



Your ref: PROPOSED NATIONAL PARK,  
NORTHEAST WALES  
Our ref: PNP/CONSULTATION/DEC24  
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Dear Sirs,

We write to offer the views of the NFU Cymru membership in respect of the proposal to designate a new National Park in Wales based on the existing Clwydian Range and Dee Valley Area of Outstanding Natural Beauty or AONB.

NFU Cymru's vision is for a productive, profitable and progressive farming sector producing world renowned climate-friendly food in an environment and landscape that provides habitats for our nature to thrive. Welsh food and farming delivering economic, environmental, cultural and social benefits for all the people of Wales whilst meeting our ambition for net zero agriculture.

The importance of the farming industry in rural Wales cannot be overstated. Welsh farming businesses are the backbone of the Welsh rural economy and the axis around which rural communities turn. The raw ingredients produced on Welsh farms are the cornerstone of the £9.3 billion Welsh food and drink supply chain employing 228,500 people - the equivalent to 17% of Wales' total workforce.

The Welsh public associate Welsh farmers, first and foremost, with providing safe, high quality and traceable food. Welsh farmers also look after 80% of the land area of Wales, maintaining and enhancing our natural environment – Wales' key asset. Farming activity supports a diverse range of species and habitats, provides a range of ecosystem services including carbon sequestration, flood alleviation; also delivering the significant backdrop – our iconic Welsh landscapes – for Wales' tourism and recreation sector worth an estimated £3 billion annually.

Welsh farmers are key promoters and protectors of our culture, heritage and language with the highest proportion of Welsh speakers of any sector (43%). It has long been recognised that moves to undermine the viability of Welsh agriculture are likely to represent a significant threat to the Welsh language.

Overall Welsh farming makes an unparalleled contribution to the economic, environmental, social and cultural well-being of Wales as shown in the NFU Cymru [Farming – Bringing Wales Together report here](#).

### **General Comments**

1. NFU Cymru submit this response as a representation of our members' concerns and views on the proposals to designate a new National Park in Wales based on the existing Clwydian Range and Dee Valley AONB, incorporating areas of Northeast Wales and Mid- Wales.
2. The Clwydian Range and Dee Valley designation of Area of Outstanding Natural Beauty (AONB) extends to 390 square kilometres of landscapes from the coastal slopes of the Prestatyn Hillside in the North, to the remote Berwyn Mountains, and the Pontcysyllte Aqueduct and Canal in the

South. Falling within the counties of Denbighshire, Flintshire and Wrexham, the Clwydian Range was designated an AONB in 1985, and was extended to include much of the Dee Valley in 2011.

3. NFU Cymru believe the candidate area is vast and extends much further than the current AONB including a significant land area without any current designation. Little evidence has been presented thus far on the benefit of further designation to agriculture.
4. AONBs, originally designated under the 1949 Act, are now designated under section 82 of the Countryside and Rights of Way Act (CROW Act) 2000. Unlike National Parks they are designated for a single purpose “to conserve and enhance the natural beauty of the area”. They have no statutory recreation purpose.
5. The significant difference between National Parks and AONBs (in addition to the core purposes described above) is that National Parks are local authorities for the purposes of planning. This has implications for infrastructure and staffing required to carry out duties in relation to development control. The National Park Authority is responsible for the Local Development Plan (LDP) which enables the purposes and duties of the designated area to be reflected through the LDP and the development control process. Within AONBs, the LDP process falls to the Local Authority.
6. NFU Cymru have reservations regarding the funding allocated to the project to investigate the scope of a new National Park designation at this time considering the pressures on the agricultural industry due to the significant changes in policy, regulatory and funding arrangements. In particular the imminent transition away from the Basic Payment Scheme and other Rural Investment Support schemes to the Sustainable Farming Scheme. It is also a particularly strenuous time with the introduction of the Control in Water Pollution Regulations and the lack of funding made available to the industry to improve infrastructure to become compliant with these new regulations.
7. Going forward NFU Cymru also question where further funding will materialise in order to support further investigation for this proposed new National Park and its possible inception.
8. The mental health and wellbeing of many farming families is fragile, and the proposals have certainly created a further sense of anxiety in the agriculture community within the areas identified.
9. NFU Cymru is disappointed with the lack of engagement between the statutory advisor (NRW) and Green Gen Cymru who have been consulting within an overlapping area regarding their significant infrastructure project which would have conflicting interests with any future National Park objectives.
10. New figures from NFU Mutual demonstrate that livestock worrying cost the UK farming sector £2.4million in 2023, a rise of 30% from 2022. Livestock farmers in the proposed National Park designation are becoming increasingly concerned that more people utilising public footpaths through farmland may accentuate livestock worrying and the number of dog attacks seen.

