Councillor / Cynghorydd Dave Hughes
Leader of the Council
Arweinydd y Cyngor

CYNGOR Sir y Fflint Flintshire COUNTY COUNCIL

Via email to [redacted]@cyfoethnaturiolcymru.gov.uk

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Dear [redacted]

Re:PROPOSED GLYNDWR NATIONAL PARK (DESIGNATION ORDER) – STATUTORY CONSULTATION 2025
RESPONSE OF FLINTSHIRE COUNTY COUNCIL

Thank you for allowing the Council the opportunity to respond to the statutory consultation for the Designation Order for the proposed Glyndwr National Park. The Council's Environment and Economy Overview and Scrutiny Committee considered the earlier consultation and provided their views at the meeting on12th November 2024. The Committee voted in favour of not supporting the proposed National Park based on the information available at the time. This decision was ratified by Cabinet on 17th December 2024.
The Council's response to the earlier consultation exercise recognised the positive aspects that such a designation may offer, but it also raised several concerns including:

- The financial burden associated with the creation of an additional National Park;
- The introduction of an additional layer of bureaucracy and governance;
- The need for an immediate review of the Flintshire Local Plan;
- The fact that the current National Landscape designation is already effective in protecting and enhancing the natural landscape and environment of the subject area; and

- The constraint on growth within the proposed National Park and within its immediate vicinity and the risk of it placing more burden on the remaining areas of the County to provide land for employment and housing.

It is acknowledged that changes to the National Park proposal have taken place in response to the 2024 consultation. These include:

- The reinstatement of the Gronant and Talacre Dunes area;
- A refinement of the boundary to better capture a coherent area of natural beauty focusing on the uplands, intersecting valleys and coastal edge; and
- The removal of a large area of settled lowlands within Powys.

In addition, it is noted that Welsh Government has clarified that if a new National Park is established, there is a commitment to funding without financially disadvantaging the existing National Parks or the constituent Local Authorities.

Notwithstanding this commitment, no precise details about funding mechanisms have been shared. On this basis and against a backdrop of Councils and a range of other public bodies within Wales consistently lobbying for additional financial support in order to manage ever increasing demands on services, the concerns about the financial cost associated with the creation and maintenance of an additional National Park remain.

As you will be aware, National Parks must have their own development plans. It is considered that this requirement would inevitably create significant additional work in strategic planning terms, including the need for an immediate review of the Flintshire Local Development Plan. Even accounting for the fact that Local Development Plans must be reviewed every four years, this would potentially increase the financial burden on the Council in the immediate term. Moreover, the proposed changes do not respond to the earlier concerns raised by the Council about governance arrangements, particularly in relation to the Development Management function of a new National Park. In the absence of such detail, there appears to be a real risk of duplication of resource and increased costs to the public purse.

As referred to in the Council's earlier response, it is recognised that the creation of a new National Park could have a number of benefits which include:

- Legal safeguards for the protection of natural beauty, wildlife and cultural heritage;
- A coordinated approach to climate adaptation and ecosystem restoration;
- Increased scope to secure match funding and large-scale grants than a National Landscape designation;
- An increase in tourism related activity; and
- Improved countryside access.

However, without appropriate mitigation measures, an increase in visitor numbers could place increased pressure on local infrastructure and the environment. Whilst it has been explained that a mitigation plan could be implemented, the details and the financial cost of this remains unknown at this stage.

In addition, whilst an increase in visitor numbers could increase exposure to Welsh language and culture, it could also potentially have a detrimental impact through, amongst other factors, an increase in demand for housing by non-Welsh speakers along with an associated increase in house prices. The effect could reduce the ability of some local Welsh speakers to afford a home within the National Park. Whilst tools such as an Article 4 Direction issued under the Town and Country Planning (General Permitted Development) Order 1995 (as amended) to limit holiday homes and Council Tax premiums could be used, these are unlikely to fully mitigate any associated adverse impacts.

It is considered that, in the absence of any firm plans relating to governance arrangements, assurances relating to duplication of resource or definitive plans to mitigate the other concerns outlined above, the Council remains unable to support the proposed creation of Glyndwr National Park.
Thank you once again for the opportunity to comment on the proposal.
Yours sincerely



Cllr Dave Hughes
Leader of The Council