

Wales's new National Park proposal: A summary of evidence for public consultation 2024.

Background

Natural Resources Wales (NRW) was commissioned by Welsh Government to assess the case for a new National Park, based on the existing Clwydian Range and Dee Valley National Landscape (formerly known as an Area of Outstanding Natural Beauty, or 'AONB'). The programme commenced in 2022, and is expected to conclude in 2026.

This public consultation (2024) is intended to provide an opportunity for wide participation and inform discussion. This document provides a short summary of the evidence collated so far. Links are provided to the full reports if more detail is needed.

We invite you to read this short summary of the evidence, and respond to the consultation via the questionnaire.



Part 1 - Provides some information about National Parks.

Part 2 - Outlines the evidence collated to inform the statutory designation procedure.

Part 3 - Summarises additional work being undertaken to support the procedure.

Part 1: About National Parks

What is a National Park?

National Parks are areas of land that have been given legal protection because of their special landscape qualities. National Parks are recognised as nationally important for their natural beauty, wildlife and cultural heritage, and because they provide significant recreational opportunities for people to access and enjoy the countryside.

Who looks after National Parks?

National Parks are governed by their own National Park Authority. These National Park Authorities are responsible for managing the National Park. Two-thirds of National Park Authority board members are local authority elected members (County Councillors) to reflect local interests. The remaining one-third are appointed through a competitive public appointment process by Welsh Ministers, due to their specialist knowledge or national perspective.

A National Park's purpose and duties?

A National Park Authority has two legal purposes to:

- Conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park.
- Promote the understanding and enjoyment of its special qualities by the public.

National Park Authorities have legal duties to:

- Prepare, consult and publish a management plan for the National Park area.
- Seek to foster the economic and social well-being of local communities within the National Park.
- Prepare, consult and publish the Local Development Plan.
- Undertake the local development management planning function.

How are National Parks managed?

To help National Park Authorities deliver these legal purposes and duties they are also the Local Planning Authority for the National Park area. National Park Authorities are legally responsible for development management, considering planning applications and granting planning permission. They are also responsible for developing the Local Development Plan, which sets out the policies to guide development to take place in the right place.

Due to their national importance National Parks are given the highest legal protection from inappropriate development. Major development can only take place where it has been agreed that there are overriding national interests and no suitable alternative sites can be found. Permitted Development Rights in National Parks are similar to those in National

Landscapes (AONBs) but more restrictive than un-designated areas to help conserve and enhance the natural beauty of the area.

In their management plans, based on evidence, assessment and consultation, National Park Authorities set out their policies and actions on how to address the forces for change impacting on the special landscape qualities and manage recreation in the National Park. These are management plans for the area and not just for the National Park Authority. They provide an additional opportunity for people to have a say of the future of these special places .

Land in National Parks is not generally publicly owned and therefore National Park Authorities work closely with land managers, businesses and communities to manage the area for the benefit of landscape, people and nature.

How are National Parks Funded?

As small public bodies, National Park Authorities receive 75% funding from Welsh Government and 25% funding from their constituent Local Authorities. They also draw in funding from a range of other sources including National Heritage Lottery Funding, National Peatland Action Programme and some income they generate themselves, which is used for the management of the National Park.

Due to their size and complexity of issues they manage, National Park Authorities receive more funding than National Landscapes (AONBs). This funding provides investment in the area including things like tourism infrastructure, supporting rural skills, reducing the carbon footprint of public buildings, providing EV charging points, and supporting affordable housing. Funding also enables landscape-scale projects to take place, for example to address community and environmental issues by managing uplands to reduce the impact of flooding on downstream communities, managing the woodlands for the benefit of clean air, water, nature and recreation and working with land managers to encourage wildlife friendly farming.

How does a National Park differ from a National Landscape

	National Park	National Landscape (Area of Outstanding Natural Beauty)
Legal Purpose	<ul style="list-style-type: none"> • Conserve and enhance natural beauty, wildlife and cultural heritage. • Promote the understanding and enjoyment of the area's special qualities by the public. 	<ul style="list-style-type: none"> • Conserve and enhance natural beauty.
Duties	<ul style="list-style-type: none"> • Prepare and publish a management plan. • Seek to foster the economic and social well-being of local communities within the National Park. • Is the Local Planning Authority for the National Park area, prepare the Local Development Plan. 	<ul style="list-style-type: none"> • Prepare and publish a management plan.
Governance Arrangements	<ul style="list-style-type: none"> • A National Park Authority is established which has legal status as a Special Purpose Local Authority public body. 	<ul style="list-style-type: none"> • National Landscape Partnership or Joint Advisory Committee (advisory). • Joint Committee (statutory) • Conservation Board (statutory).
Funding	<ul style="list-style-type: none"> • 75% Welsh Government. • 25% Constituent Local Authorities. • Draw down competitive project funding e.g., NHLF, NRW, National Peatland Fund. • Generates income for management of the National Park. 	<ul style="list-style-type: none"> • Constituent Local Authorities • Welsh Government. • NRW • Draw down competitive project funding e.g., NHLF, National Peatland Fund. • May generate income for Local Authority.

