

**Report of Members' Working Group regarding Toilet Facilities  
Funding Request from Pembrokeshire County Council**

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**Subject: Toilet Facilities funding request from Pembrokeshire  
County Council.**

Purpose of Report

This report sets out the details of a formal request from Pembrokeshire County Council to the National Park Authority regarding the funding of toilet facilities at locations across the Pembrokeshire Coast National Park. It outlines the issues identified by the Member Working Group set up to consider this matter and makes recommendations regarding a response to be returned to Pembrokeshire County Council.

Background to request

In February 2023 the National Park Authority received a letter from the Chief Executive of Pembrokeshire County Council (PCC) regarding toilet facilities in Pembrokeshire. This letter set out the results of a PCC Cabinet decision in February and identified that if the National Park Authority was unable to financially contribute towards the provision of a number of toilet facilities around the coast, that PCC would close those facilities from the 5<sup>th</sup> November 2023.

Currently PCNPA does not manage or maintain any toilets and there is no legal requirement for the Authority to respond positively to this request. Any financial contribution should be considered as a voluntary contribution and not an indication that the Authority is taking responsibility for providing toilet facilities or committing to contribute financial to the maintenance of toilet facilities in the future. The Authority already contributes around £800k towards PCCs statutory services such as managing and maintaining public rights of way in the National Park and supporting education services, as well as contributing to non-statutory services such as tourism and major events.

Following this letter, the National Park Authority agreed to establish a Members' Working Group to consider the issues raised for the National Park and the Authority.

Clarifications were sought from PCC regarding the facilities in question, the following locations were identified by officers as the locations that PCC was seeking funding for:

West Angle Bay  
Freshwater East  
Manorbier

Newport Sands / Traeth Mawr  
Newgale South  
Nolton Haven  
Poppit Sands  
Saundersfoot Car Park  
St Brides  
Broad Haven North Car Park  
Moylegrove  
Penally Station Car Park  
Solva  
Little Haven  
Newport Parrog  
Porthgain  
St Davids (Oriol Y Parc car park)

Of these facilities only Poppit Sands and St Davids (Oriol y Parc) are on land owned by PCNPA. In other cases, PCNPA has land holding assets within the vicinity of the toilet facility. In some cases, this relates to a car park for which PCNPA charges, but in some cases no charging regime is operated by the National Park.

#### Issues considered by the Working Group

The Members working group assessed a range of options. These included:

1. paying for all toilets included in the request;
2. paying for some locations;
3. paying a percentage for some toilets; and
4. not making any financial contribution.

The Group assessed these options by considering both cumulatively and individually the role that toilet facilities play in contributing towards the National Park purposes. The statutory purposes of the National Park Authority are set out within the 1995 Environment Act and include a duty to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park and also to promote the public understanding and enjoyment of its special qualities.

The Members' Working Group therefore considered a range of data as part of its work. This included consideration of geographical data looking at the proximity of facilities to important environmental designations (for example Sites of Scientific Interest or Special Areas of Conservation). It also included consideration of the contribution facilities play in relation to key areas of work for the National Park Authority such as use by its Education team for outdoor engagement and whether or not there were connections to emerging projects such as the National Park Authority's beach wheelchair schemes. Other factors such as impact on Blue Flag status were also detailed. Such criteria, as well as an understanding of levels of current public use and other information supplied by PCC's officers were used to generate a scoring system which identified which individual facilities contributed most significantly in terms of National Park purposes. The scoring system is set out in Appendix 1 for information.

As well as considering the role that toilet facilities play in contributing towards the purposes of the National Park, the Working Group were mindful of the financial

pressures facing the Authority. The financial considerations discussed by the group with the Finance Manager and officers are set out below in the financial consideration section.

