

# CONSULTATION

## Response Document



**North-East Wales National Park consultation  
Cyfoeth Naturiol Cymru/Natural Resources Wales**

**16th December 2024**

## Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 7,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Scottish Environment Link
- Wildlife and Countryside Link
- Northern Ireland Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- UN Decade on Ecosystem Restoration 2021-2030 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

CIEEM has approximately 483 members in Wales who are drawn from across the private consultancy sector, NGOs, government and SNCOs, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

**This response was coordinated by Members of our [Welsh Policy Group](#).**

We welcome the opportunity to participate in this consultation and we would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy) at [JasonReeves@cieem.net](mailto:JasonReeves@cieem.net) with any queries.

**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 should be attributed more importance, particularly given that Welsh Government has instructed National Park authorities to lead in addressing the climate and nature emergency.
- The designation process should take a broader view of the statutory designation criterion of 'natural beauty', encompassing nature-based aspects such as connectivity of core habitats, hydrology and geology that underpin the area's characteristic ecosystems and can support recovery, restoration and resilience of natural beauty that has been lost or disturbed, most notably, within recent decades.

**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 believe the definition of 'natural beauty' can be broadened to include a greater emphasis on the area's rich ecology, complementing the landscape assessment.

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

- Greater emphasis should be placed on ecological resilience, and natural boundaries like river catchments, and interconnected habitats, rather than just urban boundaries.
- We strongly encourage utilisation of the Benefits for Nature report, once finalised, with its findings carefully considered and shared publicly, to help inform boundary recommendations.
- The proposed boundary offers an opportunity to broaden the interpretation of 'natural beauty' by fully incorporating ecological features and geological richness, ensuring consistent inclusion of SSSIs, without splitting them up.
- All nature evidence must be fully considered in order to satisfy the Environment (Wales) Act, the Section 6 biodiversity duty, and the Biodiversity Deep Dive recommendation 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.”

**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 diverse habitats and species within the proposed boundary lend considerable potential for a National Park that helps Wales meet its domestic and international commitments to nature.
- However, our full support is contingent on full consideration of its nature and ecosystem connectivity, 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 the inclusion, but we recommend including the whole of Llanfair Dyffryd Clwyd and Pwll-glas to ensure that the management of the SSSI and management of the SSSI and associated features 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 would like to see those included, in order to capture as much of a coherent natural boundary 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. Inclusion of the section of the River Dee (SSSI / SAC) between Llandrillo and Cynwyd would enable stronger support for the conservation objectives for this internationally important watercourse, whilst further enhancing its natural features. We consider that the road boundary to the proposed CA, excluding the Dee watercourse and floodplain, does not reflect a natural boundary to the Area, nor enable consistency of management objectives for the area.

- 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:**

- More analysis is needed on the presence, quality, and health of peatland, woodland, SSSIs, water, and priority habitats, and how they can be extended or helped to recover.
- Backed by this analysis, ecological and climate opportunities should inform boundary decisions.
- Inclusion of ecosystem datasets like Cycle 3 of the Water Framework Directive is desirable.

**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 are happy with any name that the local community supports, 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?**

The Benefits of Nature report, which needs adequate resources for rigorous and timely delivery, must be taken into account when determining the final boundary of the proposed National Park in order to ensure ecological coherence, and support Welsh Government's 30x30 and Biodiversity Deep Dive goals.

A well-developed and resourced Ffermio Bro collaborative option for protected landscapes within the Sustainable Farming Scheme will be critical to supporting farmers to work in partnership with National Park authorities to deliver bigger, better, and more joined-up outcomes for nature and communities.