

## PCNPA Equality Impact Assessment – National Park Management Plan

# ANNEX 3

**Title of what is being Assessed:** National Park Management Plan (Stage 2: Post Consultation)

**Is this a staged Integrated Assessment:** Yes. This is Stage 2: Post Consultation, prior to approval.

This assessment tool aims to ensure the appropriate steps are taken in our plan, policy and decisions making processes to:

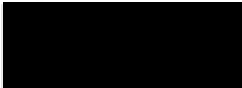
- Comply with the Public Sector Equality Duty (we are required to assess equality impacts under the Welsh Specific duties.)
- Demonstrate that we have shown due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage when taking strategic decisions under the Socio-Economic Duty.
- Ensure we are considering impact on Health and Well-being

It considers impacts on the following:

- Protected Characteristics Age, Disability, Gender Reassignment. Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation
- Carers
- Areas of deprivation within Pembrokeshire / those experiencing socio economic disadvantage potentially hidden in rural dispersed communities
- Socio economic disadvantage
- Intersectionality of Characteristics
- Health and Well-being Outcomes (Physical and Mental Health, Public Health)

### Section 1 – Details of the Strategic Plan, Policy or Decision

<b>Name of Strategic Plan, Policy or Decision being assessed</b>	National Park Management Plan – A Partnership Plan for the National Park 2025-2029 (Review) Each National Park Authority must prepare a five-yearly Management Plan "which formulates its policy for the management of the relevant Park and for the carrying out of its functions in relation to that Park" (Section 66 of the Environment Act, 1995).
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<b>Department/ Service Area</b>	Strategic Policy
<b>Officer Responsible for Impact Assessment</b>	Mair Thomas (Performance and Compliance Officer) / Michel Regelous (NPMP and Marine Officer)
<b>Responsible Senior Manager</b>	Name: Sara Morris Title: Director of Placemaking, Decarbonisation and Engagement
<b>Timetable for the Assessment</b>	Stage 1: Pre Consultation – May 2024 in advance of consultation document going to NPA 19th June. Stage 2: Assessment updated following consultation period prior to plan going for final approval.
<b>Monitoring and Review of Assessment</b>	This was a staged assessment, and the stage 1 assessment has been revisited after consultation period prior to final approval to take account of consultation feedback and further revisions to the plan, including changes to structure etc in response to consultation feedback. Assessment should inform rewording where required within the Plan – to be captured in action plan at end of assessment. Assessment may identify actions that need to be taken forward as part of implementation of the plan – to be captured in action plan at end of assessment.
<b>Chief Executive Sign Off – Completed Assessment and Summary/ Recommendations (Stage 1)</b>	<div style="text-align: right;">Sign off date:</div> <div style="text-align: center;">  </div> <div style="text-align: right;">11/03/2025</div>

## Section 2 – Aims and Overview of the Strategic Plan, Policy or Decision

### What is its proposed purpose?

The Environment Act 1995 requires the National Park Authority to prepare a Management Plan for the National Park. Each National Park Authority must prepare a five-yearly Management Plan "which formulates its policy for the management of the relevant Park and for the carrying out of its functions in relation to that Park" (Section 66 of the Environment Act, 1995). The current Management Plan is for 2020-2024. This draft replacement Management Plan – or Partnership Plan - is for 2025-2029. It builds on previous plans, reflecting updated legislation and policy, and incorporates learning from ongoing conversations with partner organisations and the public. It takes an iterative approach to planning, where the outputs and learning from one plan cycle inform the next.

The Plan contains section on Special qualities of the National Park, which have been updated following specific public consultation on special qualities. The Special Qualities are captured under the following headings with statement of significance added to them:

- Landscapes and seascapes
- Coastal scenery
- Wildlife
- Rights of Way
- Distant, uninterrupted views and open horizons
- Tranquillity
- Night Skies
- Patterns of use
- Heritage and Culture
- Earth Heritage
- Recreational Opportunity
- Community and Stewardship

Following consultation a number of changes were applied to the structure of the document, including

- Addition of a vision for the National Park
- Further information on how plan will be delivered in partnership

- Missions have been added to each theme
- Structure amended to include under each theme - mission, results, policies and measures and then set of partner actions for workstreams under each policy area.

Themes for partnership action have been included, with set of key outcomes and table of policies with key results and partners who will be responsible for their delivery. The themes for partnership action are:

Theme	Mission	Results	Policies
Conservation	Conserve and enhance landscapes, seascapes, natural beauty and wildlife.	<ol style="list-style-type: none"> <li>1. We will conserve and enhance landscape and seascape quality.</li> <li>2. We will preserve distant, uninterrupted views and open horizons.</li> <li>3. We will reduce the impact of light pollution on wildlife and people.</li> <li>4. We will conserve earth heritage sites.</li> <li>5. We will conserve and improve soil health and enhance natural carbon stores.</li> <li>6. We will promote ecosystem recovery at scale (the 30x30 target) and improve the state of wildlife on land and in the marine environment (as a milestone to clear recovery by 2050).</li> <li>7. We will increase the connectivity of the landscape for wildlife.</li> <li>8. We will achieve favourable conservation status on high nature value sites.</li> <li>9. We will maintain and enhance species for which Pembrokeshire is uniquely important.</li> </ol>	<ul style="list-style-type: none"> <li>○ Policy L1: Conserve and enhance National Parks landscapes and seascapes.</li> <li>○ Policy L2: Protect and enhance dark night skies.</li> <li>○ Policy L3: Protect and enhance earth heritage.</li> <li>○ Policy L4: Protect and enhance natural soundscapes.</li> <li>○ Policy E1: Conserve and enhance biodiversity quality, extent and connectivity at scale.</li> <li>○ Policy E2: Conserve and enhance marine biodiversity</li> </ul>

Cultural Heritage and Connection	<p>Promote enjoyment and understanding of the special qualities of the National Park</p> <p>Conserve and enhance cultural heritage</p> <p>[Note assessment recommends making amendments to this mission]</p>	<ol style="list-style-type: none"> <li>1. We will protect and restore designated and non-designated historic assets.</li> <li>2. The National Park area contributes to the Welsh target of one million Welsh speakers by 2050 .</li> <li>3. We will remove barriers to outdoor recreation and wellbeing opportunities and promote opportunities to more diverse audiences, e.g. people with visible or hidden disabilities, children and young families from areas of deprivation, people from global majority, faith and marginalised groups.</li> <li>4. More young people will discover and enjoy the National Park.</li> </ol> <p>[Note assessment recommends making addition to results]</p>	<ul style="list-style-type: none"> <li>○ H1: Conserve and enhance landscapes of historic interest, Conservation Areas, Historic Parks and Gardens, Scheduled Monuments, buildings of interest, non-designated heritage assets and their settings.</li> <li>○ Policy H2: Promote the Welsh language and local dialects, and celebrate culture and creativity related to the landscape.</li> <li>○ Policy W1: Provide and promote sustainable outdoor recreation opportunities for all.</li> <li>○ Policy W2: Provide and promote inspiring outdoor learning, well-being and personal development experiences for all.</li> </ul>
Climate and Natural Resources	<p>Reduce and adapt to the impacts of climate change</p> <p>Manage natural resources sustainably</p>	<ol style="list-style-type: none"> <li>1. We will halve carbon emissions within the National Park area by 2030 (2021 baseline). This is a milestone to the Race to Zero target of achieving carbon-neutrality in the National Park area by 2050.</li> <li>2. We will proactively respond to climate change impacts on e.g. coastal communities, roads and infrastructure, and rights of way.</li> <li>3. We will conserve and improve soil health and enhance natural carbon</li> </ol>	<ol style="list-style-type: none"> <li>7. Policy N1: Contribute to a carbon-neutral Wales.</li> <li>8. Policy N2: Adapt to climate change</li> <li>9. Policy N3: Conserve and enhance soils and natural carbon storage.</li> <li>10. Policy N4: Conserve and enhance water quality and restore natural watercourses.</li> <li>11. Policy N5: Protect air quality</li> </ol>

		<p>stores (including stores in marine and coastal environments).</p> <p>4. We will contribute to the Welsh Government commitment to reduce nutrient inputs by a minimum of 50% by 2030 .</p> <p>5. We will work collaboratively to reduce negative impacts of nutrient pollution on the quality and use of inland or coastal waters.</p> <p>6. 6. We will reduce ammonia emissions from the agricultural sector</p>	
Communities	Foster the socio-economic well-being of National Park communities in the pursuit of National Park purposes.	<p>1. We will meet all Local Development Plan targets, e.g. 60 new homes per annum, of which 23 are affordable.</p> <p>2. We will reduce the significant waiting list for affordable housing in Pembrokeshire (over 4,500 in 2024).</p> <p>3. We will contribute to delivery of Tackling Poverty: Our Strategy to 2023.</p> <p>4. We will develop and deliver projects and schemes that benefit those facing inequalities and deprivation, in particular children and young families from deprived areas.</p> <p>5. We will address the issue of high numbers of poorly paid seasonal jobs and limited employment opportunities.</p> <p>6. We will help residents and visitors adapt to changing physical and well-being needs.</p>	Policy SE1: Foster socio-economic wellbeing of National Park communities (in pursuit of National Park purposes).

		<p>7. We will implement procurement strategies that have positive impact on local businesses contributing to delivery of the Socially Responsible Procurement Duty.</p> <p>8. We will deliver the Pembrokeshire Destination Management Plan 2024-2028.</p> <p>9. 10. We will maintain and extend sustainable transport and active travel options to achieve the target of 45% of journeys being undertaken by sustainable modes by 2040.</p>	
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#### How does this relate to Equality, Socio Economic Duty and Health Outcomes?

- Authority is required to consider impact of its strategic decisions in terms of public sector equality duty, potential negative impacts on protected groups, areas where there could be risk of discrimination or opportunities to positively promote the duty. It is also required to consider socio economic duty when making strategic decisions. Across the partnership themes for actions activities have the potential to positively impact on health outcomes.
- The Authority has in place an Equality Plan and Objectives, a revised plan was approved at the February 2025 NPA, integration between the two is important to help deliver change. Long term aims in the Plan include:
  - Create a Park that is a Landscape for Everyone, this includes following equality objectives:
    - **Equality Objective:** By 2029, promotion of the National Park as a destination is representative of more diverse audiences and we will have removed some barriers to accessing the Park for underrepresented groups or those who face specific barriers. [Child Poverty Objective]
    - **Equality Objective:** By 2029, we will have developed and delivered projects and schemes that have positive benefits for those facing inequalities and deprivation, in particular children and young families from deprived areas. **[Child Poverty Objective]**
    - **Equality Objective:** By 2029, collective and collaborative action with range of partners is supporting designated landscapes to be landscapes for everyone.
    - **Equality Objective:** By 2029, the Authority through its placemaking activities is supporting an increase in the availability of affordable housing in the Park area. **[Child Poverty Objective]**