#### **National Parks current land area**

11. National Parks currently cover 19.9% of Wales’s land area which is significantly greater than England and Scotland whose land area within a national parks designation is 9.3% and 7.2% respectively.
12. The added legislation and administration costs associated with a National Park in this instance may not be justified especially with the reduced budget available to agriculture and the environment at this time.

#### **Farming in designated areas**

13. Farming has shaped our protected landscapes, creating varied fabrics across the uplands and lowlands and bringing value to local and rural economies, through food production, recreation and tourism. Our landscapes are living, working landscapes that are constantly changing through continuous management by farmers who play an integral part in protecting, maintaining and enhancing the countryside.
14. There is frustration that National Park and AONB Authorities do not always understand the needs of farming, yet these areas rely on viable farm businesses to manage the very landscape that the designated landscapes are recognised for.
15. It is important to understand that external drivers mean that farming, like all businesses, must constantly change and adapt. Farm businesses need to be able to upgrade their buildings and infrastructure to meet demand for high quality produce meeting high welfare standards and to reduce environmental risk. It must be possible for farm businesses to adopt new technology, modernise, and diversify to sustain themselves and those who rely on them. There is a concern that National Park designation will hinder and stifle the ability of farming businesses to adapt to changing market conditions and this negatively impact on farm business viability.

### **Socio-economic function**

16. Farming creates and maintains the thriving natural environments supporting the beautiful, semi-natural landscapes. Agriculture underpins the rural economy of the National Parks and AONBs and a thriving agricultural sector is part of a wider agri-food industry that is both economically and strategically important.
17. NFU Cymru has long called for an appropriate balance to be struck between the weight attached to protection of the landscape and community and business development within the National Parks. It is our view that National Parks have de-emphasised the socio-economic aspects, prioritising landscape conservation above all else with insufficient regard given to the social and economic well-being of those living and working within these areas.
18. NFU Cymru believes, in line with the Well-Being of Future Generations Act (2015), that National Park Authorities and AONBs should give equal weight to their social and economic functions as well as their existing conservation and recreation duties. However, within National Parks there is primacy of the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area due to the "Sandford Principle" which Welsh Government has committed to retaining. As a result, we believe legislation underpinning the designation of National Parks is out of step with Wales's legislative framework.

### **Governance**

19. Agriculture is often the largest land user within the designated landscapes but rarely is it adequately represented. Our members often report issues relating to lack of accountability of officers and members (some of which reside outside the National Park boundaries), together with a feeling of being powerless to influence or change policy across a range of areas. Many National Parks and AONBs have not effectively engaged with farmers and are constrained by their statutory duty to focus on natural beauty and landscapes, this is an issue that must be addressed.
20. NFU Cymru believes National Parks and AONB's need to take account of long-term ambitions of the people who live, work and maintain the protected landscapes and engagement must be improved with members appointed who are representative of agriculture and the rural economy within the designated area.

21. NFU Cymru believes that this starts with the development of a shared vision which takes into account all those with an interest in National Parks including farmers and land managers and those who make a living within Park boundaries. This needs to be followed by the development of an organisational culture which actively seeks to foster an enabling framework which is accountable, transparent and easy to engage with at all levels. Management plans must be developed in conjunction with farm businesses and National Park Authorities should establish economic for a and consultative committees with farmers.
22. We remain unconvinced of the cost-benefit of the additional layer of bureaucracy arising from landscape designation.