Whilst looking at the issue of toilet facilities in Pembrokeshire the Members' Working Group identified a number of issues it is keen to explore further, in partnership with PCC. The National Park Authority is keen to promote access to the coast for all groups, including those who face mobility challenges. The National Park Authority's beach wheelchair scheme is a first step in a key direction in this area. To ensure genuine access however, wheelchair provision must be accompanied by appropriate changing and disabled toilet facilities and secure routes from car parks to the sea front including via good quality ramps. The Working Group has identified several financial grants that would be able to support delivery of such facilities. Whilst it would not be financially feasible to provide such facilities at all locations in the National Park, the Working Group has identified six locations where it considers such accessible provision to be desirable and to expand on initial projects in a small number of existing locations in Pembrokeshire, which if expanded would provide a more strategic locational provision. The six locations identified are: West Angle Bay, Freshwater East, Manorbier, Newport Sands, Poppit Sands and Broad Haven North.

The Working Group therefore recommends that any financial support agreed by the National Park Authority be accompanied by a request that a Steering Group including representatives from PCNPA be set up over the next two years to agree a strategy for public toilets in Pembrokeshire and oversee grant applications to develop an Accessible Coast project. Members consider such a project could be considered to provide a "Gold" standard of provision to ensure genuine accessibility to the Pembrokeshire Coast National Park.

As well as the potential for some locations to support this concept of a "Gold" standard Accessible Coast type provision Members were more generally concerned about the poor quality of the majority of existing facilities around the coast. In some cases, it is apparent that lack of investment to tackle issues such as septic tank capacity is increasing revenue costs. It appears likely that capital investment (for example to upgrade facilities including perhaps solar voltaic technology on roofs or enhanced drainage) might offer opportunities to reduce longer term revenue costs. PCNPA Officers have identified a range of grant funding streams that might support such capital investment. PCNPA Officers are already working on one location specific scheme in Poppit Sands in conjunction with PCC officers where PCNPA is landowner and consider this type of approach could be expanded further. Members are therefore keen that a joint working group not only explore the for a "Gold" standard Accessible coast project, but also look strategically at opportunities to improve and enhance provision at other key locations around the coast and deliver a 'Silver' standard of basic facilities in those areas.

### **Financial considerations**

The National Park Authority (as with all public bodies in Wales) is facing financial challenges, with a similar percentage reduction to its core budget to Pembrokeshire County Council.

The total contribution requested from Pembrokeshire County Council amounts to just over £160k per year. Having carefully considered its financial position and ongoing other core commitments, the National Park has identified that it is in a position to provide financial support on a short term (two year basis) up to a level of approximately £100k per year.

This £100k can only be delivered if changes to car parking charges recommended by the National Park Authority earlier this year are delivered via changes to the National Park car parking order.

This financial position means that the option of funding all toilets at the level requested by PCC is not possible. However, funding some or part of the toilet facilities is possible.

### **Risk considerations**

As part of its options appraisal, the working group identified the risks to the National Park Authority of different options. These risks include financial risks to the Authority, environmental risks to key sites across the National Park linked to toilet closures, risks to individuals and groups (including those with protected characteristics of a loss of facilities) and risks to the status of individual locations relating to reputation through loss of Blue Flag status. The full list of risks as appraised against the individual options is set out in Appendix 2. Based on the risk assessment, the option of fully funding provision at some locations but not all was the option chosen as the most appropriate by the working group.

### **Equality considerations**

The Public Equality Duty requires the Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relations between different communities. This means that, in the formative stages of our policies, procedure, practice or guidelines, the Authority needs to take into account what impact its decisions will have on people who are protected under the Equality Act 2010 (people who share a protected characteristic of age, sex, race, disability, sexual orientation, gender reassignment, pregnancy and maternity, and religion or belief).

Whilst PCNPA has no legal duty to provide toilet facilities, provision of payment towards maintaining these facilities is likely to support PCC in reducing the impacts on groups with protected characteristics that would otherwise be negatively impacted by their closure.

### **Welsh Language**

No implications for the Welsh language are envisioned by any decision taken by the National Park Authority in relation to this request for funding.

### **Well Being and Future Generations Act**

The National Park Authority recognises the importance of public bodies working collaboratively together in the spirit of the Well Being of Future Generations Act and the Members' working group has suggested that any funding offer be made in

conjunction with a request that a joint Steering Group be established with PCC to continue to work in the ways outlined by the Well Being of Future Generations Act on this matter – looking collaboratively at long term sustainable solutions.

