area. Dunes and commons often contain previously undiscovered heritage sites.	**Opportunities:** 4. Move the sheep pen northwards as planned to beside Minffordd Road. 5. Move the sheep pens north. 6. Periodic mechanical cutting back of gorse scrub in strips and blocks as planned by the NRW on a cyclical basis so that all areas are cut in a cycle and no mature scrub can develop 7. As (3) above but allowing some areas to continue to develop as scrub. 8. Cutting back of grass thatch in a single campaign for the whole area. Allow arisings to lie. 9. As above but collect and bale grass arisings and sell as rough haylage for horses. 10. Periodic cutting of rank grass to open areas in blocks in a cycle to create a range of vegetation types. 11. Introduce a mix of grazing animals to reduce grass thatch and open up turf and increase biodiversity. 12. Introduce cattle grazing as one-off campaign, across the whole area, but with temporary electric fencing protecting the golf course. 13. Introduce periodic mob grazing by cattle in temporary electric fenced enclosures that can be moved across the common on a cyclical basis to cover the entire area over an extended period of one summer or several summers.
	Golf course (north portion)	Intensive grass care, mowing to form short strong turf grass. and land drainage	Sheep grazing the common are straying onto the golf course due to better quality grass sward. Golf Club are concerned about the dangers to walkers crossing tees fairways and greens. Health and safety risks associated with public access. **Conflicts:** Grazing animals using the golf course, depositing dung, sheltering in bunkers and damaging greens. Golf course and public access. Concerns about safety.	Golf Club would like to see the sheep pens moved north, away from the golf course, with a different route for access by road that would avoid Grazier's vehicles crossing the course. Golf Club would like to see the flooding from the Afon Crigyll resolved by dredging the mouth of the river.	**Opportunities:** 14. Encourage grazing animals away from the golf course by improving the grazing offered elsewhere within the eastern area. 15. Relocate the animal pens to a location further north, with better road access that the existing location. This could be the tarmacadamed former car park located on the track between Pont Crigyll and Trewan Sands Crossing. 16. Consider fencing of the golf course to stop entry by grazing animals. 17. Provide sheep shelters in locations that encourage sheep away from the golf course. 18. Provide permissive paths across other areas of the common to divert walkers from crossing the golf course. IoACC have considered negotiating a route along the west bank of River Crigyll to Pont Crigyll.

Area	A. Human Activity and natural events	B. Current management regime	C. Problems, threats, risks, and conflicts	D. Views of statutory consultees	E. Opportunities and remaining conflicts
	Public rights of way and Open Access	No active management of land for public access, although route across golf course is signposted and an alternative route	Walkers crossing fairways could be injured by golf balls and could be in conflict with golfers. Health and safety risks associated with public access Grazing animals could be adversely affected by walkers and unrestrained dogs Railway have indicated that they do not want walkers using the railway crossing. The owner of Trewan Sands Caravan Park is trying to close off his land to walkers on public rights of Way. **Conflict:** Trewan Caravan park operators deny that there is a PRoW across their land. Rail Track deny that there is a PRoW across their land because their crossing is substandard. Developing Gorse scrub is a barrier to walkers on the northern part of the area.	Footpath Officer is interested in gorse management to open up the footpaths. A possible Permissive Path along the Afon Crigyll was suggested as an extra route. It is understood that legal opinion is being sought regarding the status of the PRoW at the adjacent to the Railway Crossing.	**Opportunities:** 19. Refer to Opportunity 'Q' 20. Rail track to improve the rail crossing to the required standard for walkers to cross. 21. Provide alternative footpath along the east side of the railway as far as the railway underpass to the south. Possibly also extend the path north to Minffordd Road. 22. Cutting of gorse to allow walkers to disperse across the common/ Open Access area. 23. Provide informative signs about prohibited activities, behaviour around grazing animals and nature conservation objectives of management.
	Informal recreation	Use of the common (Open Access Land) does not require active management of the common.	Loss of areas for recreation due to gorse encroachment. Some signs of misuse such as fly-tipping and fires. Health and safety risks associated with public access. **Conflicts:** Motorbikes using area for scrambling?	No views expressed, although the spreading of gorse and the development of a deep grass thatch excludes people from large areas of the common. Board of Conservators are not liable for accidents and injury.	**Opportunities:** 24. Control gorse and rank grass growth to open up the Open Access areas of the common. This proposal is complaint with all others to control the growth of scrub and improve grazing. 25. Improve signing to indicate prohibited activities such as fires and fly tipping. See also Opportunity (23). 26. Inspect for and remove fly-tipping on a regular basis.
	River flooding	None known	Flooding of the golf course has occurred, and this has closed the railway underpass at the south end and has flooded the existing sheep pens. **Conflicts:** Flooding from the Afon Crigyll causes damage to the golf course, restricts use of the facility and deprives graziers of use of the animal pens.	NRW Flood team would need to be consulted if certain works were carried out in the flood zone/Afon Crigyll flood plain. Concerns about walkers using the railway when the PRoW is closed by flooding.	**Opportunities:** 27. Maintain current circumstances, accepting that the river suffers from flooding from sea and from upstream flow and adapt the golf course and footpaths to allow continued use during floods. 28. Dredge the seaward channel of the river to relieve some of the flooding. This is unlikely to address both sea and river flooding. 29. Consider means of upstream adaptions to river channel to hold water higher up the river within the common. This might include modification to landform to provide flood storage capacity. 30. Relocate the sheep pens to further north, away from the flood zone.

Area	A. Human Activity and natural events	B. Current management regime	C. Problems, threats, risks, and conflicts	D. Views of statutory consultees	E. Opportunities and remaining conflicts
Southern area (Traeth Crigyll dunes and riverside)	Grazing	No obvious signs of grazing by farm animals. Some grazing by rabbits noted.	Insufficient grazing could result in progression to rank grassland, gorse or maritime scrub. Grazing animals using the golf course, depositing dung, sheltering in bunkers and damaging greens.	NRW indicated that Sea Buckthorn is spreading at the south end of the area (possibly outside the common boundary) and needs to be controlled before it spreads. GAT would like to see scrub growth controlled and grazing improved vegetation cover on heritage sites and allow better visual surveys of the area. Dunes and commons often contain previously undiscovered heritage sites.	**Opportunities:** 31. Encourage grazing animals away from the golf course by relocate the animal pens, see Opportunity (16). However, this would not encourage grazing within the Traeth Crigyll Dunes. 32. Grazing of the dunes west of the course could form part of measures to control the development of scrub in the northern, Cymyran Dunes area. See opportunity (XXX). 33. Mob grazing might be a practical solution on a cyclical basis within temporary enclosures. See Opportunities (6) to (13).
	Golf course (south portion)	Intensive grass care and land drainage	Sheep grazing the common are straying onto the golf course due to better quality grass sward. Health and safety risks associated with public access may be a minor concern here with both the PRoW and Coastal Path diverting walkers away from the fairways. Golf course do not like walkers crossing tees and greens.	Golf Club would like to see the sheep pens moved north, away from the golf course, with a different route for access by road that would avoid Grazier's vehicles crossing the course. Golf Club would like to see the flooding from the Afon Crigyll resolved by dredging the mouth of the river.	**Opportunities:** 34. Encourage grazing animals away from the golf course by relocating the animal pens, see Opportunity (16). 35. Provide sheep shelters away from the golf course. See Opportunity (18). 36. Flooding solutions, see Opportunities (28) to (30). 37. Provide informative signs about prohibited activities, behaviour around grazing animals and nature conservation objectives of management.
	Informal recreation	Use of the common (Open Access Land) does not require active management of the common.	Heavy use of the riverside areas by the public is damaging vegetation and reducing biodiversity. Signs such as wear and tear of vegetation, litter, fires and other damage show that uncontrolled public access is causing damage to dunes vegetation and to biodiversity. This was particularly severe in the riverside saltmarsh. Paths worn by walkers is creating open sand habitat which might be considered good for some species. Aeroplane observers are known to collect on the dunes.	No specific concerns expressed, although it has been noted that the intensity of public use of the riverside areas and some of the dunes is adversely affecting vegetation and biodiversity.	**Opportunities:** 38. Provide informative signs about prohibited activities and nature conservation within the riverside saltmarsh and dunes. 39. Guided public access could reduce shoreline damage to saltmarsh vegetation and encourage the exposure of open sand habitat.
	Coastal Path and Open Access	Signing and minimal physical works	Health and safety risks associated with public access. Wear and tear to vegetation from overuse of path could occur, but paths worn by walkers is creating open sand habitat which might be considered good for some species.	Coastal Path Officer noted that there is motorbike damage, in the dunes and that the development of scrub is limiting access to the area. IoACC would like to upgrade the coastal path through these areas to a bridleway.	**Opportunities:** 40. Coastal Path through dunes could be given alternative routes which could be used cyclically to diversify habitat whilst minimising serious wear and tear damage. 41. Allow horses to use the Coastal Path (permissive use), or upgrade to bridleway, with clear route signing to avoid damage to golf course. 42. Maintain Coastal Path for pedestrians only.
	Access track to RAF valley and lighting structures	None noted, routine maintenance and repairs including use by maintenance vehicles	Damage to vegetation and formation of tracks. Misuse of the track by private vehicles and entry onto dunes.	IoACC Footpaths Officer indicated that landowners at Trewan Sands Crossing have blocked the crossing which has discouraged walkers.	**Opportunities:** 43. Signs to prohibit use of vehicles, unless authorised.

Area	A. Human Activity and natural events	B. Current management regime	C. Problems, threats, risks, and conflicts	D. Views of statutory consultees	E. Opportunities and remaining conflicts
Northwestern area (Cymyran dunes)	Grazing	None noted. Conditions suggest gradual progression from rank grassland to coastal scrub.	Lack of grazing is allowing areas of coastal scrub to develop, which has some value for biodiversity, but grazing is still required. Sheep pens and release of sheep are at the south ends of the common and few if any animals will reach this northern extreme, unless placed there by graziers. The area is too small and offers low grade grazing. The tough thatch of the rank grassland cannot be reduced by sheep and so cattle or horses are required. Absence of adequate grazing is reducing general biodiversity of the common	NRW have indicated that grazing within this area would be beneficial for nature conservation. Cattle or horse grazing would be preferable to sheep, although all three could be valuable in controlling scrub. GAT would like to see scrub growth controlled and grazing improved to expose heritage sites and allow better visual surveys of the area. Dunes and commons often contain previously undiscovered heritage sites.	**Opportunities:** 44. Carry out selective mechanical cutting of scrub to retain areas considered of value, while opening up other areas for grazing. 45. Reintroduce cattle mob-grazing to this area to control scrub regrowth, remove rank grass growth and open up bare soil on a periodic basis. 46. Re-establish sheep grazing of this area, linked with the Crigyll Dunes area to the south, linked by a narrow strip of dunes/shoreline. Sheep numbers should be limited in the area so as not to overgraze. To do this some form of sheep pen would be needed. 47. Allow the process of scrub development to proceed with periodic interventions to keep through-routes open.
	RAF facilities (structures)	Routine maintenance and repairs including use by maintenance vehicles	Damage to vegetation and formation of tracks that private vehicle can follow.	No views expressed	**Opportunities:** 48. Encourage airfield boundary inspections and maintenance vehicles to keep strictly to existing track and avoid spreading damage more widely
	Coastal path	Signing and minimal physical works	Health and safety risks associated with public access Wear and tear to vegetation from overuse of path could occur, but paths worn by walkers is creating open sand habitat which might be considered good for some species.	IoACC Coatal Path Officer would like to see the path opened to horses. NRW have indicated that horses on the coastal path might be beneficial to their work in the SSSI to conserve a population of a rare dwarf rush (Juncus capitatus) species because horses hooves would create openings in turf and wet hollows that would support the rush.	**Opportunities:** 49. Allow horses to use the Coastal Path, as an extension of Opportunity (42). 50. Maintain Coastal Path for pedestrians only. 51. Control scrub growth to maintain open access and keep the coastal path open.
	Access road to private property (Cymyran)	None noted, although locked gates limit vehicle access to key holders.	Private owners at Plas Cymyran require access through locked gates so keys issued. Dunes at south end of area show signs of damage and wear due to unauthorised access by vehicles.	General approval for the locking of gates to exclude vehicles.	**Opportunities:** 52. Maintain lockable gates 53. Add equestrian gates to allow use by horses.
	Informal recreation and access to beach	Fences and locked gates recently installed to exclude vehicles from dunes and beach	Private owners at Plas Cymyran require access through locked gates so keys issued. Dunes at south end of area show signs of damage and wear due to unauthorised access by vehicles. Paths worn by walkers is creating open sand habitat which might be considered good for some species	NRW and the Board of Conservators have expressed concerns about misuse of the dunes by vehicles accessing beaches.	**Opportunities:** 54. Effective management of scrub to ensure full public access on foot along the dunes and to the foreshore. See Opportunities (44) to (47). 55. Continue to exclude unauthorised vehicles.
	Site of Special Scientific Interest	Active management when NRW resources allow to support and diversify biodiversity in accordance with SSSI Management prescription.	A rare species of Juncus is known in the area (1 of 2 in Wales) management for this species is required, or it would be lost. Rutting by vehicles and walkers has helped in the past. Public access is required, but vehicles need to be restricted due to damage caused by camping and misuse, fly-tipping etc.	NRW have indicated that grazing within this area would be beneficial for nature conservation. Cattle or horse grazing would be preferable to sheep, although all three could be valuable in controlling scrub.	**Opportunities:** 56. Control of scrub as Opportunities (44) to (47). 57. Mechanical interventions to create suitable conditions to support rare dwarf rush (Juncus capitatus).

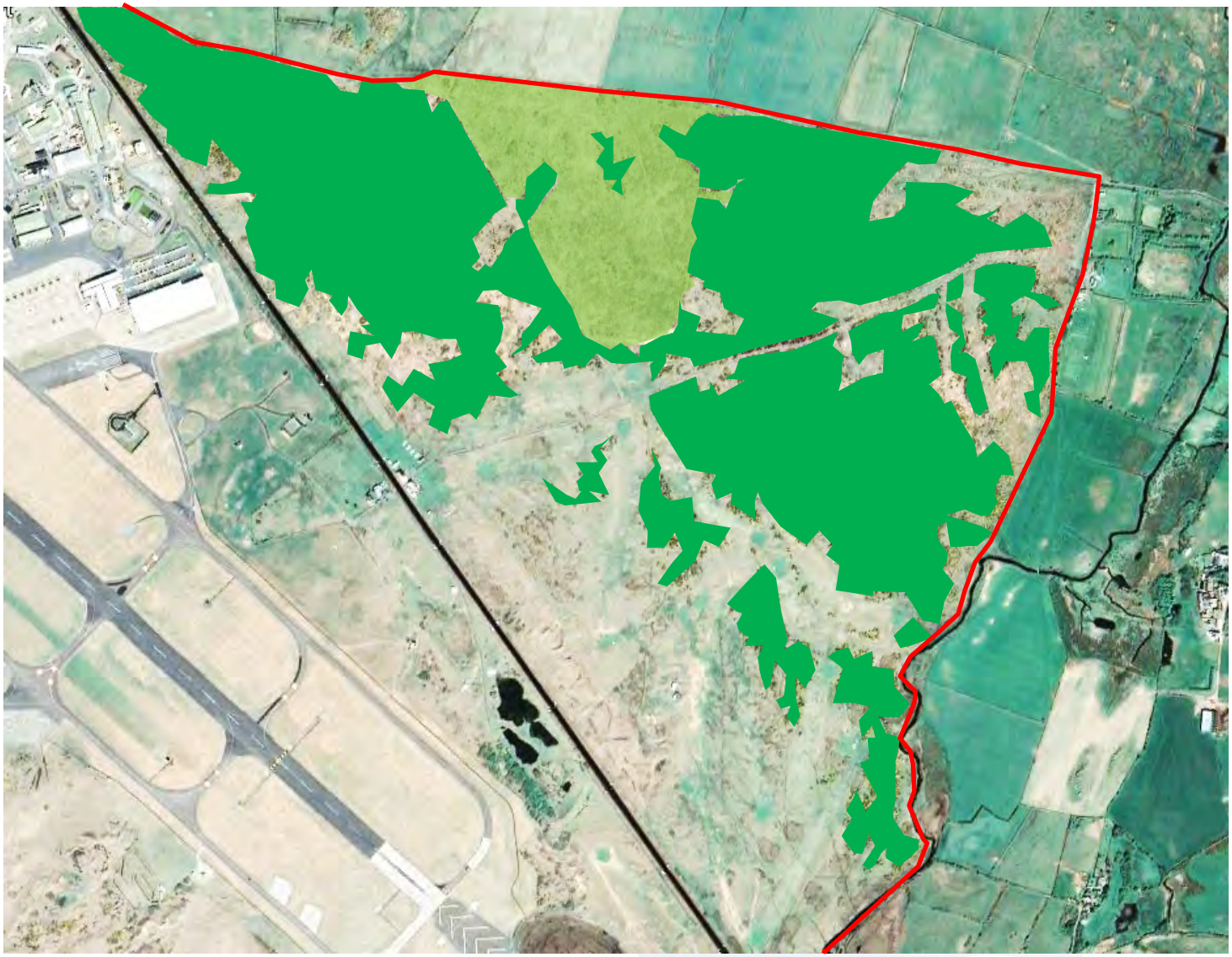


Figure 5.2: Main areas of gorse scrub in Eastern Area (Cyttyr Tywyn Trewan)

This image shows the extent to which gorse is becoming the dominant or co-dominant species over much of the common. The remaining common grassland is grazed by sheep or mown as part of the golf course.

Dominated by gorse scrub:

Gorse scrub becoming dominant

Remaining areas contain scattered clumps

The mown grass is more palatable to the sheep and so grazing occurs mostly around the fringes of the golf course and in isolated patches within the gorse dominated land.

Although not shown on the plan (right) strips of gorse scrub have been cut through these green blocks by Natural Resources Wales.