Why do we have National Parks?

National Parks are:

- Extensive tracts of landscape, often covering parts of different Local Authority areas.
- Often but not always National Parks are upland, mountainous areas like Eryri (Snowdonia) or Bannau Brycheiniog (Brecon Beacons) and some parts of Pembrokeshire Coast National Park such as Mynydd Preseli, which is otherwise largely coastal.
- Areas which contain nationally important and highly valued habitats and landscapes that are sensitive to change from human pressure or climate change.
- Usually have a degree of recreational pressure due to the number of visitors, particularly in honeypot sites.
- Areas which have a National Park Authority, that employs specialist staff and are the Local Planning Authority for the Park area.

Due to the complexities and challenges of managing these areas, and to conserve and enhance these nationally important landscapes, a National Park is a mechanism to manage the area in an integrated way through the work of a dedicated National Park Authority. To enable this to happen the National Park Authority is the Local Planning Authority for the National Park area.

As these areas cover a number of different Local Authorities, appropriate governance arrangements are required to ensure there is national and local representation e.g., Bannau Brycheiniog covers parts of nine Local Authorities and so has a number of elected members proportionate to each Local Authority area as well as Welsh Government appointed members.

There is a legal process for designating a National Park which assesses evidence to determine whether the area meets the natural beauty and recreation criteria for designation.

Part 2: Statutory Evidence

Area of Search for a potential National Park

This report sets out NRW's process in defining an Area of Search for a potential new National Park. The Area of Search determines the geographical extent for further investigation. The starting point was the existing Clwydian Range and Dee Valley National Landscape as this has already met the first condition by demonstrating suitable Natural Beauty for designation as an AONB (now National Landscape).

Mapping has been developed to assist NRW in identifying areas of natural beauty using established terminology set out in NRW's Procedural Guidance 2022. These are: Landscape quality, Scenic quality, Relative wildness, Relative tranquillity, Natural heritage features, Cultural heritage.

NRW used LANDMAP and other GIS data to provide spatial evidence. LANDMAP evaluates landscape within a nationally consistent, quality assured dataset for: Geological Landscape, Landscape Habitats, Visual and Sensory, Historic Landscape and Cultural Landscape.

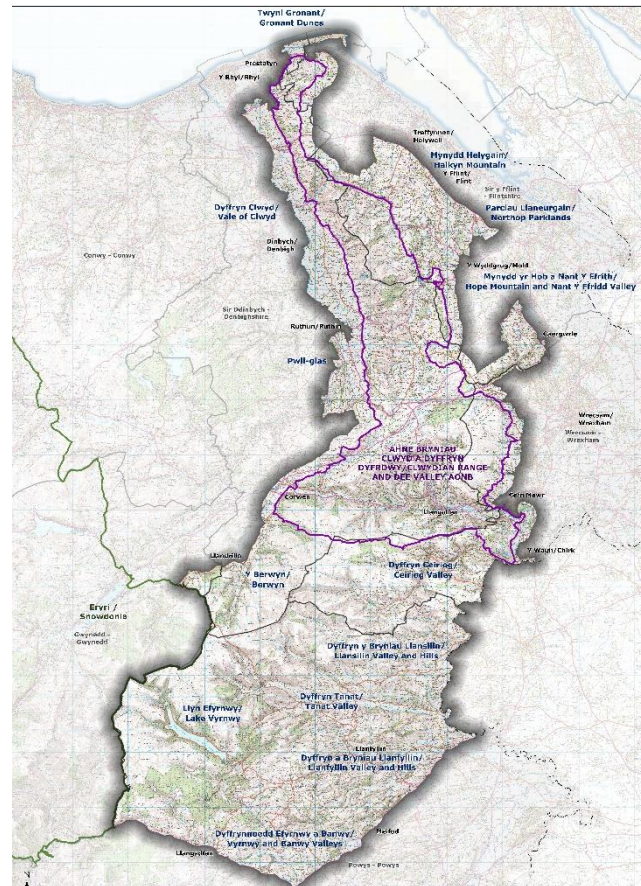
Whilst the appraisal of landscape can rely on perceptions and may be open to interpretation, LANDMAP has helped provide a consistent baseline for analysis. Professional judgement has also been applied in decision making. Our mapping identified areas of Natural Beauty across the region, within and beyond the existing Clwydian Range and Dee Valley National Landscape.

Those areas that, in combination with the existing National Landscape, could create a continuous and extensive tract of land, with a regional sense of identity, cohesion and unity, were considered for inclusion.

Factors such as development effects on landscape quality and integrity, dislocation and distance from the core area of study were considered. This resulted in some areas with notable natural beauty, that could not be incorporated as part of a single, continuous tract of land, and were excluded on that basis.

To meet the requirements of a National Park, an *initial* analysis of outdoor recreation and attractions was also carried out. This shows that opportunities for open air recreation associated with the landscapes natural and built heritage, is well represented. Attractions in the southern portion are more dispersed, due to the extensiveness of the Berwyn uplands and their remoteness. However significant opportunities for outdoor recreation are present across the entire Area of Search. Following the Engagement period 2023 additional areas were included (see Part 3 for further details).