Members have been mindful of the need to act in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive and resilient communities and have sought to maximise support for facilities whilst balancing this against financial limitations.

## **Conclusion**

Following an options appraisal and careful consideration of the National Park purposes and other duties - including that of the Well Being of Future Generations and those imposed by the Equality Act, the Members' Working Group recommends that the National Park Authority agree to fund toilet facilities at the following locations within the National Park for a period of two years:

West Angle  
Freshwater East  
Manorbier  
Newport Sands / Traeth Mawr  
Poppit Sands  
Saundersfoot  
Broad Haven North  
Solva

In addition to the above, the Asset Management Group for the National Park Authority has recommended funding St Brides because of the longer-term intentions of the Authority to continue to use the walled garden in its accessibility and education programme. The total cost of funding the above based on annual costs provided by PCC is £101,610.

Having reviewed the geographical distribution of locations, officers also recommend that Little Haven be added to the locations for funding, to ensure that a cluster of closures does not occur within St Brides Bay. This will take the total cost to the National Park Authority to £110,970.

The Members' Working group also recommend that this offer be accompanied by a request to PCC to set up a Working Group to consider how toilet facilities at key locations can be enhanced via grant applications to improve infrastructure and reduce ongoing revenue costs. Members consider that an opportunity exists in 6 locations (West Angle, Freshwater East, Manorbier, Poppit Sands, Newport Sands / Traeth Mawr and Broad Haven North) to deliver an Accessible Coast project linking enhanced changing places facilities to the National Park's beach wheelchair scheme and improved physical infrastructure such as beach ramps. Members also consider that there is a more general opportunity to seek grant funding for capital investment to improve general provision around the coast.

## **RECOMMENDATION:**

**That Members agree:**

1. To approve a formal offer to Pembrokeshire County Council to fund toilet facilities at specific locations within the National Park for a period of two years.
2. To agree that this offer be subject to a request for a commitment from Pembrokeshire County Council that it establish a working group consisting of representatives of the National Park, along with other relevant partners to develop a strategy to seek grant funding to improve general standards at locations around the coast and to develop an Accessible Coast project, submitting grant funded applications over this two year period.

Background Documents

Appendix 1: Scoring system for facilities

Appendix 2: Options appraisal

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Last updated 28/08/23	Blue Flag implications?	Use profile	Proximity to other facilities	PCNPA Engagement and Inclusion	
				Team use	Wheelchair scheme?
<b>Public Toilets Data</b>	PCC data Are there any 'Blue Flag' beach implications at this location if public toilet ceases to operate <b>YES/NO</b>	Please describe volume of use ( <b>High/medium/low</b> ) & profile of use ( <b>seasonal/Year round</b> )	Alternative Facility within 1 mile walk? (Phil Barlow analysis)	Use by PCNPA Engagement and Inclusion Team?	Is location part of Beach Wheelchair scheme?
	West Angle ( Adjacent to Wave Crest café)	N	Low winter, medium summer, all year round	No	Yes - school groups, one of the beaches that provides good access to the coast for schools
Freshwater East ( Path leading to beach)	N	Low winter, medium summer, all year round	No	Yes - school groups. One of the beaches that provides good access to the coast for schools	Yes
Manorbier Car Park	N	Low winter, medium summer, all year round	No	Yes - school groups. One of the beaches that provides good access to the coast for schools	No (but planned)
Newport Sands/Traeth Mawr Car Park	N	Low winter, medium summer, all year round	No	Yes - school groups and other inclusivity programmes	Yes
Newgale South Car Park	N (other toilet facilities available)	Low winter, medium summer, seasonal	Yes (Newgale Central Car park)	Yes, but could use central car park and toilets.	No (but possible in future)
Nolton Haven Car Park	N	Low winter, medium summer, seasonal	No	No	No
Poppit Sands ( next to RNLI)	Y	Low winter, medium summer, all year round	No	Yes - school groups and other inclusivity programmes. One of the beaches that provides good access to the coast for schools	Yes
Saundersfoot Car Park	N (other toilet facilities available)	Low winter, high summer, all year round	No	yes - inclusivity programmes. Also one of the beaches that provides good access to the coast for schools	Yes
St Brides	N	Low winter, medium summer, all year round	No	Yes, used by schools and inclusivity groups. Walled orchard has toilet block built by Scouts and formerly unavailable to our groups but would need to continue this or public loo provision.	No
Broad Haven North End Car Park	N (other toilet facilities available)	Low winter, medium summer, seasonal	Yes (Broad Haven, South Car Park)	Yes - schools and inclusivity groups. One of the beaches that provides good access to the coast for schools - possibly highest use beach for this purpose.	Yes
Moylegrove Car Park	N	Low winter, low summer, all year round	No	No, but we have been encouraging outdoor pursuits advisors at Ceibwr to use these facilities	No
Penally Station Car Park	N	Low winter, low summer, all year round	No	No	No
Solva Car Park	N	Low winter, medium summer, all year round	No	No	No
Little Haven ( Next to RNLI)	N	Low winter, medium summer, all year round	No (whilst technically yes (Broad Haven, South Car Park), however when the tide is in this involves a walk up and along a steep hill on a road without footpaths.	No	No
Newport Parrog	N	Low winter, medium summer, all year round	Yes (Newport, Long Street Car Park)	Yes - Walkability Groups. Not Education groups due to poor coach access	No
Porthgain	N	Low winter, medium summer, all year round	No	Not education, but this is a start/end point for several NPA led walks during the spring and summer	No
St D Oriel Y Parc	N	Low winter, medium summer, all year round	Yes (within Oriel y Parc)	More likely to visit when OYP is open and use theirs.	Yes (MOBILITY SCOOTERS)
<b>Total</b>					

