



Your ref: CLWYDIAN RANGE
NATIONAL PARK PROP
Our ref: CLWYDIAN RANGE
NATIONAL PARK PROP
Email: grug.evans@nfu.org.uk
Direct line:
Date: Friday 5th December 2025

Dear Sirs,

We write to offer the views of NFU Cymru 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 position on the proposed Glyndŵr National Park remains unchanged, and our members continue to raise strong objections. Following further meetings and detailed discussions with our members, it's clear the concerns highlighted in our previous consultation response in 2024 still stand.

While we recognise that some changes have been made to the proposed boundary, these amendments do not address the issues raised by our members. Farmers remain deeply worried about the potential impact on their businesses and the uncertainty surrounding how land management, food production, and future development would be affected. Although we have taken the time to listen again and review the revised proposals, the practical challenges our members foresee remain unresolved. Our consultation response reflects a consistent message: the proposed National Park does not provide the clarity or benefits required to justify its introduction, and our members cannot support the proposal.

General Comments

1. NFU Cymru submit this response as a representation of our members' concerns and views the proposals to designate a new National Park in Wales based on the Clwydian Range and Dee Valley.
2. NFU Cymru believe the 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 on the benefit of further designation to both the environment and agriculture.
3. 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.
4. The significant difference between National Parks and AONBs 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. Within a National Park, the National Park Authority is responsible for the Local Development Plan (LDP) which enables the purposes and duties of the National Park to be reflected through the LDP and the development control process. Within AONBs, the LDP process falls to the Local Authority.
5. 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 changes in policy and reduction in support payments in light of the UK's exit from the EU.

6. Going forward NFU Cymru also question where further funding will materialise as we've seen budget cuts across the whole industry and further pressure at this time could appear abrasive and exacerbate emotions which are already fought.
7. The mental health of the industry is currently under immense strain, and the proposals have certainly created a further sense of animosity towards the agriculture community within the areas identified. Landowners and farmers co-operation are integral to the success of any future collaboration between any potential body and environmental projects.

National Parks current land area

8. National Parks currently cover 19.9% of Wales's land area which is significantly greater than England and Scotland whose land area under national parks are 9.3% and 7.2% respectively.
9. It is true to state that even with this significant difference in area of land managed as a National Park there are no specific improvements reported on the protection of the landscapes or nature recovery above land area not within a designation.
10. 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

11. Farming has helped to shape our protected landscapes, producing diverse patterns across both uplands and lowlands and supporting local and rural economies through food production, recreation and tourism. These are living, working landscapes that continue to evolve under the ongoing stewardship of farmers, who play a vital role in protecting, maintaining and enhancing the countryside.
12. There is frustration that National Parks and AONBs don't always understand the needs of farming, yet these places rely on viable farm businesses to manage the very landscape that the designated landscapes are recognised for.
13. It is important to understand that external drivers mean that farming, like all businesses, must 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.

Socio-economic function

14. 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-emphasized 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.
15. 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

16. 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 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.
17. 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.
18. 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 fora and consultative committees with farmers.

Appropriateness of Designation

19. 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.
20. These areas are protected because of their national significance in contributing to beautiful countryside, wildlife and cultural heritage. To designate 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.

Planning

21. The planning process is often cited as a negative by farmers 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.
22. Planning decisions are made on visual 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.
23. 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.
24. 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 change with the times. Retaining viable farm businesses enables the continued management of the wider landscape that the National Parks are valued for.
25. 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

26. 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. However, while this industry is based on the landscape managed by farmers, farming businesses rarely benefit directly.
27. 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.
28. The impact of poor visitor management creates a negative feeling for visitors and local businesses
29. Public access is already limited because of practical constraints on the ground. Narrow rural lanes, inadequate parking, a lack of public toilets, and minimal visitor infrastructure make it difficult for large numbers of people to reach these places safely. While these areas may be rich in natural beauty or ecological value, their capacity to accommodate visitors is inherently low.
30. Pressure on Local Communities- Traffic congestion, damage to verges, blocked farm access, and increased noise all place strain on residents and local businesses. Without a coordinated management framework, these problems tend to intensify rather than improve.
31. Habitats can suffer from trampling, disturbance of wildlife, and informal parking that damages vegetation. The absence of controlled access points leaves landscapes more vulnerable.

Housing

32. 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.
33. 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.
34. 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. Refer The Well-being of Future Generations (Wales) Act 2015.
35. 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.

Upskilling and Jobs

36. It is unclear, or little evidence is presented to demonstrate the number of jobs the elevated designation would provide to the area.
37. 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.
38. For individuals within the community to be competitive in the housing market jobs made available would need attractive remuneration packages.
39. The further departure of the next generation due to lack of opportunities will threaten local facilities such as schools and businesses.

Funding

40. The agricultural and environmental budget has been significantly reduced after the UK's departure from the EU which is having a significant impact on farming in Wales.
41. Over recent years, significant cuts have been made to the budgets of Wales's existing three national parks, reducing their capacity to maintain, improve access, and deliver. This raises

concern about whether the creation of a new Glyndŵr National Park is achievable without guaranteed long-term additional.

Healthcare Services

42. 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.
43. NHS services in Wales are under currently under immense pressure with ambulance response times gradually increasing. The percentage of emergency department patients admitted, transferred or discharged within 4 and 12 hours is currently worse in Betsi Cadwaladr than the Wales average.
44. Mountain Rescue figures for January-December 2023 shows that Northeast Wales had 73 callouts whereas Llanberis and the Ogwen Valley (both falling under the Eryri National Park) had a combined 482 call outs. Visitors are underprepared which is putting much more pressure on call outs on our local services especially in the summer months.

Thank you for the opportunity to comment on the consultation. I hope these points are fully considered in the decision-making process.

Yours sincerely,

NFU Cymru