The report is available to view in full. See the 'Further Information' section at the end of this document.



Area of Search Map (Version 1 - 2023)

Identification of the Special Qualities of the area of search for a potential new National Park

The evaluation criteria for designating a National Park or National Landscape embraces distinctive characteristics and key features, which together gives an area its 'Special Qualities'. These 'Special Qualities' and the forces that may affect them, are generally the starting point for writing a management plan to achieve the potential benefits of designation.

NRW Commissioned 'Craggatak Consulting' an independent landscape consultant, to identify the special qualities found within an Area of Search.

The consultant undertook desktop studies and ran three interactive bilingual workshops with a wide range of stakeholders. The long history of considering the area for National Park status was reviewed, starting with the Dower report in 1945 and the 1947 Hobhouse Committee that led to the establishment of the Eryri and other National Parks, but also identified sites within the current Area of Search (the Clwydian Range and Berwyn). A range of reports and websites for past decisions and supporting evidence were reviewed.

These included Area Statements, National Landscape Character Assessments, LANDMAP, landscape assessments and strategies produced by the relevant local authorities.

During the review of published material, references were also collected on the cultural associations, artists and features (including contemporary) within the Area of Search and artists and galleries were interviewed. There were two in-person workshops held to engage public sector staff, other strategic stakeholders and specialists, and third sector organisations. (Llangollen Town Hall and Llanfyllin Public Institute on the 22nd and 23rd of Sept 2023 respectively). Suggested distinctive characteristics were logged along with, key features and common themes against the sub-regions of the Area. Taking findings from the literature review, cultural association study and workshop findings in combination. And following a confirmatory meeting with contributors, the consultant proposed a range of special qualities grouped under the following six headings:

- **An inspiring space that promotes mental, physical, and spiritual health and wellbeing.**
- **A place with cohesive communities and distinctive settlement patterns.**
- **A story of human interaction with the landscape over millennia.**
- **A home to internationally and locally important species and habitats.**
- **A distinctive, complementary, and contrasting landscape.**
- **A landscape providing benefits beyond its borders.**

The report is available to view in full. See the 'Further Information' section at the end of this document.

Forces for Change in the Area of Search

This report is concerned with identifying influences that are directly or indirectly causing change in the area or are expected to. To deliver its legal duties a National Park would need to manage or mitigate change and therefore will need to understand what the drivers of change are. Only then can it be assessed if a National Park would provide a suitable mechanism for managing the changes affecting the area.

NRW Commissioned 'Land Use Consultants (LUC)' to undertake an assessment of both Forces for Change and Management Options. The causes of change in the area were identified using a variety of sources including national policy and guidance documents, those already identified in the Clwydian Range and Dee Valley National Landscape, and those identified for other protected landscapes, evidence reports, stakeholder feedback and mapped information.

Five main categories of force for change were identified in the Area of Search:

- **Climate change:** An overarching force for change which can impact the other four. This includes climate change plus mitigation and adaptation actions.

- **Planning built development and infrastructure:** This encompasses for example new housing, business, industry, retail, transport, renewable energy, grid infrastructure, minerals, quarrying, and waste.
- **Land management, agriculture, forestry and natural environment:** Land management and the natural environment underpin natural heritage. Influences include the viability of land management and the need for income diversification, agricultural support, forestry and woodland, the National Forest for Wales, and climate change.
- **Sustainable communities, people, and management of cultural heritage:** This includes climate change, land management, visitors, and population change from both migration and age structures. It explores the impacts on cultural heritage resources, community involvement and participation in local events and traditions, use of the Welsh language, changes in employment, and the availability of local housing.
- **Visitor management, Recreation, tourism, and access:** A key issue here is increasing levels of recreation and tourism and its impacts on communities, land management, existing recreational resources, traffic and wildlife. There are related needs for new infrastructure such as accommodation, facilities, access infrastructure, public transport, and active travel options.

The review of forces for change highlighted the complexity of the change influences affecting the areas special qualities, and the interlinkages between them. Actions to address one can result in 'ripple effects' across the other special qualities. A comparative analysis of management mechanisms in other protected landscapes within the UK, provides a key resource for understanding how the area of search could be managed to mitigate negative consequences and realise beneficial opportunities for people and nature.

The report is available to view in full. See the 'Further Information' section at the end of this document.

Evaluation of Management Options

This report compares the available options for managing the forces for change acting on the Area of Search. Although NRW was commissioned to assess the case for a new National Park, this was not the only option considered. Five options were evaluated in relation to how well each could be expected to manage the forces for change acting on the special qualities of the area. A Designation Order will only be issued if NRW is content that the evidence shows the proposed course of action is on balance, preferable to the alternatives.