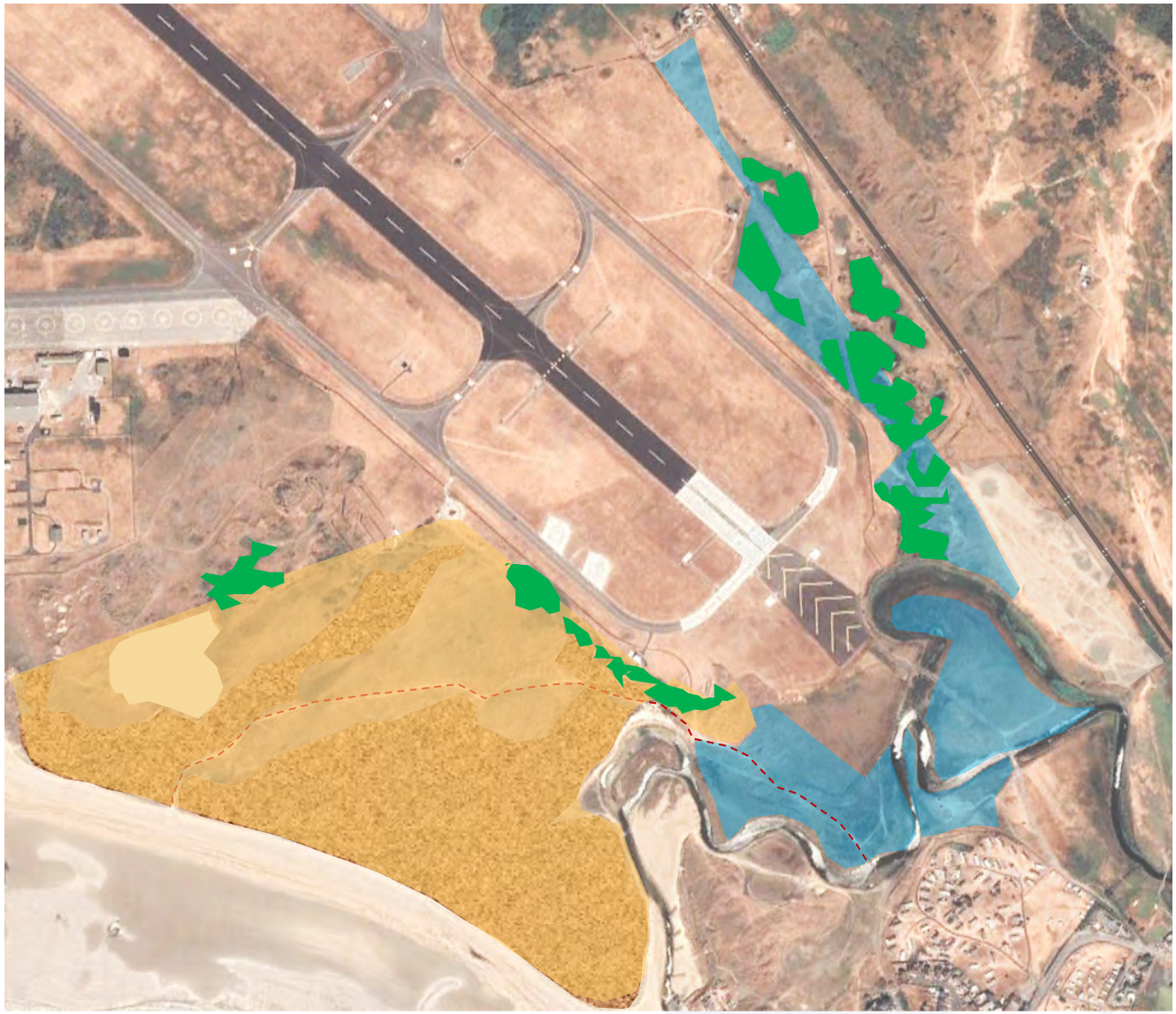


Figure 5.3: Scrub in the Crigyll Dunes area

Mapping of ground condition is limited to the area of the common or the immediate setting, where relevant.

- Dark green indicates areas of coastal scrub and gorse
- Areas of predominantly dune sand
- Areas where dune topography seems relatively undisturbed
- Areas of heavy disturbance of dune vegetation
- Areas where the dune landform has been levelled and the vegetation is damaged by recreation

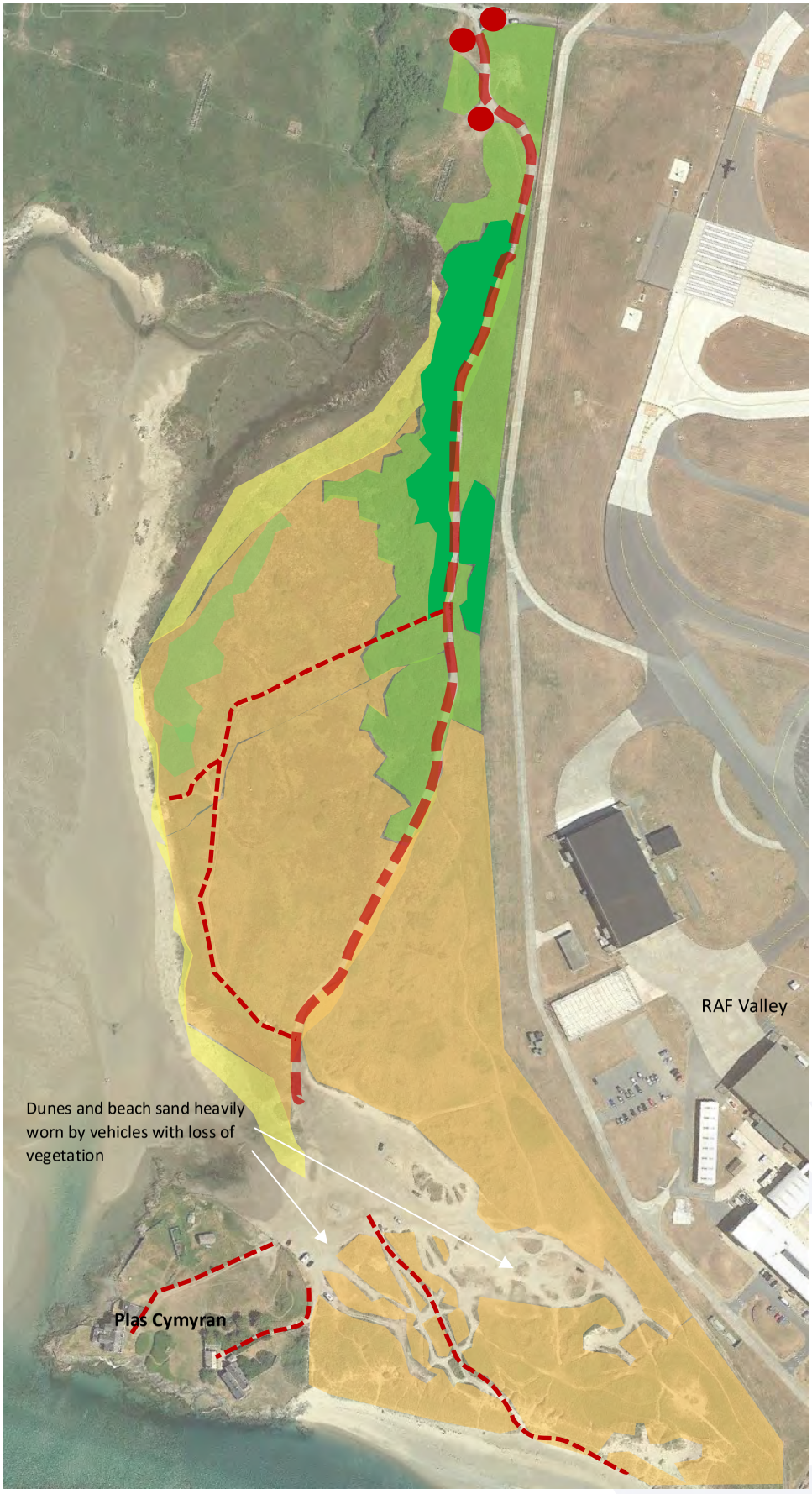


Figure 5.4: Scrub in the Cymyran area

Mapping of ground condition is limited to the area of the common or the immediate setting, where relevant.

5 PROPOSED MANAGEMENT

5.1 Objectives of the Management Plan

A. To ensure that the Board of Conservators can sustain their legal obligations under the Board Constitution, various Acts of Parliament and Byelaws.

- make, alter or revoke regulations for grazing by animals[10] of any class.
- appoint officers to enforce the regulations.
- constitute and regulate a committee of graziers.
- delegate to the grazier committee '*such of the powers exercisable by resolution under the Act*'.

B. To ensure a steady income to the Board of Conservators so that they can undertake management interventions to meet their legal duties and support sustain the vision for Tywyn Trewan.

C. To instigate a programme of vegetation management interventions to control the development of scrub, mainly gorse, to create diverse habitats that can support increased biodiversity and provide authorised graziers with an opportunity to graze farm animals and support their farm incomes.

D. To continue to support recreation and to always maintain the right of free access to the common for *'the privilege of recreation by walking, riding and enjoying air and exercise thereon'*[11].

E. Encourage the local communities to enjoy the open space and to understand and care for the natural environment provided by the common.

5.3.2 The four areas of Tywyn Trewan are to be managed in a sustainable manner with beneficial and responsible use shared use by Authorised Graziers, Golfers, the public.

5.2 The Vision for the Management Plan

5.2.1 Based on recognised conflicts, problems and the views of the consultee organisations the Board of Conservators have a range of Opportunities set out in Table 5.1, to choose from, some are mutually exclusive, and others could be taken in combinations. The choice should be made based on a clear vision for the common and should aim to achieve the agreed objectives and priorities, which are set out in this section of the management plan.

[10] "animals" means horses, asses, cattle, sheep, goats, and swine.
[11] Refer to Section 1.7 of this management plan

5.4 Implementing the vision

5.3.3 The management and activity on the land will encourage biodiversity, restore grazing value and reduce unwanted areas of scrub.

Table 5.2: Objectives and targets

Objective	Targets and performance
• To substantially reduce and eradicate gorse scrub throughout the common	Cyclical cutting of gorse and associated grass thatch, with 20% of areas cut each year on a 5-year cycle. In Areas where gorse is at low percentage, the bushes are to cut by hand and the stumps treated with herbicide. Target after 5 years: no further spread of gorse and no mature clumps of gorse visible to form seed. After gorse clearance consider the most appropriate grazing regime to discourage regrowth. This could include grazing by ponies alongside sheep, or by suitable breeds of cattle on a regular controlled 'mob grazing' approach to minimise conflict with sheep grazing.
• To cut or graze rank grass within the eastern Cyttyr Tywyn Trewan to remove thatch to create a mosaic of grassland habitat to and improve the quality of grazing.	To use grazing animals to reduce the thatch in those areas not dominated by gorse. If this cannot be achieved, undertake cyclical cutting of thatch, alongside areas of gorse scrub, with 20% of areas cut each year on a 5-year cycle. Target: to be completed in 5 years with grazing restored throughout the eastern area.
• To cooperate with NRW and other interested bodies to recover the decline of Cymyran Heathland and ensure the survival of *Juncus capitatus.*	Mechanical cutting of gorse, brambles and other scrub by 20% a year with selective spot treatment with herbicide to discourage regrowth of unwanted species. Manual creation of habitat for Juncus capitatus so that the species can be recorded within 5 years.

Objective	Targets and performance
• To reverse the decline of and secure the resilience of biodiversity throughout the common	Sustain management to reduce scrub and to encourage grazing so that over of 20 years a total of 70% of species recorded as being present between 1978 and 2000 are re-established.
• To encourage a more even distribution of grazing and reduce conflict between grazing and the golf course.	In conjunction with removal of scrub and rank grass, the sheep pens are to be relocated to a new location with good public road access and freedom from river and sea flooding. Target 1: sheep pens relocated within 12 months. Target 2: no agricultural vehicles to cross the golf course once pens are relocated. Target 2: grazing by sheep is spread evenly throughout the eastern area within 5 years.
• To manage public access so as to discourage damage by overuse of areas of sensitive habitat and from the less stabilised dunes to reduce the adverse effects of heavy wear and tear on the soils and vegetation.	Plan and implement the creation of permissive paths and signage/interpretation as necessary to guide people along routes that protect sensitive areas and divert walkers from the dangers of the golf course. Implement over 5 years, with an interim review after 3 years to assess and amend as necessary. Where conflicts occur with golf course, use warning signs. Install path indicator signs/posts to show permissive routes.
• Allow equestrian use of the Coastal Path through the common	Achieve within 3 years. Consider if funding is available to control scrub as part of implementation of the bridal way scheme.

5.3.4 The four key challenges to be addressed so as to meet the vision for the common, that are central to this plan, are:

A. Scrub control.

B. The form, and intensity of grazing on the common.

C. Protection of the golf course from grazing animals and farm vehicles.

D. Public access to the common and safe use associated with the golf course.

E. Saltmarsh management to restore biodiversity

5.3.5 The following sections, 5.4 to 5.8 describes the tasks in the order A to D.

5.4 Scrub management (Point A in paragraph 5.3.4)

5.4.1 Scrub is a valuable habitat and one on which many species depend for their survival. However, if left unmanaged, it can rapidly take over areas of the dunes, grassland and heathland. Scrub control is a valuable role of grazing animals, and the use of grazing animals is set out later in this section. There are different kinds of scrub developing within different areas of the common.

Coastal scrub at Cymyran

5.4.2 Coastal Scrub composed of blackthorn, hawthorn, gorse and bramble occurs at Cymyran. Another woody species that might be expected is privet. Natural or semi-natural scrub typically represents an important phase in the natural succession and can be important for certain bird species. The scrub is taking over areas of dune grassland and lowland heath. NRW, who undertaken management of the SSSI, have indicated that some scrub is welcomed, but needs to be managed to stop its spreading.

5.4.3 The proximity to RAF valley and the Coastal Path present barriers to grazing livestock at Cymyran making it less viable as a management option unless a form of shepherded grazing can be used, or other means applied to constrain animals to a given area. Whether or not grazing is viable, the mechanical cutting and removing of scrub and bramble needs to be undertaken as a priority to protect the remaining areas of heath. The removal of scrub would also facilitate the creation of suitable habitats for J. capitatus. The proposal put forward under the Dynamic Dunes Project was to use a brush cutter supported by hand removal. Additionally, pathways would be opened up to allow more access across the dunes to promote disturbance of sand. Stripping suitable areas back to bare sand to allow restoration of J. capitatus would also be achieved.

5.4.4 In situ intervention on the Cymyran site under the Dynamic Dunes project[12] plans to include cutting/scarifying along the edges of paths, removal of invasive species including Rosa rugosa and scrub clearance. Proposals to deepen the depressions/slacks may also be possible whilst these works are undertaken. Path works at the site are intended to directly benefit the Juncus and to encourage more foot traffic to keep the paths open. Horse riders and walkers could be encouraged to certain areas of the Cwmran site to keep open areas on paths and this could be achieved via engagement with the local community, publicity via press and social media, through collaboration with the Anglesey Coastal Path and through interpretation, way markers and soft barriers. Increased access to the site should be considered with sensitivity towards the local community and any potentially negative impacts it may bring eg. Increased litter, increased instances of antisocial behaviour and the deterioration of other sensitive habitats eg. saltmarsh.

Gorse scrub

5.4.5 Gorse scrub with some bramble occurs in other areas, for example in the eastern Cyttyr Tywyn Trewan. Gorse, which is persistent and difficult to control is taking over the more stabilised dunes where grazing has been concentrated but has been reduced in recent years. Once gorse bushes grow sufficiently tall, grazing animals can no longer reach the softer green shoots. Traditionally the gorse has been managed, normally by periodic cutting and burning.

5.4.6 Managing gorse scrub will be the most challenging problem. Gorse scrub develops where the soils are light and free-draining and where severe frost is infrequent. The species prevailing at Towyn Trewan is Common Gorse Ulex Europeaus. It is a short-lived species, but seeds very freely with seed lasting in the soil for long periods. Removal of gorse plants is relatively simple, but recolonisation occurs readily from the seed bank. Complete eradication of gorse would be near impossible and so a regime of cyclical or periodic cutting is more likely to succeed. Such a regime would allow some gorse to remain between cyclical cutting to provide habitat. For maximum conservation benefit patches of gorse of around 0.6 acres (0.25 ha) are optimal and these should not be allowed to form a dense cover.

5.4.7 Recommended cutting techniques include:

- Cutting the gorse to ground level and treating the stumps with an approved herbicide. This method minimises disturbance to the soil and other vegetation. If done with a flail the plants can be reduced to small pieces. If cut down by hand the dead bushes can take several years to rot down.

[12] FossilPlants. www.fossilplants.co.uk; Natural Resources Wales. https://naturalresources.wales/?lang=en; Botanical Society of Britain and Ireland; VC 52 Recorders https://bsbi.org/anglesey; Tywyn Trewan Board of Conservators

- Grubbing out gorse bushes, using an excavator fitted with a weed rake is damaging to vegetation and any archaeological remains. The arisings need to be left on site to rot down or be burnt.
- Once cut down or grubbed out the area needs to be managed under suitable grazing or under a regular regime of cutting/mowing regrowth. Livestock, deer and rabbits will control regeneration in circumstances where the surrounding grass is less palatable.

Sea Buckthorn scrub

5.4.8 Sea buckthorn scrub which occurs near Rhosneigr is highly invasive and whilst currently not yet found within the common, the species will spread given sufficient time. This species is not native to Wales but has now become well established on a number of dune systems, and has become particularly problematic. Eradication of this species is essential. NRW have undertaken some management work to control the species in the location near Rhosneigr.

5.5 Grazing and animal management (Point B in paragraph 5.3.4)

5.5.1 It should be noted that grazing can present something of a dilemma. Grazing is important to maintain appropriate conditions for a variety of species and to maintain a grass-dominated sward. On the one hand undergrazing can result in rapid colonisation by scrub species. On the other hand, overgrazing can have a detrimental impact by removing flowers that produce seed, unifying vegetation structure, reducing habitat diversity, damaging grazing quality and increasing soil fertility. Achieving the appropriate balance will allow a dynamic dune system to the west of the golf course and good grazing to the east and north.

5.5.2 The establishment of appropriate grazing levels is a matter of importance on the delicate soils and habitats of the dune-based commonland. Using domestic grazing stock maintains a long-term traditional regime. Choice of stock can influence a whole range of factors, both those affecting the conservation of the site, such as vegetation structure, plant composition, impact on rare species, and tree or scrub cover, but also on the practicalities of keeping stock, such as method of enclosure (if viable), electronic collars, shepherding/herding or grazier involvement to manage the animals. The main types of stock successfully used on Welsh sand dunes elsewhere are cattle, sheep and ponies. Each creates a characteristic range of grassland habitat types. To maintain the overall biodiversity and grazing value, retaining and possibly enhancing the overall variety of grazing stock is worthy of consideration.

5.5.3 At Tywyn Trewan the grazing seems to be limited to sheep with strict limits on numbers. The regime is set out in byelaws and it is assumed that the density of 1 sheep to every four acres has been established as suitable from past experience. In the eastern area, which includes

397 acres (161 hectares), the total number of sheep is limited to 100 accompanied by their unweaned lambs. If other grazing species were used in the dispersed grazing regime this would equate to around 25 horses or 15 adult cattle. If mob grazing regime is applied to cattle, the numbers would be much higher and would remain on an area for a shorter period.

5.5.4 Using comparative figures for other grazing animals, Table 5.3, below, sets out the theoretical total capacity of the common based on current areas. This does not take account of areas that are currently covered in scrub or are bare sand.

Table 5.3: Potential grazing capacity of the common

Area of common	Total area in ha / acres	Total grazing limits for sheep (4/acre) and the theoretical horses/cattle equivalent Sheep / Horses / Cattle	
		Including golf course	**Excluding golf course**
Northern area (Minffordd Road and Valley access road triangle)	0.8 / 1.97	Nil	Nil
Eastern area (Cyttir Tywyn Trewan)	161 / 398	100 / 25 / 15	89 / 23 / 12
Southern area (Traeth Crigyll shore, dunes and riverside)	49.5 / 122	30 / 8 / 6	28 / 6 / 4
Northwestern area (Cymyran shore and dunes)	13.4 / 33	8 / 2 / 2	8 / 2 / 2
Rounded total	225 / 555	Sheep: 138 Horses 35 Cattle 24	Sheep: 125 Horses 31 Cattle 18

5.5.4 horses naturally graze unevenly, eating short grass areas first and only grazing longer turf if there is insufficient short grass; cattle graze longer grass preferentially, tending to produce a uniform sward; goats tend to browse shrubs if these are available. Sheep graze the finer shorter turf. One important advantage of using cattle and horses dispersed or mob grazing is that their hooves can break up the turf to allow seed to germinate. Cattle all tend to rip out vegetation rather than nibble and this also opens up the turf. However, technical advise

suggests that over-intensive permanent grazing by cattle and horses should be avoided, particularly in the winter when wet condition prevail.