<ul style="list-style-type: none"> <li>○ Our Services are accessible and inclusive by default and our projects are contributing to addressing inequality</li> <li>○ Our workforce is diverse, we are an employer of choice and staff feel supported within an inclusive and fair work environment</li> <li>○ A diverse range of people are able to influence the work of the Authority and decisions that affect the Park area.</li> <li>● There are known barriers and challenges that impact on access to the Park and wider environment/ outdoors and challenges for communities living within the park, including affordable housing, accessible transport etc.</li> <li>● Some interventions that don't directly relate to equality and inclusion themes, could have unforeseen negative consequences and impacts and the assessment process should help identify these, and any mitigating actions needed.</li> </ul>
<b>Is it new or existing and under review?</b>
Current management Plan is for 2020-2024. This is a review for draft replacement Management Plan for 2025-2029. The draft plan has been subject to further revision following consultation feedback from partners and these revisions have been considered as part of this stage 2 assessment.
<b>What will change as a result of it and/or what changes are being proposed?</b>
<ul style="list-style-type: none"> <li>● Reduction to four themes for Partnership action from original five, the new themes are conservation, connection, climate and natural capital and communities. This more closely align with the Authority's revised Well-being Objectives.</li> <li>● Management Plan sets out a range of results across themes that it is trying to achieve through partnership action (see table above)</li> </ul>
<b>What are its anticipated notable outcomes (positive and negative)?</b>
<p><b>Positive:</b></p> <ul style="list-style-type: none"> <li>● Reduced number of themes align closely with the Authority's revised Well-being Objectives, helping support Authority to drive delivery of the Plan internally and when working with strategic partners</li> <li>● Management Plan sets out a range of results across themes that it is trying to achieve through partnership action (see table above)</li> <li>● Number of areas within the plan help support promotion of the public sector equality duty, particularly in terms of supporting more people to access the outdoors and experience the Park's Special Qualities</li> <li>● Following consultation process and feedback from partners further work has been carried out to engage with partners to support the plans status as a partnership plan.</li> </ul> <p><b>Negative:</b></p> <ul style="list-style-type: none"> <li>● Challenges in terms of meeting expectations of plan within a context of increasing budget pressures and competing delivery pressures.</li> </ul>



- Inclusion related activities are normally reliant on time bound project funding. However, there are opportunities of aligning different goals such as nature recovery and volunteering to develop projects that meet a number of objectives as seen with funding secured for Pathways project.
- Authority and partners are facing challenging financial environment and pressures which could impact on ability to deliver or create new challenges/ issues. The Authority will need to work creatively and collaboratively with partners to address these issues. An example of this was the establishment of the toilet working group with PCC.
- Some interventions that don't directly relate to equality and inclusion themes, could have unforeseen negative consequences and impacts and the assessment process should help identify these, and any mitigating actions needed.
- Some interventions may cause tensions between different Park user groups or between or within communities and/ or visitors.
- Challenges around commercialisation of Park was highlighted within responses to Special Qualities survey in terms of pressures around adventure providers, the Authority as it looks at income diversification opportunities will need to consider how it can balance its own financial needs with these challenges. Linked to this is potential barriers that can be placed on some groups due to increases in charges for some services.

#### **Detail the budget implications relating to it?**

- Budget allocated for National Park Management Plan development, including creation of Easy Read version.
- Plan sets strategic direction of Authority and will inform future prioritisation of resources for delivery against it. In some areas additional external/ project funding will be needed.
- Inclusion related activities are normally reliant on time bound project funding. However, there are opportunities of aligning different goals such as nature recovery and volunteering to develop projects that meet a number of objectives as seen with new funding secured for Pathways project.
- Authority and partners are facing challenging financial environment and pressures which could impact on ability to deliver or create new challenges/ issues. The Authority will need to work creatively and collaboratively with partners to address these issues. An example of this was the establishment of the toilet working group with PCC.
- Challenges around commercialisation of Park was highlighted within responses to Special Qualities survey in terms of pressures around adventure providers, the Authority as it looks at income diversification opportunities will need to consider how it can balance its own financial needs with these challenges.

#### **Indicate which groups of people will be, or potentially could be, impacted upon by its implementation (e.g. service users, employees, volunteers, people living in particular communities)? Please include any equality or socio economic disadvantaged groups likely to be affected**

1. Communities, Visitors, residents, stakeholders and the public in general

- The Plan will influence future action that could affect people living in the Park in areas such as accommodation, employment, transport, access to the outdoors, heritage and culture, education, well-being initiatives and quality of the environment and landscape they live in. It could also impact on future resilience of communities within the Park area. This has implications for people across protected groups and those affected by socio economic disadvantage.
  - The Plan will influence actions that could affect future visitors to the Park including access and experience. This has implications for people across protected groups and those affected by socio economic disadvantage.
  - The Plan aims to increase access to the Park to underrepresented audiences and groups or those who face barriers to access. This has implications for people across protected groups and those affected by socio economic disadvantage.
  - The Plan aims to engage people in looking after the Park and influence behaviours of people when in the Park including recreational users. This has implications for people across protected groups and those affected by socio economic disadvantage.
  - Plan is part of developing an ongoing conversation about the Park with Communities and Stakeholders. This has implications for people across protected groups and those affected by socio economic disadvantage.
  - Plan aims to health support improved health outcomes, for those living in the Park or visiting the Park. This has implications for people across protected groups and those affected by socio economic disadvantage.
2. The work undertaken by NPA and other organisations involved in the delivery of the plan
- The Plan is a partnership plan and identified identifies workstreams with partner actions across four themes.
  - For the Authority the partnership themes align with its Well-being Objectives and the details within the policy areas and results sections will influence priority actions and deliverables within the Authority's delivery plans. It will also highlight key areas for its future partnership work.
3. The long-term work of the NPA and other organisations involved in the delivery of the plan
- Impact monitoring will be used to evaluate the direction and rate of travel. Where gaps are identified additional action may be required.
  - The land use planning dimension of the National Park Management Plan is put into effect through the statutory Local Development Plan for the National Park.
4. Staff of NPA and other organisations involved in the delivery of the plan

- To solve some of the challenges identified or pursue some of the opportunities identified staff may need to change and adapt their ways of working. Staff may also be working within a context of increasing budget pressures and competing delivery pressures.
- Working collaboratively with partners will be key to delivery of the plan.
- Plan could impact on areas relating to workforce skills, transport, housing, recreation and access to the outdoors and culture all areas that could impact on workforce recruitment, experiences and retention.

**Is the policy related to, influenced by, or affected by other policies or areas of work (internal or external) and any assessments carried out on them?**

**Following areas highlighted within legislation/ policy and proposals and guidance and resources section of the plan:**

#### **Legislation**

- Active Travel (Wales) Act 2014
- Agriculture (Wales) Act 2023
- Countryside and Rights of Way Act 2000
- Environment Act 1995
- Environment (Wales) Act 2016 including the principles of sustainable management of natural resources
- Equality Act 2010
- Historic Environment (Wales) Act 2023
- National Parks and Access to the Countryside Act 1949
- Planning (Wales) Act 2015
- Social Partnership and Public Procurement (Wales) Act 2023
- The Well-being of Future Generations (Wales) Act 2015 (including the five ways of working principles)

#### **Policy and proposals**

- Biodiversity Deep Dive 2022 (including the 30x30 target)
- Cymraeg 2050
- Environmental principles, governance and biodiversity targets: White Paper 2024, which includes proposals for a statutory target framework for biodiversity in Wales, delivered locally through the Local Nature Recovery Action Plan, geared to improvement in the status of species and ecosystems by 2030 and their clear recovery by 2050
- European Landscape Convention
- Future Wales National Plan 2040

- Just Transition Framework for net zero
- Local Development Plan 2 Pembrokeshire Coast National Park
- Llwybr Newydd: The Wales Transport Strategy 2021
- Marine Area Statement
- National Parks UK Climate Emergency Response Statement
- Natural Resources Policy 2017
- Nature Recovery Action Plan for Pembrokeshire
- Net Zero Strategic Plan 2022
- Noise and Soundscape Plan for Wales 2023-2028
- Pembrokeshire Destination Management Plan 2024-28
- Pembrokeshire Local Flood Risk Strategy
- Planning Policy Wales Edition 12, February 2024
- South-West Area Statement
- South West Wales Flood Risk Management Plan 2023-2029
- South West Wales Regional Transport Plan (2025-2030)
- Welcome to Wales: Priorities for the Visitor Economy 2020-2025
- Well-being Plan for Pembrokeshire 2023-2028
- Welsh National Marine Plan 2019

### **Guidance and resources**

- Future Trends Report (2021)
- LANDMAP – the Welsh landscape baseline
- Designated Landscape Management Plan Guidance (Natural Resources Wales)
- State of Natural Resources Report for Wales 2020 / Bridges to the Future
- State of the UK Climate Report 2023
- The National Strategy for Flood and Coastal Erosion Risk Management in Wales
- The Nature and Us / Natur a Ni vision (2023) for a 2050 where society and nature thrive together, and where people are more involved in decisions that impact on nature.
- The State of Nature 2023
- Third UK Climate Change Risk Assessment: Summary for Wales

In future, the Partnership Plan must also have regard to the sustainable land management report published under section 6 of the Agriculture (Wales) Act 2023. The first of these is due in December 2026, so will fall within the lifetime of this Plan.

#### **Internal Plans/ Integrated Assessments:**

- Local Development Plan 2 (to 2031) – Equality Impact Assessment carried out as part of the development process
- Corporate and Resources Plan and Well-being Objectives 2023/24 – 2026/17
- Equality Plan and Objectives 2020 - 2024 – Equality Impact Assessment carried out as part of the development process. A revised plan was approved at the February NPA and includes the following:
  - Create a Park that is a Landscape for Everyone, this includes following equality objectives:
    - **Equality Objective:** By 2029, promotion of the National Park as a destination is representative of more diverse audiences and we will have removed some barriers to accessing the Park for underrepresented groups or those who face specific barriers. [Child Poverty Objective]
    - **Equality Objective:** By 2029, we will have developed and delivered projects and schemes that have positive benefits for those facing inequalities and deprivation, in particular children and young families from deprived areas. **[Child Poverty Objective]**
    - **Equality Objective:** By 2029, collective and collaborative action with range of partners is supporting designated landscapes to be landscapes for everyone.
    - **Equality Objective:** By 2029, the Authority through its placemaking activities is supporting an increase in the availability of affordable housing in the Park area. **[Child Poverty Objective]**
  - Our Services are accessible and inclusive by default and our projects are contributing to addressing inequality
  - Our workforce is diverse, we are an employer of choice and staff feel supported within an inclusive and fair work environment
  - A diverse range of people are able to influence the work of the Authority and decisions that affect the Park area..
- [Welsh Language Promotion Strategy – 2023 -2028](#) - Equality Impact Assessment carried out as part of integrated assessment as part of the development process. (Not currently referenced in the plan but reference should be made)
- Integrated Assessments related to recreational management considerations and decisions – Traeth Mawr, Freshwater East and variations to Car Parking Standing Orders (related to charging).
- Authority approved at October NPA Socially Responsible Procurement Strategy and Objectives in support of Socially Responsible Procurement Duty.
- Pembrokeshire Coast Youth Manifesto, which focuses on actions for the following:

- Youth Empowerment
- Living
- Learning
- Working

**Following have not been included in the legislation/ policy section of the document, however relevant assessments recommends that they are added:**

- Legislation
  - Welsh Language (Wales) Measure 2011
- Policy and Proposals
  - Equality Plans and Objectives (Welsh Government, Pembrokeshire Coast National Park Authority, Pembrokeshire County Council)
  - National Framework for Social Prescribing
  - Welsh Language Promotion Strategies (Pembrokeshire Coast National Park Authority, Pembrokeshire County Council)

### **Section 3 – Considering the Evidence and Assessing Impact: Equality/ Socio Economic Disadvantage and Inequality of Outcomes/ Health Inequalities and Outcomes**

This section uses data, information, consultation and engagement and other relevant information to assess potential impact of the plan, policy or decision and potential mitigating action needed. Gaps in data and knowledge are also noted. See Appendix 1 for further detailed evidence from key sources.

A thematic area focused impact approach has been taken tailored to National Park Management Plan.

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NOTE: Reference is made where relevant to consultation responses from public consultation on Special Qualities that was carried out to inform the National Park Management Plan. 63 responses were received to this online consultation. The questions asked were as followed and responses noted within evidence section note the number of the question they relate to:

Questions Asked

1. Think of three places in the National Park that are special to you. What is it about these places that make them special?
2. Can you think of anything else that makes the National Park special?
3. What are the main challenges facing the special qualities you've listed above?
4. What action needs to be taken to protect or restore the things that make the National Park special?
5. Which of the following best describes you?
6. Thank you for replying to the survey. Your responses will help shape the management of the National Park. If you have any other comments, please add them below.

