

Wales's New National Park Proposal - Public Consultation 2024

Campaign for National Parks Response

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Campaign for National Parks welcomes the opportunity to contribute to this public consultation. We represent a family of local and national organisations passionately advocating for the appropriate protection and management of our treasured Welsh Designated Landscapes and we understand the multiple benefits that designation can bring for people, nature and the climate.

The evidence is clear that the three existing Welsh National Parks deliver great value to Wales. The evaluated area is also a distinctive and culturally significant area which can connect more communities to the landscape, enhance and improve the rural economy, and advance the wellbeing and climate ambitions of Welsh Government.

A new National Park designation is the strongest legal protection we have available to enhance wildlife, natural beauty and cultural heritage and it would bring resources and people together, stimulating rural investment, green jobs and supporting farmers and land managers.

Significant economic benefits can be achieved for the area whilst new planning powers will mean that a more strategic approach can be taken that delivers the housing needed for local people whilst preserving the landscape for future generations.

CONSULTATION QUESTIONS

4. During our engagement period in 2023, a number of key themes were identified. In your opinion, which are the most important themes? Select three only

Landscape conservation, Recognition for the area, Tranquillity

Wildlife, Agriculture and Land Management, Environment and Sustainability

Management of Tourism, Public services, and infrastructure

Questioning the necessity for change, Management and Controls, Costs,

Funding, Bureaucracy

Local people and Communities, Local Economy

Access issues and Outdoor recreation

Housing implications

Culture and Heritage

Planning implications

Boundary location

5. Would you like to suggest any other themes or add any additional information? Please briefly explain your answer

The themes identified last year are helpful, but we think that they could be expanded further and used more broadly to better articulate the case for designation.

Section 6 of the *2023 Engagement Period Report* makes a good effort of responding to the identified themes, providing valuable clarifications to some of the key questions and queries raised through the engagement period (such as funding, transport infrastructure and house prices), however, this research could have been more clearly articulated in this round of

consultation through the publication of a desirability report or similar which clearly outlines the case for a new National Park and the value it brings to local communities. It is not clear how these themes will be used in future communication with the public.

Other themes which we think have been missed include:

Sustainable transport, due to the importance of creating a National Park which is fit for the future and accessible for as many people as possible. The availability of sustainable transport is a key element affecting how people access the area, and in particular young people who are more likely to rely on buses and trains.

Equality, diversity and inclusion is an important theme which may be dealt with via impact reports during the next stage of the designation programme, but this National Park has a big opportunity to draw in a broad range of communities from large urban conurbations and this should be explored further as an important theme for the Park.

Governance and deliberative democracy. We would like to see this National Park become an exemplar for democratic engagement of citizens with deliberative democracy at the heart of decision-making. This is an important theme if this National Park is to be an exemplar for future designations.

6. Do you agree with our conclusions that this area has natural beauty? Select one only

Strongly agree

Agree

Unsure

Disagree Strongly disagree

Please give a reason for your answer We strongly agree that the candidate area has natural beauty and is a worthy candidate for National Park status.

We also feel that through the applied definition of natural beauty as “flora, fauna and geological and physiographical features,” the candidate area could go further in including areas on the boundary of the candidate area which show a high degree of natural beauty (under the 1949 Act) so that ecologically coherent boundaries are maintained and the potential for the enhancement of biodiversity under the section 6 duty of the Environment Wales Act is maximised.

Is there any other important information we should include in our assessment of natural beauty? If yes, please give further details

Without nature and climate being included in the designation criteria, we think it is important that the delayed Benefits for Nature report is concluded as soon as possible so that its findings can inform decision making on the candidate area before the Board is asked to review the candidate area. The report’s scope should include the full evaluation area and the wider catchment beyond the area of search so that opportunities for the enhancement of biodiversity are not missed, and priority ecological networks are maintained within the boundary as much as possible.

7. Do you agree with our conclusions that this area has opportunities for open air recreation? Select one only

Strongly agree

Agree

Unsure

Disagree

Strongly disagree

Please give a reason for your answer

We strongly agree that the candidate area demonstrates a wide range of opportunities for open air recreation, however, the candidate area has lost some key evaluation areas which show a high degree of potential for open air recreation. We believe that the opportunities presented in

Talacre and Gronant Dunes (EA1) and Halkyn Mountain (EA6) would greatly benefit the proposed National Park as a place to promote the public enjoyment of the area's special qualities.

Is there any other important information we should include in our assessment of opportunities for open air recreation? If yes, please give further details

We feel that the assessment of recreation in the Evaluated Areas is somewhat limited, broadly highlighting the scale and quantity of recreation opportunities rather than the special qualities of the recreational experiences that are possible in these open spaces.

As with the potential for nature recovery in the evaluated areas, the potential for enhancing recreation should be given greater weight within the assessment so that opportunities to improve the public's understanding and appreciation of these special places are not missed.