5.5.5 Using a mixed grazing regime and cyclical cutting of scrub will create diverse conditions conducive to increased biodiversity, control of gorse scrub, maintenance of good grazing and open space for recreation.

5.5.6 Under the Glastir Advanced, the Welsh Government can offer financial support to fund environmental work targeted at specific locations which are best placed to deliver the aims of Glastir Advanced[13]. Option 25b – Management of Sand Dunes with Mixed Grazing has certain rules under the Whole Farm Code which apply to all the land within the Option 25b. The rules include:

- Manage by light grazing with cattle, sheep, goats or ponies.
- On dunes, maintain a sward with a range of heights. At least 20% of the sward must be less than 5 centimetres in height and at least 40% must be less than 10 centimetres.
- Grazing levels should not exceed 0.6 Livestock Units / Hectare at any time between 1 March and 15 July.
- A minimum of 30% of the livestock units (LUs) must be grazing cattle in each calendar year.
- A minimum of 15% of the livestock units (LUs) must be grazing sheep in each calendar year
- A Stocking Diary must be kept and made available on request.

5.5.7 Consideration of these rules by the Board of Conservators, and of the possibility of graziers taking up the Glastir Option 25b would contribute to the long-term maintenance of the common and achieve biodiversity benefits. Furthermore, a mixed grazing regime of this kind could substantially reduce the cost of cutting gorse mechanically and manually. The Glastir Scheme includes some financial support to mechanical cutting of gorse.

Case study at Newborough Warren

[13] Objectives of Glastir
- Managing soils to help conserve our carbon stocks and reduce soil erosion.
- Improving water quality and reducing surface run-off.
- Managing water to help reduce flood risks.
- Conserving and enhancing wildlife and biodiversity.
- Managing and protecting landscapes and the historic environment.
- New opportunities to improve access and understanding of the countryside

5.5.6 At Newborough Warren, on Anglesey, a long term (16 year) programme of grazing management has been implemented[14] and this has helped to maintain the dune flora and fauna. Because of its positive effects on species diversity, plant communities and habitat condition in sand dunes, livestock grazing is recommended for conservation management.

5.5.7 The authors concluded that '*Grazing brought about a shift from a tall-grass dominated, species-poor community* [with scrub species] *to a more species-rich community in the dry dunes but did not change community type in dune slacks (wetter areas which sometimes flood with raised ground weather or heavy rain*.' The report summary states that '*at the species level, grazing enhanced the abundance of some desired perennial, annual and biennial species, graminoids and bryophytes in both habitat types. The increased frequency of positive indicator species for habitat condition suggests that grazing was beneficial for species of conservation interest. Nitrogen (N) values decreased after grazing in dry habitats but showed no long-term change independent of grazing, suggesting no increase in site fertility over the study period.'* It continues, '*long-term grazing management can play an important role for the conservation of dune communities and associated species. Because of its positive effects on species diversity, plant communities and habitat condition in sand dunes, livestock grazing is recommended for conservation management*.'

5.6 Protecting the Golf Course (Point C in paragraph 5.3.4)

5.6.1 Anglesey Golf Club invest considerable resources to maintaining a high-quality links course on the Common, which delivers local employment as well as other economic and community benefits. The Golf Club members have raised concerns about the use of sand bunkers as overnight shelters by sheep. During periodic stock management agricultural vehicles are driven across the course to the current location of the sheep pens and can cause damage to fairways, tees, and green and have on occasions disrupted play during golf matches. The Golf Club recognise that grazing is how the wider common is managed and that Authorised Graziers have the right to graze animals on the common.

5.6.2 The presence of grazing animals on the golf course is thought to arise for two reasons. Firstly, the presence of improved grassland which offers sweeter grazing, and secondly the presence of the sheep pens to the east side of the railway embankment, which routinely floods. Resolution of these problems is most readily achieved by moving the sheep pens to a location that has previously been agreed with the graziers, at the north end of the common, accessible from Minffordd Road in Llanfihangel Yn Nhowyn. This new location would allow graziers to

[14] Effects of long-term grazing management on sand dune vegetation of high conservation interest; Katharina Plassmann, M. Laurence M. Jones, Gareth Edwards-Jones. First published: 12 January 2010; https://doi.org/10.1111/j.1654-109X.2009.01052.x; Co-ordinating editor: A. Acosta.

bring and remove sheep by road without crossing the golf course. Sheep would be less inclined to lie and graze on the golf course.

5.6.3 Encouraging sheep to graze the northern end of the common more intensively would support plans to cut and control gorse and rank grassland.

5.6.4 Whilst there is a reluctance to graze cattle or ponies on the common, there are means to control their movements using electronic collars or temporary single-strand electric fences that might remain in place for a period of weeks only. These methods of control should be considered alongside using cattle and ponies to graze the common.

5.7 Public access (Point D in paragraph 5.3.4)

5.7.1 The common is classified as Open Access land and so there are no limits to people walking across any part. There are some very specific matters to be addressed:

1. There are health and safety concerns for walkers crossing the golf course due to the danger of being struck by golf balls.
2. The Trewan Sands Crossing is closed to public use by local landowners. Rail Track have raised concerns about the safety of the railway crossing for pedestrians. This restricts use of the common by cutting off a link across the railway.
3. Existing paths, identified by Public Rights of Way (PRoW), are in danger of being lost under scrub.
4. Isle of Anglesey County Council (IoACC) are keen to see the Anglesey Coastal Path through the common upgraded to allow use by equestrians.
5. There is inadequate signage directing walkers.
6. Flooding along the flood plain of the Afon Crigyll can close the railway underpass at the south end of the common, limiting use of the golf course and the common. There is anecdotal evidence from golf course staff that walkers divert along the railway embankment as far as Rhosneigr Railway Station to avoid the floods. With the Trewan Sands Crossing also closed the two portions of the common would be isolated from each other by the railway.

5.7.2 The following solutions are proposed:

A. That measures to allow equestrian use of the Coastal Path should be implemented by the IoACC to increase use of the coastal strip of the common. This could also support the management plan for the Cymyran area of the SSSI by creating habitat for the *Juncus Capitata*.

B. Support efforts by the IoACC Footpaths Officer to reopen the Trewan Sands Crossing for safe use by pedestrians.

C. Managing of gorse, as proposed in section 5.4 and 5.5, would open up PRoW that are currently becoming overgrown by gorse scrub.

D. Establish new permissive footpath routes through the common which should be well signposted to encourage sustainable pedestrian use. Some useful path alignments are shown in **Figure 5.5**, which provide for shorter loops as a well as longer routes within the wider PRoW network. A previous proposal for a path along the west side of the Afon Crigyll was made by the footpaths officer, but this has never been implemented. A further route could be provided from the Trewan Sands Crossing to Rhosneigr that avoids walkers using the railway embankment to avoid floods.

E. Permissive paths and PRoW should be well signposted supported by way markers. IoACC should be able to obtain funds to assist with signposting.

5.8 Saltmarsh management (Point E in paragraph 5.3.4)

5.8.1 Damage done to the saltmarsh at the mouth of the Afon Crigyll compromises its value for biodiversity. Whilst this is a secondary concern for the Board of Conservators, because it is not about supporting the value of the land for Graziers, it does enhance the quality of the common. Applications for funding to support wider management works will be enhanced by proposals that deliver clear biodiversity and sustainability benefits.

5.8.2 Clearly, delineating areas of vegetative interest from public access may improve the diversity of the sward and reduce erosion,

5.8.3 The saltmarsh has been grazed in the past and evidence for this is the generally low biodiversity of the area. Grazed saltmarsh develops a sward dominated by grazing and trampling tolerant plants which typically exclude other saltmarsh species. Experience elsewhere demonstrates that continued grazing of saltmarshes is preferred because formerly grazed marshes rarely regenerate into the former diverse marsh communities that would have existed before grazing.

5.8.4 Restoring diversity to saltmarsh requires grazing by native herbivores, such as ducks or geese, and/or low levels of intermittent grazing by livestock (typically at a ratio of 2 to 3 sheep or 0.7 to 1.0 young cattle per hectare, between April and October (Beeftink, 19771)), results in a moderate level of grazing which replicates most closely a ‘natural’ un-grazed saltmarsh. This kind and intensity of grazing typically improves structural diversity to the habitat and allows a wide range of species of plants and invertebrates, plus grazing intolerant species to recolonise.

5.8.5 Another measure that can improve the riparian habitat includes cutting of channels at a tangent to the main watercourse to increase the area of mid and high tide saltmarsh zones, with a concomitant increase in the abundance of saltmarsh species. However, this would alter the current characteristics of the site and may have unintended consequences such as changes in river morphology.

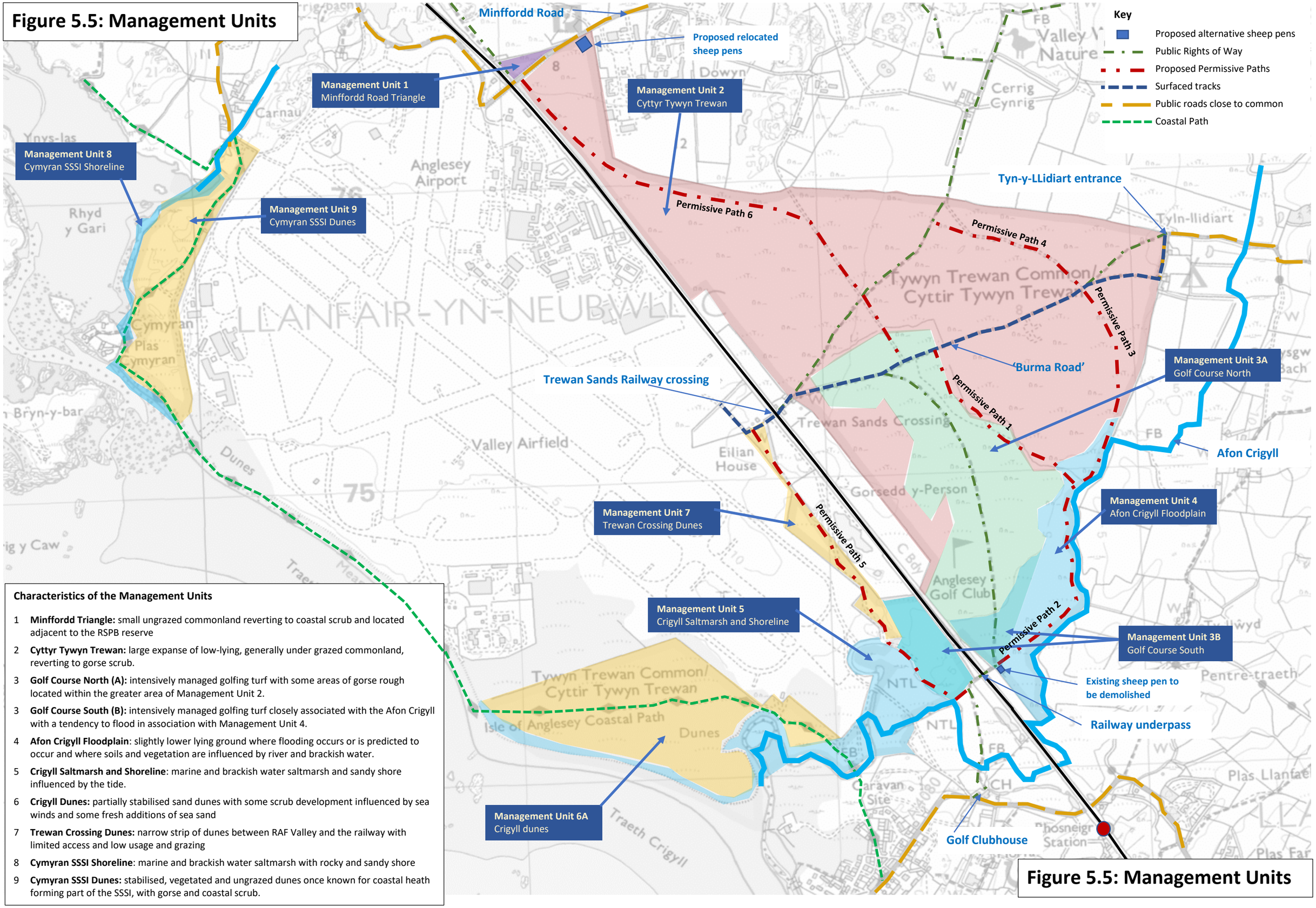
6 MANAGEMENT UNITS

6.1.1 For easy of management of the common, the area is divided into Management Units, which are subdivisions of the four previously identified 'Areas'. Management Units are definable because they display reasonably consistent characteristics of soil, vegetation and hydrology. Management interventions can be formulated to suit the management Units. The Management units are shown on **Figure 6.1**.

Table 6.1: Characteristics of the Management Units

Management Unit		**Defining characteristics**
1	**Minffordd Triangle**	Small ungrazed commonland reverting to coastal scrub and located adjacent to the RSPB reserve
2	**Cyttyr Tywyn Trewan**	Large expanse of low-lying, generally under grazed commonland, reverting to gorse scrub. There is generally low intensity public use, but closer to the Tyn-y-Llidiart entrance there are signs of informal car parking.
3 A	**Golf Course North (A)**	Intensively managed golfing turf with some areas of gorse rough located within the greater area of Management Unit 2.
3 B	**Golf Course South (B)**	Intensively managed golfing turf closely associated with the Afon Crigyll and therefore low-lying with a tendency to flood in association with Management Unit 4.
4	**Afon Crigyll Floodplain**	Low lying ground where flooding occurs or is predicted to occur and where soils and vegetation are influenced by river and brackish water.
5	**Crigyll Saltmarsh and Shoreline**	Marine and brackish water saltmarsh and sandy shore influenced by the tide and showing signs of intensive use by people.
6	**Crigyll Dunes**	Partially stabilised sand dunes with some scrub development influenced by sea winds and some fresh additions of sea sand
7	**Trewan Crossing Dunes:**	Narrow strip of dunes between RAF Valley and the railway with limited access and low usage and grazing.
8	**Cymyran SSSI Shoreline**:	Marine and brackish water saltmarsh with rocky and sandy shore
9	**Cymyran SSSI Dunes:**	Stabilised, vegetated and ungrazed dunes once known for coastal heath and forming part of the SSSI. Now developing gorse and coastal scrub. This area receives intensive use by people with gates installed to limit vehicle access.

Figure 5.5: Management Units



Characteristics of the Management Units

1 **Minffordd Triangle:** small ungrazed commonland reverting to coastal scrub and located adjacent to the RSPB reserve

2 **Cyttyr Tywyn Trewan:** large expanse of low-lying, generally under grazed commonland, reverting to gorse scrub.

3 **Golf Course North (A):** intensively managed golfing turf with some areas of gorse rough located within the greater area of Management Unit 2.

3 **Golf Course South (B):** intensively managed golfing turf closely associated with the Afon Crigyll with a tendency to flood in association with Management Unit 4.

4 **Afon Crigyll Floodplain**: slightly lower lying ground where flooding occurs or is predicted to occur and where soils and vegetation are influenced by river and brackish water.

5 **Crigyll Saltmarsh and Shoreline**: marine and brackish water saltmarsh and sandy shore influenced by the tide.

6 **Crigyll Dunes:** partially stabilised sand dunes with some scrub development influenced by sea winds and some fresh additions of sea sand

7 **Trewan Crossing Dunes:** narrow strip of dunes between RAF Valley and the railway with limited access and low usage and grazing

8 **Cymyran SSSI Shoreline**: marine and brackish water saltmarsh with rocky and sandy shore

9 **Cymyran SSSI Dunes:** stabilised, vegetated and ungrazed dunes once known for coastal heath forming part of the SSSI, with gorse and coastal scrub.

Figure 5.5: Management Units

7 MANAGEMENT STRATEGY AND PRESCRIPTIONS

Table 7.1: Management Strategy and Prescriptions

Management Units	**Area** Hectares/acres	**Summary description**	**Management Objectives**	**Management Strategy**
1. Minffordd Triangle	0.8ha	Small ungrazed commonland reverting to coastal scrub. There is no agricultural access to the area and boundaries to the RSPB reserve to the north are incomplete. No apparent public access, although there is a PRoW extending north alongside the railway. Separated from Minffordd Road by a stock fence.	Allow natural progression to coastal scrub and woodland. Allow incidental grazing Undertake minor management interventions as necessary to meet obligations.	The strategy for this unit, which is a small area of land of little value for grazing, but as scrub might contribute to the conservation objectives of the adjacent RSPB Valley reserve. Major management interventions in this area would use up scarce resources that would be better spent on other areas of the common. RSPB could be licenced to carry out management on the land that would support their nature conservation objectives on the adjacent nature reserve.
2. Cyttyr Tywyn Trewan	105.6ha	Large expanse of general low lying and gently undulating grassed commonland reverting to gorse scrub. Enclosed by field boundaries and roadside fences. Cattle grid at Ty'n Llydiart in main road entrance. Track extends west to Trewan Sands Railway Crossing. PRoW are present.	To routinely control gorse by mechanical means to maintain grassland for grazing by farm stock. Allow sheep grazing in accordance with accepted practice. Encourage or instigate periodic controlled mob-grazing by cattle to help to control gorse regrowth on a cyclical basis, while allowing a diverse range of conditions to support indigenous species. Allow small irregular edged blocks of gorse to remain in suitable areas as shelter for sheep and as habitat. No blocks should remain for more than 5 years before being cut. Develop route for permissive paths to avoid golf course and support public access. Enhance biodiversity	The strategy for this unit needs to remove scrub, remove grass overgrowth to encourage more palatable young growth, in combination with a more effective spread of grazing intensity and restoration of biodiversity. Where gorse forms dense stands there will be little or no underlying herbaceous vegetation. A. Maintaining the whole 105 hectares of common free of gorse scrub will require considerable investment and might not be feasible if it is carried out over a single year. The proposed strategy is to implement a 5 year cycle of cutting in 5 coups (See **Figure 5.6**). B. Commencing cutting gorse in the first in late summer through to midwinter to avoid the bird nesting season. In the following years the gorse cutting should move progressively around the common until the entire area is cut. The flailed woody arisings should be relatively small and should break-down and rot quickly. The flailing of the gorse should also remove the rank grass overgrowth but if necessary, the thatch and overgrowth can be cut with a pasture topper in the autumn and the cuttings left to rot. C. If feasible, the cut stems of gorse should be treated with a suitable herbicide to discourage regrowth using Grazon. The work must be carried out by a certified operator. Alternatively, holes can be drilled into the stumps and filled with Glyphosate. Regrowth could also be treated with Glyphosate using a weed-wipe when new shoots reach a height of around 100mm (4inches). D. Even if gorse stems are poisoned or removed, the regrowth of gorse will occur from the reservoir of seed and established seedlings in the soil which can persist for considerable periods. Equines and cattle have been used successfully elsewhere to control this regrowth. This should be cheaper and more productive than repeated mechanical cutting of gorse. *E.* The Board of Conservators might wish to consider using equine or cattle mob grazing, contained within temporary enclosures formed from single-strand electric fence that can allow sheep to pass underneath. Traditional breeds of cattle are better at grazing on coarse grass regrowth and fresh green gorse shoots than modern dairy breeds or sheep. Cattle and equine grazing should encourage fresh growth can occur in the following spring that would be better suited to sheep. *The Board of Conservators might wish to consider consulting with the Anglesey Grazing Partnership (PONT) an organisation which brings together and shares knowledge, expertise and practical skills on conservation and grazing across Wales. The aim is to collaborate with those in the farming, conservation, local communities and other interest groups to help deliver practical grazing solutions that benefit the various interests in an integrated manner.* F. Agreement of routes to proposed permissive paths and signing should be agreed within 2 years and implemented as the gorse scrub clearance progresses to open up the routes, or sooner where possible. Overall plan for permissive paths completed within 5 years. G. IoACC to be encouraged to erect signs for existing PRoW with destinations added and warning signs about flooding on the route leading to the railway underpass. Target within 2 years.