Feedback from consultation on the draft management plan have been included where relevant below and relevant feedback is also outlined in Appendix 2.

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**Do you have evidence or reason to believe that this will or may impact on Protected Characteristics / Socio Economic Disadvantage and Inequality of Outcomes/ Health and Well-being Outcomes and Inequalities in terms of thematic areas? Consider both positive and negative impacts.**

Area to Address	Accessible Document and Promotion of Plan
<b>Protected Characteristics affected/ Communities of Interest/ Communities of Place/ Intersectionality</b>	<ul style="list-style-type: none"> <li>• Age, Disability, Race</li> <li>• Intersectionality of Characteristics</li> </ul>
<b>Evidence or Issue</b>	
<ul style="list-style-type: none"> <li>• Improvements have been made to the original document in terms of font size etc. The size of the document has also been reduced, this will make the document easier to navigate.</li> <li>• An Easy Read document was produced for the consultation, with intention to produce Easy Read version of final document. Cost for creation of Easy Read version have been included within plan development budget. Alongside supporting people who use Easy Read to engage with the plan it will help with issue identified within consultation feedback around accessibility of terms (<b>Accessibility of Terms:</b> Special Qualities: National Trust Cymru - We feel that this section is too complex, with words that are complicated and hold little meaning to most. For example 'Earth Heritage' could be called geology which would be clearer to most). However there remains some difficult terms which won't be familiar to people, particularly those without for example a geography/ environmental or heritage background. An example of this is use of term transhumance, could this term be explained as seasonal movement between fixes summer and winter pastures. Could there be an option for HTML</li> </ul>	

<p>version for us to create a separate glossary website page that explains some of these terms – this could also act as education tool.</p> <ul style="list-style-type: none"> <li>• ID 67/ Live in PCNP/ Q6: “Please make different accessible versions of the management plan e.g. audio, video, infographic, for kids, for older youth and share them across social media.”</li> <li>• Authority required to comply with Public Sector Bodies (Websites and Mobile Applications) (No.2) Accessibility Regulations 2018.</li> </ul>
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<b>Impact/ Risk</b>	<b>Response/ Mitigation/ Any additional actions needed</b>
<ul style="list-style-type: none"> <li>• Positive impact of having easy read version and improvements made to formatting in terms of original document in terms of font size etc.</li> <li>• Terminology in places may not be understood by people who aren't from a geography/ environmental or heritage background (example provided use of term transhumance). Could there be an option for HTML version for us to create a separate glossary website page that explains some of these terms – this could also act as education tool.</li> <li>• Consideration of how post approval to develop different ways of bringing the management plan and its monitoring/ impact alive to wider audiences, particularly young people.</li> <li>• Ensuring compliance with Public Sector Bodies (Websites and Mobile Applications) (No.2) Accessibility Regulations 2018.</li> </ul>	<p>Recommended Amendment/ Action:</p> <ul style="list-style-type: none"> <li>• Document Format: Final document available in HTML format and easy read version is available.</li> <li>• Amendment to Text/ Additional Supporting Information: Double check terminology for any complex ones that could benefit from explanation and consider developing a glossary (this could be separate website page for html version and could be developed as an education resource)</li> <li>• Ongoing conversation/ monitoring: Engage with youth committee, engagement and inclusion team and communications team to consider post approval how to bring the management plan and its monitoring/ impact alive to wider audiences, particularly young people.</li> </ul>

<b>Area to Address</b>	<b>Suggested Amendments for Forward/ About this Plan</b>
<b>Protected Characteristics affected/ Communities of Interest/ Communities of Place/ Intersectionality</b>	<ul style="list-style-type: none"> <li>• Age, Disability</li> <li>• Socio economic disadvantage</li> <li>• Areas of deprivation within Pembrokeshire / those experiencing socio economic disadvantage potentially hidden in rural dispersed communities</li> </ul>



	<ul style="list-style-type: none"> <li>• Intersectionality of Characteristics</li> <li>• Health and Well-being Outcomes</li> </ul>
<b>Evidence or Issue</b>	
<ul style="list-style-type: none"> <li>• Suggested amendments to wording from Stage 1 assessment have been applied</li> <li>• Forward references areas relevant to this assessment in terms of: health emergency, wider determinants of health, challenges relating to jobs and housing for young people, link with just transition, poverty, role the park, its assets and partnerships can help address these issues, example provided of Roots to Recovery Project.</li> </ul>	
<b>Impact/ Risk</b>	<b>Response/ Mitigation/ Any additional actions needed</b>
<ul style="list-style-type: none"> <li>• Suggested amendments from Stage 1 applied</li> <li>• Forward positively gives visibility to some of the challenges identified in the equality impact assessment and also role Park and partners involved in the plan can play in addressing these issues</li> </ul>	No

Area to Address	Referencing Pembrokeshire Coast Youth Manifesto	
Protected Characteristics affected/ Communities of Interest/ Communities of Place/ Intersectionality	<ul style="list-style-type: none"><li>• Age</li><li>• Socio economic disadvantage</li><li>• Areas of deprivation within Pembrokeshire / those experiencing socio economic disadvantage potentially hidden in rural dispersed communities</li><li>• Intersectionality of Characteristics</li><li>• Health and Well-being Outcomes</li></ul>	
Evidence or Issue		
<ul style="list-style-type: none"><li>• It is positive that an introduction from the Pembrokeshire Coast Next Generation has been included within the document.</li><li>• Forward from the Pembrokeshire Coast National Park Generation now makes explicit reference to Youth Manifesto: Our Youth Manifesto and priorities for action on youth, empowerment, living, learning and working have fed into this Plan and we are pleased to see the importance of young people accessing nature recognised.</li><li>• To provide further recognition of the Youth Manifesto, it would be beneficial to include it within the examples of relevant legislation, policy and guidance in the policy and proposal section.</li></ul>		
Impact/ Risk		Response/ Mitigation/ Any additional actions needed
<ul style="list-style-type: none"><li>• Positive that an introduction from the Pembrokeshire Coast Next Generation has been included within the</li></ul>		Recommended Amendment/ Action:

<p>document. Forward from the Pembrokeshire Coast National Park Generation now makes explicit reference to Youth Manifesto: Our Youth Manifesto and priorities for action on youth, empowerment, living, learning and working have fed into this Plan and we are pleased to see the importance of young people accessing nature recognised.</p> <ul style="list-style-type: none"> <li>• To provide further recognition of the Youth Manifesto, it would be beneficial to include it within the examples of relevant legislation, policy and guidance in the policy and proposal section (Annex 1).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to Text: Include Pembrokeshire Coast National Park Next Generation Youth Manifesto in the examples of relevant legislation, policy and guidance in the policy and proposal section (Annex 1).</li> </ul>
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Area to Address	Health and Well-being - Access to the Outdoors / Connecting with Nature/ Partners Mentioned in the Plan	
Protected Characteristics affected/ Communities of Interest/ Communities of Place/ Intersectionality	<ul style="list-style-type: none"><li>• Age, Disability, Gender Reassignment. Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation</li><li>• Carers</li><li>• Socio economic disadvantage</li><li>• Areas of deprivation within Pembrokeshire / those experiencing socio economic disadvantage potentially hidden in rural dispersed communities</li><li>• Intersectionality of Characteristics</li><li>• Health and Well-being Outcomes</li></ul>	
Evidence or Issue		
Issues Highlighted in Stage 1 of the Assessment		
<ul style="list-style-type: none"><li>• SoNaRR 2020, NRW - Role of Healthy Ecosystems and Access to Green and Blue Spaces, <a href="#">NRW</a> (Source: <a href="https://naturalresources.wales/evidence-and-data/research-and-reports/state-of-natural-resources-report-sonarr-for-wales-2020/?lang=en">https://naturalresources.wales/evidence-and-data/research-and-reports/state-of-natural-resources-report-sonarr-for-wales-2020/?lang=en</a> )<ul style="list-style-type: none"><li>○ SoNaRR 2020 highlighted the positive impact that increasing access to green and blue spaces, active travel and providing community facilities to bring people together can have on preventing mental ill health and improving mental well-being and physical health. It also highlights that role Placemaking can play in promoting people’s prosperity, health, happiness, and</li></ul></li></ul>		

well-being in the widest sense. It delivers connected, mixed use neighbourhoods with access to services and amenities that encourage physical activity, energy efficiency, social interactions, safe play and learning opportunities. Socio-economic and health inequalities are lower in greener neighbourhoods and the poorest areas tend to be those with the least available good quality public green and blue space.

- SoNNaR 2020 notes that although many people in Wales already enjoy, appreciate and understand the natural world, there are considerable challenges to connect people to the natural environment. Developing a sustained connection, knowledge, understanding and interaction with nature ideally begins in early childhood through play and learning outdoors to establish an emotional connection to nature. Progressing through formal and informal nature-based learning develops an understanding of the natural world and the human impact on it and allows people to take a personal position on their behaviour and commitment to protect and maintain natural resources and influence others to do so. Recent evidence from research undertaken in relation to the COVID-19 pandemic shows outdoor education being advocated as a tool for home schooling and the safe reopening of schools. There is also wider recognition that outdoor space is part of the classroom with learners having the further benefit to their physical and mental health (NRW, 2020, Unpublished)
- Evidence shows that low-income areas suffer not only from issues associated with poor housing, lower educational attainment and poor diet, but also less access to good quality green and blue space, all of which contribute to poor health. Men and women in the most deprived areas of Wales spend approximately 19 and 18 years less in good health and die on average 9 and 7 years earlier respectively, than those living in the least deprived areas.
- Outdoor recreation, sport, learning, playing and volunteering opportunities all facilitate increased physical activity levels, accruing health benefits associated with tackling many of the key health issues in Wales, particularly the rise in obesity and Type 2 Diabetes levels (Welsh Government, 2019a). Healthy, active and resilient natural and built environments provide opportunities for people to be physically active outdoors.
- The mental health benefits of exposure to, and engagement with, natural landscapes and their contribution to general psychological health and well-being is well evidenced (Bragg and Atkins, 2016). The wildlife, landscapes and seascapes of Wales are a rich source of inspiration for many forms of artistic and cultural expression. These interactions with - and connections to – nature, play an important role in maintaining mental health and provide opportunities to improve physical health.
- Studies show that children with ADHD showed greater improvement in behaviour whilst in woodlands than in urban areas: this may be linked to tranquillity (Horwitz et al., 2015).
- Levels of participation in nature activities increased significantly, particularly in urban areas. 60% of people say they are seeing more wildlife. 42% have increased levels of gardening activities. Surveys undertaken during this period show that adults in Wales and Scotland believed looking after their mental health was important, particularly being physically active outdoors to manage stress. (NRW, 2020, Unpublished).