EA6 for example holds a lot of potential for improving accessibility within an engaged local community who value the landscape and its protection. A National Park could bring a lot of value in this area through the support of local access forums to continually improve the recreational opportunities in the area whilst recognising the breadth of biodiversity present in the area.

The assessment of EA1 (Talacre and Gronant Dunes) already recognises the high quality of recreational opportunities, which are both accessible and well used, providing visitors with a vitally important opportunity to understand the coastal and marine features of the area and how they interact with and influence the wider area. The abundance of wildlife and opportunities to learn about the coastal and marine environment are vitally important in this area and the opportunities for recreation are all part of enhancing the public's understanding of the area. Excluding this area would be a missed opportunity for supporting opportunities for open air recreation.

8. Do you think the area proposed should be a National Park? Select one only

Yes

Yes, but with modifications to the proposed boundary

No

Don't know

9. To what extent do you agree with where the proposed National Park boundary has been drawn? Select one only

Strongly agree

Agree

Neutral

Strongly disagree

Disagree

Unsure

Any further comments?

The candidate area presents a huge opportunity to positively manage and enhance the special qualities of the area. There are a breath of habitats, species and recreational opportunities contained within the candidate area which we have no doubt will benefit from inclusion in a National Park boundary; not least the Berwyn Range which is a vitally important addition to the candidate area due to its scenic value, but also its extensive opportunities for open air recreation and potential for nature recovery and climate adaptation in terms of its extensive area of peatland.

We have responded *strongly agree* to this question because we are supportive of the candidate area as it currently stands and fully support its designation to this boundary, however, we also believe that there is a strong case for extending it further to ensure that excluded areas which demonstrate similarly strong recreational opportunities, and also great potential for nature recovery, are not missed.

10. The area around Pwll-glas and Upper Dee Valley are now included within the Candidate Area. Do you agree with this inclusion? Select one only

Strongly agree

Agree

Neutral

Strongly disagree

Disagree

Unsure

Any further comments?

We agree with this inclusion, however, using the road as a boundary cuts the local community in half and excludes half of the Craig Adwy-wynt a Choed Eyarth House a Chîl-y-groeslwyd SSSI. We would recommend including the whole of Llanfair Dyffryd Clwyd and Pwll-glass to ensure that the management of the SSSI and the support of the local community is coherent.

11. The following areas are not included in the Candidate Area: Gronant Dunes, Vale of Clwyd, Halkyn Mountain, Hope Mountain and Mynydd Mynyllod. To what extent do you agree with these being excluded? Select one only

Strongly agree

Agree

Neutral

Strongly disagree

Disagree

Unsure

Any further comments?

We are eager to see a National Park boundary which is nature-rich and accessible to all.

As explained briefly above, we believe that the partial exclusion of evaluation areas (in the case of EA20) or the total exclusion of others (EA1 and EA6) risks missing important opportunities for open air recreation, promoting the public's deeper appreciation and connection with the landscape alongside the potential to enhance and recover nature.

- **Talacre Gronant Dunes (EA1)** was included in the area of search due to its botanical, entomological and ornithological interest. Due to the only breeding little tern colony in Wales, sand eels and other vitally important wildlife, this area has a significant role to play in the health of bird populations across the candidate area.

The evaluation report already recognises the high scenic quality and the natural beauty of the area. The expansive dune system offered by Gronant Dunes & Talacre also provides one of the only remaining examples in North East Wales of nature-based solutions to the impacts of climate change at our coast.

This sand dune system in conjunction with the adjacent saltmarsh provide a natural flood defence and buffer to increased storm frequency and intensity. Saltmarsh and neighbouring peatland lock away valuable volumes of carbon from our atmosphere. Their intertidal and dynamic nature allow for constant changes in landscape, expanding their natural beauty and a sense of awe.

The Coastal Countryside Ranger of Denbighshire County Council reports visitor connectedness between Gronant Dunes & Talacre with the Prestatyn hillside; visitors to the coast will often go onwards inland to explore the hills, and vice versa. The Offa's Dyke and Wales Coastal paths connect the area to the wider landscape and the inclusion of this EA would enhance the National Park greatly through connecting land and sea and the inter-dependent relationship which exists between the two.

- **Halkyn mountain (EA6)** is recognised in both the evaluation report and the public engagement period report as being a highly popular area for open air recreation. It demonstrates fine views and a strong sense of community. As the EA is so close to urban populations the area also offers an excellent connection to the wider National Park landscape.

The evaluated area includes some important section 7 species such as the Great Crested Newt and it also includes rare habitat of Calaminarian grasslands which can

survive in the very specific soil type of the area (which includes heavy metals and contaminants from the industrial age). This EA offers a fantastic opportunity for the National Park to include an area which has already well-loved recreational opportunities and fantastic examples of cultural and natural heritage. All these elements would benefit from protection as a National Park, but it is the established recreational opportunities which gives this area such an important place in the new National Park.