Management Units	Area Hectares/acres	Summary description	Management Objectives	Management Strategy
				H. Sheep grazing should resume in the spring following cutting of gorse and grass overgrowth. I. Creation of sheep shelter scrapes within the common (see Item K) in tandem with gorse cutting. J. Construction of new sheep pens at Minffordd Road to be progressed in Year 1, with demolition of existing pens to follow on immediately.
3.A. Golf Course North	36ha	Well managed golfing turf with some areas of gorse rough.	Management in accordance with the Anglesey Golf Club requirements. Minimal interference from agricultural vehicles Discourage grazing animals from using the golf course to sleep Reduce conflict between golfers and walkers	The strategy for this unit is to protect the golf course from damage by agricultural vehicles and from sheep sleeping overnight in sand bunkers includes: K. Restoration of more palatable grass in Cyttyr Tywyn Trewan to encourage sheep away from the course, as set out in (Unit 2). L. Cutting of gorse scrub as set out in Management Unit 2 Items A to D but supported by mechanical cutting rather than cattle or equine grazing. M. Formation of shallow scrapes to provide shelter for sheep within the Adjacent Management Units might encourage these animals away from the golf course. The scrapes will have an additional benefit to biodiversity. N. Establish permissive paths (see Action F) to divert walkers around this area of golf course.
3.B. Golf Course South	12ha	Well managed golfing turf with some areas of gorse rough.	Management in accordance with the Anglesey Golf Club requirements. Minimal interference from agricultural vehicles Reduce conflict between golfers and walkers Discourage grazing animals from sheltering in the golf course at night	O. As Golf Course North. P. Relocate the existing sheep pens to further north within the common to a position either beside Minffordd Road or at Ty'n-Llydiart, where existing boundaries aid sheep driving and capture. Target for relocation is 1 year to take advantage of gorse and rank grass cutting in Coup 1 and 2. Q. Establish permissive path (see Action F) to divert walkers around east side of golf course.
4. Afon Crigyll Floodplain	14ha	An area of low-lying riverside land within the river floodplain and within reach of the high tide. The wetter conditions fringing the common will favour species that prefer these conditions. The area identified is within the NRW flood zones and evidence of flooding in adjacent areas is visible in aerial photographs	To routinely control scrub development to maintain grassland for grazing by farm stock. Allow sheep grazing in accordance with accepted practice. Infrequent cattle grazing in dry periods allowable to break up turf and encourage biodiversity. Develop route for permissive paths to avoid golf course and support public access.	The strategy for this unit is broadly similar to that for Unit 2, although there is an increased likelihood of flooding with fresh, brackish or even salt water. Salt marsh has formed downstream. Areas that are most liable to flooding will offer different grazing conditions and variation in biodiversity. Gorse is discouraged by wet ground and regular flooding. The absence of the species therefore indicates the limits of the wetter ground conditions. R. Control of gorse and coarse grass overgrowth should be achievable by the means set out in Unit 2 (Actions A to E). This Unit is included in the 5-year cycle shown in **Figure 5.6**. S. Cattle grazing, as part of the management strategy for Unit 2 would be beneficial in the gorse free areas to open up the turf and create more diverse conditions for native species. Temporary electric fences would keep cattle from entering the watercourse. T. Scrapes in the grass areas would be beneficial for wildlife, holding shallow temporary pools in the late winter and spring. U. Establish permissive paths (see Action F) as an alternative route to divert walkers around the golf course.
5. Crigyll Saltmarsh and Shoreline	11ha	Sandy and muddy shoreline associated with the intertidal Marine and brackish water saltmarsh. The unit suffers wear and tear from public use. The area identified is within the NRW flood zones.	Guide public access by limited sign posting/ information signs to reduce damage to salt marsh vegetation.	Interventions to benefit the common grazing would have little relevance here. V. The Management Unit has considerable value to intertidal biodiversity, but the open access leaves little opportunity to control public access. In consultation with North Wales Wildlife Trust and NRW there may be funds available to design and install signs that provide useful information to encourage a more positive attitude towards the habitat. This is not a high priority and a target for this should be within 5 years. W. Measures set out in Section 5.8 should be considered to support the restoration of saltmarsh.
6. Crigyll Dunes	29.5ha	Remnant dunes from the former mobile dune system that were destroyed in the construction of Valley Airfield. There is active dune building along the southwest shore. Otherwise partially stabilised sand dunes with	Control gorse and coastal scrub species by cyclical cutting, Encourage occasional low-density cattle and sheep grazing in central area. Guide public access away from less stabilised dunes with sings and information boards.	The interventions here are relatively minor, with early scrub development, some wear and tear associated with informal public use of the dunes and associated beach. X. Control of scrub by selective cutting and herbicide treatment of cut stems over the next 5 years, when resources become available. Early intervention of these small areas would save on much more costly work in the future. Y. Monitoring of the spread of Sea Buckthorn and rapid cutting and herbicide treatment of cut stems if found with in the common. If found NRW should be informed because they are actively controlling this plant at Rhosneigr.

Management Units	Area Hectares/acres	Summary description	Management Objectives	Management Strategy
		some relatively minor scrub development. Anglesey Coastal Path extends east-west through the dunes.	Allow horses to use the Coastal path Install vehicle and motorbike barriers and horse gates to Coastal path at river bridge.	Z. In conjunction with the Coastal Path Officer, and in preparation for allowing horses to use the Coastal Path, way markers should be installed to guide horse riders and walkers along the route and so reduce damage to the active dunes adjacent to the shoreline. As part of this work, vehicle/motorbike barriers and horse-gates should be added at or close to the footbridge over the river to limit access to unauthorised vehicles. Target within 3 years.
7. Trewan Crossing Dunes	5ha	Narrow remnant common between RAF Valley and the railway. The area appears to have undergone some historical disturbance. Limit grazing.		AA. Once the Trewan Sands Railway Crossing is reopened to pedestrians, provide way markers and signs for a permissive path from the crossing to the PRoW from Rhosneigr. This should be high priority to provide an alternative route to avoid flooding at the railway underpass. Target within 2 years.
8. Cymyran SSSI Shoreline	2ha (approx.)	marine and brackish water saltmarsh, rocky and sandy shore, and low shoreline cliffs.		There are no management actions considered necessary for this area. Protection from damage by vehicles has been controlled by the recently installed vehicle gates at the Carnau entrance to the north.
9. Cymyran SSSI Dunes	11.4ha	Narrow remnant strip of stabilised, vegetated ungrazed dunes with gorse and coastal scrub between RAF Valley and the shore. Anglesey Coastal Path extends through the unit north to south. Damage has been caused by uncontrolled access by vehicles and campers. Now controlled by gates.		Because this area forms part of the SSSI, NRW are keen to see management interventions to support their biodiversity and conservation objectives. BB. Mechanical cutting of coastal scrub to reduce the extent of bramble and gorse over a 5 year period and to open up areas of grassland to encourage reestablishment of maritime heath. NRW should be consulted on the priority areas to be cut. The RAF may have concerns about cutting close the airfield boundary fence. The cutting of scrub could be considered as an extension of the area of the 5-year cutting cycle at Management Unit 2 (Activities A to D). Refer to **Figure 5.7.** CC. Whilst grazing is considered difficult in this area due to public access, disturbance and lack of security, a mob grazing method or shepherding of cattle, or tethering of horses might be feasible with significant benefits for nature conservation and control of scrub regrowth.

Management Areas 2 and 3: Gorse scrub clearance

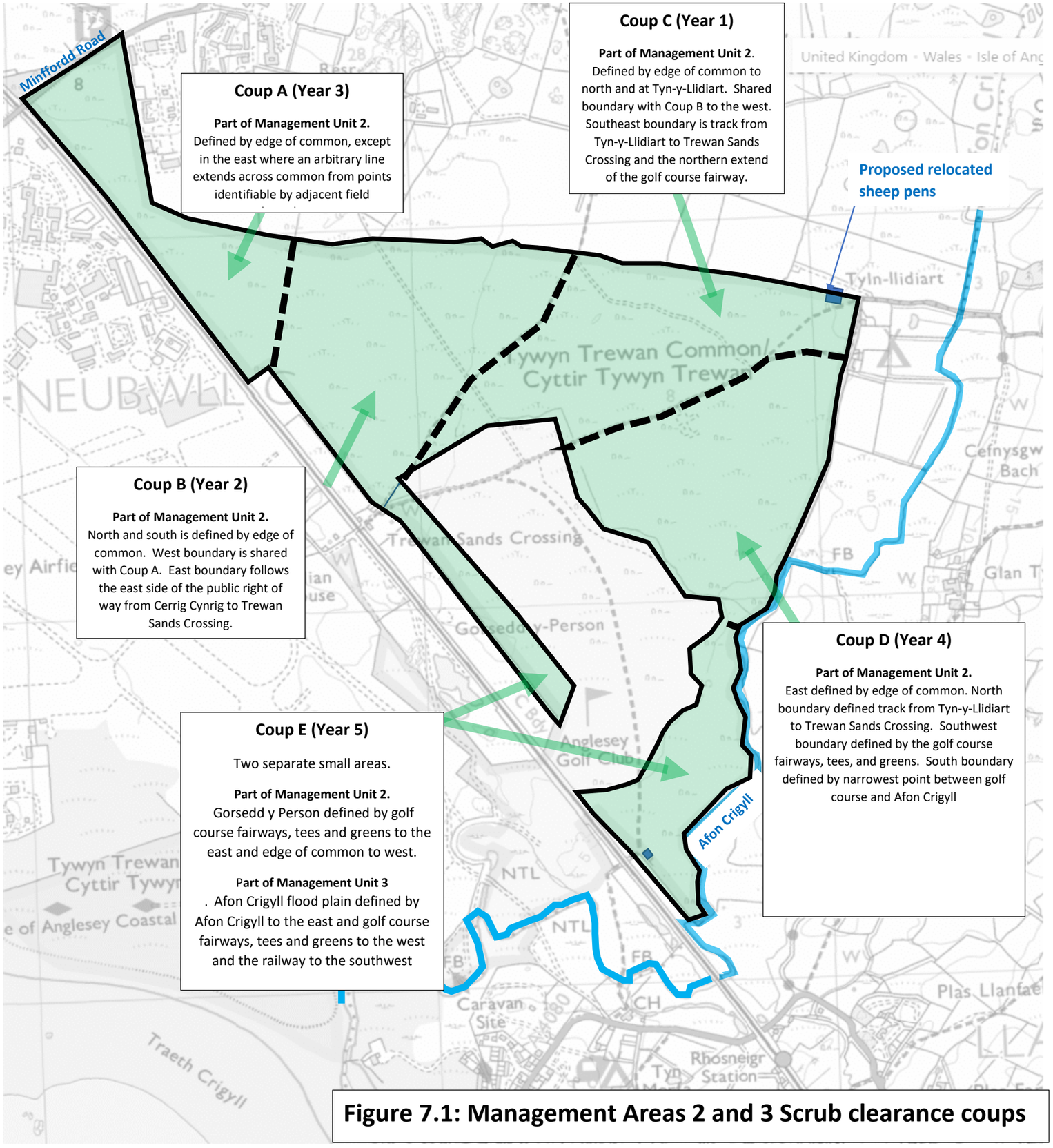


Figure 7.1: Management Areas 2 and 3 Scrub clearance coups

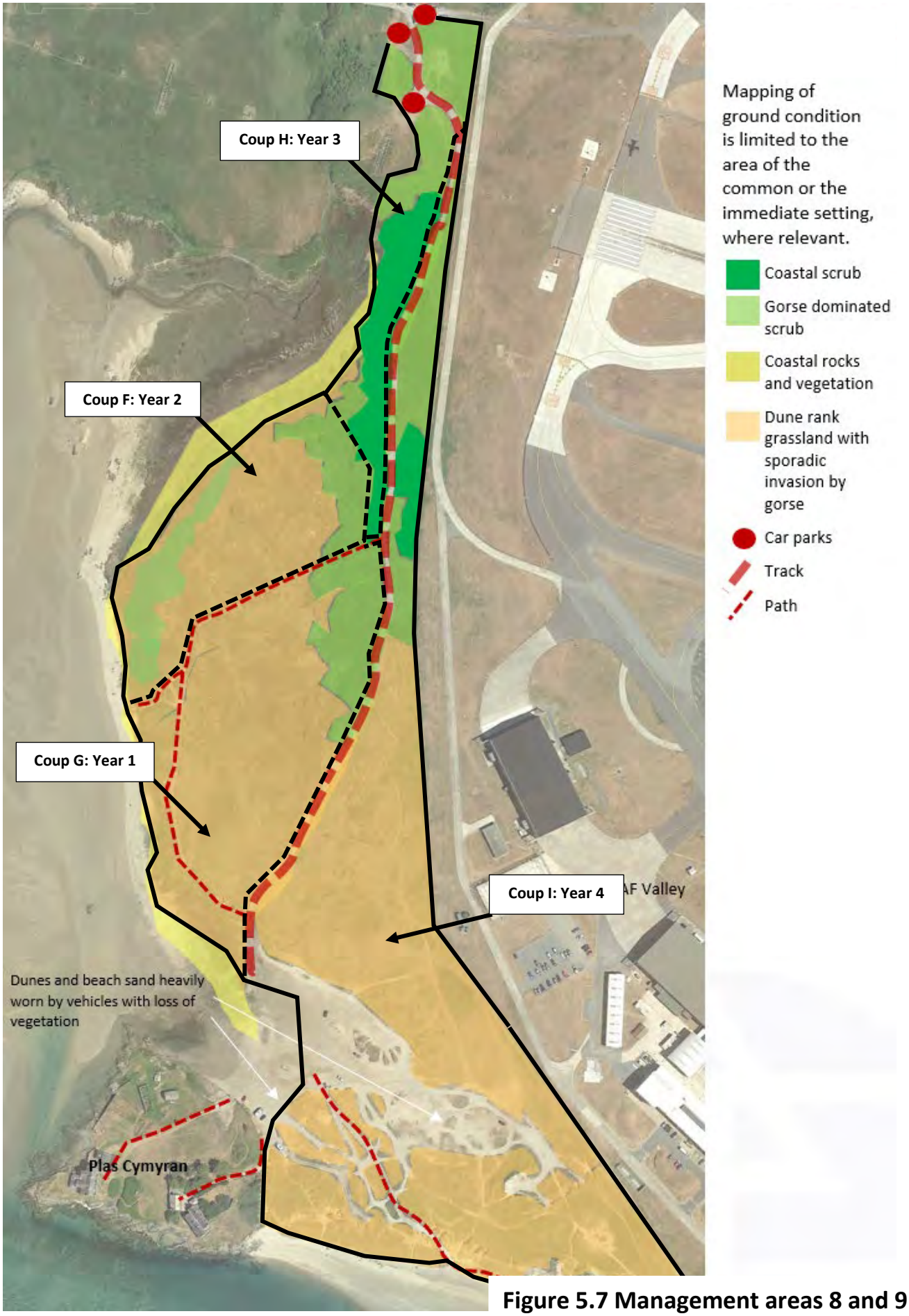


Figure 5.7 Management areas 8 and 9 Scrub Clearance

8 INDICATIVE PROGRAMME BASED ON A 5 YEAR CYCLE

Table 8.1 Indicative 5-year Programme

	Year 1		Year 2		Year 3		Year 4		Year 5	
	2023/2024		2024/2025		2025/2026		2026/2027		2027/2028	
	1stFeb-31stAug	1st Sept-Jan31st	1stFeb-31stAug	1st Sept-Jan31st	1stFeb-31stAug	1st Sept-Jan31st	1stFeb-31stAug	1st Sept-Jan31st	1stFeb-31stAug	1st Sept-Jan31st
Cutting of scrub and topping of grass (avoiding bird nesting season) 5-year cycle		Coup A		Coup B		Coup C		Coup D		Coup E
Herbicide treatment of scrub regrowth (spot treatment of stump treatment in growing season)										
Sheep grazing optimum period for vegetation management										
Optimum mob grazing period										
Relocation of sheep pens										
Formation of shallow scrapes away from golf course										
Negotiate permissive paths										
Improve signing of Permissive Path 1 (Golf Course)										
Implement Permissive Path 5: (Rhosneigr to Trewan Sands Crossing) subject to reopening of crossing										
Implement Permissive Path 6: (Minffordd Road to Burma Road)										
Implement Permissive Path 4: (link Cerrig Cynrig to Burma Road)										
Implement Permissive Path 3: (Burma Road to Afon Crigyll)										
Implement Permissive Path 2: (Afon Crigyll to Railway underpass)										
Introduce horses to the Coastal Path and install information signs at Afon Crigyll Saltmarsh and in Crigyll Dunes to reduce impact of footfall on biodiversity and mobile dunes										
First cut of coastal scrub at Cymyran SSSI Dunes.		Coup F		Coup G		Coup H		Coup I		
Topping of regrowth at Cymyran SSSI Dunes				Coup F		Coup G		Coup H		Coup I

9 PHOTOGRAPHS RECORDING THE SITE IN MARCH 2022.

The Golf Course, view north northeast from near the club house. The Afon Crygyll Bridge lies in the centre of the view. The track takes golfers onto the course beyond the river.

Golf course

The Afon Crygyll. This channel is tidal and prone to flooding. RAF Valley airfield lies in the background with the humps of well-vegetated dunes rising above the skyline to right of centre

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The Crygyll Dunes viewed from Rhosneigr.
The Afon Crygyll Estuary lies beyond the house. The beach and dunes of the common can be seen to be vegetated without areas of scrub.

The arc of the bay at Traeth Crygyll

The Tyn-y-Llydiart/Pont Crygyll entrance to the Cyttyr Towyn Trewan with A cattle grid and stock gate. The bilingual byelaw sign is visible beyond. The footpath sign indicates the routes that extend to Trewan Sands Crossing. The sheep pens could be moved to this location, inside the cattle grid.

A more intensively grazed area of the common just inside the Pont Crygyll entrance. In the background can be seen the stands of gorse. To the right of the fence is a grazed field with no rank growth and green spring growth beginning.

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An area of low-lying ground with winter and spring inundation in the foreground which has been colonised by Yellow Flag (*Iris pseudoacorus*). The middle ground is filled with rank, inadequately grazed dune grassland. The background is gorse scrub

View south towards Rhosneigr from a point on Burma Road close to Pont Crygyll.

Turning over strips of the undergrazed turf to encourage species diversity by opening up opportunities to recolonise from propagules in the soil.

Gorse scrub which has been burnt, whether purposely or accidentally, the rank grass growth is also removed, allowing other species to recolonise.

A scrape created by Natural Resources Wales to provide exposed sandy dune soils with varying moisture regimes, intended to provide basking opportunities for reptiles such as adder and common lizard and to allow plant species suppressed by rank grass growth to recolonise

Strips cut through the scrub to remove gorse overgrowth and expose the underlying soil and turf

The gorse is kept back from the roadside, either by regular cutting, or because sheep follow the road and crop the verges.