Public Toilets Data	Environmental designations		Number of 'Greens' = Contributes to Park Purposes	Cost of annual contribution (2023 base)	Fund for 2 years	long term access project with changing facility? (focus on wheelchair/engagement use - 2 greens or 1 green 1 amber)	Justification for short-term payment (2-3 years)
	SSSI Distance category (Close = less than 50m, Near less than 100 m, Distant 100m+)	SAC Distance category (Close = less than 50m, Near = less than 100m, Distant 100m+)					
West Angle ( Adjacent to Wave Crest café)	Close	Close	5	£5,725	YES	yes	
Freshwater East ( Path leading to beach)	Distant	Distant	3	£10,064	YES	yes	
Manorbier Car Park	Close	Distant	3	£13,895	YES	yes	
Newport Sands/Traeth Mawr Car Park	Near	Distant	3	£14,689	YES	yes	
Newgale South Car Park	Distant	Distant	0	0	NO		
Nolton Haven Car Park	Near	Near	1	£0	NO		
Poppit Sands ( next to RNLI)	Close	Close	6	£19,028	YES	yes	
Saundersfoot Car Park	Distant	Distant	4	£11,516	YES	already new build?	
St Brides	Near	Near	2	£7,400	YES		
Broad Haven North End Car Park	Close	Close	4	£7,239	YES	yes	
Moylegrove Car Park	Distant	Distant	1	0	NO		
Penally Station Car Park	Close	Distant	2	0	NO		
Solva Car Park	Close	Close	3	£12,055	YES		
Little Haven ( Next to RNLI)	Near	Near	1	£0	NO		
Newport Parrog	Distant	Distant	1	0	NO		
Porthgain	Distant	Distant	1	0	NO		
St D Oriel Y Parc	Distant	Distant	1	0	NO		
<b>Total</b>				£101,610			
			plus Little Haven	£9,360			
				£110,970			