### **Appropriateness of Designation**

23. In principle, NFU Cymru is opposed to designations where certain areas are 'fenced off' for special treatment. It is our view that areas under special conservation status such as National Parks and AONBs can lead to an artificial and unsustainable preservation of a landscape whereas, in reality, these landscapes need to adapt and change over time allowing communities to be sustained.
24. These areas are protected because of their national significance in contributing to beautiful countryside, wildlife and cultural heritage. To designate more and more areas as National Park is counter-intuitive and undermines the rationale for designating them in the first place. If the majority of the countryside is under designation it would dilute the special nature of designated areas. Before designating further National Parks, NFU Cymru believes that improvements are required to the functioning of existing National Parks. It is imperative that lessons are learnt from those living and working in these areas.
25. The same argument applies to AONBs 'upgrading' to National Parks where there is concern amongst farmers that the change in status and increased level of protection are not seen as compatible with supporting farming to modernise, diversify and remain viable.

### **Process of designation**

26. The proposed National Park designation is a key concern for our members. The proposal appears arbitrary, and the process needs to be more transparent. Welsh Government must provide information relating to the proposed National Park, the rationale for designation, the proposed boundaries etc.

### **Planning**

27. The planning process is often cited negatively by the farming communities, working and living within National Parks. Our members have observed a huge variation and inconsistencies in performance across the three National Parks in Wales which has led to significant tensions in some areas.
28. Planning decisions are made on their visual impact as opposed to economic or social grounds. Landscape designations can be used as a pretext to delay decisions, withhold permission or impose conditions which make farm business development, and even survival, unsustainable.
29. The planning process can frustrate farmers trying to diversify their income base by investing in tourism projects or alternative income streams. While we recognise that a system designed to protect landscape character will lead to some frustrations, there is a need for a careful balance.
30. NFU Cymru believes that the planning process must recognise the strategic importance of food production. Concerns about landscape protection should be balanced with an understanding of the need for farm businesses to adapt to the times, and ensure they are not economically

disadvantaged for farming within a protected landscape. Retaining viable farm businesses enables the continued management of the wider landscape that the National Parks are valued for.

31. The impact assessment should seek to understand the additional costs for businesses associated with National Park designation including planning where increased costs are incurred in terms of the time taken to seek permission, costs of providing more detailed applications, higher standard of design, seating and choice of materials.

### **Public access**

32. Farmers play a major role in the provision of public access to our iconic landscapes. Recreation and tourism are seen as one of the ways for National Parks to meet their statutory duty. Whilst protected landscapes are reliant upon the land management of farming businesses, rarely do they see the direct benefit of their work.
33. A small number of farming businesses do capitalise on tourism, but it still requires the landscape to be managed through agricultural activity. There needs to be a careful balance between encouraging more visitors and managing the environmental impact of those visitors.
34. The impact of poor visitor management creates a negative feeling for visitors and local businesses.
35. As previously mentioned, livestock worrying is a key concern of members within the potential National Park area. Tourists visiting the area are currently bringing their pets with them, with the majority behaving well and following guidance provided. However, an increase in the number of tourists and their dogs, will undoubtedly lead to an increase in the number of attacks reported. Members are used to dealing with footpaths and public rights of way through their land, however, there is little they can do to protect their livestock from these sorts of attacks.
36. Members highlighted they are concerned about increasing incidents of trespassing being observed currently since the Covid-19 pandemic, and they are expecting this situation to get worse if the National Park proposals were to go ahead. There is a need for visitors to be educated on the dangers of rural areas, the importance of abiding by the countryside code, and the need to follow guidance when visiting local communities and rural areas.

### **Housing**

37. It is a concern that elevating the designation of the area from AONB status to National Park status will impact house prices in the areas both within and adjoining the proposed new National Park. It is likely an elevated designation could lead to house price increases due to increased popularity and desirability of the area to those living outside these communities.
38. Residents and the next generation could find it difficult to afford the houses available and therefore be forced to move elsewhere; this threatens the rural communities as a whole and the Welsh language.
39. The number of houses available on the market is already limited across Wales and further legislation or restrictions on development could exacerbate the situation in the area. This threatens the economic balance of the community and disabling the next generation from remaining in these areas.
40. The danger presented here is that any housing or planning policies that are inevitably developed will put pressure on houses and development opportunities available and their cost. It has already been seen within the Eryri National Park especially because of Covid-19 (<https://planning.snowdonia.gov.wales/advice-and-guidance/affordable-housing/>).

