Cyswllt Amgylchedd Cymru | Wales Environment Link

WEL response: North-East Wales National Park consultation

Date: 16 December 2024

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, Tranquility
- **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

Ecosystem services and the ecological functioning of the area haven't been given enough importance, despite Welsh Government instructing National Park authorities to 'become exemplars in responding to the climate and nature emergency', including contributing to delivering the Biodiversity Deep Dive recommendations; contributing to Wales's delivery towards Global Biodiversity Framework targets and impending domestic biodiversity targets, net zero targets and fulfilling the Section 6 duty under the Environment (Wales) Act. The designation process has taken a narrow view of the statutory designation criterion of 'natural beauty', and we believe many nature-based aspects have been overlooked or dismissed too readily.

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: It does, but we think the definition of 'natural beauty' has been considered narrowly and the area's rich ecology should be given more focus alongside the landscape assessment.

Is there any other important information we should include in our assessment of natural beauty? If yes, please give further details: ecological resilience, natural rather than just urban boundaries (i.e. river catchment areas) and interconnected habitats should be more strongly considered than they have at this stage. These play an integral part in how the landscape is experienced and perceived as a whole. We'd urge for the Benefits for Nature report to be finalised, findings considered and made public before boundaries are fixed for recommendation. We appreciate the engagement NRW has had with environment NGOs in the last 2 weeks before the consultation deadline, but this hasn't been made public and it isn't clear how much it will inform boundary changes at this stage. The fact that this report as a key piece of evidence has been absent from the process so far means that NRW must undertake further consideration of the proposed boundary after the report is published, to avoid the risk of establishing a boundary that could stymie or compromise the nature and climate potential of the new National Park.

The boundary as presented has had only the basic designation legislation considered – with an arguably narrow interpretation of the special qualities that lie behind 'natural beauty'. For example, the primary elements of 'natural beauty' include 'ecological features, which take into account the geological and biological richness of the area, including the diversity of flora and fauna, and the geological formations that contribute to the area's distinctive natural and landscape character. Areas with rare or unique ecosystems, geological formations, or habitats for wildlife are also

considered part of this beauty.' Yet several SSSIs are split up by the proposed boundary, with some inside and some outside of it.

Split SSSIs include: Mynydd Mynyllod and the Upper Dee Valley – Evaluation Area (EA20) – missing priority heathland, and the exclusions of Halkyn Mountain (EA6) and Hope Mountain (EA14) will also overlook and split up SSSIs. The included areas of EA20 also lose a large section of the River Dee, when it's very close to the boundary, so it would make sense to extend the boundary at least to include a larger portion of this SAC river corridor to ensure cohesive management. In addition, Craig Adwy-wynt a Choed Eyarth House a Chîl-y-groeslwyd SSSI is split by the river and the recreational opportunities along its extent should be recognised.

The Environment (Wales) Act and subsequent instruction from Ministers seem to have been overlooked, especially the Section 6 biodiversity duty. The Welsh Government's Biodiversity Deep Dive also specifically recommended to: "Ensure that the potential designation of a new National Park in northeast Wales affords opportunities for climate change mitigation and nature recovery as key delivery priorities for the new Park." We do not think this can be assured without all the nature evidence being fully considered.

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: Yes, there are excellent opportunities for a wide range of recreation within the proposed area; most notable are paddle sports on the River Dee, fishing Lake Vyrnwy, rock climbing in Eglwseg Valley, alongside mountain biking and hiking / walking in many of the open areas. Although places with good recreation have also been excluded, such as horse-riding on Halkyn

Mountain (which also has diverse heritage) and the Gronant Dunes and Talacre which includes sections of the Wales Coast Path and nearby access to Offa's Dyke Path. Although this may be premature, as we recognize that a National Park is distinguished from a National Landscape by the 'markedly superior recreation experience' so the current recreation provision is an important consideration, we'd like to see more thought given to enhancing areas for their recreational potential, rather than just mapping what's already taking place. The National Park Authority should help give better coordination and signposting (both figurative and literal) to routes, and work with farmers and land managers on improving rights of way. The highway authorities can, if they wish, delegate some of their powers to the National Park Authority, which is likely to be better placed to address them. The Authority should have a robust ranger service, active on the ground, to smooth relations between land managers and visitors, and to provide education services to foster responsible recreation and understanding and enjoyment of the area's special qualities. There is also good potential for a National Park Authority to apply for National Lottery Heritage Funds for further improvement, and for a Local Access Forum to be established for community and recreational interests within the area to have a voice and also provide a conduit for NGO input.