- **Implementing the Socio-economic Duty, A review of evidence on Socio-economic Disadvantage and inequalities of outcome. Welsh Government (2021)** (Source: <https://gov.wales/sites/default/files/statistics-and-research/2021-11/review-of-evidence-on-socio-economic-disadvantage-and-inequalities-of-outcome-revised.pdf> ) identified the following key inequalities of outcome due to socio-economic disadvantage in terms of Health:
  - Poorer physical health and lower life expectancies in more deprived areas;
  - More likely to suffer from non-communicable disease in more deprived areas;
  - People in areas of higher deprivation more likely to have poorer mental health, increased risk of suicide, and are less likely to request help for mental health;
  - Reduced access to adequate healthcare for certain communities of interest and in rural areas;
  - People from Black, Asian and Ethnic Minority communities are more likely to suffer health inequalities and experience barriers to accessing healthcare and exercise/sport;
  - Women more likely to be unpaid carers;
  - LGBTQ+ people more likely to suffer from psychological distress;
  - Disabled people face more unmet needs in healthcare.
- **Pembrokeshire Youth Assembly – “What Matters to You? Consultation 2023** (Source: <https://mgenglish.pembrokeshire.gov.uk/mgConvert2PDF.aspx?ID=73946> ) Identified that the top two issues of concerns among young people are:
  - The cost of living crisis - Support for families during the cost of living crisis and work to help prevent this impacting other areas such as young people's education, etc.
  - Mental health, emotional health and well-being - Services should be improved with young people's help and mental health education should be compulsory and challenge stereotypes
- **Pembrokeshire Well-being Assessment** (Source: <https://www.pembrokeshire.gov.uk/public-services-board/well-being-assessment>) found that:
  - Covid 19 has exacerbated issues such as mental health, loneliness and health inequalities
  - From a survey of our residents, affordability and accessibility to leisure services can be a barrier to healthy behaviours
  - The presence of the National Park has a positive impact on the well-being of young people in the county, with many citing it as the best thing about Pembrokeshire.
  - From a survey of our residents, affordability and accessibility to leisure services can be a barrier to healthy behaviours
  - Rates of diagnosis of dementia are projected to significantly increase over the coming years.
  - Population projections suggest that the number of people aged 80 or over will increase significantly by 2040.
  - There are year on year increases in the demand for domiciliary care packages.
  - The number of unpaid carers is increasing and likely underestimated by official figures.

- **National Survey for Wales – April 2022 to March 2023**  
(Source: <https://www.gov.wales/national-survey-wales-headline-results-april-2022-march-2023-html#126294> )
  - People were asked about their mental wellbeing. The results are scored using the Warwick Edinburgh Mental Well-being Scale (WEMWBS), a scale of 14 self-assessed questions with scores ranging from 14 to 70. A higher score (58 to 70) suggests high mental wellbeing, while scoring 44 or lower suggests having low mental wellbeing. Scoring between 45 and 57 suggests the person has medium mental wellbeing.
  - The average WEMWBS score in 2022-23 is 48.2. This is similar to the score in 2021-22. 32% of people have low wellbeing, 55% have medium wellbeing, and 13% have high wellbeing. On average younger people have lower wellbeing: those aged 16 to 24 have a score of 47.4, compared with a score of 51.1 for those aged 65 and over.
  - The survey also included a series of questions which assess levels of loneliness. Based on these, 13% of people were found to be lonely. People in material deprivation were more likely to be lonely: 34% of materially deprived people say they are lonely, compared with 9% of people who were not materially deprived.
  - 24% of people from Black, Asian and Minority Ethnic communities say they are lonely all or most of the time compared with 12% of White (Welsh, English, Scottish or Northern Irish) people.
- **NHS – 5 steps to mental well-being**
  - Connect with other people
  - Be physically active
  - Learn new skills
  - Give to others
  - Pay attention to the present moment
- **Health Outcomes for Gypsy and Traveller Communities**
  - The Welsh Government '[Designing Gypsy and Traveller Sites](#)' guidance notes that: "Gypsies and Travellers are amongst the most socially excluded groups, with health and education outcomes significantly worse than the settled population." This is important from a Pembrokeshire perspective as Census 2021 data notes Pembrokeshire has a higher % of people identifying as White: Gypsy or Irish Traveller at 0.5% (560) than Wales at 0.1%.
  - The Welsh Government has produced guidance for Health Care Practitioners on working effectively with [Gypsy and Travellers – Travelling to better health](#).
- **Welsh Government National Framework for Social prescribing (2024)** (Source: <https://www.gov.wales/national-framework-social-prescribing-html#135357> )
- **Volunteering and Engagement:** Seeding Change Report: shining a light on the barriers to nature conservation volunteering for young women and non-binary people of colour (Source: <https://www.wildlondon.org.uk/news/seeding-change-report> )

- **Projects:** Authority is engaged in a number of projects, partnerships and activities that are supporting more people to access the outdoors, engage in activities that promote 5 steps to well-being and connect with nature. These include First 1000 Days early years project, Roots to Recovery with MIND Pembrokeshire, Pathways supported volunteering project, supported walking opportunities, including exercise referral, engagement with young people through Next Generation work, D of E, work with Schools and colleges, Pembrokeshire Outdoor Schools, volunteering opportunities.
- **The Early Years Network – The Power of Outdoor Learning: Regulating Behaviours and Promoting Holistic Development** (Source: <https://theearlyyearsnetwork.co.uk/knowledge-hub/embracing-nature-the-benefits-of-outdoor-learning> )
  - Research has shown that spending time in natural environments has numerous benefits for children, including helping them to regulate their emotions, boost their wellbeing, promote good physical health, and improve their cognitive abilities and skills. Spending time in natural environments has been found to reduce stress, improve mood, and increase feelings of happiness and well-being. Moreover, nature-based learning inherently promotes holistic development as the outdoor environment naturally helps to foster curiosity, creativity, problem-solving skills, and social interactions. Through the outdoor environment early years professionals and parents are able to harness a world that provides children with the optimal environment to boost their mental health and emotional wellbeing, explore their physical capabilities, become mesmerised by natural open ended resources that compliment their own curiosity and imaginations, as well as the endless opportunities to learn through play. As the world quickly becomes more sedate and physical health markers continue to dramatically decline it has never been more important that early years professionals are providing opportunities for young children to get outside and move their bodies.

### **Feedback from draft Plan consultation**

- **Positive impact of nature/ heritage/ wilderness of well-being, including heritage alongside nature, positive impact of outdoor education opportunities**
  - Cadw - W2/B – potentially broaden – Deliver nature and heritage based social prescribing and wellbeing initiatives, this would then also broaden delivery partners.
  - Special Qualities: NRW - We also recommend that the sense of remoteness and wildness is reinstated as a headline special quality, in recognition of the importance for human health and well-being of being able to experience untamed or 'wild' places such as those in PCNP.
  - Equality Impacts: Pembrokeshire County Council - In terms of people's health outcomes, the provisions of the Partnership Plan would be likely to bring positive health benefits, particularly if efforts are made to ensure that the National Park is accessible to as many people as possible, including both tourists and residents. In a disability and mobility context,

<p>access to some of Pembrokeshire's fine beaches in the National Park remains a challenge that will require innovative solutions.</p> <ul style="list-style-type: none"> <li>○ The Cleddau Project CIC - We are in agreement that the following headline issues require a meaningful response [this included]: Providing outdoor learning opportunities, in particular for children</li> <li>○ Butterfly Conservation - We strongly support the Key Outcome "Provide and promote inspiring outdoor learning, well-being and personal development experiences for all", particularly Action W2/C. Butterfly Conservation, in collaboration with the University of Derby, have demonstrated the positive impact of citizen science on mental health and nature connectedness.</li> </ul>	
<b>Impact/ Risk</b>	<b>Response/ Mitigation/ Any additional actions needed</b>
<p><b>General Impact/ Risk</b></p> <ul style="list-style-type: none"> <li>• Increasing access to the outdoors and nature for children and young people through outdoor education and play opportunities can have a positive impact on their mental health and well-being. Access to outdoor play and its impact on emotional, cognitive and physical development is particularly important in early years settings. Similarly access to the outdoors and nature can have positive impact on people of all ages in terms of mental health and well-being and physical well-being and groups currently experiencing worse health outcomes.</li> <li>• Some groups face barriers to being able to access health and well-being opportunities within the Park and additional assistance may be needed to support them to remove these barriers. Tailored projects can assist in this area and the National Park due to its Special Qualities is especially suited for the development of projects that support the 5 steps to mental well-being.</li> </ul> <p><b>Positive Impacts/ Recognition</b></p>	<p><b>Recommended Amendment/ Action:</b></p> <ul style="list-style-type: none"> <li>• Amendment to text: Amend Cultural Heritage and Connection mission to explicitly reference health benefits of Special Qualities, suggested re wording: "Enhance equitable access to the National Park and promote the enjoyment, understanding, and health benefits of its Special Qualities for all."</li> <li>• Amendment to text: Suggest adding following to Cultural Heritage and Connection Background Section: "The Welsh Government has in place a national framework for social prescribing. The consultation on the partnership plan highlighted the role that partners can play in contributing to the social prescribing and wider well-being agenda in Wales linked to heritage, nature and outdoor activities. Many of the key partners involved in delivery of this plan are engaged with Public Health Wales's Hapus platform in support of mental well-being."</li> <li>• Amendment to text: State of the Park section suggest Additional title heading is created for Connection of Unequal Access and Public Health Benefits of the Park. To strengthen well-being references suggest adding as part of this: The National Park</li> </ul>

<ul style="list-style-type: none"> <li>• Following within the plan should support action in identified in General Impact/ Risk: <ul style="list-style-type: none"> <li>○ Policies - W1: Provide and promote sustainable outdoor recreation opportunities for all./ W2: Provide and promote inspiring outdoor learning, well-being and personal development experiences for all. [Note Well-being has been added following suggestion from initial assessment]</li> <li>○ Actions: E1/L Develop nature recovery projects which also help increase the range of people able to participate in these activities. H1/A Enhance public awareness and enjoyment of the historic environment, including landscapes, buildings and monuments, remove barriers to access and promote opportunities to more diverse audiences./ W1/B Deliver programmes to enable access for people with specific needs/ W2/A Deliver active outdoor, environmental, heritage and arts-based recreation and learning to young people and families, e.g. First 1,000 Days. W2/B Deliver nature- and heritage-based social prescribing, e.g. walking programmes, mental health initiatives, and supporting people identified as facing barriers to the National Park e.g. Roots to Recovery. [Note other parts of this assessments suggests some rewording for some of these actions.</li> </ul> </li> </ul> <p><b>Considerations as a result of changes to the draft plan</b></p>	<p>provides a great asset that can be used to support both mental and physical well-being. Opportunities and projects by National Park Authority and partners within the park can support people to experience both the Park’s special qualities and the 5 steps to mental well-being:</p> <ul style="list-style-type: none"> <li>○ Connect</li> <li>○ Be Active</li> <li>○ Keep Learning</li> <li>○ Give</li> <li>○ Take Notice</li> </ul> <ul style="list-style-type: none"> <li>• Amendment to Text: Add following to results section - We will deliver projects and opportunities that embed the 5 steps to well-being in their approach contributing to National Milestones on mean mental well-being score, percentage of people who volunteer and health lifestyle behaviours.</li> <li>• Amendment to Text: Amend title of workstream from Understanding the National Park to: Understanding and promoting health benefits of the National Park</li> <li>• Ongoing Conversation/ Monitoring: Explore how key partners will engage with range of smaller organisations, community groups, support groups who can help delivery of the plan and ensure that activities aimed at increasing access or supporting health and well-being actively are designed and informed by those they seek to benefit. It is also important to consider as part of partnership plan monitoring are their opportunities to set up way of capturing case studies of work of smaller organisations, community and support groups.</li> <li>• Amendment to Text: Amend W2/B to “Deliver programmes that help people experience the 5 Ways to Well-being in the Park, focusing on nature- and heritage-based social prescribing, e.g.</li> </ul>
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<ul style="list-style-type: none"> <li>• However, on review of amended plan and based on feedback from partners the approach within the plan could be strengthened to further capture positive role Park, its special qualities and partnership action can play on health and well-being and associated social prescribing agenda. Suggested amendments are as follows: <ul style="list-style-type: none"> <li>○ Mission has been added to Cultural Heritage and Connection – potential for this mission to be strengthened to highlight health benefits the Park offers amending it from Promote enjoyment and understanding of the special qualities of the National Park to “Enhance equitable access to the National Park and promote the enjoyment, understanding, and health benefits of its Special Qualities for all.”</li> <li>○ Cultural Heritage Section could be strengthened to include further reference to role of partners and opportunities in terms of social prescribing.</li> <li>○ Suggest adding following to Background section for Cultural Heritage and Connection as a result of feedback received from partners as part of the consultation: The Welsh Government has in place a national framework for social prescribing. The consultation on the partnership plan highlighted the role that partners can play in contributing to the social prescribing agenda in Wales linked to heritage, nature and outdoor activities. Many of the key partners involved in delivery of this plan are engaged with Public Health Wales’s Hapus platform in support of mental well-being.</li> </ul> </li> </ul>	<p>walking programmes, mental health initiatives, and supporting people identified as facing barriers to accessing the National Park’s health benefits, e.g. Roots to Recovery.” Suggest Lead as: Pembrokeshire Coast National Park Authority. Key Delivery Partners: Public Health Wales, Hywel Dda Health Board, Mind, Tirweddau Cymru, National Trust Cymru</p> <ul style="list-style-type: none"> <li>• Amendment to Text: Add in following partnership action to workstream on understanding and promoting health benefits of the Park: Support and engage with <a href="#">Public Health Wales Hapus</a> platform to promote role heritage, nature and outdoor opportunities in the National Park can play in supporting well-being. Suggest Lead as: Public Health Wales. Key Delivery Partners: Amgueddfa Cymru – Museum Wales, Cadw, National Trust Cymru, Natural Resources Wales, Pembrokeshire Coast National Park Authority.</li> <li>• Ongoing Conversation/ Monitoring: Explore how to involve health partners in future partnership plan meetings and capture the positive work of partners in this area.</li> <li>• Amendment to Text: Add following to conservation results: We will have supported a wide range of people to take action for nature.</li> </ul>
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- State of the Park section suggest Additional title heading is created for Connection of Unequal Access and Public Health Benefits of the Park. To strengthen well-being references it would be beneficial to make reference to the role of National Park as an asset that can be used to support mental and physical well-being and to reference the 5 steps to mental well-being. Positively reference is made in State of Nature section to positive impact outdoor learning etc can have on young people and children.
- Potential gap in terms of cultural heritage and connection results and the results could consider how we impact on wider national milestones, consider adding in: We will deliver projects and opportunities that embed the 5 steps to well-being in their approach contributing to National Milestones on mean mental well-being score, percentage of people who volunteer and health lifestyle behaviours.
- Well-being has been added to following policy in line with suggestion from first impact assessment so policy now reads: W2: Provide and promote inspiring outdoor learning, well-being and personal development experiences for all.
- Workstream: Understanding the National Park, could be strengthened from Health and Well-being perspective if it was reworded to: Understanding and promoting health benefits of the National Park
- Gaps were identified in terms of List of Partners mentioned in the original draft of the plan as part of stage 1 assessment, this was wider than health