A building, possibly associated with the RAF base, has been demolished and only the tarmacadam surfacing has been kept. Fly-tipping has occurred in various locations around the fringes of the car park.

A view southeast from Burma Road towards the low ridge to the east of the Afon Crygyll. The gorse scrub appears to be in obeyance over much of this area, perhaps following cutting or burning.

A view southwest along Burma Road towards Trewan Crossing and the caravan park, with the golf course occupying this area of the common. The mown green grass must act as a powerful draw for the sheep. The turf in the foreground shows signs of vehicle tyres which may indicate that private vehicles are contravening the byelaws. The ditch to the left of the road seems to be an adequate barrier to vehicles.

As previous photograph, but here the worn turf is caused by golf buggies.

The mown turf of the gold course.

A view south of the northern part of Cymyran dunes area from near the car park at Carnau. In the middle ground are a reed bed and low lying areas forming embayed salt marsh within the intertidal zone. In the foreground can be seen ungrazed dune grasses with bramble infiltrating. A first step in the development of coastal scrub. The contrast with the turf of the field to the right is obvious. In the background are the dunes that extend south towards the Afon Crygyll Estuary. The yellow colour on the dunes shows the presence of gorse, indicating that those areas of the dunes slacks are sufficiently stable for scrub and dense turf to develop. To the left of the dune slacks is an area of well-developed coastal scrub dominated by blackthorn.

Another view of the salt marsh, reed beds and vegetated dunes with the channel of the outflow stream from Llyn Dinam and Llyn Penrhyn in the foreground.

View across the car park at the Carnau end of the dunes (Rhyd Gari). The car park and the Coastal Path sign are important indication of managed public use of this area.

Trewan Sands Caravan Park, where the North Wales mainline railway and Burma Road meet.

Appendix 1

BYELAWS & REGULATIONS WITH RESPECT TO TOWYN TREWAN COMMON

Provided by courtesy of The Board of Conservators in May 2022

Situate in the Parishes of Llanfihangelynnhowyn, Llechylched and Llanfaelog, or some of them, in the County of Anglesey, for the proper management and control of the said Common.

Inclosure Acts 1845 to 1899.

Commons Regulation Towyn Trewan Provisional Order Act, 1908.

We the Body of Conservators acting under the Award in the Matter of the Regulation of the Towyn Trewan Common situate as above in the County of Anglesey and every other power enabling us in that behalf DO hereby make the following Bye-laws for the Regulation of the said Common.

1. Unauthorised person means any person not for the time being duly authorised by the Conservators in writing for any purpose connected with the management of the Common, and not being a person acting legally by virtue of some estate or interest in over or affecting the Common, or a person duly authorised in writing by any person entitled to act as aforesaid.
   The Act means the Commons Regulation (Towyn Trewan) Provisional Order Act, 1908.
   The Conservators means the Conservators for the time being appointed by or under the provisions of Part II of the Provisional Order of Regulations set forth in the Schedule to and confirmed by the Commons Regulation (Towyn Trewan) Provisional Order Act, 1908.
2. No person shall on the Common use any indecent language or gesture or commit or solicit incite or provoke any other person to commit any indecent act to the annoyance of any person frequenting the Common.
3. No unauthorised person shall encamp or erect any post, railing, fence, pole, tent, booth, stand, building or other structure for any purpose on any part of the Common.
4. No unauthorised person shall catch or trap any bird or animal, or set any trap or net, or lay any snare of any description for birds or animals, or set or incite any dog to chase, hunt or pursue any game, vermin or other animals, nor shoot or take the egg or nest of any bird on the Common.
5. No unauthorised person shall to the danger of any person using the Common carry, discharge or cause to be discharged any gun, pistol or firearms of whatsoever description on any part of the Common.
6. No person shall wilfully throw or discharge on the Common any stone or other missile to the damage or danger of any person or animal thereon.
7. No unauthorised person shall break up or disturb the surface of the Common, or cut dig or take away any turf, sods, rushes, gravel, sand or other substances on or from any part of the Common.
8. No person shall in any way injure or deface by posting thereon bills, placards or notices, or remove any seat, fence, barrier, notice-board, boundary posts or stones, or other property which may have been put up or maintained by the Conservators or other person or persons authorised by them, on the Common, or throw, leave or deposit any filth, rubbish, broken

glass, bottles or other refuse, nor cause or suffer the aforementioned filth, rubbish &c., or other refuse to be thrown left or deposited upon any part of the Common.

9. No unauthorised person shall light or place any fire on the Common, or wilfully or negligently place, throw or let fall any lighted or combustible substance, article or thing which may cause or be likely to cause damage by fire to any timber, brush, wood, gorse, heather, furze, fern, grass or other plant on the Common.
10. No unauthorised person shall break in or exercise or cause to be broken in or exercised any horse or other animal on the Common.
11. No person shall wilfully obstruct, disturb, interrupt or annoy any other person in the proper use of the Common or hinder or obstruct any officer of the Conservators in the proper execution of his powers or duties.
12. No person shall play cricket, football, golf, tennis or other organised game on the Common except at such places and at such times as the Conservators may appoint by notices exhibited on the Common; and no person shall resort to or attempt to occupy any part of the Common appointed as aforesaid either for general use or for the use of a particular club, so as to interfere with any person or persons already occupying such part and using it for the purpose for which it has been appointed or as the case may be with such Club when using the part in the manner and at the times allowed by the Conservators.
13. Where any parts of the Common have been set apart temporarily or otherwise by the Conservators by Notices for preserving the grass for the purpose of any game, no person shall while such is set apart, wilfully injure by riding, driving over, or otherwise, the turf of any such part.
14. No unauthorised person shall turn out on the Common any cattle, sheep, horse, ass or mule or other animal whether of a commonable nature or not, or knowingly permit any of the aforementioned or any other animal to graze, feed or to stray on the Common. But this Bye-Law shall not be deemed to apply to a dog under the absolute control of its owner or o any other person.
15. No person exercising the right of grazing shall put or keep on the Common any entire animal other than rams, or any animal suffering from any infectious or contagious disease, or of a vicious character or disposition, and in the event of one or more of his animals dying, he must take immediate steps to have the carcase or carcasses removed from off the Common.
16. Every person entitled to turn out stock upon the Common shall before turning them out upon the Common cause such stock to be distinctly marked by letters, figures or other identification marks readily distinguishable from all or any other mark or marks already adopted and entered by some other person on the Conservators' Register.
17. Every person entitled to turn out stock upon the Common must register in a book to be kept for that sole purpose by the Clerk to the Conservators, or such Officer as the Conservators may from time to time appoint, his particular mark, figures or other means of identifying his stock, together with his name and address, and also before the end of October in each year forward to the said Clerk or Officer a statement in writing containing the number and description of all animals turned out by him on the Common and so marked as his property.

18. No person entitled to turn out stock upon the Common shall permit or cause his registered identification mark or marks to be transferred, altered, substituted or abandoned without the written consent of the Conservators.
19. No person entitled to turn out stock upon the Common, taking his animals' ears as the basis for attaching or otherwise his registered identification mark or marks shall cause or permit any such mark or marks to be split, punctured or attached to the ear or ears at a point lower than one and a half inches from the tip of the ear or ears, and no part of the ear or ears shall be cut off.
20. All lambs or the young of any stock upon the common must on attaining the age of Four months be branded or otherwise marked by the owner's registered identification mark or marks.

Adopted at a duly convened Meeting of the Conservators held on 22nd day of May, 1913.

(Signed) RICHARD WILLIAMS, *Chairman*
ROBT. O PIERCE, *Hon Secretary*

I hereby confirm the foregoing Bye-Laws.

R L McKENNA,
One of His Majesty's Principal Secretaries of State.

Whitehall
14th August 1913

Whereas by the Award of the Valuer in the matter of the Regulation under the Inclosure Acts, 1845 to 1899, of Towyn Trewan Common in the County of Anglesey, the Conservators, in exercise of the power given to them by the said Award do by this their Bye-Law declare it is declared that the measure of the right of common of pasture shall as regards any land in respect of which rights of common are thereby allowed be deemed and taken to be as follows:-

One sheep for every 4 acres of such land

Provided that the young of such stock shall not be counted until fully weaned.

Every person who shall offend against any of the foregoing Bye-Laws shall be liable for every such offence to a penalty not exceeding £500.

Adopted at a duly convened meeting of the Conservators held on the 24th June 2011

G I THOMAS, Chairman

MENNA EVANS, Secretary

Appendix 2

LIMITATIONS IMPOSED BY OPEN ACCESS REGULATIONS

The Countryside Rights of Way Act 2000 (CRoW)

1.3.8 Under this Act the common was designated as Open Access land. The Countryside and Rights of Way Act 2000 extends public rights of access to all registered common land in England and Wales. This includes the 'right to roam' and allows for activities like walking, sightseeing, birdwatching and climbing. It does not allow for riding bicycles or horses, driving vehicles, camping, and several other activities that may damage the common land and its vegetation or disturb livestock or wildlife. In some circumstances, people who must drive across a common to access their property may have a right to do so.

1.3.9 There are a number of aspects that are of importance in the consideration of management and protection of Tywyn Trewan:

A. **Erecting fencing for up to 6 months**: temporary fencing on commons for up to 6 months to restrict the movement of grazing animals. To do this, you must be the owner of the land, a commoner (anyone who has rights of common on the land), anyone acting with written consent of the owner. The area fenced off must not be bigger than either 10 hectares or 10% of the area of registered common land of which it is part, whichever is the smaller area. The temporary fence under this exemption, must be removed the fences for 6 months before it can be fenced again.

B. **Erecting fencing for up to 1 year:** (or up to 3 years on moorland) can be erected to protect vegetation if the intention is to grow or restore it. The area fenced off must not be larger than 1% of the area of registered common land. It also can't have been enclosed within the previous year. The erector of the fence must be the owner of the land, a commoner, or acting with written consent of the owner.

C. **Erecting fencing for up to 5 years:** temporary fencing can be erected to restrict access to conserve nature. The area fenced can't be bigger than 1% of the area of

the registered common land, by itself or along with other areas in the same common. The erector of the fence must own the land or have written consent from the owner to prove you're working on their behalf, or have a written agreement with Natural Resources Wales, or the Secretary of State.

D. **Installing rows of obstacles:** such as bollards or large stones to stop vehicles accessing common land over a length no greater than 200 metres. There can be no more than one row of obstacles within a single land registry unit. An existing row of obstacles can be extended, but to no more that a combined length of 200 metres. This barrier cannot be used if it stop members of the public using the common for recreation or commoners from exercising their rights of common. To do this you must be either the owner of the land or any other person acting with the written consent of the owner of the land.

Appendix 3

Welsh Government – Common Land Consents Guidance

Introduction

The Planning Inspectorate in Wales (PINS Wales) is responsible for the procedural work for all of the Welsh Ministers' casework in relation to common land in Wales (including applications for exchange of land in respect of town or village greens) as well as determining, on behalf of the Welsh Ministers, applications for consent under section 38(1) of the Commons Act 2006 ("the 2006 Act"). PINS Wales' responsibility for procedural work also relates to the Welsh Ministers' consents, certificates and orders under various other statutory provisions in relation to common land and town or village greens identified in paragraph 4.15 below. The Deputy Minister for Agriculture and Fisheries retains responsibility for the Welsh Government's policy in relation to the management and protection of common land and greens.

1 The Guidance

1.1 This note sets out the Welsh Government's guidance in relation to the determination of such casework and is published for the guidance of the Welsh Ministers, PINS Wales, commons registration authorities and applicants for consent. It may also be of assistance to those interested in such applications (perhaps as supporters or objectors).

1.2 The Welsh Ministers and PINS Wales seek to adhere to this guidance in processing and determining applications under section 38(1) and section 16(1) and, so far as is relevant, in relation to other statutory provisions (see paragraph 4.15 below). Every application to the Welsh Ministers must, however, be considered on its own merits and a determination may, in exceptional circumstances, depart from the guidance if it appears appropriate to do so. In such cases, the decision maker will explain why it has decided not to follow the guidance.

1.3 This guidance must be read in conjunction with the 2006 Act, other legislation relevant to the type of application being considered, and the guidance notes published by PINS Wales in relation to particular types of application. The guidance notes are published on the website of PINS Wales, at:
http://www.planningportal.gov.uk/planning/countryside/commonland/commonland

2 Why is common land important?

2.1 The aim of the Welsh Government's Natural Resource Management Programme is to ensure that we make the most of Wales' natural resources while looking after natural systems and building their resilience and continuing to provide the benefits to people, communities and the economy in Wales in the long term. That is particularly relevant to common land as around 8% of

the land area of Wales is common land, with approximately 45% of common land lying within a National Park and approximately 45% included in Sites of Special Scientific Interest (SSSI).

2.2 Many commons form vital parts of the local economy by maintaining a living for commoners who use the areas to graze their stock; providing employment and generating income for sporting uses; providing an attractive backdrop to some of our most beautiful and popular tourist areas; and by preserving examples of the country's heritage, with internationally important archaeological sites and historic landscapes.

2.3 Individual commoners who still exercise their rights are maintaining a tradition that has been in existence for hundreds of years. This is particularly important in upland areas where commons form a vital element in the local agricultural economy.

2.4 Some of the varied benefits we wish to see our common land delivering are:

Economic

- maintaining a living for commoners who use common land to graze livestock, often with consequential benefits to the wider rural community;
- providing employment and generating income from sporting use
- providing aesthetic beauty in the landscape, which encourages tourism;

Agriculture

- ensuring upland farms can rely on the grazing of common land, which is a significant component of livestock production in Wales;
- maintaining local infrastructure and expertise capable of long term sustainable agricultural management;

Biodiversity

- maintaining natural vegetation rich in flora and fauna;
- protecting a diversity of habitat (on common land, the diversity reflects the lack of incentive to "improve" such land because of the absence of any single controlling interest);
- promoting Sites of Special Scientific Interest and the conservation of other nationally designated sites;
- sustaining grazing systems which are responsible for maintaining many landscape and environmental values on agriculturally-active commons;

Archaeological

- preserving landforms and features in unploughed soils (common land and greens have often been undisturbed for centuries);
- protection of important archaeological and historic sites;

Recreation

- enjoyment of the landscape by visitors and tourists;
- providing open space for surrounding communities;
- use for a wide range of organised activities and local traditional activities;
- commons which are sporting estates contributing to the local economy;

Cultural

- common land and greens providing focus of communities for ancient and traditional activities;
- long-standing traditions associated with the use of common land and greens; and
- increasing the value of open, unenclosed common land and greens as a *de facto* “communal” resource and providing a sense of belonging.

3 Protecting commons — our policy objectives

3.1 The Welsh Government’s desire to protect commons contributes to a number of its strategic objectives:

- reversing the decline of and securing the resilience of our biodiversity by focusing on ecosystems as a whole and their connection with our economy and our communities; and

- through sustainable use of our resources the opportunity to drive growth and exploit new markets, increase efficiency and improve the resilience, safety and prosperity of our communities, our economy and our environment.

3.2 Within those objectives the Welsh Government wishes to see:

- Soil and land managed sustainably;
- Biodiversity valued, safeguarded and enhanced;
- People enjoy, understand and care for the natural environment;
- Improved local environment quality;
- Designated sites either in good condition or improving; and
- Sustainable, living landscapes with best features conserved.

3.3 The 2006 Act, along with a suite of earlier legislation on common land, enables the Welsh Government to:

- Safeguard commons for current and future generations to use and enjoy;
- Ensure that the special qualities of common land, including its open and unenclosed nature, are properly protected; and
- Increase the number of Sites of Special Scientific Interest in favourable condition.

3.4 To achieve this we have a consent/approval process in place to ensure the following outcomes are achieved:

- our stock of common land and greens is not diminished — that, on balance, any deregistration of registered land is balanced by the registration of other land of at least equal benefit;

- works take place on common land only when they maintain or improve the condition of the common or, in exceptional circumstances, where they confer some wider public benefit and are either temporary in duration or have no lasting impact; and

- any use of the common or green is consistent with its status (as common land or green).

3.5 Sections 16(6) and 39(1) of the Act set out the criteria to which the Welsh Ministers must have regard when assessing an application. In applying the criteria the Welsh Ministers will look at the application not only as it is, but will consider whether the application proposes the best possible outcome. It may be that a more acceptable outcome could be achieved by adopting a different approach.

3.6 For example, an application relates to works at point A, and the evidence suggests the works would have a reduced impact on public access and nature conservation if erected at point B (and there is no reason why the works could not be erected at point B). In cases where the Welsh Ministers are satisfied that there is a better approach it is open to them either to impose conditions to improve the outcome or to refuse consent for the application before them, where they are satisfied after applying the statutory criteria that there are good grounds for doing so.

3.7 Similarly, if an application proposes the erection of permanent fencing, but the purposes of the fencing will be achieved within a reasonably predictable timescale, or the utility of the fencing should be reviewed from time to time because of its impact, the Welsh Ministers may decide to impose a condition requiring the works to be removed after a period of time, or refuse consent for the works.

3.8 Equally, if an application proposes the erection of temporary fencing to prevent livestock from wandering on to a road running through a common and causing accidents, the Welsh Ministers might want to know whether the applicant has explored the option of asking for a temporary speed limit to be introduced on the appropriate stretch of road to mitigate the risks of an accident whilst preserving the open nature of the land, or for warning signs to

be introduced (*e.g*. warnings of cattle on road) that would have the effect of slowing traffic down. If these were considered and rejected by the applicant as being ineffective, the Welsh Ministers might want to know why.

3.9 Looking at each of the criteria some of the considerations which should be taken into account include:

3.9.1 the interests of persons having rights in relation to, or occupying the land (and in particular persons exercising rights of common over it)

- What effect will the proposals have on the ability of commoners or other rights holders (including the landowner) to exercise their rights?
- What alternatives have been explored that might reduce the impact of the proposals on the exercise of commoners' rights?
- What effect will the proposals have on other rights holders, such as those with rights of access across the land?

3.9.2 the interests of the neighbourhood

- Does the proposed replacement land or outcome intended by the proposed works add something that will positively benefit the neighbourhood?
- Does the loss of the release land or the construction of the works mean that local people will be prevented from using the common or green in the way they are used to? For example, will the loss of the release land reduce the area of the cricket pitch below a viable threshold, or the works interfere with a regular riding circuit (particularly if any replacement land cannot mitigate the loss)?
- Does the construction of the works or, in relation to any exchange, will the removal of the release land from its status as common land or green, interfere with future use and enjoyment (whether by commoners, the public or others) of the land as a whole (*e.g*. will fencing sterilise part of the land, rendering it practically inaccessible)? Is it likely or possible that the release land could cease to be available as a means of access between other parts of the land as a whole (*e.g*. the removal of a vehicular access way from a green would enable the owner to fence off the access way from the green on either side, or otherwise exclude access to it)?

3.9.3 the public interest

The public interest is defined at sections 16(8) and 39(2) of the Act as including the public interest in nature conservation, the conservation of the landscape, the protection of public rights of access to any area of land, and the protection of archaeological remains and features of historic interest:

- What effect will the proposals have on those wishing to use the common for recreation and access? (In the case of any exchange, it should be assumed that the release land will cease to be available for recreation and access, unless a legally binding provision is intended to be made to assure continued use)

- Are there potential benefits to nature conservation from carrying out the proposals? Does Natural Resources Wales or any other competent person agree with the assessment of any proposed benefits? It may be appropriate to consider indirect benefits - for example, if the works will facilitate the continuation of sustainable grazing systems, which in turn deliver environmental benefits.