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

There are extensive routes used by walkers, cyclists and horse riders, some actively promoted, others less so, but all of significance to people's quiet enjoyment of the area and the businesses that they support. These include the significant networks of quiet lanes, which provide important routes for road cycling, as well as enabling connectivity for all users. Greater account needs to be taken of this aspect, which provides a clearer picture of functionality of access and public rights of way opportunities to the countryside both within and outside of the proposed candidate area.

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? We think the broad area has great potential to be a National Park, with diverse habitats and species, and many recreational opportunities that would benefit from more focused management. However, we cannot approve of the boundary without ensuring it has benefited from full consideration of its nature and ecosystem connectivity. The pace of biodiversity decline in recent decades highlights the importance of factoring in areas of significant biodiversity potential, going beyond current basic considerations of “presence-or-absence”.

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
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, as well as the limestone pavement and heritage. 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.

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 is coherent and that the local community is not left divided.

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? Yes, we would like to see those included, with consideration to capturing as much of a coherent natural boundary, and visual envelope as possible. We would also want to see the following included, with consideration of the species and habitats present:

- Talacare Gronant Dunes (EA1): this includes a little tern colony and sand eels, both Section 7 species. We'd recommend for the boundary to go down to the mid-high or low water and incorporate the Talacre Warren and Gronant Dunes SSSIs in full. The candidate area holds 100% of breeding little terns in Wales and we hope that including this in the area will maximise their protection.
- Halkyn mountain (EA6): this also has section 7 species present – such as the Great Crested Newt – and is a registered historic landscape, including the rare habitat of Calaminarian grasslands. It also has areas of SAC and SPA designation as well as common and open access land.
- Mynydd Mynyllod (EA20): missing out a large area of priority ecological networks and part of the Important Curlew Area (ICA5) for which the National Landscape currently takes responsibility. SSSI sites would be split in half by the proposed boundary.

- Caerwys Lowlands (EA5): If catchments / sub catchments are not used as boundaries, this is justified for inclusion by aesthetic landscape quality alone, but it also links to Halkyn and is important for dormice, bats, and native broadleaved bluebell woodlands.
- Pwll Glas (EA16): The current boundary cuts the SSSI and this village and Llanfair Dyffryn Clwyd in half, we would recommend its full inclusion.

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

We would want to see more analysis of the presence, quality and health of peatland, woodland, SSSIs, water and priority habitats in the area. Whilst there is reference to their presence, there doesn't seem to be analysis of how these could be recovered or extended holistically – i.e. the ecological and climate opportunities that could be identified within the area of search and inform the boundary decisions. Ideally, we would also want to see ecosystem datasets such as Cycle 3 of the Water Framework Directive included in the evaluation.

A National Park Authority should enable better integrated, holistic management, ensuring liaising with reserve managers, local interest groups and NGO teams directly. This would benefit several sites that are currently excluded from the Candidate Area. For example, North Wales Wildlife Trust's Coed Ciligroeslwyd SSSI reserve is just outside the candidate area, yet holds both nationally and locally significant species as well as limestone pavement. The wider Craig Adwy-wynt a Choed Eyarth House a Chîl-y-groeslwyd SSSI is also split by the boundary, despite its geology being the same. The Maes Hiraddug SSSI looks to be cut in half by the boundary and the Ddol Uchaf SSSI is only metres outside the boundary.

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

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 would be happy with any name the local community deems appropriate, so long as it is Welsh language first.

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

We support the establishment of a National Park Authority as the preferred management option. We are pleased that NRW are now progressing the Benefits of Nature report, but it must be sufficiently resourced to be delivered with rigour and at pace, and be allowed to inform any final boundary modifications. This report should serve as an important evidence base underpinning Welsh Government's 30x30 and Biodiversity Deep Dive ambitions for National Parks in Wales. 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.

Wales Environment Link (WEL) is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales. WEL is a respected intermediary body connecting the government and the environmental NGO sector. Our vision is a thriving Welsh environment for future generations.

This paper represents the consensus view of a group of WEL members working in this specialist area. Members may also produce information individually in order to raise more detailed issues that are important to their particular organisation.

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