related plan. However, following feedback as part of the consultation the structure and references to partners has been changed, with focus on partnership organisations, focused on those who play a lead delivery role and then the key delivery partners. Based on the reduced list, it is not appropriate for inclusion of wider groups to be listed. However, it would be beneficial to consider

- How key partners will engage with range of smaller organisations, community groups, support groups who can help delivery of the plan and ensure that activities aimed at increasing access or supporting health and well-being actively are designed and informed by those they seek to benefit. It is also important to consider as part of partnership plan monitoring are their opportunities to set up way of capturing case studies of work of smaller organisations, community and support groups.
- Linked to the above currently no reference is made in terms of the Workstream:  
“Understanding [and promoting health benefits] of the National Park to role of health related bodies such as Public Health Wales or Hywel Dda Health Board. Many of the key partners who provided feedback or who have been listed in other areas as key delivery plan are involved in the Public Health Wales Hapus platform including Amgueddfa Cymru – Museum Wales, Cadw, National Trust Cymru, Natural Resources Wales. The Authority

<p>Health and Well-being Officer has also had engaged with Public Health Wales in terms of their Hapus platform. Partners highlighted examples of how they have engaged with this agenda within consultation responses. Cadw noted need to reference heritage alongside nature in terms of action linked to social prescribing.</p> <ul style="list-style-type: none"> <li>➤ Suggest amending W2/B to “Deliver programmes that help people experience the 5 Ways to Well-being in the Park, focusing on nature- and heritage-based social prescribing, e.g. walking programmes, mental health initiatives, and supporting people identified as facing barriers to accessing the National Park’s health benefits, e.g. Roots to Recovery.” Suggest Lead as: Pembrokeshire Coast National Park Authority. Key Delivery Partners: Public Health Wales, Hywel Dda Health Board, Mind, Tirweddau Cymru, National Trust Cymru</li> <li>➤ Suggested Adding in following partnership action: Support and engage with <a href="#">Public Health Wales Hapus</a> platform to promote role heritage, nature and outdoor opportunities in the National Park can play in supporting well-being. Suggest Lead as: Public Health Wales. Key Delivery Partners: Amgueddfa Cymru – Museum Wales, Cadw, National Trust Cymru, Natural Resources Wales, Pembrokeshire Coast National Park Authority.</li> </ul>	
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<p>➤ It is important that we explore how to involve health partners in future partnership plan meetings and capture the positive work of partners in this area.</p> <ul style="list-style-type: none"> <li>• The Conservation partnership theme has a partnership action on “Develop nature recovery projects which also help increase the range of people able to participate in these activities.” It would be beneficial to make link back to result section, as volunteering and having opportunity to support nature recovery can have positive impact on people’s well-being and its also important as part of this to support a more diverse range of people to participate in conservation activities. Examples in practice include Pathways project securing funding to support INNS work, Natur am Byth project which outcomes include “inspired people in Wales from all walks of life to take action and mobilised diverse communities to care for the wildlife on their doorstep.” Projects designed to support Nature recovery are well suited to incorporating the 5 steps to mental well-being</li> </ul>	
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Area to Address	Community/ Visitors: Widening Access/ Experiencing and Benefiting from Special Qualities in the Park/ Welcoming Park for All / Access to Toilets and Changing Places
Protected Characteristics affected/ Communities of Interest/ Communities of Place/ Intersectionality	<ul style="list-style-type: none"> <li>• Age, Disability, Sex, Pregnancy and Maternity, Gender Reassignment, Race, Religion or Belief, Sexual Orientation</li> <li>• Areas of deprivation within Pembrokeshire / those experiencing socio economic disadvantage potentially hidden in rural dispersed communities</li> <li>• Socio economic disadvantage</li> </ul>

	<ul style="list-style-type: none"> <li>• Intersectionality of Characteristics</li> <li>• Health and Well-being</li> </ul>
<b>Evidence or Issue</b>	
<b>Issues Highlighted in Stage 1 Assessment</b>	
<b>Comments made as part of the PCNPA commissioned Experiences for all Research</b>	
<ul style="list-style-type: none"> <li>• ““Spain has a wonderful beach system, wooden walkway right to the water and seating and cafes all the way down and I can actually get on the beach, sit there and put my feet in the sand, I can't remember the last time I did that in Pembrokeshire”. “Where I can sit is limited by where the car is parked, being disabled you're limited to car parks when there's no where to sit down while your family goes for a walk”.</li> </ul>	
<b>Projects/ Services:</b>	
<b>PCNPA Beach Wheelchairs/ Mobility Equipment Service:</b>	
<ul style="list-style-type: none"> <li>• In 2023/24 399 booking were made for PCNPA beach wheelchairs and mobility equipment. Beach wheelchairs are hosted by businesses/ organisations in the Park. During 2023: Tenby museum took on the push mountain trike as a pilot.</li> </ul>	
<b>Comments made in relation to Beach Wheelchair Service 2021:</b>	
<ul style="list-style-type: none"> <li>• “I found it very good and I really relied on it for my mum as otherwise she would not have got on the beach let alone managed to dip her feet in the water”</li> <li>• “It was truly amazing to have the opportunity to the our little boy to the beach, he loved every second of it. The process was easy and the lady was very helpful”</li> <li>• “Absolutely amazing! I wish every beach had access to one. It meant my daughter could go further out and round the beach to explore. We are usually limited to how far we can take her because she walks for short distances abs gets tired. Her normal Chair doesn't get across the sand easily. Great!”</li> </ul>	
<b>National Trust Cymru Stackpole Estate</b> (Added as part of stage 2 assessment)	
<ul style="list-style-type: none"> <li>• National Trust team have worked hard to improve access across the Stackpole Estate to enable more visitors to enjoy it. A tramper (all-terrain mobility scooter) and a beach wheelchair are both available to borrow at Stackpole and were purchased</li> </ul>	

following visitors' donations to help us improve accessibility on the estate. They also provide information on accessible routes at Stackpole (Source: [Accessibility at Stackpole Estate|Wales | National Trust](#) )

## **Inclusion Projects**

PCNPA is supporting a range of other projects breaking down barriers to accessing the Park including Roots to Recovery, Pathways, Next Generation Activities, First 1000 Day Project and developing its Get Outdoors Scheme building on legacy of its supported walking activities. Work is also being undertaken on improving facilities at Traeth Mawr. PCNPA supported walking projects have used portable toilets in the past to help support access, provision of minibus to access project activities around Park has also helped address transport barriers for some individuals and enabled them to see parts of the Park they would not normally be able to access.

### **Open to All Accelerator Project – Visit Pembrokeshire and Pembrokeshire Coast National Park** (Added as part of stage 2 assessment)

- During 2024, the Pembrokeshire Coast National Park Authority in partnership with Visit Pembrokeshire delivered the Open to All project which worked with businesses and organisations to make Pembrokeshire the first choice for residents and visitors who face barriers to travel and tourism. Alongside offering a range of training sessions, facilitating bespoke events, carrying out audits and much more, the team created Resource Hub for everyone to use. See below two case studies from project
- **Mobiloo Tour.**
  - What issue was addressed:** Mobiloo is a mobile accessible toilet and changing facility designed to enable disabled individuals to participate in events and outings with dignity and independence. It ensures that everyone can enjoy social activities without facing barriers due to toilet access. Mobiloo is fully accessible, mobile changing place equipped to provide comfort, privacy and independence to those who need it. It includes features such as a hoist, adult-sized changing bench, and an accessible toilet. The primary aim of the Mobiloo tour was to raise awareness among businesses and members of the public about the importance of accessible facilities.
  - What was achieved:** In November the 'Open to All' team arranged for the Mobiloo to visit Pembrokeshire and showcase its services at three prominent public spaces. The day's journey included: Milford Haven Marina: Starting the day at the marina, the Mobiloo received a fantastic response from members of the public who were keen to learn more about its features and potential impact. Dale Village: A visit to Dale, where Windswept Water Sports (advocates for accessibility and inclusion) welcomed the Mobiloo. Traeth Mawr/ Newport Sands: The day ended at Traeth Mawr/ Newport Sands beach. In addition, the Mobiloo was also made available as part of the projects Water Sports Accessible Adventure events, These

beach open days highlighted a wide variety of local water sports and adaptive equipment providers, offering opportunities for individuals who typically face barriers to outdoor activities.

**Those Involved:** Mobiloo. Open to All Team (joint project between Visit Pembrokeshire and Pembrokeshire Coast National Park Authority funded via Shared Prosperity Fund.)

**Feedback/ Long Term Impact:** By showcasing the Mobiloo, the team highlighted the possibilities for making outdoor spaces more inclusive, ensuring that everyone can enjoy them without facing barriers. Throughout the day, the Mobiloo team met people who shared their experiences and challenges in finding accessible spaces. Highlighting the importance of initiatives like Mobiloo in fostering inclusion. "The freedom and dignity this provides to families like ours cannot be overstated." "Seeing the Mobiloo in action is inspiring. It's a game-changer for accessibility." The survey the team carried out linked to Pembrokeshire Mobiloo Tour showed that many participants had not heard of or seen a Mobiloo before, and that 89% would be more likely to attend an event if one was present.