A range of management options which could feasibly be applied to manage the Forces for Change were compared, these are:

- **Business as usual:** This explores the implication of a ‘do nothing’ approach. Continue the management of the National Landscape (AONB) only, with no designation in place to manage the rest of the area being considered.
- **Valleys Regional Park:** This explores applying the example of a partnership that was established to help the Welsh Valleys thrive environmentally, socially and economically.
- **South Pennines Regional Park:** This option explores another example, a prospective national park that was instead taken forward as a regional park.
- **National Landscapes (AONB) Conservation Board:** Is similar to a National Landscape but has a recreation duty, its own governance board and would be directly funded by Welsh Government. The Chilterns and Cotswolds currently have Conservation Board status. .
- **National Park:** This option compares the greater powers of a National Park, and also reflects the anticipated scope of a future national park in Wales, taking into account the Biodiversity Deep Dive and Wellbeing of Future Generations (Wales) Act.

LUC also identified key management functions and used them in order to apply a comparative analysis of the potential options listed in dealing with the forces for change. The management functions used were:

Context, remit and purpose: For each option, information is provided on the context, history and remit including the main aims and purpose of the approach.

Governance and membership: The governance of each management option is explored in terms of board structure and membership, functions and responsibilities.

Core Funding: How each management option is funded, and any in-kind support provided by members.

Planning: If the option has planning powers, or outlines other documents used to inform future planning for the area, and the relative weight of these documents.

Forward Planning: If the option has forward planning powers.

Development Control: If the option has development control powers.

The evaluation considers how each option, with its associated management functions can addresses the forces for change: Climate Change, Planning built development and infrastructure, Sustainable Communities, people, and management of cultural heritage, Land management, agriculture, forestry and natural environment, Visitor management, recreation, tourism, and access.

The report reflects Sustainable Management of Natural Resources (SMNR) principles from the Environment (Wales) Act 2016 and the five Ways of Working set out in the Well-being of Future Generations Act 2015.

It concludes that a National Park or a National Landscape designation (over the entire area), are preferable to alternatives in terms of providing an integrated framework and security of funding for longevity and partnership working. They both provide a statutory basis for the area including requirement for a management plan and placing duties on other relevant authorities to have regard for their purposes. However, due to the planning functions, and the security of core funding via a National Park Grant from Welsh Government, a National Park provides the strongest mechanism for addressing the identified forces for change. It also acknowledges that a National Park will be able to draw on the extensive experience of other National Parks and through its' management mechanisms address pressures and opportunities, including any associated with its creation such as increased tourism.

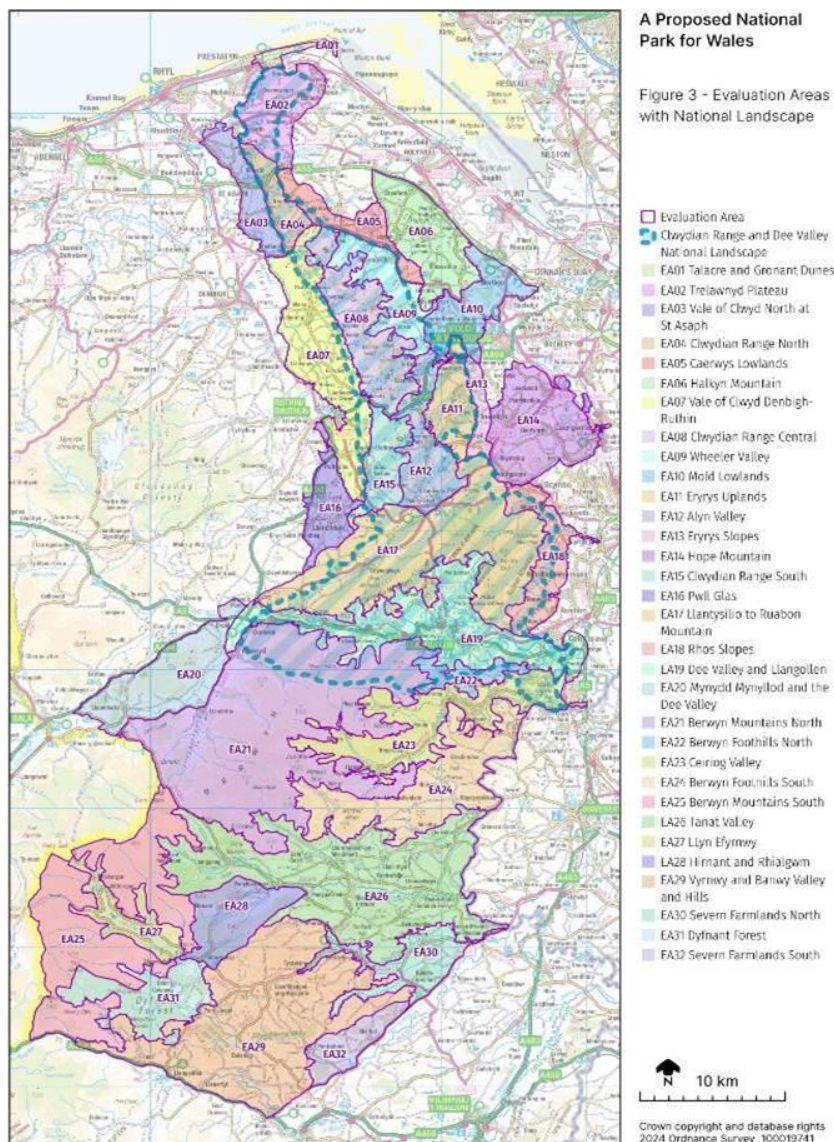
The report is available to view in full. See the 'Further Information' section at the end of this document.