- In relation to any exchange, what will be the impact of the replacement land in relation to nature conservation compared with the release land? Does Natural Resources Wales or any other competent person agree with the assessment?

- What will be the impact on the landscape if the proposals proceed? Is the landscape in a specially designated area, such as a National Park or Area of Outstanding Natural Beauty? Will the impact include an adverse effect on the enjoyment of the remaining part of the common or green (*e.g*. if development of any release land might spoil the view or impair the conservation of wildlife on the remaining part)? What consideration has been given to minimising any impact by good design (*e.g*. in relation to a fencing scheme, minimising the extent of new fencing by utilising the existing boundaries of the common)?

- Will the proposals help protect archaeological remains and features of historic interest (particularly if there are such features on any land being deregistered)?

- How do the proposals fit into the historical context? For example, in relation to an ancient common, uniformly described in historical documentation with well-defined boundaries, what effect would they have on the local heritage?

3.9.4 <u>any other matter considered to be relevant</u>

This criterion allows other issues to be taken into account when assessing an application. It may include looking at the wider public interest, which may arise, for example in a major infrastructure project.

3.10 In assessing these considerations, the Welsh Ministers will take into account any matter which is relevant. They will not necessarily rely on the applicant, supporters and objectors to bring all such matters to their attention, but will also rely on their own experience and insight to draw appropriate conclusions. For example, they will not assume that, because no one objects to an application, that there are no adverse impacts, but will consider what impacts might arise, taking into account these criteria, and applying their

knowledge and experience, together with information available in representations, to make a judgement. If necessary, if there is doubt about the extent of any impact, they will consider using their powers to require a site visit or public inquiry, or to seek professional advice, in order to improve understanding of the merits of the application.

4 Other Policy Considerations

Exchange land in applications to deregister or exchange common land under section 16 of the 2006 Act

4.1 Applicants must propose replacement land if the area of the release land is over 200m² (see section 16(2)). Even in cases where the land to be deregistered is less than 200m² the Welsh Government expects land to be offered in exchange for the land being deregistered as our policy is not to allow our stock of common land and greens to diminish. The Welsh Government does not see the purpose of section 16 being to facilitate the deregistration of "unwanted" or "useless" pieces of common land or green; but to enable registered land to be released in exchange for replacement land of equal value.

4.2 In considering an application which does not propose replacement land, section 16(7) requires that the Welsh Ministers have "particular regard to the extent to which the absence of such a proposal is prejudicial" to the interests specified in section 16(6)(a) to (c) (*i.e*. the "private" interests, the interests of the neighbourhood, and the public interest referred to in paragraphs 3.9.1 to 3.9.3 above). In general, the Welsh Ministers will grant consent where no replacement land is offered only in exceptional circumstances. Such circumstances are most likely where a wider public interest is being served by the deregistration which may mitigate the prejudice caused by the loss of the release land. An example is the creation of a slipway for a lifeboat station, or the provision of a disabled access ramp to a village hall. Even in such cases, land should be offered in exchange unless there is a compelling reason why this is not possible (*e.g*. the registered land is surrounded by development, and it is not practicable to provide replacement land which would be integral to the site). It follows that an application for deregistration where no replacement land is offered is most unlikely to be granted if no public interest is served by the deregistration.

4.3 Nor does the Welsh Government see the purpose of section 16 as enabling the deregistration of land which is claimed to have been wrongly registered: other provision is made for that specific purpose in the 2006 Act.

4.4 In considering an application under section 16, the Welsh Ministers will assume that the release land is correctly registered. Where access to the release land is limited by inclosure (*e.g*. by a fence or hedge), or the release land is occupied by buildings or other works, they will assume that such inclosures or works are unlawful (unless the contrary is shown, *e.g*. by reason of a consent granted under section 194 of the Law of Property Act 1925) and that they will not endure. Accordingly, in those circumstances, they will

consider the proposed exchange as if the release land were an integral part of the common and properly available for public use.

4.5 Where it is proposed to offer land in exchange which is not contiguous with the common in which the release land is situated, the Welsh Ministers would expect to be provided with information on the following issues where applicable:-

- what rights or easements exist which would enable animals to be moved from existing common land to that offered in exchange eg how would access across private land be obtained?;

- how would the movement of animals over different commons affect the rights and usage of those with existing rights on different commons? There could be the danger of interfering with existing rights eg overgrazing, prevention of those persons with existing rights from grazing animals etc, and information would be required as to how those risks would be avoided;

- where animals would be moved over private land and/or different commons, what steps would be taken to avoid the risk of any diseases spreading to/from the other land and/or from one flock or herd to another?

Works on commons under section 38 of the 2006 Act

4.6 Commons should be maintained or improved as a result of the works being proposed on them. The Welsh Government sees Part 3 of the 2006 Act, and its predecessor provision in section 194 of the Law of Property Act 1925, as conferring additional protection on common land, rather than enabling common land to be used for purposes inconsistent with its origin, status and character. In other words, consent under section 38 should be seen as a gateway, which enables the construction of works which are sympathetic to our policy objectives for common land, but reinforces controls on development which are inappropriate or harmful.

4.7 In deciding whether to grant consent to carry out works on common land, the Welsh Ministers (and Inspectors) will wish to establish whether the proposed works are consistent with the use of the land as common land. For example, an application for works which facilitate grazing of a common by a rights holder will be considered to be consistent with the future use of the land as common land, whereas an application for works to extend a private dwelling onto common land will be considered not to be consistent with the future use of the land as common land, and will normally be refused.

4.8 Where it is proposed to construct or improve a driveway across a common, consent will be required under section 38 if the works involve the “laying of concrete, tarmacadam, coated roadstone or similar material” (other than for the purposes of repair of the same material). Such an application

may be consistent with the continuing use of the land as common land, even where the driveway is entirely for private benefit, because the construction will not in itself prevent public access, or access for commoners animals. By its very nature, however, paving will have an impact on the enjoyment of the common by reducing the area available for recreation and grazing, by removing habitat, perhaps by affecting drainage, and introducing an urbanising feature into what will normally be an essentially open and natural setting. Nevertheless, the Welsh Government takes the view that, in some circumstances, a paved driveway may be the only practical means of achieving access to land adjacent to the common or green. Moreover, where an existing unsurfaced means of access is already in use, a sympathetic paving proposal may be aesthetically preferable.

4.9 The Welsh Government also notes that the alternative of deregistration of the land covered by a drive, and the substitution of replacement land elsewhere, may be undesirable in that the release land ceases to be subject to statutory protection, and may cease to be available to the community (the potential impact of deregistration may be greater where the release land is core or integral to the enjoyment of the common or green as a whole). These issues will vary according to the particular circumstances and no general rule can be formulated.

4.10 The Welsh Ministers generally have no power to grant consent to construct or improve a driveway across a town or village green, and the construction and subsequent use of such a driveway may well be illegal. Where it is intended to construct a vehicular means of access across a green, the Welsh Government notes that an application may be required under section 16 to deregister the affected land, but where such an application relates to an area of the green which is not more than 200m² in area, the principles set out in paragraph 4.1 to 4.5 above (in relation to the provision of exchange land) will apply.

4.11 Consent will not normally be granted under section 38 for permanent buildings on common land, because such development is normally incompatible with the future use of the land as common land. Where such buildings are intrinsically related to the enjoyment or management of the common, however, such as a cricket pavilion, lambing shed or a keeper's hut, the giving of consent under section 38 may be considered appropriate.

Underlying public benefit

4.12 Some proposed works on common land do not benefit the common but nevertheless there is a potential underlying public benefit, for example works for the generation of sustainable energy (wind farms).

4.13 The Welsh Government wishes to promote sustainable energy generation in an appropriate setting but, equally, its policy is to ensure that the stock of commons is not diminished, that works on common land must maintain or improve the condition of the common, and the use must be consistent with its status as common land. To balance these issues the

Welsh Government's expectation is that applications for such infrastructure projects on common land are more likely to be successful under section 16 of the Act, so that an exchange of land is proposed and can be taken into account. An application for consent to such works under section 38 will rarely be granted unless there are convincing reasons why an application under section 16 cannot be pursued.

4.14 Similarly, works may be proposed in relation to common land which do not benefit the common, but confer some wider benefit on the local community, such as minor works undertaken by a statutory undertaker (*e.g*. a water utility) to provide or improve the public service to local residents and businesses. In such cases, the Welsh Government's expectation is that applications for such purposes on common land are more likely to be successful under section 16 of the Act, so that an exchange of land is proposed and can be taken into account. An application for consent to such works under section 38 will rarely be granted unless there are convincing reasons why an application under section 16 cannot be pursued. Exceptionally, however, consent may be appropriate where the works are of temporary duration (such as a worksite) or where the works will be installed underground (such as a pipeline or pumping station), and the proposals ensure the full restoration of the land affected, and the works confer a public benefit.

Applications not within scope of section 38

4.15 Applications which are not appropriate to proceed under section 38 may often be eligible to be considered under section 16. In certain cases, however, it may be possible or more appropriate to make application under other provisions:

- Powers of compulsory purchase or (in relation to a local authority) appropriation, for which purposes the Welsh Ministers' certificate is required under the Acquisition of Land Act 1981, section 19 or paragraph 6 of Schedule 3 — these powers may be exercised only by a local authority or other body on which such powers are conferred (such as under an Act of Parliament), and may also be used to acquire rights over common land (*e.g*. a right to bury a pipeline in the land and to confer enduring rights of access for maintenance) instead of a right to acquire the land itself.

- National Trust Act 1971, section 23: in relation to works on common land owned by the National Trust.

- Countryside Act 1968, section 9: facilities and buildings undertaken by local authorities on common land or neighbouring land in interests of promoting public access.

- Dyfed Act 1987, sections 42 and 65; access over greens and rights over Kingsmoor Common

4.16 Applications under these other statutory régimes are subject to the same policy considerations set out in this guidance in so far as the considerations are compatible with the requirements of the specific legislation.

General policy in relation to consent

4.17 This guidance explains the Welsh Government's policy in relation to consents generally. It should not be assumed that, where this guidance indicates that a consent might be appropriate in the circumstances specified, that an application in those circumstances will necessarily be granted. Such applications will be considered on their merits in relation to the context, this guidance, and specifically that any works proposed should maintain or improve the use of the land as a common or town or village green and the criteria set out in the relevant legislation. Although many proposals are linked to, or are a central part to, a related consent for planning permission, the issues that need to be considered are quite different, as what may be perfectly reasonable from a planning perspective, may, or could, have an adverse impact on the traditional use of the land as a common or green. The Welsh Government, where possible, wishes to protect and conserve the stock of common land and greens and where appropriate to promote its protection and its continued use for traditional activities.

Matters to be taken into account

4.18 In considering any application for consent (or for a certificate), the Welsh Ministers will have regard to the following matters:

- Their duty to conserve biodiversity (see section 40 of the Natural Environment and Rural Communities Act 2006), and their duty to further the conservation of the section 41 list of features of principal importance for conserving biodiversity;

- Their duty (in relation to land designated as a site of special scientific interest), "to take reasonable steps, consistent with the proper exercise of the authority's functions, to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest" (see section 28G of the Wildlife and Countryside Act 1981);

- Their duty to have regard to the requirements of the Habitats Directive so far as they may be affected by the exercise of those functions; in particular, it may be necessary for an appropriate assessment to be carried out before a consent may be granted for works which are likely to have a significant effect on an area designated as a special area of conservation under the Habitats Directive or as a special protection area under the Wild Birds Directive (see The Conservation of Habitats and Species Regulations 2010 (SI 2010/490));

- Their duty (in relation to a National Park) to have regard to the purposes for which National Parks are established, and if it appears

that there is a conflict between those purposes (of the national park), the requirement to attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park (see section 11A of the National Parks and Access to the Countryside Act 1949); and

- Their duty (in relation to an area of outstanding natural beauty) to have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty (see section 85 of the Countryside and Rights of Way Act 2000).

5 Enforcement against unlawful works

5.1 Any person (including an incorporated body or local authority) may seek enforcement action against unlawful works by application to the county court under section 41 of the 2006 Act. The Welsh Government has published guidance on taking such action. Unlawful works means works which require consent under section 38, but which have not received such consent.

5.2 Responsibility for the enforcement of the requirement for consent set out in Part 3 of the 2006 Act lies with the local community. Enforcement action may be taken by any local authority (including a community council and a National Park authority), as well as by members of the public and persons representing civic, amenity and recreational bodies. The Welsh Ministers will take enforcement action in the case of any breach in exceptional circumstances only as, in their view, it is more appropriate for action to be taken by those persons whose rights have been affected.

Appendix 4

Flood risk activities permit

This information has been copied from the Natural Resources website and could be subject to update. This provided here as guidance to the likely implication of doing works within areas that could flood.

You need a flood risk activity permit, previously called flood defence consent, if you want to do work:

on or near a main river

on or near a flood defence structure

on or near a sea defence

in a flood plain

Permission is also necessary to ensure the work will not interfere with our flood risk management assets or adversely affect the local environment, fisheries or wildlife.

You could be breaking the law if you start work without getting the permit you need

Not near a main river

You do not need a flood risk permit to work on an ordinary watercourse – usually small rivers, streams and ditches. But you should contact your local authority responsible to apply for an ordinary watercourse consent.

If the work you're planning is in an Internal Drainage District (IDD) you will need to **apply for a land drainage consent**.

Contact us if you're not sure if the watercourse is a main river, ordinary watercourse, or part of an Internal Drainage District.

Activities that need a permit

You will need to apply for a flood risk activity permit before carrying out the following temporary or permanent work:

erecting any structure in, over or under a main river

carrying out of any work of alteration or repair on any structure in, over or under a main river if the work is likely to affect the flow of water in the main river or to impact on any drainage work

erecting or altering any structure designed to contain or divert the floodwaters of any part of a main river

any dredging, raising or taking of any sand, silt, ballast, clay, gravel or other materials from or off the bed or banks of a main river (or causing such materials to be dredged, raised or taken), including hydrodynamic dredging and desilting

any activity which is likely to divert the direction of the flow of water into or out of a main river or alter the level of water in a main river

any activity within 8 metres of a non-tidal main river, or within 8 metres of any flood defence structure or culvert on that river or any activity within 16 metres of a tidal main river, or within 16 metres of any flood defence structure or culvert on that river, which is likely to:

cause damage to or endanger the stability of the banks of that river or of any culvert

cause damage to any river control works

alter, reconstruct, discontinue or remove any river control works;

divert or obstruct flood waters or impact on the drainage of that river

interfere with Natural Resources Wales' access to and along that river

any activity (other than an allowed activity (see below for definition)) on a flood plain that is:

more than 8 metres from a non-tidal main river or more than 16 metres from a tidal main river

more than 8 metres from any flood defence structure or culvert on a non-tidal main river

or more than 16 metres from any flood defence structure or culvert on a tidal main river, which is likely to divert or obstruct floodwaters, to damage any river control works or to impact on drainage

any activity within 16 metres of the base of a sea defence which is likely to:

endanger the stability of, cause damage to or reduce the effectiveness of that sea defence

interfere with Natural Resources Wales' access to and along that sea defence

any activity within 8 metres of the base of a remote defence which is likely to:

endanger the stability of, cause damage to or reduce the effectiveness of that defence

interfere with Natural Resources Wales' access to and along that defence
any quarrying or excavation within 16 metres of the base of a remote defence which is likely to cause damage to or endanger the stability of that defence
any quarrying or excavation within 16 metres of a main river or any flood defence structure or culvert on that river which is likely to cause damage to or endanger the stability of the banks of that river

Activities that do not need a permit

Exemptions

You do not need to apply for a permit if your activity meets the **description and conditions of one of the exempt flood risk activities**. But you will need to register your exemption before starting work.

It is free to register an exemption.

Exclusions

You do not need to get permission if you plan to carry out one of the **excluded activities**. But you must operate within the description and conditions of the exclusion.

Flood risk activity exclusions

You can carry out some flood risk activities without a flood risk activity permit or registering for an exemption.

You must meet the specific conditions set out in the **technical guidance for flood risk activity exclusions**. It is a criminal offence to carry out an excluded activity without meeting the appropriate conditions.

Excluded flood risk activities:

any activity carried on in an emergency

a **licensable marine activity** in Wales

the erection and use of ladders and scaffold towers

the construction and use of service crossings within an existing structure

the attachment of a flood protection device directly to a building in order to protect the interior of that building.

the carrying out of minor works on or affecting bridges and culverts for highways and public rights of way

the erection of fencing

erection of notice boards

clearance of purpose-built sediment traps

site investigation boreholes and trial pits within a flood plain

If you need to undertake temporary works (for example use scaffolding or coffer dams in the channel), **contact us to discuss if a bespoke permit might be needed**.

Find out more about flood risk activity permits if your proposed activity is not listed or does not meet all the specific conditions.

Carrying out emergency work

Let us know if you need to carry out any emergency work in response to an unplanned occurrence which presents:

a risk of serious flooding to property

serious detrimental impact on drainage

serious harm to the environment

serious risk to public safety

You need to contact us as soon as practicable (via the email addresses below) and explain what activities have been carried out and the circumstances:

floodpermitting.northmid@naturalresourceswales.gov.uk

DFRSouthPermitting@cyfoethnaturiolcymru.gov.uk

A pre-planned activity which has been planned in response to an emergency before it occurs will not be deemed as emergency works.

Register an exemption

You can register an exemption if you meet the specific conditions set out in the **technical guidance for flood risk activity exemptions**. It is a criminal offence to carry out an exempt activity without meeting the appropriate conditions. It must be noted that works in close proximity to a designated site may not meet the exemption criteria.

It is free to register an exemption.

Exempt flood risk activities:

the erection of an electrical cable service crossing over a main river

the erection of a service crossing below the bed of a main river by directional drilling not involving an open cut technique

service crossings attached to the outside of existing structures over a main river

the construction of footbridges

the maintenance of raised river or sea defences

the maintenance of structures within the channel of a main river other than raised river or sea defences

the construction of a drinking bay on the bank of a main river

the construction of access platforms on the bank of a main river or that project into or over a main river

the construction of small outfall pipes and headwalls to main rivers

the repair and protection of main river banks using natural materials

repair of bank slips and erosion

the installation of channel habitat structures made of natural materials (excluding weirs and berms)

the installation of rafts for survey

gravel cleaning for fish-spawning beds

construction of eel pass devices on existing structures

construction of fish passage notches on an existing impoundment

the excavation of scrapes and shallow wetland features in a floodplain

construction of bankside wildlife refuge structures

improvement works for tracks and paths

If you need to undertake temporary works (for example use scaffolding or coffer dams in the channel), **contact us to discuss if a bespoke permit might be needed**.

Register an exemption

Complete the **application form to register an exemption**.