### **Upskilling and Jobs**

41. It is unclear, with little evidence presented to demonstrate the number of jobs the elevated designation would provide for the area.
42. A concern would be that many of the upskilling opportunities would not be realised within the new designation as the jobs would attract individuals from outside the area who have already obtained the relevant qualifications and experience.
43. For individuals within the community to be competitive in the housing market, jobs would need to be made available with attractive remuneration packages.
44. Without securing facilities for rural businesses to develop, there is likely to be a significant impact on the retention of the next generation, and young people will be forced to look elsewhere for employment opportunities. This trend may also enhance the brain drain already being observed across large areas of Wales and ultimately impact the resilience and prosperity of the rural communities.

### **Funding**

45. The agricultural and environmental budget has been significantly reduced, in real terms, after the UK's departure from the European Union which is having a significant impact on farming in Wales.
46. It has been made clear that the Welsh Government is under budgetary pressure, it is therefore fair to question whether the funding of a new National Park is achievable currently. NFU Cymru would not wish to see funding currently delivering support on the ground for farmers and the rural economy diverted to fund this proposal.
47. A fourth National Park designation in Wales will mean funding for the existing three National Parks will need to be stretched further, without the guarantee of additional financial support. This is concerning our members considerably, as they do not wish to see other areas of Wales struggling further due to the proposed new designation.

### **Healthcare Services**

48. Healthcare across North Wales is currently under severe scrutiny, pressure to improve performance, statistics and standards. Warnings are issued from the Betsi Cadwaladr health board at the beginning of every summer for tourists to be responsible when visiting North Wales over the summer months and only call the emergency services when the situation calls for it. Other services have been made available to alleviate the pressure on A&E departments.
49. NHS services in Wales are currently under immense pressure with ambulance response times gradually increasing since 2016 and are currently at an all-time high. In October 2016 ambulance response times for Betsi Cadwaladr Health board were as low as 4 minutes, 54 seconds compared to 10 minutes and 1 second in October 2024.
50. A National Park designation would also temporarily increase the population of the area over the summer months, enhancing the pressures on all local healthcare services.

### **Local Infrastructure**

51. An increase in tourists to the area will mean there will be a requirement for sufficient amenities, such as toilets with disabled access and baby changing facilities, car parking with disabled access, overnight accommodation, and readily available food and beverage outlets.

52. Car parking facilities are currently very sparse across the area of the proposed National Park, with limited options available for long-stay parking. Another consideration would be that if the parking situation was not resolved, or more space allocated, an increase in visitors to the area would likely impact local agricultural businesses as access to these facilities would be restricted. This may also lead to an increase in vehicles being parked along roadsides, verges, and in field gateways. The potential blocking of gateways would undoubtedly have an adverse effect on farmers ability to access fields to manage livestock, causing an effect on animal health and welfare, and restricting harvesting operations, as large machinery will be unable to gain access. This will also mean local residents are unable to gain access to their properties and may in turn pose a health and safety risk.
53. The quantity of refuse facilities within the proposed National Park area would need to increase exponentially to meet the requirements for the current number of visitors, meaning this requirement would rise even further following any National Park designation.
54. Local councils will be responsible for the budgets to fund such public amenity projects, with their current funding already being accentuated to support communities and residents.
55. The staffing prerequisite to maintain and monitor increasing numbers of local infrastructure such as public toilets and refuse areas, would put further strain on budget requirements. Although increasing the number of employment prospects for the local area, it would not necessarily provide the opportunity to upskill.
56. An increase in adverse weather occurrences, means there is a surge in requirements for regular maintenance, and repair works to local amenities.

### **Traffic and Public Transport**

57. Higher levels of traffic to the area will have a detrimental impact on the air quality.
58. The rural roads themselves are narrow, and often single track without sufficient passing opportunities. Visitors from further afield, would not necessarily be used to manoeuvring on such narrow roads, meaning a greater chance of collisions and incidents occurring, thus posing a health and safety risk to both tourists and local residents.
59. According the Brake, the road safety charity, more than half of the fatal crashes in the UK occur on rural roads. They also provide the following statistics about rural roads:
  - a. Per miles travelled, rural roads are the most dangerous for all kinds of road user.
  - b. Cyclists, motorcyclists and car drivers are more than three times as likely to be killed per mile travelled on a rural road than an urban road.
  - c. Speed is often a major factor in rural road crashes. A study of single-carriageway rural roads estimated that a 10% increase in average speed results in a 30% increase in fatal and serious crashes.
  - d. The most common crash types on rural roads are collisions at intersections, head-on collisions and running off the road.
  - e. Every year, more than 1000 people die on rural roads in the UK.
60. Public transport is very sparse across the rural locality for the proposed National Park, and North Wales. This in turn means visitors travelling to and from the area will need to travel in by car to gain access. The current bus facilities provide irregular services to some parts of the area, and trains are only available from nearby large towns such as Welshpool, Gobowen, Wrexham, Flint, Prestatyn or Abergele and are therefore not easily accessible from the proposed National Park area.