- **Black Girls Hike Visit Pembrokeshire**

**What issue was addressed:** Black Girls Hike provides a safe space for Black women to explore the outdoors. It was founded in 2019 to encourage women of colour to actively experience our wild spaces and challenge the status quo. They plan nationwide group hikes, activity days, and training. The Open to All project reached out to Black Girls Hike to invite them to plan a hike near St. Davids. The aim of the O2A project is to make Pembrokeshire a more welcoming and inclusive space for all, especially those experiencing barriers that are not always visible. The project challenge attitudes around access by creating opportunities to increase ethnic diversity in our beautiful county. Black Girls Hike organiser worked with the Open to All Team and a local group called We Move to plan an exciting weekend at the YHA in St.

Davids. The We Move project is based in Narberth and enables young people of the global majority to experience activities they may not have accessed before, join with others to celebrate who they are, and discuss shared challenges

**What was achieved:** On the 5th of October, the Authority's North Ranger led the joint group on a beautiful but windy hike from the hostel where they saw wild horses, seals and birds and bonded over a shared love of nature. The groups were joined by a photographer hired by Open to All to capture images for the purpose of increasing diversity of representation in visual media. When someone opens a website and sees people who look like them, they are more likely to engage with that space. By providing greater diversity in representation, we increase inclusion while also increasing visitor numbers

**Those involved:** Authority North Ranger and Health and Well-being Officer. We Move. Black Girls Hike. Authority's North Ranger. Open to All Team (joint project between Visit Pembrokeshire and Pembrokeshire Coast National Park Authority funded via Shared Prosperity Fund.)

**Feedback/ Long Term Impact:** The impact of the visit on participants can be seen in video created by Open to All team, available to download from: <https://visitpembrokeshire.vercel.app/ota/collections/open-to-all-project-2024> The project and arranging the event has helped forge a relationship with our local community We Move group, the Pembrokeshire Coast



National Park Authority, the YHA and Visit Pembrokeshire. Black Girls Hike plan to make visiting Pembrokeshire an annual event. Set of images created to help increase diversity of representation in visual media.

**NPMP Special Qualities Consultation** - Issue of accessibility for different groups and welcoming/ inclusive environment, access to toilets highlighted within some responses to Special Qualities consultation:

- ID7/ Lives in Pembs/ Q3: "Accessibility - terrain, slope, public transport."
- ID8/ Lives in Pembs/ Q3: "We need to improve access to many beaches , e.g. Newgale, as it's very difficult for anyone with mobility issues to get across high pebble defences." Q4: "Improve access to beaches"
- ID15/ Visit Pembs (Overnight stay)/ Q6: "Please, make the national park more accessible for people with a disability."
- ID22/ Live in PCNP/ Q4: "Improving accessibility using public transport, cycling and walking."
- ID32/ Live in PCNP/ Q2: "Its friendly and welcoming environment"
- ID39/ Live in PCNP/ Q1: "An accessible place to walk in all weathers."
- ID41/ Live in PCNP/ Q6: "Use social media, tourism, social prescribing etc to encourage more beneficial understanding, connections and mutual care between people living inside and outside the Park, particularly young people living elsewhere, who face such a difficult and uncertain future. Use nature to encourage hope and drive actions to stop the harm of our interdependent future."
- ID 41/ Live in PCNP/ Q3: "How do we share this lovely place with nature and make it more accessible."
- ID 57/ Live in PCNP / Q3: "maintaining access for all and the footpath network."
- ID 63/ Live in PCNP/ Q3: "blocking access to the beach has hurt business owners, attracting less tourism to the area, prevented boat users from enjoying the sea and also restricted disabled people from using a resource that should be available to everyone" Q4: "remove the boulder blocking access, improve the system for beach parking and enforce safety, allowing boat users to continue as before whilst managing the safety for everyone using the area."
- ID 29/Live in PCNP/ Q3:"Threats of closing public toilets. The World Health Organisation website says these are essential." Q4: "Help us keep toilets open." Q6: "It is also essential we keep all the beach toilets open."
- ID 57/Live in PCNP / Q4: "Keeping the toilets open and not charging expensive car parking charges. Being aware that there are areas where there is no mobile signal."
- ID 61/ Live in PCNP /Q3: "Closure of public toilets and lack of investment in renewing important infrastructure such as public toilets."

**Traeth Mawr Survey:** Traeth Mawr survey captured a range of views in terms of how site could be made more accessible and highlighted the importance of engaging with users to gain insight into barriers and developing appropriate solutions. It also

highlighted challenges that can arise when implementing wider recreational management decisions. Some of the response themes highlighted under the question what would make Traeth Mawr more accessible including:

Topic	Response Themes	Sample of Quotes
<b>General layout</b>	<ul style="list-style-type: none"> <li>• less gravel surfaces.</li> <li>• improved information boards</li> <li>• better toilets / toilet facilities/ changes places</li> <li>• changing facilities</li> <li>• better steps</li> <li>• ramp incline to beach,</li> <li>• picnic benches</li> <li>• shelter (trees)</li> <li>• removal of metal barriers and rock</li> <li>• access to BBQ/ fire pits</li> <li>• beach camping</li> </ul>	<ul style="list-style-type: none"> <li>• "Proper Wheelchair access from the Iron bridge to the beach and carpark. Ensure appropriate suitable wheelchairs and suitable on site hoist. Proper changing room facilities shower and changing disabled bench."</li> <li>• "Proper accessible access, proper safe wheelchairs with five point harness plus recliner option with proper footplates with straps. Changing facilities with shower hoist and changing bench for disabled use only."</li> <li>• "A better slope from the disabled car parking spaces to the beach. Perhaps the slope could be made wider and less steep. My elderly mother uses a walker to negotiate the slope, and it's a bit steep near the bottom. Perhaps a resting area halfway would be useful too, just somewhere to pause and get your breath back without getting in the way of other people using the slope. I don't think I'd attempt it with the wheelchair."</li> <li>• "More and wider parking spaces for those with disabilities"</li> <li>• "Mobility wheelchair for relatives."</li> <li>• "More disabled parking. More spacious toilet cubical (have to touch toilet seats with legs to shut the door). Changing rooms to prevent people changing in toilets and getting everything wet and</li> </ul>
<b>Transport</b>	<ul style="list-style-type: none"> <li>• Cycle routes &amp; cycle racks</li> <li>• Public transport and buses</li> <li>• Footpath</li> </ul>	
<b>Car park</b>	<ul style="list-style-type: none"> <li>• increased parking</li> <li>• disabled parking bays on both the left and right for café access and beach view options</li> <li>• Lower local fees prices</li> <li>• Extend length of free parking.</li> </ul>	
<b>Drop off access.</b>	<ul style="list-style-type: none"> <li>• Requests have been made in relation to beach drop offs for horses and boats.</li> </ul>	
<b>Outdoor mobility equipment</b>	<ul style="list-style-type: none"> <li>• Issues raised regarding awareness off the equipment, type and access all year.</li> </ul>	

<b>Dogs access</b>	<ul style="list-style-type: none"> <li>• Dog behaviour management and cleanliness is a repeating issue.</li> </ul>	being in there a long Time. New seating is great, allows me to take in the view even on a bad day, however, there are not enough to accommodate need.”
<i>Cleanliness</i>	<ul style="list-style-type: none"> <li>• Sewage, pollution and litter</li> <li>• Dog mess</li> </ul>	<ul style="list-style-type: none"> <li>• “Disabled parking near the beach - which is reserved for disabled people. Often find that spaces are taken by people who are not displaying a blue badge.” “Switchback gentle slope Better quality toilets”</li> </ul>

- Issue of Toilets and access came up within Traeth Mawr survey:
  - Make it more accessible: “Better quality toilets “
  - Like about visiting Traeth Mawr: “The cafe and toilets are essential to my enjoyment as is parking near the beach.” “toilets” “ It’s important that there are toilets. It’s important that the public toilets stay open. I don’t think that the beach or the area would be as attractive if visitors and walkers use the sand dunes as toilets.”
  - Discourages you from visiting: “Poor Toilet/WC Provisions” “disgusting toilets” “Unacceptable state of toilets No showers.” ““He has OCD, and since the public toilets were closed we haven’t been able to visit the beach because he cannot wash his hands. “
  - Additional Comments: “Please, please, please, do not close the toilets. They are one of the biggest reasons I like this beach as many don’t have them which is a nightmare with small children. They might need an upgrade but do not get rid of them.” “Please keep the toilets! I'd happily pay to use them if there was a card reader to pay like in Cardigan (i never carry cash!) “ “It would be a disaster to close the toilets. The dunes would suffer, the cafe’s business would suffer, the golf club would suffer.” “IT SHOULD BE ENSURED THAT THE PUBLIC TOILETS REMAIN OPEN (WITHOUT HIDING BEHIND EXCUSES, SUCH AS "PUBLIC TOILETS ARE THE RESPONSIBILITY OF PEMBROKESHIRE COUNTY COUNCIL.” “• We have been visiting this area for over 20 years and we love the fact that there has been minima change. However as our parents have gotten older wheelchair access and toilets have become a real necessity, so good/cleanfacilites are imperative.”

**Landscape Review, DEFRA**  
 (Source: [DEFRA - Landscapes Review - Final Report 2019 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812212/DEFRA_Landscapes_Review_Final_Report_2019.pdf))

Although relating to English National Parks aspects of the Landscape Review in England relating Landscapes for Everyone have

relevancy to National Parks in Wales in terms of thinking about diversity and intersectionality and engagement with National Parks. It highlights that most visits are made by the same (better off, less diverse) people repeatedly, and those who miss out are the older, the young – especially adolescents – and those from lower socio-economic groups and black, Asian and minority ethnic communities.

- 13% of children (under 16) and 5% of young people (aged 16-24) typically never visit the natural environment or even spend any of their leisure time outdoors. Children are spending less time unsupervised outside and children from black, Asian and minority ethnic, and low income, communities are even less likely to do so.
- 18% of children living in the most deprived areas never visit the natural environment at all.
- 20% fewer Visibly Minority Ethnic (VME) children go out into green spaces weekly compared to white, middleclass children
- Children from deprived backgrounds visit 10% more than VME children.
- The numbers of children going on school visits to the countryside is shockingly low at just 6-7%.
- The groups which visit the countryside least are those aged 65 and over, members of the black, Asian and minority ethnic population and residents living in the most deprived areas of England.
- The report highlighted that there is also a group of people identified through Policy Lab research as being very familiar and particularly engaged with national landscapes. They may have grown up visiting them as children, or work or volunteer in them and feel very comfortable out in the environment. Policy Lab termed these people as being members of what one might call 'the club'. This can be seen by some to be an exclusive membership, and all members feel they have a right to access national landscapes. It is as if access to the countryside involves joining a club. Those on the inside get the benefits. Those on the outside need ways in which to join. Part of the issue appears to be that little is known about what those who don't visit our national landscapes need or want.
- Transport is highlighted as a particular challenge.
- The report also notes that it has been particularly dispiriting to hear how little legacy there is from the 'MOSAIC' projects, funded by the Campaign for National Parks, to increase black, Asian and minority ethnic visitors. There are notable exceptions, the Peaks and North York Moors for example, but they are just that: exceptions. [Note: PCNPA was involved in the MOSAIC projects, and the concern raised in this review is relevant for the legacy of the project in terms of PCNPA]

### **Reports on barriers**

A number of reports or best practice guidance documents have been produced highlighting barriers that people with different characteristics or intersectionality of characteristics face to accessing the outdoors and nature and suggestions for improvement:

- [Changing Landscapes – Actioning Change, Backbone CIC's Symposium](#) (2021)