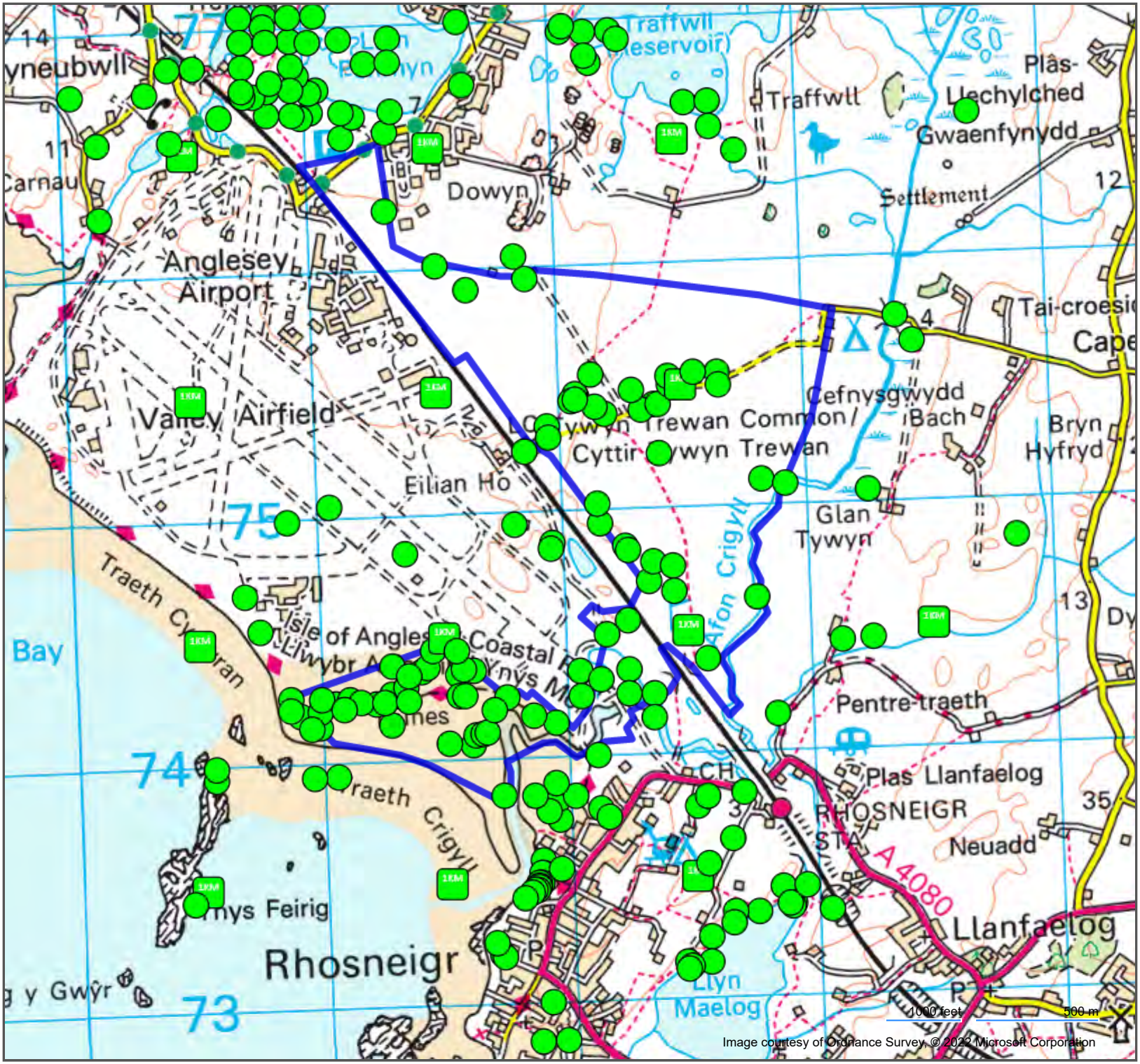
You will need to include:

the name and address of the individual or organisation responsible for carrying out the flood risk activity

the 12-digit national grid reference where the exempt work is being carried out

a location plan of where the work will be carried out

Once registered, your exemption details will appear on the flood risk activity exemption public register.



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North Wales Environmental Information Service

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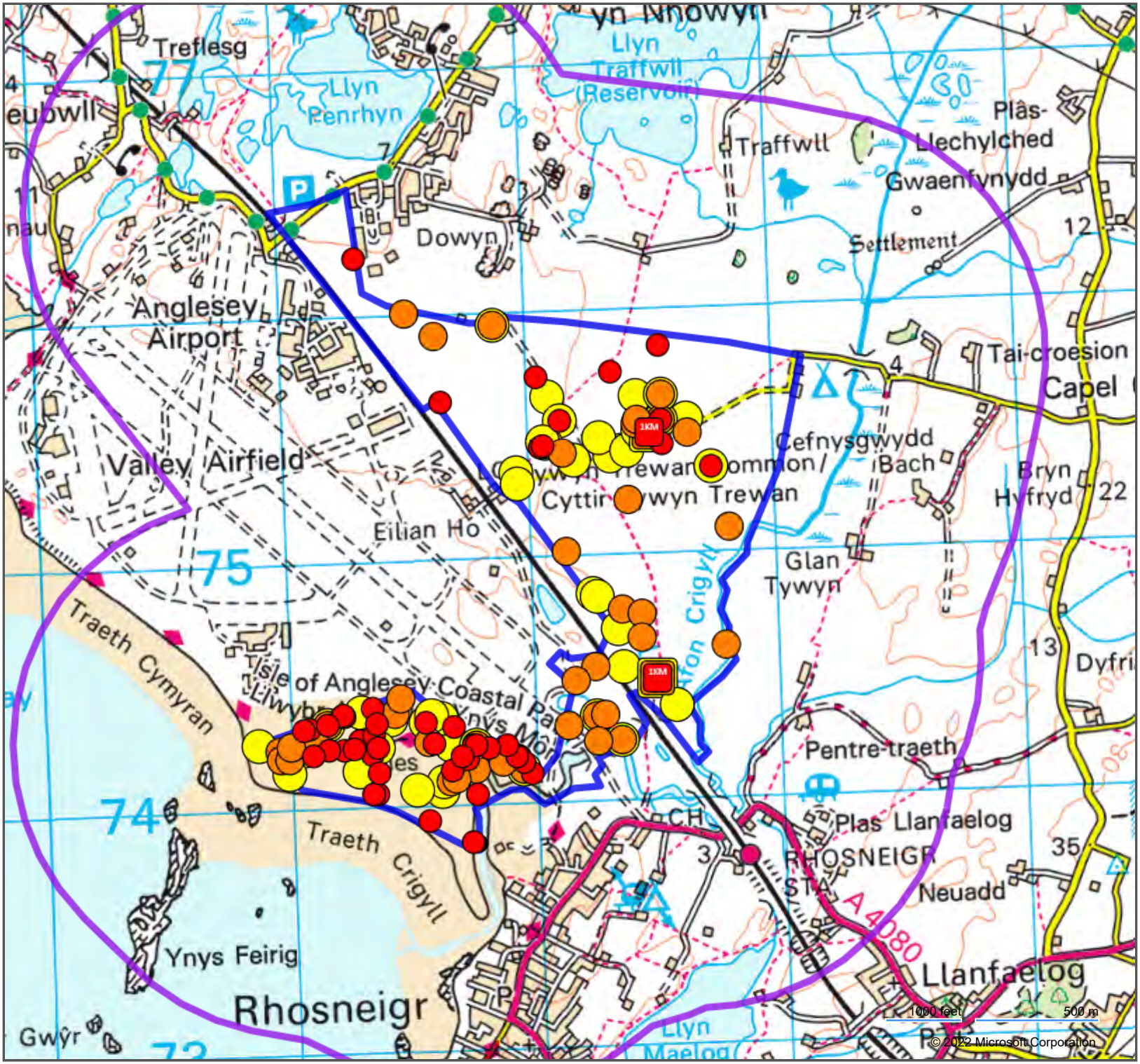
Map of all plants recorded within 1km

Key

Search Location



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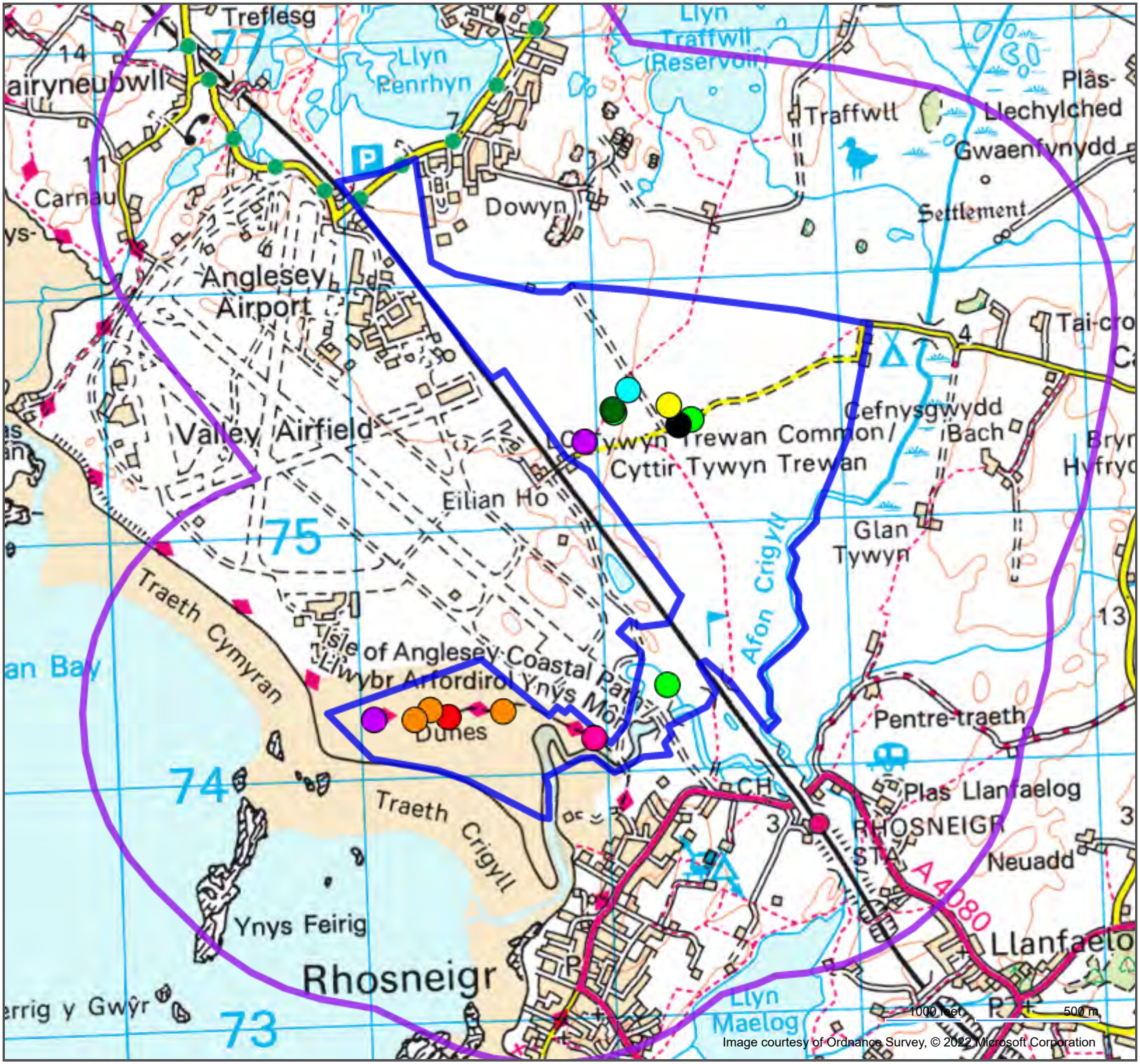
Key

- Search Location
- LERC Boundary
- Search Buffer (1000m)
- Category 1 Species
- Category 2 Species
- Category 3 Species
- Designation List - INNS



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Plants speices in the Last 10 years

Key

- Search Location
- LERC Boundary
- Search Buffer (1000m)

Plants

- Broad Scalewort
- Common Aloe-moss
- Common Feather-moss
- Field Gentian
- Fine-leaved Marsh Feather-moss
- Hair-pointed Grimmia
- Hampe's Threadwort
- Large Hook-moss
- Lesser Centaury
- Sand-hill Screw-moss
- Seaside Centaury
- Silver-moss
- Starry Hoar-moss
- Tree-moss
- Yellow Crisp-moss

Appendix 5 List of all plant species recorded

Search Group	Scientific Name	English Name	Earliest Year	Latest Year	Total Records
Category 1 Species	Cerastium fontanum	Common Mouse-ear	1982	2014	8
Category 1 Species	Chamaemelum nobile	Chamomile	2002	2010	2
Category 1 Species	Cochlearia officinalis	Common Scurvygrass	1983	1998	4
Category 1 Species	Dactylorhiza incarnata	Early Marsh-orchid	2005	2010	5
Category 1 Species	Dactylorhiza purpurella	Northern Marsh-orchid	1984	2010	6
Category 1 Species	Gentianella campestris	Field Gentian	1992	2019	6
Category 1 Species	Hyacinthoides non-scripta	Bluebell	2005	2017	3
Category 1 Species	Hypopitys monotropa subsp. hypophegea		1992	1999	3
Category 1 Species	Salsola kali subsp. kali	Prickly Saltwort	1998	2011	4
Category 1 Species	Armeria maritima	Thrift	1975	2005	4
Category 1 Species	Oenanthe fistulosa	Tubular Water-dropwort	2009	2009	1
Category 1 Species	Centaurea cyanus	Cornflower	1982	1982	1
Category 1 Species	Gymnadenia conopsea	Common Fragrant-orchid	1982	1982	1
Category 1 Species	Otanthus maritimus	Cottonweed	1894	1894	1
Category 2 Species	Centaurium littorale	Seaside Centaury	2005	2012	3
Category 2 Species	Centunculus minimus	Chaffweed	1999	2008	4
Category 2 Species	Cynoglossum officinale	Hound's-tongue	2005	2011	2
Category 2 Species	Erodium lebelii	Sticky Stork's-bill	1986	2008	5
Category 2 Species	Frankenia laevis	Sea-heath	1978	2011	6
Category 2 Species	Hypochaeris glabra	Smooth Cat's-ear	2002	2008	3
Category 2 Species	Inula crithmoides	Golden-samphire	1986	2007	3
Category 2 Species	Limonium humile	Lax-flowered Sea-lavender	1984	1999	3
Category 2 Species	Limonium recurvum		2009	2011	3
Category 2 Species	Mibora minima	Early Sand-grass	1987	2011	6
Category 2 Species	Pyrola rotundifolia subsp. maritima		2008	2008	1
Category 2 Species	Radiola linoides	Allseed	1982	2008	3
Category 2 Species	Spiranthes spiralis	Autumn Lady's-tresses	2006	2008	4

Appendix 5 List of species recorded in the last 10 years

Search Group	Scientific Name	English Name	Earliest Year	Latest Year	Total Records
Category 2 Species	Lathyrus palustris	Marsh Pea	2014	2014	1
Category 3 Species	Erophila glabrescens	Glabrous Whitlowgrass	2014	2014	1
Category 3 Species	Geum rivale	Water Avens	2017	2017	1
Category 3 Species	Silene latifolia x dioica = S. x hampeana	Hybrid Campion	2014	2014	1
Category 3 Species	Crithmum maritimum	Rock Samphire	2016	2016	1
Category 3 Species	Potamogeton trichoides	Hairlike Pondweed	2012	2015	3
Category 3 Species	Alisma lanceolatum	Narrow-leaved Water-plantain	2012	2012	1

Appendix 5 List of all plant species recorded

Search Group	Scientific Name	English Name	Earliest Year	Latest Year	Total Records
Category 2 Species	Viola canina subsp. canina		2002	2011	6
Category 2 Species	Viola tricolor	Wild Pansy	1982	2007	4
Category 2 Species	Vulpia fasciculata	Dune Fescue	1993	2011	4
Category 2 Species	Baldellia ranunculoides	Lesser Water-plantain	1966	2010	3
Category 2 Species	Minuartia verna	Spring Sandwort	1984	1984	1
Category 2 Species	Viola canina	Heath Dog-violet	1984	1984	1
Category 2 Species	Bromus hordeaceus subsp. thominei	Sand Soft-brome	1992	1998	2
Category 2 Species	Papaver argemone	Prickly Poppy	1992	1998	2
Category 2 Species	Elatine hydropiper	Eight-stamened Waterwort	1988	2015	9
Category 2 Species	Callitriche truncata	Short-leaved Water-starwort	1997	2015	9
Category 2 Species	Hottonia palustris	Water-violet	1895	1982	2
Category 2 Species	Myriophyllum verticillatum	Whorled Water-milfoil	1895	1895	1
Category 2 Species	Cuscuta epithymum	Dodder	1983	1983	1
Category 2 Species	Glebionis segetum	Corn Marigold	1991	1991	1
Category 2 Species	Lathyrus palustris	Marsh Pea	2014	2014	1
Category 2 Species	Potamogeton filiformis	Slender-leaved Pondweed	1826	1826	1
Category 2 Species	Limosella aquatica	Mudwort	1910	1910	1
Category 2 Species	Genista anglica	Petty Whin	1994	1994	1
Category 2 Species	Carex diandra	Lesser Tussock-sedge	2001	2001	1
Category 3 Species	Ammophila arenaria	Marram	1982	1998	6
Category 3 Species	Anacamptis pyramidalis	Pyramidal Orchid	1984	2009	8
Category 3 Species	Aster tripolium	Sea Aster	1983	2005	5
Category 3 Species	Bromus hordeaceus x lepidus = B. x pseudothominei	Lesser Soft-brome	1972	2004	3
Category 3 Species	Carduus nutans	Musk Thistle	2009	2009	2
Category 3 Species	Carex arenaria	Sand Sedge	1982	1984	5

Appendix 5 List of all plant species recorded

Search Group	Scientific Name	English Name	Earliest Year	Latest Year	Total Records
Category 3 Species	Carex viridula subsp. viridula	Small-fruited Yellow-sedge	2002	2008	2
Category 3 Species	Centaurium pulchellum	Lesser Centaury	1992	2012	4
Category 3 Species	Dactylorhiza incarnata subsp. coccinea		2008	2009	2
Category 3 Species	Epipactis palustris	Marsh Helleborine	1984	2007	3
Category 3 Species	Erodium moschatum	Musk Stork's-bill	1992	1992	1
Category 3 Species	Juncus gerardii	Saltmarsh Rush	1983	1998	4
Category 3 Species	Juncus maritimus	Sea Rush	1983	2014	5
Category 3 Species	Limonium procerum subsp. procerum		2011	2011	1
Category 3 Species	Lythrum portula	Water-purslane	1977	1999	5
Category 3 Species	Mentha aquatica	Water Mint	1977	2014	14
Category 3 Species	Moenchia erecta	Upright Chickweed	2006	2006	3
Category 3 Species	Neottia ovata	Common Twayblade	1994	2007	3
Category 3 Species	Oenanthe lachenalii	Parsley Water-dropwort	1983	1984	3
Category 3 Species	Ophrys apifera	Bee Orchid	1998	2009	8
Category 3 Species	Plantago maritima	Sea Plantain	1983	2016	10
Category 3 Species	Puccinellia maritima	Common Saltmarsh-grass	1983	1998	5
Category 3 Species	Reseda lutea	Wild Mignonette	1982	2009	4
Category 3 Species	Rumex hydrolapathum	Water Dock	1977	1998	12
Category 3 Species	Salix repens	Creeping Willow	1977	2005	8
Category 3 Species	Saxifraga granulata	Meadow Saxifrage	1979	1982	2
Category 3 Species	Schoenoplectus tabernaemontani	Grey Club-rush	1983	2014	5
Category 3 Species	Schoenus nigricans	Black Bog-rush	1983	1984	2
Category 3 Species	Sedum anglicum	English Stonecrop	1977	2016	7
Category 3 Species	Stellaria pallida	Lesser Chickweed	1984	2006	5
Category 3 Species	Tragopogon pratensis	Goat's-beard	1977	2014	6
Category 3 Species	Trifolium ornithopodioides	Bird's-foot Clover	1977	2009	6
Category 3 Species	Triglochin maritimum	Sea Arrowgrass	1983	2005	5