Evaluation Areas Assessment

Although the evidence has suggested a National Park would be the best way of managing forces for change, National Park status can still only be applied if there is a suitable and extensive tract of land that meets the statutory criteria. To establish this, NRW commissioned the help of Gillespies LLP (in partnership with Ffiona Fyfe Associates Ltd and Countryside). The work involved dividing the Area of Search up into smaller Evaluation areas and making a detailed assessment of each, including extensive site visits supplemented by remote data. The Assessment Criteria categories used were 'Landscape Quality', 'Scenic Quality', 'Relative Wildness', 'Relative Tranquillity', 'Natural Interest', 'Cultural Interest', and 'Recreation'.

The Evaluation areas subjected to detailed assessment are illustrated below.

The report is available to view in full. See the 'Further Information' section at the end of this document.



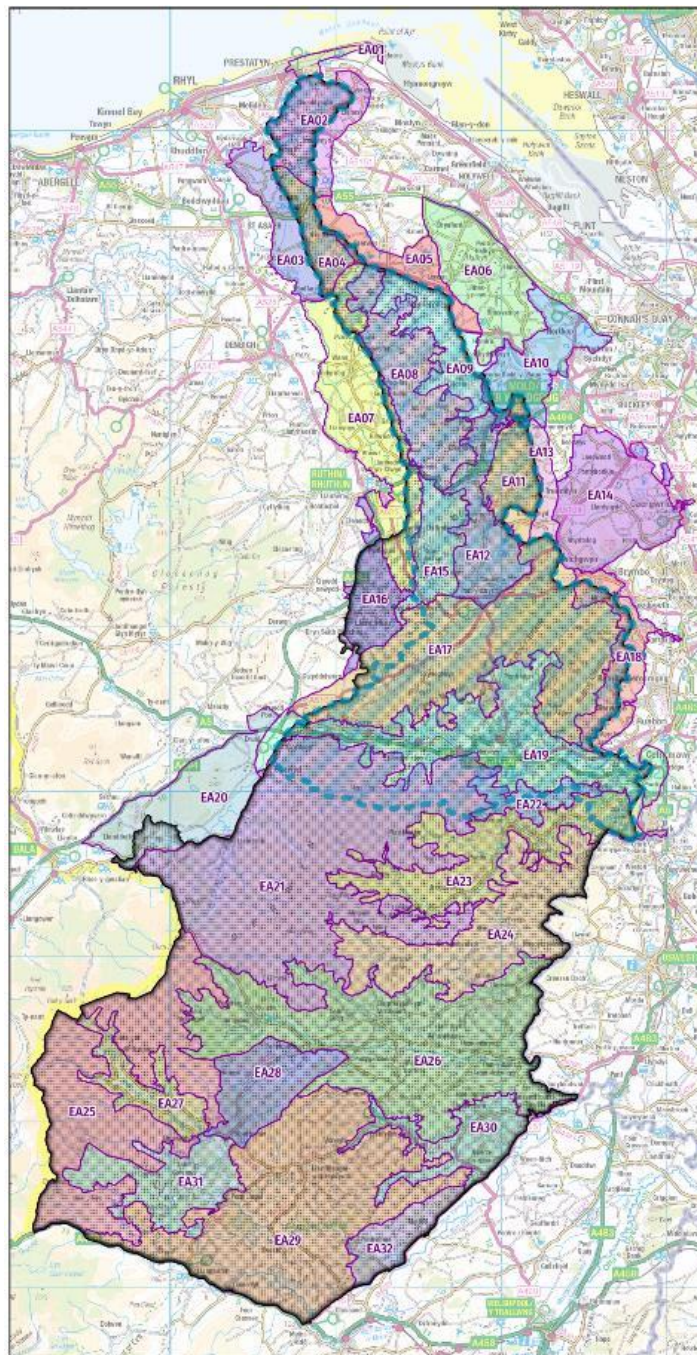
Candidate Boundary Assessment

This stage assesses these areas to determine whether they meet **all** of the statutory criteria for a National Park. The rationale to include or exclude each location is set out in the Evaluation Areas Assessment report. This forms the 'Candidate Area' and represents the proposed boundary for a new National Park. The boundary was created following appropriate recognisable features on the ground.

During this public consultation (2024) we are particularly interested in receiving feedback

on the Candidate Area map. We want to ensure that we get the boundary right before moving forward. A National Park is still not yet guaranteed as there are further stages of analysis. For a Candidate Area to meet the statutory tests for a National Park, it must be part of an qualifying extensive tract of land and must also meet requirements in terms of its desirability based on a balance of expected impacts. These will all be assessed in 2025 following and informed by the public consultation.