## Rescue Services

61. The recent Welsh Air Ambulance (WAAC) decision to close the Welshpool Air Ambulance base has caused great controversy throughout the local area. Following the closure announcement, there will be a newly created base functional from 2026, and located near the North Wales A55, merging the Caernarfon and Welshpool aircrafts and rapid response vehicles. This change will mean that a large proportion of Mid Wales is likely to experience extended wait times for emergency rescue services and will likely have to rely further upon facilities from neighbouring Shropshire.
62. An influx in tourists to the local area, will mean accidents occur more frequently and availability of ambulances via air or road will be accentuated. Following on from our previous highlighted point around the number of incidents that occur on rural roads, coupled with an increase in visitors if the designation was to go ahead, it is likely that rescue services would be unable to cope with the additional pressures, meaning the local community are further impacted.

## Welsh language and Culture

63. Welsh language and culture are central to the identity and heritage of Wales.
64. The establishment of a fourth new National Park in Wales could have a notable impact on the Welsh language, depending on approach to its development and management. The following influencing factors should be considered when considering the Welsh language and culture:
- a. **Pressure on Welsh-speaking Communities:**  
Increased tourism might attract non-Welsh speakers to areas where Welsh is dominant, potentially diluting the use of the language in everyday life.
  - b. **House Price Increases:**  
National parks often increase property demand, potentially pricing out local Welsh-speaking residents and leading to demographic changes that could weaken the language's presence in those areas.
  - c. **Balancing Cultural and Economic Goals:**  
If the park prioritises tourism over cultural preservation, there's a risk that the focus on the Welsh language might be overshadowed by commercial interests.
  - d. **Mitigation and Maximisation Strategies**
    - i. **Policy Integration:** Welsh language preservation should be a core objective in the NRW consulting phase, and the potential National Park development plans, guided by input from Welsh-speaking communities.
    - ii. **Tourism Management:** Encourage sustainable tourism that respects and promotes Welsh culture and language.
    - iii. **Community Involvement:** Actively involve local residents in planning and operations to ensure the park supports the language.

## Mental Health

65. Farming within a rural locality is an excellent career and can provide huge benefits to those who work within the sector; however, it is a career that comes with huge amounts of pressure, isolation and demand daily, with it often being difficult to reach out for support.
66. Agriculture carries one of the highest rates of suicide, with poor mental health in Agriculture being recognised as a massive issue across the sector. At present, NFU Cymru members are faced with ever increasing demands posed on both their business and the people they employ. Increasing Control of Water Pollution Regulations, Bovine Tuberculosis, uncertainty around the future Sustainable Farming Scheme, and the overall future of Welsh Family Farms mean it is an incredibly challenging and stressful time for the sector.



67. Consideration must be given to the extended burden in which a new National Park designation would present for those farming within the area.

**NFU Cymru Engagement**

68. NFU Cymru would like to engage further with NRW on behalf of members that may be affected by the proposed National Park designation. During this consultation, NFU Cymru organised a member meeting in Llangollen where we were presented to by Natural Resources Wales (NRW) Project Manager Mr Ash Pearce. The meeting had over 60 NFU Cymru members in attendance, from across the proposed area, and the feedback given during the evening has helped inform our consultation response.

69. Going forward, NFU Cymru should like further opportunity to organise such meetings on behalf of members and would welcome NRW representatives to join for those discussions.

70. We would stress that farmers and landowners must be fully involved in any further developments.

We trust that you shall consider the points above and consider the impact any new National Park designation will have on the local community, and farmers within.

Yours sincerely,

NFU Cymru