Appendix 5 List of all plant species recorded

Search Group	Scientific Name	English Name	Earliest Year	Latest Year	Total Records
Category 3 Species	Triglochin palustre	Marsh Arrowgrass	1983	1983	2
Category 3 Species	Ulex gallii	Western Gorse	1983	1994	3
Category 3 Species	Vicia lathyroides	Spring Vetch	1999	2006	5
Category 3 Species	Viola riviniana x canina = V. x intersita		2010	2010	1
Category 3 Species	Butomus umbellatus	Flowering-rush	1977	2010	10
Category 3 Species	Gentianella amarella	Autumn Gentian	2006	2006	1
Category 3 Species	Calystegia soldanella	Sea Bindweed	1982	2016	5
Category 3 Species	Atriplex laciniata	Frosted Orache	1998	2005	2
Category 3 Species	Atriplex portulacoides	Sea-purslane	1998	2005	2
Category 3 Species	Cakile maritima	Sea Rocket	1982	2005	4
Category 3 Species	Draba incana	Hoary Whitlowgrass	2005	2005	1
Category 3 Species	Eryngium maritimum	Sea-holly	1984	2016	4
Category 3 Species	Euphorbia paralias	Sea Spurge	1984	2016	4
Category 3 Species	Geranium sanguineum	Bloody Crane's-bill	2005	2009	2
Category 3 Species	Glaux maritima	Sea-milkwort	1983	2005	4
Category 3 Species	Honckenya peploides	Sea Sandwort	1984	2016	5
Category 3 Species	Myosotis ramosissima	Early Forget-me-not	2005	2005	1
Category 3 Species	Rhinanthus minor	Yellow-rattle	1982	2005	7
Category 3 Species	Allium vineale	Wild Onion	1977	1998	5
Category 3 Species	Anthyllis vulneraria	Kidney Vetch	1982	2005	5
Category 3 Species	Bolboschoenus maritimus	Sea Club-rush	1983	1984	2
Category 3 Species	Bromopsis erecta	Upright Brome	1982	1982	1
Category 3 Species	Elytrigia juncea	Sand Couch	1982	1998	3
Category 3 Species	Euphorbia portlandica	Portland Spurge	1982	1998	4
Category 3 Species	Leontodon hispidus	Rough Hawkbit	1982	1998	2
Category 3 Species	Lepidium heterophyllum	Smith's Pepperwort	1982	1982	1
Category 3 Species	Leymus arenarius	Lyme-grass	1984	1998	2

Appendix 5 List of all plant species recorded

Search Group	Scientific Name	English Name	Earliest Year	Latest Year	Total Records
Category 3 Species	Limonium binervosum	Rock Sea-lavender	1984	1984	1
Category 3 Species	Limonium vulgare	Common Sea-lavender	1984	1998	2
Category 3 Species	Phleum arenarium	Sand Cat's-tail	1982	1984	2
Category 3 Species	Salicornia europaea	Common Glasswort	1983	1998	3
Category 3 Species	Silene latifolia	White Campion	1982	1982	1
Category 3 Species	Silene uniflora	Sea Campion	1984	2005	2
Category 3 Species	Spergularia marina	Lesser Sea-spurrey	1984	1998	2
Category 3 Species	Spergularia media	Greater Sea-spurrey	1984	2005	3
Category 3 Species	Trisetum flavescens	Yellow Oat-grass	1982	1982	1
Category 3 Species	Erophila glabrescens	Glabrous Whitlowgrass	2014	2014	1
Category 3 Species	Trifolium subterraneum	Subterranean Clover	1983	2009	3
Category 3 Species	Anchusa arvensis	Bugloss	1998	1998	1
Category 3 Species	Atriplex littoralis	Grass-leaved Orache	1998	2005	2
Category 3 Species	Beta vulgaris subsp. maritima	Sea Beet	1998	2016	3
Category 3 Species	Iris foetidissima	Stinking Iris	1998	1998	1
Category 3 Species	Lamium amplexicaule	Henbit Dead-nettle	1983	1998	2
Category 3 Species	Suaeda maritima	Annual Sea-blite	1998	1998	1
Category 3 Species	Tragopogon pratensis subsp. minor		1998	1998	1
Category 3 Species	Viola tricolor subsp. curtisii	Seaside Pansy	1998	1998	1
Category 3 Species	Myriophyllum spicatum	Spiked Water-milfoil	1964	2015	9
Category 3 Species	Ceratophyllum demersum	Rigid Hornwort	1977	2015	16
Category 3 Species	Lemna trisulca	Ivy-leaved Duckweed	1988	2015	7
Category 3 Species	Nuphar lutea	Yellow Water-lily	1977	2015	10
Category 3 Species	Nymphaea alba	White Water-lily	1977	2015	11
Category 3 Species	Potamogeton pectinatus	Fennel Pondweed	1961	2015	10
Category 3 Species	Geum rivale	Water Avens	2017	2017	1
Category 3 Species	Trifolium scabrum	Rough Clover	1982	2009	3

Appendix 5 List of all plant species recorded

Search Group	Scientific Name	English Name	Earliest Year	Latest Year	Total Records
Category 3 Species	Carex pseudocyperus	Cyperus Sedge	1982	2011	6
Category 3 Species	Pulicaria dysenterica	Common Fleabane	1983	1984	2
Category 3 Species	Salix alba	White Willow	1983	1983	1
Category 3 Species	Callitriche hamulata	Intermediate Water-starwort	1895	1998	3
Category 3 Species	Callitriche hermaphroditica	Autumnal Water-starwort	1961	2015	8
Category 3 Species	Callitriche platycarpa	Various-leaved Water-starwort	1977	1988	3
Category 3 Species	Carex acuta	Slender Tufted-sedge	1895	2001	4
Category 3 Species	Carex acutiformis	Lesser Pond-sedge	1966	1988	3
Category 3 Species	Carex elata	Tufted-sedge	1961	1998	9
Category 3 Species	Carex riparia	Greater Pond-sedge	1895	1998	7
Category 3 Species	Elatine hexandra	Six-stamened Waterwort	1982	2006	3
Category 3 Species	Eleocharis acicularis	Needle Spike-rush	1977	2015	10
Category 3 Species	Lobelia dortmanna	Water Lobelia	1895	1895	1
Category 3 Species	Potamogeton crispus	Curled Pondweed	1978	2015	7
Category 3 Species	Potamogeton obtusifolius	Blunt-leaved Pondweed	1895	2015	4
Category 3 Species	Potamogeton perfoliatus	Perfoliate Pondweed	1895	2015	6
Category 3 Species	Potamogeton pusillus	Lesser Pondweed	1988	2015	5
Category 3 Species	Ranunculus circinatus	Fan-leaved Water-crowfoot	1964	2010	7
Category 3 Species	Ranunculus lingua	Greater Spearwort	1961	2015	5
Category 3 Species	Schoenoplectus lacustris	Common Club-rush	1961	2002	8
Category 3 Species	Sparganium emersum	Unbranched Bur-reed	1964	2012	4
Category 3 Species	Zannichellia palustris	Horned Pondweed	1982	2015	6
Category 3 Species	Silene latifolia x dioica = S. x hampeana	Hybrid Campion	2014	2014	1
Category 3 Species	Crithmum maritimum	Rock Samphire	2016	2016	1
Category 3 Species	Hypericum elodes	Marsh St John's-wort	1983	2014	2

Appendix 5 List of all plant species recorded

Search Group	Scientific Name	English Name	Earliest Year	Latest Year	Total Records
Category 3 Species	Lysimachia vulgaris	Yellow Loosestrife	1977	1998	6
Category 3 Species	Scutellaria galericulata	Skullcap	1977	1998	7
Category 3 Species	Carex disticha	Brown Sedge	1977	1982	3
Category 3 Species	Centaurea scabiosa	Greater Knapweed	1982	1983	2
Category 3 Species	Geranium columbinum	Long-stalked Crane's-bill	1983	1983	1
Category 3 Species	Cerastium arvense	Field Mouse-ear	1983	2006	2
Category 3 Species	Lemna gibba	Fat Duckweed	1964	1964	1
Category 3 Species	Pedicularis palustris	Marsh Lousewort	1983	1983	1
Category 3 Species	Ranunculus sceleratus	Celery-leaved Buttercup	1983	1999	2
Category 3 Species	Sagina nodosa	Knotted Pearlwort	1983	1983	1
Category 3 Species	Melica nutans	Mountain Melick	1983	1983	1
Category 3 Species	Umbilicus rupestris	Navelwort	1983	1983	2
Category 3 Species	Agrimonia procera	Fragrant Agrimony	1982	1982	1
Category 3 Species	Apium inundatum	Lesser Marshwort	1966	1982	2
Category 3 Species	Bidens cernua	Nodding Bur-marigold	1982	1998	3
Category 3 Species	Bidens tripartita	Trifid Bur-marigold	1982	1982	1
Category 3 Species	Calamagrostis epigejos	Wood Small-reed	1982	1982	1
Category 3 Species	Carduus tenuiflorus	Slender Thistle	1977	1977	2
Category 3 Species	Catapodium marinum	Sea Fern-grass	1977	1977	2
Category 3 Species	Dactylorhiza maculata	Heath Spotted-orchid	1982	2010	2
Category 3 Species	Eleogiton fluitans	Floating Club-rush	1966	1982	2
Category 3 Species	Galium uliginosum	Fen Bedstraw	1982	1982	1
Category 3 Species	Myrica gale	Bog-myrtle	1977	1998	3
Category 3 Species	Ornithopus perpusillus	Bird's-foot	1977	1994	4
Category 3 Species	Potamogeton berchtoldii	Small Pondweed	1982	2015	4
Category 3 Species	Potamogeton gramineus	Various-leaved Pondweed	1966	1982	3

Appendix 5 List of all plant species recorded

Search Group	Scientific Name	English Name	Earliest Year	Latest Year	Total Records
Category 3 Species	Ranunculus trichophyllus	Thread-leaved Water-crowfoot	1977	1977	2
Category 3 Species	Sagina subulata	Heath Pearlwort	1977	1982	1
Category 3 Species	Urtica urens	Small Nettle	1977	1977	2
Category 3 Species	Scilla verna	Spring Squill	1983	2005	3
Category 3 Species	Trifolium striatum	Knotted Clover	1983	1983	1
Category 3 Species	Berula erecta	Lesser Water-parsnip	1988	1998	3
Category 3 Species	Juncus subnodulosus	Blunt-flowered Rush	1998	1998	1
Category 3 Species	Littorella uniflora	Shoreweed	1984	2015	4
Category 3 Species	Myriophyllum alterniflorum	Alternate Water-milfoil	1999	1999	1
Category 3 Species	Ranunculus aquatilis	Common Water-crowfoot	1988	1999	3
Category 3 Species	Samolus valerandi	Brookweed	1999	1999	1
Category 3 Species	Fumaria bastardii	Tall Ramping-fumitory	1982	1982	1
Category 3 Species	Potamogeton trichoides	Hairlike Pondweed	2012	2015	3
Category 3 Species	Alisma lanceolatum	Narrow-leaved Water-plantain	2012	2012	1
Category 3 Species	Veronica anagallis-aquatica	Blue Water-speedwell	1988	1988	2
Category 3 Species	Agrostis vinealis	Brown Bent	1994	1998	2
Category 3 Species	Carex dioica	Dioecious Sedge	1984	1984	1
Category 3 Species	Smyrnium olusatrum	Alexanders	1984	1984	1
Category 3 Species	Lathyrus linifolius	Bitter-vetch	1994	1994	1
Category 3 Species	Potamogeton lucens x gramineus = P. x angustifolius	Long-leaved Pondweed	1924	1924	1
Category 3 Species	Salix viminalis x caprea = S. x smithiana	Broad-leaved Osier	1988	1988	1
Designation List - INNS	Cotoneaster integrifolius	Entire-leaved Cotoneaster	1982	1982	1
Designation List - INNS	Crocosmia pottsii x aurea = C. x crocosmiiflora	Montbretia	1984	1998	2
Designation List - INNS	Rosa rugosa	Japanese Rose	1998	2016	2

Appendix 5 List of all plant species recorded

Search Group	Scientific Name	English Name	Earliest Year	Latest Year	Total Records
Designation List - INNS	Sedum album	White Stonecrop	1998	1998	1
Designation List - INNS	Elodea canadensis	Canadian Waterweed	1988	2015	6
Designation List - INNS	Lemna minuta	Least Duckweed	1998	2015	3
Designation List - INNS	Crassula helmsii	New Zealand Pigmyweed	2008	2008	1

Appendix 6

Heritage sites at Tywyn Trewan

Scheduled Ancient Monument

There is one scheduled ancient monument within 1km called **Castellor Hut Group** reference AN088. It is a prehistoric unenclosed hut circle located 440m north east of the site.

The monument comprises the remains of a group of hut circles that probably date to the Iron Age or Romano-British period (c. 800 BC - AD 400). The site consists of two pasture fields divided by a wall, the western one bounded by the Afon Crigyll and the eastern by another wall. Along the edge of the west field, above the river, is some outcropping rock, the line of which is continued southwards by an intermittent row of boulders, singly and in groups, possibly the remains of a boundary wall. In the northern part of the east field, and just outside it to the south, are clear remains of hut circles. There are also some ploughed-over circles in the east field just to the NW of the better-preserved ones. Most of the area, particularly the east field, shows undulations suggestive of enclosures of various shapes and sizes, although there are no other clear features. The monument is of national importance for its potential to enhance our knowledge of later prehistoric domestic construction practices. The monument retains significant archaeological potential and there is a strong probability that structural evidence has survived, together with internal and external floor surfaces. The scheduled area comprises the remains described and areas around them within which related evidence may be expected to survive.

Listed buildings

There are four listed buildings within 1km of the site. Three are to the south and associated with Rhosneigr:

War memorial - Built in the 1920's to commemorate the men of Rhosneigr who lost their lives in the First World War (similar in style to one in Gwalchmai, which was built in 1926, by John Griffiths, Monumental Works, Llangefni); another commemorative plaque was added to the SW face following the Second World War.

Memorial clock tower. Three stages; the lowest faced with rock-faced limestone masonry, base with plinth and top with raking ashlar course to second stage. The front face (NW) has a segmental-headed arched recess, the arch with floriate stops; the recess containing a commemorative plaque to the men of Rhosneigr who fell in the First World War. The rear (SE) face has a similarly detailed recess which contains a segmental-headed doorway. The SW face has a smaller segmental-headed commemorative plaque, added following the Second World War. The second stage of the tower is faced with snecked granite masonry; the angles have limestone quoins and the interior is lit by narrow lights (one in the lower SE face, one in the upper NW face) with limestone surrounds. The upper, clock, stage is of ashlar limestone masonry, set in over a stepped raking course. Each face contains a clock face with advanced label over; the domed roof is surmounted by a plain cross.

Surf point - The house was built 1906-8 for the sausage manufacturer, C H Palethorpe, of Tipton, Worcestershire.

A castellated seaside 'folly' style house; a light-heartedly designed holiday home built to resemble a large sandcastle at the seashore. Assymmetrically planned; the main block square in plan with octagonal towers at the seaward facing angles, an additional rectangular block extending from the NE corner. Continuing south-eastwards from the SE corner of this rectangular block is a castellated wall which returns in a northeasterly direction to form 2 sides of a yard with lean-to verandahs and outbuildings along the inner sides of the shielding walls and a small pitched roof hut in the centre. The principal elevations of the house are the NW and SW elevations of the 2-storey, square block, which face out to sea. Both elevations have a continuous, stressed string above the first floor windows and octagonal towers at each corner; windows are slightly recessed sashes with single paned lower lights and small paned upper lights. The NW elevation has similarly detailed windows between the towers, 3 windows to the ground floor and 2 windows to the first floor flanked by small circular fixed lights. The SW elevation has a single ground floor window towards the SW tower; the towers are linked by a slate-roofed verandah on timber supports. There is a rectangular stack to the SE which is slightly advanced over a lombard frieze; left of the stack the castellated parapet steps upwards by 3 steps, echoed by detailing on the wall below. The SE elevation of the square block returns to meet the rectangular block and has a single window to the ground

floor, the first floor with 3 mock arrow slits. The SW elevation of rectangular block has a single first floor window at its NW end, right of this window is an advanced block formed by 3 sides of a tall stair tower illuminated by tall, narrow, small paned lights to each of 3-storeys; the ground floor is a further advanced square block with a slate roof and 2 round-headed lights. The SE return beyond the stair tower has a first floor transomed and mullioned window of 3-lights, upper lights with stained glass windows depicting sailing ships; the storey above has 5 mock arrow slits. The SW elevation of the rectangular block then continues as a 2-window range with ground floor, slate-roofed verandah. The NE elevation of the square block is a mirror of the SW elevation, with tower at the corner and opposing chimney stack. The elevation is then advanced as the NE elevation of the rectangular block; the NW part with single window to ground and first floors, central part with 2 ground floor windows and 4 narrower first floor windows, the SE part with single ground floor at SE end and wider ground floor window to right. Beyond the SE end of the rectangular block is a yard; a wall extends from the SE corner and returns NE, with entrance through a segmental headed panelled door under a segmental arched porch on rubble piers; the returning wall with castellated parapet stepped upwards in the centre and at the angles. The inner walls of this yard have lean-to outbuildings and slate-roofed verandahs along their lengths; a small pitched roof outbuilding extending from the lean-to at the SE end. The entrance to the house is at the landward side, through 2 gateways, each with square, rubble piers surmounted by rendered caps and globe finials. The gates are wooden, the bottom part with some slats pierced, the upper part with spaced slats under a top rail descending to the centre. The grounds are enclosed by low rubble walls. The formality of the composition is enhanced by consistently detailed crenellation and whitened roughcast rendered walls throughout.

Listed as a striking example of an early C20 seaside home (reflecting the development of the area as a resort), an unusual, idiosyncratic design, planned and detailed for picturesque effect. .

Sea wall, Surf point - Probably built 1906-8, contemporary with the adjacent Surf Point. A stretch of seawall, built of rubble masonry, part rendered. The wall is comprised of 5 adjoining sections; the south-westernmost section has a round-fronted rendered cap and

contains a central, circular bastion; the abutting stretch of wall is fully rendered and the round-fronted capping is embattled; the next stretch north-westwards is also embattled but has lost most of its facing render; abutting the NW end is another circular bastion (as the first) and the stretch of wall at the far NW end is embattled and without much of its render. The rear of the wall has widely spaced buttresses with rounded caps, the wall has periodic openings to the properties beyond, which in turn are seperated by rubble walls and railings which abut the rear of the seawall.

Listed as a good example of an early C20 sea wall; created to form an inspired setting to the similarly styled Surf Point house which stands above it to the E.

There is one listed building to the north east:

Bridge East Of Tyn-Lidiart - A rubble-built road bridge of 3 spans, the central arch larger than the flanking flood arches. Each arch with roughly shaped stone voussoirs. A roughly capped rubble parapet of small stones over a dripcourse just above the central arch.

Listed as a good, well-preserved example of an early C19 road bridge.