Candidate Area Boundary (2024)



A Proposed National Park for Wales

Figure 36 - Candidate Area

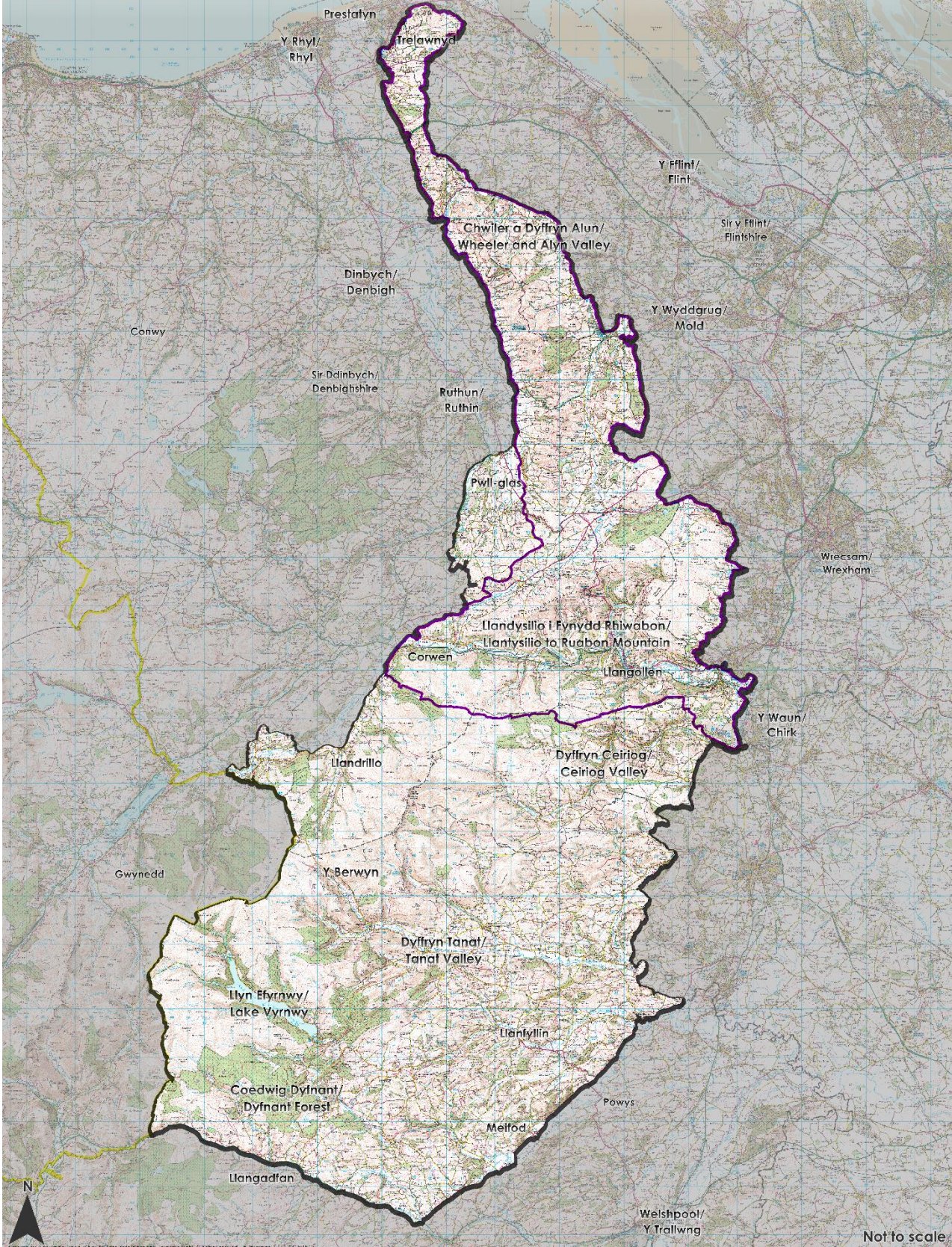
- Candidate Area
- Clwydian Range and Dee Valley National Landscape
- Evaluation Area
- EA01 Talacre and Gronant Dunes
- EA02 Trelawnyd Plateau
- EA03 Vale of Clwyd North at St Asaph
- EA04 Clwydian Range North
- EA05 Caerwys Lowlands
- EA06 Halkyn Mountain
- EA07 Vale of Clwyd Denbigh-Ruthin
- EA08 Clwydian Range Central
- EA09 Wheeler Valley
- EA10 Mold Lowlands
- EA11 Eryrys Uplands
- EA12 Alyn Valley
- EA13 Eryrys Slopes
- EA14 Hope Mountain
- EA15 Clwydian Range South
- EA16 Pwll Glas
- EA17 Llantysilio to Ruabon Mountain
- EA18 Rhos Slopes
- EA19 Dee Valley and Llangollen
- EA20 Myrdd Mymlyod and the Dee Valley
- EA21 Berwyn Mountains North
- EA22 Berwyn Foothills North
- EA23 Ceiriog Valley
- EA24 Berwyn Foothills South
- EA25 Berwyn Mountains South
- EA26 Tanat Valley
- EA27 Llyn Efyrrwy
- EA28 Hirnant and Rhialgwm
- EA29 Vyrwy and Banwy Valley and Hills
- EA30 Severn Farmlands North
- EA31 Dyfnant Forest
- EA32 Severn Farmlands South