## Appendix 2 - Options Assessment

Option	Advantage	Risks	Recommendation
<p>1. Do nothing option – refuse the request</p>	<p>Cost neutral to the Authority and does not create assumption/burden of ongoing costs.</p>	<p>Risk of closure of the 17 toilet facilities.</p> <p>Closure of facilities would have negative potential impacts in terms of access for vulnerable groups including those with protected characteristics such as those with disabilities. Potential difficulties in National Park operations for Engagement and Inclusion groups in some areas.</p> <p>Potential environmental impacts on SACs/SSSIs in some locations.</p> <p>Potential impact on Blue Flag status for Poppit Sands – could also impact on Saundersfoot and Broad Haven North if alternative facilities closed.</p>	<p>Closure of all facilities would be likely to have a negative impact on the Park purposes particular the purpose to promote public understanding and enjoyment of the special qualities and in some places might have a negative impact on conservation (potential impacts on SSSIs and SACs).</p> <p><b>This approach is therefore not recommended.</b></p>
<p>2. Full payment option – agree to pay in full for all toilet facilities on an annual basis</p>	<p>Ensures ongoing provision of all facilities across the National Park with no potential impacts on public understanding and enjoyment of special qualities or conservation.</p>	<p>Total cost to the Authority for this financial year alone is £160,221.</p> <p>With budgetary constraints this is likely to be unfeasible for the Authority.</p> <p>Risks of these costs increasing for some facilities given their age and lack of maintenance over many years.</p>	<p>The full request cannot be financially supported by PCNPA. There are some facilities which could close without a significant impact or risk to the Park purposes.</p> <p><b>This approach is therefore not recommended.</b></p>

		Risk of PCNPA committing to fund some facilities where their closure would not negatively impact on Park purposes or where use is very low.	
3. Part Payment Location option	<p>Ensures ongoing provision of those facilities across the National Park which have been identified as contributing to Park purposes.</p> <p>The advantage of this option is that it may be financially viable for the Authority to support up to approximately £100k of costs per year.</p>	<p>Risks of PCC assuming PCNPA will cover these costs on an ongoing basis and that these costs will increase significantly year on year for some facilities given their age and lack of maintenance over many years.</p> <p>Risk of some facilities still needing to close which might partially contribute to Park purposes.</p>	<p>If the contribution is approximately £100k per annum this could be supported financially by PCNPA, provided other anticipated income generation streams are successfully introduced at a later date.</p> <p>There are some facilities which could close without a significant risk to Park purposes.</p> <p><b>This approach is recommended but on a short-term basis only (financial commitment for 2 years). It is recommended that any offer be accompanied by a request that during this time PCC, PCNPA and other interested parties work collaboratively to seek grant funding for an investment project to improve facilities and reduce running costs.</b></p>
4. Part Payment Percentage Option – agree to pay 50% of costs for a select number of locations on an annual basis	The advantage of this option is that it may be financially viable for the Authority to support up to £100k of costs per year.	Risk is that without a 100% commitment PCC will still close these facilities which are not fully funded in November 2023 and that this will therefore not ensure the ongoing provision of those facilities	Closure of facilities would be likely to have a negative impact on the Park purposes particular the purpose to promote public understanding and enjoyment of the special qualities and in some

		across the National Park which have been identified as contributing to Park purposes.	places might have a negative impact on conservation (potential impacts on SSSIs and SACs).  <b>This approach is therefore not recommended.</b>
5. Improve facilities option – seek to establish a partnership approach with PCC to redevelop and improve facilities drawing on grant funding to reduce revenue costs over a 2 year period	This option has significant advantages in potentially reducing running costs at the same time as ensuring enhanced provision for communities and visitors.	Risk is that without an immediate commitment from PCNPA that PCC closes facilities in the short-term that contribute to Park purposes.	PCNPA has identified a number of grant funding streams that could be accessed by both Authorities to improve facilities.  <b>This approach is recommended but tied to Option 3 a short term part payment of specific locations option.</b>
6. Strategic Accessibility project - identify 5-6 strategically important locations on the Coast to create as fully accessible locations with the aim of developing a capital grant funded project to re-develop the existing facilities to include full accessible changing rooms and have bespoke storage areas alongside these for wheelchair/mobility aid hire with protected key pads. Identify if asset transfer in any of these locations would help delivery.	This option has significant advantages in potentially reducing running costs at the same time as ensuring enhanced specific provision for communities and visitors who require disabled provision.	Risk is that without an immediate commitment from PCNPA that PCC closes facilities in the short-term that contribute to Park purposes	PCNPA has identified a number of grant funding streams that could be accessed by both Authorities to improve facilities.  <b>This approach is recommended but tied to Option 3 a short term part payment of specific locations option and Option 4 which seeks to encourage a partnership approach to look at a general upgrade of facilities supported by grant applications.</b>