

APPENDIX 1

DENBIGHSHIRE COUNTY COUNCIL

DRAFT INTERIM POSITION ON THE PROPOSED DESIGNATION OF A NEW NATIONAL PARK IN NORTH EAST WALES

FEBRUARY 2025

This whole statement constitutes Denbighshire County Council's official draft interim position.

Elected members and officers of Denbighshire County Council (DCC) have participated in several consultation and briefing events as part of the public consultation process and a dedicated DCC member workshop on this proposal. Views have been recorded and a summary statement capturing the majority view can be put forward as follows.

Denbighshire County Council (DCC) considers that an interim position on the proposal of a new National Park (or similar designation) in North East Wales as set out by Natural Resources Wales (NRW) in the latest consultation and published candidate area **is not possible** at this time. More clarity and assurance on key areas and further information is required to make an informed decision. These concerns are set out below.

DCC recognises that a national park designation with a new approach may have benefits for tourism, climate change, economic development, the health and well-being of local communities and the management of countryside recreation and biodiversity. Also, that there may be advantages to a consistent approach for governance over the area and planning functions. Further, that the availability and level of funding might be improved to manage the functions and responsibilities of the new National Park.

However, DCC also recognises the process to determine desirability to designate is yet to be completed and there is a significant amount of work still to do by NRW before DCC can give a final position on this.

DCC has significant concerns in the following areas (as summarised from the engagement events with members and officers):

- **Costs and timing of this work in the context of the budgetary pressures faced by local government at this time.** Local Authorities are struggling to maintain and deliver statutory services with diminishing resources. They are considering many cost cutting measures and service reductions currently, including, for instance, the closure of public toilets and libraries. The work the Authority is being asked to undertake regarding a new national park in North East Wales tests the Authority's credibility with residents, partners and communities who perhaps feel it should be

focussing on other more pressing matters. Whilst NRW have stated that they have received a budget to complete the necessary work, there is concern that the programme is taking resources away from other areas of NRW work and is costing Local Authorities in officer and member time. Members are particularly concerned about the timing of this programme and do not feel the time is right to undertake this work. Members feel that officers do not currently have capacity to consider properly the implications of this important long-term proposal. The work programme for the National Park is considered an untimely workload for all involved and not a Council priority.

- **Future resources and funding if designation takes place.** There has been no assurance from Welsh Government directly about the funding of the national park if it was designated. DCC considers this assurance to be vital if there is to be an agreed final position from the Council on this proposal. There is concern the proposal will be underfunded and there will be an increase burden on the local authorities involved. DCC need to understand and have certainty from Welsh Government on the level of future annual funding to the Park Authority and if new funding will be made available for the portion of funding that needs to come from the local authorities.
- **Impact on Planning and other Local Authority Services.** With no firm indication on the management and planning authority position (and governance generally) for the proposed National Park, it is difficult to understand the potential implications for Denbighshire. DCC seek clarity on whether a single planning authority will be created or if another approach is preferred? At what point in the designation process would the new national park become a material planning consideration? The replacement Denbighshire LDP is currently in preparation but is unlikely to be adopted prior to 2026. We need to fully understand the implications of the designation order on the progress of the LDP. If the LDP is not adopted prior to the designation order, will the Denbighshire LDP be sent back to the start of the process as the evidence base must relate to the area outside of the national park only? Given that the national park area may include 5 current LPA areas and 2 SDP areas how will development management and compliance operate? If the current policies in the constituent LDPs are to be used, how will a consistent approach be maintained? There are a very limited number of suitably qualified and experienced planning staff across the region. The creation of an additional planning authority could increase recruitment difficulties.

DCC also seeks clarity on the impact for existing Countryside and National Landscape Services and Public Rights of Way teams.

- **Additional Assessments.** DCC recognise that NRW have commissioned additional impact assessments on the Welsh Language, Health and Equalities. Also, further studies on the analysis on the benefits for Nature and Socio-economic factors. DCC welcomes this. The Authority feels this information should have been available at the start of the public consultation so it could have informed this statement and wider responses. DCC understands that some of this information may not be made publicly available. DCC considers this information important in its ability to reach a final position and requests that NRW make all information publicly available. In addition to the assessments above, DCC suggest that NRW undertake a formal economic impact assessment (including areas adjacent to the proposed area).

- **Community Cohesion.** The Council have specific concerns around this issue. In places the proposed boundary splits settlements and communities. What will this mean, in practice, for people in those communities where one side of the road may be in the national park and the other not included? How will this affect the community, and will there be a split in community cohesion? Members and Officers have a perception that it will cause division and seek clarity from NRW that this issue will be considered in the work on impact assessments and what mitigation might be put in place to reduce any impact.
- **Talacre and the Gronant Dunes and Mynydd Mynyllod and the Upper Dee Valley.** DCC seeks clarification on the rationale for the removal of Gronant SAC/SSSI and the area around Mynydd Mynyllod from the candidate area. The Authority takes the view that the case for natural beauty and opportunities for outdoor recreation in both areas appears to be strong and it requests that NRW reconsider these areas of the County.