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Ardal Ymgeisiol/Candidate Area

-  Ardal Ymgeisiol/Candidate Area
-  Parc Cenedlaethol Eryri/Eryri National Park
-  Tirwedd Cenedlaethol Bryniau Clwyd a Dyffryn Dyfrdwy/Clwydian Range and Dee Valley National Landscape



Statutory Consultation 2025

There will be a statutory consultation in 2025. At that point feedback from a non-statutory engagement period (2023) and a public consultation (2024) will have been considered and incorporated into the final proposal. All impact assessments will be complete and NRW's Board will have had an opportunity consider the evidence and decide if a designation is desirable. A fully updated and detailed boundary map along with all the supporting evidence will be made available to view at the statutory consultation. See the 'Further Information' section at the end of this document.

Part 3: Additional Evidence

NRW is also undertaking a series of additional steps to ensure a collaborative and inclusive process. The process is framed to reflect the Welsh legislative and policy framework, the Well-Being of Future Generations (Wales) Act and the legal requirement on NRW to apply the Sustainable Management of Natural Resources (SMNR) principles, with a focus on nature recovery and climate adaptation and mitigation. This is allowing greater opportunity to incorporate a wider range of perspectives and considerations into the assessment procedure. Some of those considerations can be reflected in NRW's recommendations, others would need to be addressed in a National Park Management Plan.

Engagement Period (2023)

NRW held an early engagement period in October and November 2023. This was not a consultation but an opportunity to share the Area of Search map and gather feedback and information, especially from residents and stakeholders. Our aim was to better understand the range of issues and perspectives related to the National Park proposal. Evidence that might influence the Area of Search was welcomed. The engagement period was also an opportunity for us to start raising awareness among the local population, that an assessment was underway.

We ran 11 online and in-person drop-in events. 619 people attended events in-person, 105 attended events online and we received hundreds of emails and 966 people formally responded to the questionnaire.

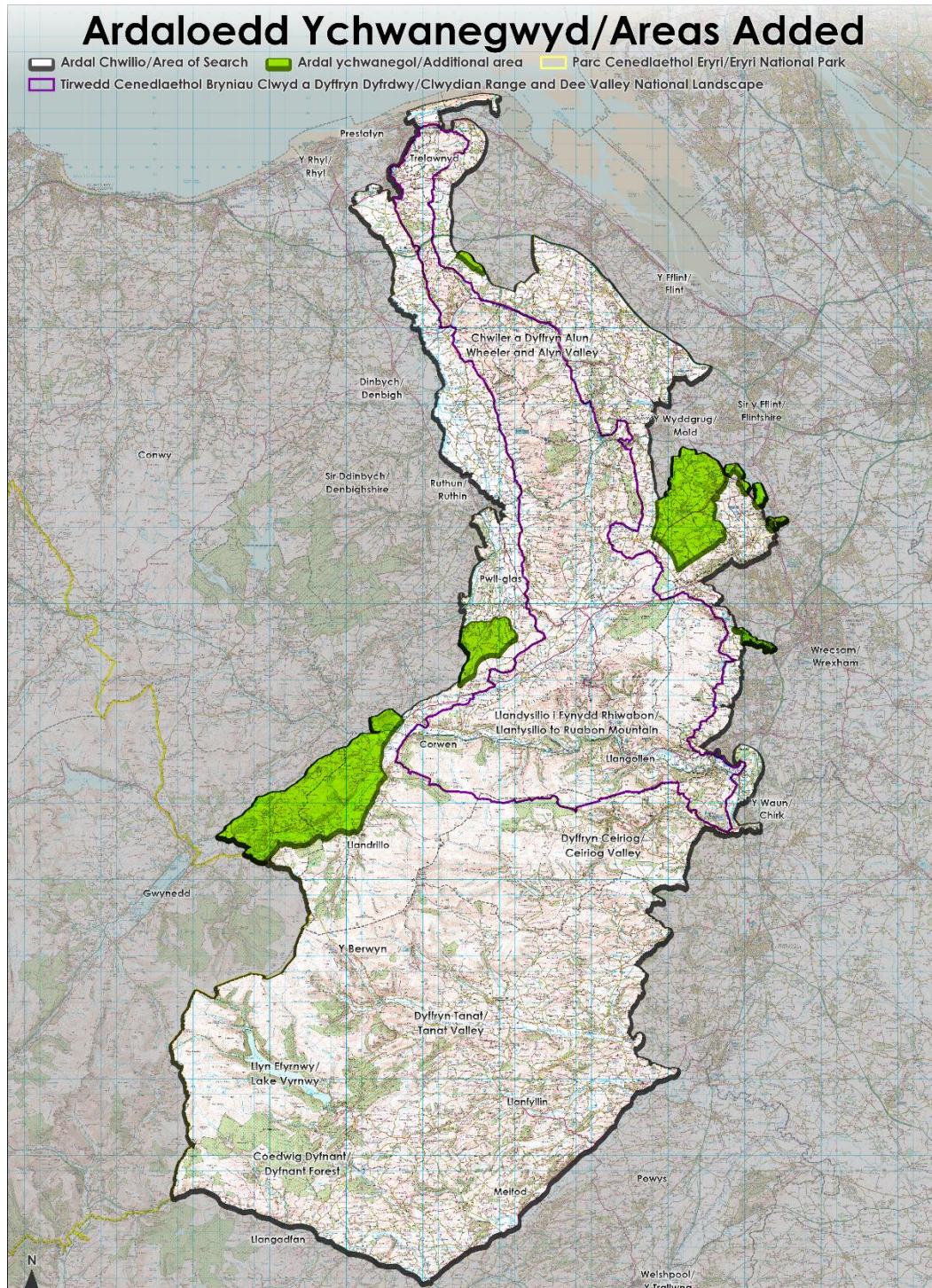
We analysed the responses and organised them into the following list of most frequently mentioned themes (in order from most to least common):