- [Access to nature in the English Countryside, The countryside charity](#) (2021)
- The Recreational Audit for disabled access in Pembrokeshire survey report, PCF (2016)
- Outside Voices, An anthology of lived experiences sets out different people's lived experience providing an insight into the stories of those who are not well seen, heard or represented in the outdoor sector: [outside-voices-report.pdf \(yha.org.uk\)](#)
- [Working Together to Create Change on Diversity in UK Walking and Hiking, All of the Elements x The Pilgrim Trust](#)
- [By All Reasonable Means – Least restrictive access to the outdoors \(2022\)](#)
- [Who has a public rights of way, Ramblers](#)
- [Surfing for Diversity, Waves Wahines CIC \(2022\)](#)
- [Adapt my Beach Report, How to create manage, sustain and improve inclusive beach](#), Mae Murray Foundation (2023)
- Muslim Hikers – [Muslim Hikers x Wales Cost Path Partnership](#), [What are 'Proper Walkers' \(BBC News\)](#), [Mount Snowdon inaugural trek](#), [The Countryside Code](#),
- [Dementia-Friendly environment checklist, Alzheimer's Society](#)
- [Pembrokeshire Coastal Forum commissioned Ethnic Diversity Toolkit](#)
- [Welsh Government Anti-racist Wales evidence report: racism relating to climate change, environment and rural affairs](#) (Added as part of stage 2 assessment)
- Hate Crime Figures for Dyfed Powys 2022/23  
(Source: <https://assets.publishing.service.gov.uk/media/65425d08d36c910012935bad/hate-crime-england-and-wales-2022-to-2023-data-tables-second-edition.ods>) - Dyfed Powys Police Force Area – Hate Crimes Reported 2022/23

Race	Total Religion	Sexual Orientation	Disability	Transgender	Total number of motivating factors	Total number of offences
458	24	128	106	34	750	750

- Lack of access to toilets can have impact on people taking up conservation volunteering opportunities, the following was highlighted in the Seeding Change report- [Exploring barriers to nature conservation volunteering for young women and non-binary people of colour, London Wildlife Trust, Natural England, Wanders of Colour](#)  
Whilst the availability of toilets and handwashing facilities is essential for everyone, additional needs that arise from medication, disabilities and menstruation means having access to private, accessible, and clean toilets and handwashing facilities is not simply a desire, but a requirement. 'Wild weeing' – or urinating outdoors without toilets and handwashing facilities – has become a normalised practice within the conservation sector despite it being wholly inaccessible to many communities, including women. In this way, the infrastructure of nature reserves and the expectations of those working within the conservation sector continue to reflect the biases that arise from a male-dominated field: cis-male colleagues do not have

additional considerations such as menstruation to consider, are more likely to feel safe enough outdoors to urinate and therefore often do not factor the need for adequate toilets and handwashing facilities into the planning and delivery of sessions. However, volunteering programmes cannot expect participants to feel comfortable and safe enough to be able to urinate outdoors. Women and non-binary people in particular require easy access to toilets and handwashing facilities to be available in order to engage with a volunteering session. For young Muslim women, engagement relies upon the accessibility of facilities due to the need for clean spaces to complete ablution and prayer. Many young Muslim women said they are unlikely to return to a site that lacks adequate facilities as they would prioritise their ability to complete obligatory tenants of their faith: "It's difficult with things like wudu [ablution] if there's no accessible toilets...it does sometimes feel like we're working around the limitations of the space." For women and non-binary people – particularly when they are young people – being able to use facilities without worrying about their physical safety is a basic necessity that should be met by any organisation that genuinely aims to engage with these communities. The lack of clean and accessible facilities at a site will therefore inherently exclude women and non-binary people from engagement opportunities."

**Changing Places Toilets – Why Changing Places toilets are important** (Source: <https://www.changing-places.org/pages/view/why-are-changing-places-toilets-important> )

"Thousands of people with profound and multiple learning disabilities, as well other disabilities that severely limit mobility, cannot use standard accessible toilets. People may be limited in their own mobility so need equipment to help them or may need support from one or two carers to either get on the toilet or to have their continence pad changed. Standard accessible toilets (or "disabled toilets") do not provide changing benches or hoists and most are too small to accommodate more than one person. Without Changing Places toilets, the person with disabilities is put at risk, and families are forced to risk their own health and safety by changing their loved one on a toilet floor."

**Changing Places are also highlighted within Alzheimer Society** [Dementia-Friendly Environment Checklist](#).

**The Provision of Toilets in Wales: Local Toilets Strategies, Statutory Guidance, Welsh Government (2018) –**

(Source: <https://www.gov.wales/sites/default/files/publications/2022-02/the-provision-of-toilets-in-wales-local-toilets-strategies.pdf> )

- In Wales we have a higher percentage of older people than anywhere in the UK. Conditions such as incontinence, urgency and prostate problems tend to be more common as we get older which can lead to a need for more regular access to toilet facilities. Older people rely on toilets and many older people feel unable to take advantage of local amenities without having confidence that toilets are available. The Older People's Commissioner for Wales has highlighted the need for access to toilets by older people, and the impact a lack of provision can have on their health.

- Standard accessible toilets meet the needs of some people with disabilities but not all. The Changing Places Consortium campaigns on behalf of those people who cannot use standard accessible toilets. This includes people with profound or multiple disabilities and their carers, as well as many other people with disabilities and people with long term serious health conditions. They need Changing Places toilets which are publically accessible with enough space and appropriate equipment, including a height adjustable adult changing bench and a hoist. Changing Places are currently not mandated in planning requirements, but provision of these specialised facilities must not be overlooked, as the definition of a toilet
  - in the Act includes ‘changing places for disabled persons’.
- Many of the units surveyed each year by the British Toilet Association fall well below the current Equality Act 2010 standards. Ostomy users, persons with restricted mobility issues and wheelchair users often struggle with incorrect fittings in accessible toilets and the lack of specified provision.
- Children, young people and families need access to suitable facilities, including baby changing facilities. Traditionally, these may have been provided only in women’s toilets, which would present a problem for men who care for children.
- Gender is also an issue in terms of toilet provision; despite women making up more than half of the UK population, and with a higher proportion of older people being women, there is more provision for men, primarily because
  - of the smaller space that urinals take up. Historically, the ideal ratio of 1 male facility to 2 female facilities has not been delivered, which results in insufficient provision for women. In addition, during the consultation for the Welsh
  - Government Action Plan to Advance Equality for Transgender People, consultees identified that the issue of toilet provision is of concern to the Transgender community.
- The expansion of the night-time economy, and changes in working patterns, has led to a requirement for toilets to be available on a 24 hour basis every day. The needs of transport workers, delivery workers, emergency service
  - representatives and others who work outdoors or travel from place to place or at irregular times are also often overlooked in the provision of toilets.
- Whilst certain groups may have specific needs, access to toilets is a cross cutting issue as all groups in society rely on adequate toilet provision to go about their daily lives.

**PCNPA Equality Plan 2025 -2029 Supporting Evidence Document (information contained in Joint Priorities and Challenges in terms of Infrastructure and facilities) (Addition for Stage 2 Assessment)**

Lack of access to toilets can prevent or make it difficult for people to access recreational, volunteering, social and community engagement opportunities in the Park. This is exacerbated for people who have additional needs relating to health, disability, faith or caring responsibilities. Provision of accessible and changing place toilets play an important role in supporting disabled people

and carers accessing the Park. Poor toilet provision will impact on ability of locations within Park to be age and dementia friendly.

The issue of access toilets was highlighted within the Authority's National Park Management Plan Special Qualities survey, responses included:

- Threats of closing public toilets. The World Health Organisation website says these are essential."
- "Closure of public toilets and lack of investment in renewing important infrastructure such as public toilets."

The Authority is part of a Toilet Working Group with Pembrokeshire County Council and other partners to develop a strategy to seek grant funding to improve general toilet standards at locations around the coast and to develop an Accessible Coast project. The Authority agreed to a financial contribution to toilets of £110k per year to support toilets over a 2 year period. Regular meetings have been established between key officers of the Authority and Pembrokeshire County Council meeting every 2-3 months on this issue. The main area of work to date has been on sharing evidence on sites and identifying what additional baseline information may be required

Pembrokeshire County Council is required to have a Local Toilet Strategy under the Public Health (Wales) Act 2017.

**Map of Public Toilets in Pembrokeshire:** <https://www.pembrokeshire.gov.uk/map-data/public-toilets-map>

**Changing Place Toilets in Pembrokeshire:** Tenby – The Green Car Park/ Whitesands Beach Car Park (Source: <https://www.pembrokeshire.gov.uk/public-conveniences-changing-facilities>)

**[Pembrokeshire County Council Cabinet Report on Public Toilet Funding](#)**

**[PCNPA NPA Report - PCNPA facilities voluntary payment to PCC regarding public toilets – update on joint working](#)**

**Pembrokeshire Coastal Car Parks Feasibility Report 2024** (Addition for Stage 2 Assessment)

Strategy Section on Accessibility notes following:

- The "ADAPT my beach" guidance document mentioned previously can provide support when considering improving access within the car parks, between parking areas and other facilities, and onto the beach itself.
- ADAPT stands for Access, Dignity, All-Ability, Participation and Transformation.



- Access: “Visitors should be able to move from point of arrival on to the sand, café, toilet or equipment loan scheme storage point safely and confidently. Pathways, ramps, terrain, handrails, parking should all be compliant with local regulations.” Mobility equipment should be considered, however it is not suitable for everyone. Walkways can enable users of wheelchairs who must remain seated, young children in buggies, people who are blind or partially sighted and those with sensory challenges to access the beach more easily.
- Material selection is important to consider, for example: Maintenance, Robustness, Non-slip properties, Environmental attributes, Buildability (and potential temporary/flexible
- Accessible parking, along with a drop-off that ensures that everyone can access beach amenities if accessible bays are fully occupied.
- Dignity: Changing Places facilities in addition to standard disabled toilets are essential to ensure that everyone’s needs are met. Access to other facilities, such as cafes, is also critical, and ensuring that there is sufficient provision for wheelchair users inside and out (e.g. picnic benches that are designed with space for wheelchair users to sit with family or friends).
- All-Ability: Beach mobility equipment such as beach wheelchairs, floating wheelchairs and beach walkers enable more people to access and enjoy the beach. Appropriate storage space for beach equipment is also important, and elements to consider include: Wide double doors (large chairs may be 1.2m wide when built), Firm, level terrain on the approach to the storage unit, Threshold flush with the approach, no lip, Electric point within the storage unit, Space for small table, Walls suitable for hanging brackets, notice boards and liability notices, External tap, with drainage for hosing equipment down after use.
- The guide also includes useful information and advice on training for staff based at beaches, lifeguards and volunteers: Disability awareness training. Overview of Inclusive Beach project aims and the operation of the beach mobility loan scheme. Practical familiarisation with beach mobility equipment. Lifting & handling training. Explore any opportunities / adaptations needed for joint working which may increase safe participation for more abilities together on the beach. For example, the implementation of a water safety group to contribute to the Inclusive Beach risk management plan. The guide also suggests that an online booking system is highly effective, allowing people to secure access to beach equipment and avoid disappointment (and reduce anxiety). Maintenance and servicing is also an important factor, and a plan should be created to ensure the longevity of equipment. On-site toolboxes and servicing provided by a suitably qualified technician are highly recommended.

### **TGA Mobility rated Pembrokeshire as the most accessible UK Tourist Hotspots**

(Source: [UK's Most Accessible Tourist Hotspots - TGA Mobility](#))

**Pembrokeshire: 61.27/100**

Pembrokeshire tops the list with an impressive score, boasting a wealth of **accessible attractions** set against the backdrop of the stunning Welsh coastline. Some key highlights include the famous Pembrokeshire Coast National Park, which offers several accessible trails, including the popular Skrinkle Haven, where wheelchair users can enjoy the coastline's beauty. Attractions such as Pembroke Castle and Carew Castle have also been praised for their accessible facilities, with ramps, lifts, and disabled parking.