- **Mynydd Mynyllod (EA20)** has only partially been included and excludes a large extent of the River Dee. In terms of maintaining ecologically coherent boundaries the loss of a large section of the Dee is significant if the National Park is to successfully bring partners together across the widest catchment of the river possible. With the river dropping in and out of the National Park, the management opportunities are greatly reduced. The riverbank and the river itself offer fantastic opportunities for recreation.

12. Do you have any other comments about the Candidate Area boundary? Please specify:

The candidate area is a high-quality landscape which demonstrates all the special qualities of a National Park. The southern extents of the candidate area are high in natural beauty and recreation opportunities whilst also offering ample opportunity for nature restoration.

We do feel like there could be improvements to the boundary, but we would also be supportive of the candidate area in its current form.

13. If a National Park is established, then it would require a new Name. Working with partners we have identified two options.

a. Bryniau Clwyd a'r Berwyn

Clwyd recalls the name of the local government area 1974- 96. Bryniau Clwyd is the mountain chain from Prestatyn to the Dee Valley and recalls the medieval cantref of Dyffryn Clwyd. Berwyn is a historic name for the chain of mountains extending south from the Dee Valley. Together they describe the geographical extent of the Candidate area well.

b. Glyndŵr

Owain Glyndŵr lived within the Candidate area at Sycharth. A variant of his name, Glyndyfrdwy is one of the constituent regions of the park. He was the last Prince of Wales who led a rebellion in 1400 and by 1404 had established rule over the whole country. When his strongholds were recaptured, Glyndŵr disappeared and acquired a mythical status as the Mab Darogan, who will one day return. Glyndŵr also recalls the name of the local government area 1974-96.

Please select the one you prefer or suggest your own.

Park Cenedlaethol - Bryniau Clwyd a'r Berwyn - National Park

Park Cenedlaethol - Glyndŵr - National Park

Other

If other, please specify with a short justification is possible:

We have not expressed an opinion on a specific name, but we do think that it is vitally important that the new name protects the Welsh language and the cultural and natural heritage of the area.

The name should be memorable and iconic, and it should be Welsh language first. Any icon used should reflect the sustainable development principles of the National Park whilst also reflecting the value of National Parks in Wales.

14. Are there any other comments you wish to add on the proposal for a new National Park?

This consultation also includes an assessment of the management options and as there is no specific question on the assessment we are providing a short comment here.

The land use planning system is an important delivery mechanism for protecting designated landscapes but planning encompasses a wide range of activities. It includes the management of development and use of land, the provision of land for jobs and housing, the conservation

and enhancement of wildlife, the preservation and restoration of historical properties, the protection of cherished landscapes and archaeological assets and of the Welsh language and cultural heritage. The existing National Park Authorities have a good track record of delivering a high-quality service which compares very favourably with other local planning authorities.

Many of the benefits which National Parks provide, including tourism and rural economic growth, would be lost if anything were to detract from the special qualities for which these areas are valued. The challenge is to ensure that the range of outcomes and benefits that protected landscapes provide is not compromised by insensitive change, unsympathetic land use or irresponsible development. This means that it is essential that the new National Park has a single dedicated National Park Authority with responsibility for both plan making and planning decisions in the area. There are a number of strong arguments in favour of this including that:

- By using their planning responsibilities to ensure successful delivery of the statutory purposes of National Parks, NPAs have delivered significant benefits to Wales, as demonstrated by Welsh Government research (Delivery of planning services in statutory designated landscapes in Wales, 2012, Welsh Government).
- The Edwards Report in 1991 and several subsequent independent reviews, have found that having a separate authority is the most effective way of managing planning in National Parks. The conclusions of the Williams Commission in Wales also endorse this.
- The Welsh Government research referred to above also demonstrated the advantages of planning to the boundaries of designated landscapes. This is because the National Park Authorities are able to adopt a consistent approach across the whole of the National Park area regardless of local authority boundaries resulting in a clearer focus on the National Park purposes and better alignment between the Local Plan and the National Park management plan.
- NPAs are best placed to consider both the national and local aspects of planning in National Parks, since they have both nationally and locally appointed members.

Consideration should be given to adopting a model similar to the one which operates in the South Downs where the National Park Authority has agreed partnerships with all the local authorities operating within the National Park boundaries. This has allowed local authorities to continue dealing with the majority of planning applications for their area if they wish to. Five of the authorities have chosen to take up this option with the National Park Authority dealing with

all planning applications, advice and queries across the rest of the National Park area. There is a single Local Plan for the whole National Park which the National Park Authority is responsible for developing and all applications must be determined against the policies in this plan, including those for which constituent local authorities are responsible. This approach ensures that constituent local authorities can continue to have a high degree of influence on individual planning decisions while still ensuring a strong focus on National Park purposes as a result of having a single Local Plan for the area.