1. Landscape conservation, Recognition for the area, Tranquillity.
2. Wildlife, Agriculture and Land Management, Environment and Sustainability.
3. Tourism, Public services, and infrastructure.
4. Necessity for change, Management and Controls, Costs, Funding, Bureaucracy.
5. Local people & Communities, Local Economy.
6. Access issues & Outdoor recreation.
7. Housing.
8. Culture and Heritage.
9. Planning implications.
10. Boundary queries.
11. A need for more information.

These themes have informed relevant parts of the statutory assessment work as outlined in Part 1. They have also informed discussion with stakeholders. Although some are beyond NRW's remit, we continue to work with Welsh Government, Local Authorities, and others to help clarify and resolve questions related to planning and funding for example. Other themes will more appropriately inform the development of a management plan for a National Park or National Landscape.

Themes 10 (boundary queries) is entirely within NRW's remit and as a result of information, evidence and appeals by respondents, the following changes to the Area of Search were either accepted or rejected. The detailed reasoning for the decision can be viewed in the full report.

<p>Accepted changes to be considered as part of the Area of Search.</p> <p>Sufficient justification to assess or lack of justification to reject without further assessment.</p>	<p>Not accepted changes to the Area of Search.</p> <p>Insufficient justification to assess further, and/or sufficient contra indicating evidence to reject.</p>
<ul style="list-style-type: none"> • Include the area north of Hope Mountain. • Include Clywedog Valley – Bersham. • Include Park in the Past. • Include Caer Estyn hillfort. • Include Mynydd Mynyllod and the Dee Valley at Llandrillo. • Include Parklands of Bryn Gwyn Hall and Rhug Estate. 	<ul style="list-style-type: none"> • Exclude Halkyn Mountain. • Exclude The landscapes within Powys. • Include Denbigh Moors. • Include Llyn Brenig and Clocaenog Forest. • Include Additional parts of the Vale of Clwyd. • Include Pantasaph. • Include Wepre Park. • Include Parklands of Nerquis Hall, Tower and Wynnstay Hall. • Include Ruthin. • Include the Cambrian Mountains and Pumlumon. • Include Powys Castle. • Include areas based on the River Dee catchment area.



Theme 11 - 'A Need for more information': This theme reflects that the 2023 engagement period was an information gathering exercise rather than a consultation. We have acknowledged however that there is a need to correct misinformation circulating and provide greater clarity in several areas. The engagement report, this summary of evidence, and information available on our webpage seeks to address this issue and help the discussion become better informed over time.

The engagement report is available to view in full. See the 'Further Information' section at the end of this document.

Consultation 2024

Following a public consultation in the Autumn of 2024, a consultation report will be produced summarising the process, responses, and analysis. This will be made publicly available in 2025 to further inform discussion, help us improve the proposal and guide subsequent decisions by NRW Board prior to a statutory consultation in 2025.

Additional Assessments

Several additional impact assessments and studies have been initiated to support decision making. Responses to the public consultation will directly inform some of these. All assessment reports will be made available at the statutory consultation in 2025.

- Welsh Language Impact Assessment.
- Health Impact Assessment.
- Equalities Impact Assessment.
- Screening for Strategic Environmental Assessment.
- Screening for Habitats Regulation Assessment.
- Socio-Economic Benefits Analysis.
- Benefits for Nature Analysis.
- Review application of Sustainable Management of Natural Resources principles and Ways of Working from the Well-being of Future Generations Act.

All evidence will be available to view in full. See 'Further Information' at the end of this document.

Further information

All reports currently available can be viewed via our project information pages. Once completed, all further evidence will be made available ahead of a final consultation in 2025.

[Wales's New National Park Proposal - Natural Resources Wales Citizen Space - Citizen Space \(cyfoethnaturiol.cymru\)](https://www.naturalresources.wales/citizen-space/cyfoethnaturiol.cymru)