### **Feedback from draft Plan consultation**

#### **Accessibility/ Coastal Access Strategy**

- Pembrokeshire County Council - there appears to be no real mention of the Coastal Access Strategy within the Plan which may be a route for delivering some of the objectives
- Welsh Government – Visit Wales - Also welcome the focus on accessibility from a provision perspective.
- The Cleddau Project CIC - We are in agreement that the following headline issues require a meaningful response [this included]: Providing sustainable outdoor recreational opportunities for a full cross-section of society, and increasing the frequency of people's participation
- Survey response – Have we accurately captured the State of the Park, and the main challenges and opportunities? Is there other evidence that would add ? No – Toilets
- Survey response - What comments do you have on the proposed policies, actions and partnerships for Communities? More disabled access and amenities like toilets
- Survey Response: What impact do you think the Plan will have on protected groups - Only if you provide the means for people to enjoy the park by encouraging the less abled and providing facilities will this work
- Survey Response: While many actions listed represent an improved delivery of services to these groups e.g. an Accessible Coast Strategy and also there are statements from those who would be affected, we feel that more detail is needed and measurable outcomes.
- Initial Equality Impact Assessment: Pembrokeshire County Council - The list is comprehensive and links into many aspects of the council's work. Whilst the questions/issues raised through the impact assessment are all valid addressing them won't necessarily be straightforward. Budget pressures on the council itself and/or uncertainty around external funding programmes may mean that in future additional pressure is put on services like public toilets.
- Equality Impacts: Pembrokeshire County Council - In terms of people's health outcomes, the provisions of the Partnership Plan would be likely to bring positive health benefits, particularly if efforts are made to ensure that the National Park is

accessible to as many people as possible, including both tourists and residents. In a disability and mobility context, access to some of Pembrokeshire's fine beaches in the National Park remains a challenge that will require innovative solutions.

#### **Promoting Heritage to more diverse audiences**

- Cadw - H1/A – partners – you could add RCAHMW and Cadw. Should this policy echo policy W/1A (remove barriers to outdoor recreation ... and promote opportunities to more diverse audiences) – should the HE policy include not just enhancing public awareness and enjoyment but also removing barriers (real or perceived) and promoting heritage to a more diverse audience?
- Pembrokeshire County Council - There appears to be no mention about promoting the arts and seems very cultural heritage heavy which is more about the past and preserving the past. It is through the arts that new things are created, and where a lot of vibrancy comes from. It is worth noting that there are more artists in Pembrokeshire per capita than any other county in the UK.

<b>Impact/ Risk</b>	<b>Response/ Mitigation/ Any additional actions needed</b>
<p><b>General Impact/ Risk</b></p> <ul style="list-style-type: none"> <li>• There are awareness, access and affordability issues in terms of tourism and recreational opportunities within the Park and a need to promote and support the Park to become an inclusive Park that is a Landscape for Everyone. Some people from protected groups or experiencing socio economic disadvantage face additional barriers to accessing opportunities in the Park and feeling welcome within the Park (this can be compounded by intersectionality considerations).</li> <li>• Lack of access to toilets can prevent or make it difficult for people to access recreational, social and community engagement opportunities in the Park. This is exacerbated for people who have additional needs relating to health, disability, faith or caring responsibilities. It also may prevent people taking up volunteering opportunities in the Park in terms of locations with limited toilet facilities. Provision of accessible and changing place toilets play an important role</li> </ul>	<p><b>Recommended Amendment/ Action:</b></p> <ul style="list-style-type: none"> <li>• Amendment to Text: A vision for the National Park: The Park is for everyone and is a welcoming place, where people can enjoy and help protect its Special Qualities.</li> <li>• Amendment to Text: Suggest amending “Inclusive access to the National Park is a cornerstone of this vision, enabling everyone, regardless of background or ability, to experience and connect with this unique environment.” to “Inclusive access and removing barriers to the National Park is a cornerstone of this vision, enabling everyone, regardless of background, to experience and connect with this unique environment.”</li> <li>• Amendment to Text: Amend mission to “Enhance equitable access to the National Park and promote the enjoyment, understanding, and health benefits of its Special Qualities for all.”</li> </ul>

<p>in supporting disabled people and carers accessing the Park. Poor toilet provision will impact on ability of locations within Park to be age and dementia friendly. Pressures on public funding of toilets means that current provision of toilets within Park is likely to change. Close partnership working is needed to ensure this situation is managed and to develop projects such as the proposed one at Traeth Mawr which aims to provide new toilets and changing places facilities. There will continue being an ongoing challenge of building, management and maintenance costs alongside wider issues relating to drainage or climate risks potentially for some sites.</p> <ul style="list-style-type: none"> <li>• Targeted projects and schemes can help increase access to the Park in short term and long term for those that face potential barriers to engaging with the Park, however there is a need to ensure the long term legacy of these projects (learning from some of the issues that arose in terms of limited legacy impact of Mosaic projects for National Park Authorities involved and issue that projects tend to be time bound and reliant on securing project funding).</li> <li>• There is a need to ensure our approach is following the social model rather than the medical model of disability and that solutions and projects are developed with those they are seeking to benefit. Importance of making connections with range of grassroots organisations and learning from those who are already engaged in increasing access, including looking at representation and information provided (see videos from Muslim Hiker referenced above.)</li> <li>• Issue of lack of diversity in PCNPA workforce and wider outdoor/ environmental workforce can create additional barriers, particularly for diversity in terms of ethnicity.</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to Text: Include following in conservation results “We will have supported a wide range of people to take action for nature.”</li> <li>• Amendment to Text: Suggest following be added to Cultural Heritage and connection Background section: It is recognised that some groups face additional barriers to enjoying, understanding and accessing the Park. The Authority and partners can play an important role in working together and with others on initiatives to address this.</li> <li>• Amendment to Text: Suggest additional heading is added to the State of the Park section for Cultural Heritage and Public Health on Unequal Access and Public Health Benefits of the Park</li> <li>• Amendment to Text: In state of the Park amend from “Across Wales, barriers to participation include time, disability, health issues and age, lack of adequate public transport, transport poverty, and barriers faced by members of the global majority, marginalised groups and faith groups.” To “Across Wales, barriers to participation include time, lack of adequate public transport, transport poverty, adequate facilities and further barriers faced by disabled people, people with health issues, people from different age groups, people from global majority groups, marginalised groups and faith groups. The Authority and its partners have been engaged in activities to make the Park more accessible and inclusive. This includes accessible walking routes, accessible view points and beach wheelchair and all terrain equipment. Wider budgetary pressures facing partner organisations means that collaboration is required to develop creative and sustainable solutions in this area.”</li> </ul>
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<ul style="list-style-type: none"> <li>Residents and tourists may be targeted in terms of hate crime due to their disability, gender identity, religion or belief or religious dress, race, ethnicity, nationality or sexual orientation. They may also be subjected to sexual violence, harassment or experience domestic abuse. This may impact on their use of public transport and access to opportunities and facilities within the Park and further afield.</li> <li>Approaches to respond to recreation management or other pressures on the Park can place additional barriers on certain groups, this came through in terms of Traeth Mawr survey. It is important that equality impact assessments are carried out when looking to introduce recreation management tools and that cross section of users are engaged with to inform decision making. Recreational management tensions between visitors and communities can impact on creating a wider more welcoming experience for new users of the Park who previously may have limited experience of accessing National Park and countryside. It is Important to engage with communities and visitors to identify and manage issues and to ensure appropriate messaging is given to new users and support to communities to ensure that a welcoming environment is created and people are aware of potential conflict/ pressure point. Muslim Hikers for example have created a video on <a href="#">Countryside Code</a>.</li> </ul> <p><b>Positive Impact/ Recognition</b> Following within the plan should support addressing above,</p> <ul style="list-style-type: none"> <li>E1/L Develop a nature recovery projects which also help increase the range of people able to participate in these activities</li> <li>Results for Cultural Heritage and Connection includes -We will remove barriers to outdoor recreation and wellbeing</li> </ul>	<ul style="list-style-type: none"> <li>Amendment to Text: Suggest for results for Cultural Heritage and Connection that following added in 'people from global majority, faith and marginalised groups.' to: We will remove barriers to outdoor recreation and wellbeing opportunities and promote opportunities to more diverse audiences, e.g. people with visible or hidden disabilities, children and young families from areas of deprivation, people from global majority, faith and marginalised groups.</li> <li>Amendment to Text: Suggest for greater clarity in terms of accessible coast strategy that W1/B is amended to following, which should assist clarifying this partnership action: Deliver programmes and projects that promote an accessible coast approach creating more inclusive experiences in the Park and helping remove barriers to access for people with specific needs e.g. Get Outdoors Scheme, application of accessibility strategy within Car Park report. Visit Pembrokeshire should be added to Key delivery partners for this action. This action will include within its remit considerations related to access and toilets/ changing places as demonstrated by work carried out as part of the Car park report.</li> <li>Amendment to Text: Suggest that W2/A is amended to: Deliver active outdoor, environmental, heritage and arts-based recreation and learning to young people and families, including targeted projects for those from areas of deprivation or facing inequalities e.g. First 1,000 Days. Suggest that lead is noted as Pembrokeshire Outdoor Schools and then that key delivery partners include Pembrokeshire Coast National Park Authority, Pembrokeshire County Council and Tirweddau Cymru. This recognises some of the current partnership work in areas such as early years, engagement with young people</li> </ul>
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<p>opportunities and promote opportunities to more diverse audiences, e.g. people with visible or hidden disabilities, children and young families from areas of deprivation / More young people will discover and enjoy the National Park.</p> <ul style="list-style-type: none"> <li>• H1A Enhance public awareness and enjoyment of the historic environment, including landscapes, buildings and monuments, remove barriers to access and promote opportunities to more diverse audiences.</li> <li>• W1: Provide and promote sustainable outdoor recreation opportunities for all/ W2: Provide and promote inspiring outdoor learning, well-being and personal development experiences for all.</li> <li>• H1/A Enhance public awareness and enjoyment of the historic environment, including landscapes, buildings and monuments, remove barriers to access and promote opportunities to more diverse audiences.</li> <li>• W1/B/ W1D/ W2/A,W2/B and W2/C (see comments below in terms of amendments for these)</li> </ul> <p><b>Considerations as a result of changes to the draft plan</b></p> <ul style="list-style-type: none"> <li>• A vision for the national park could be strengthened to capture idea of creating a welcoming park for all.</li> <li>• What achieving the vision positively includes reference to: Inclusive access to the National Park is a cornerstone of this vision, enabling everyone, regardless of background or ability, to experience and connect with this unique environment. Would suggest that it could be slightly reworded to align more with social model of disability: Inclusive access and removing barriers to the National Park is a cornerstone of this vision, enabling everyone, regardless of background, to experience and connect with this unique environment.</li> </ul>	<p>including through Futureworks and cross collaboration of activities in the Park for Kinship/ Springboard groups.</p> <ul style="list-style-type: none"> <li>• Amendment to Text: Suggest W2/B in line with suggestions relating to Health and Well-being is amended to: Deliver programmes that help people experience the 5 Ways to Well-being in the Park, focusing on nature- and heritage-based social prescribing, e.g. walking programmes, mental health initiatives, and supporting people identified as facing barriers to accessing the National Park's health benefits, e.g. Roots to Recovery.</li> <li>• Ongoing Conversation/ Monitoring: Due to financial pressures on provision of toilets within Pembrokeshire it is important that the Authority considers how it can best engage with relevant bodies and communities to assess progress, manage challenges and identify collaborative solutions during the plan period.</li> </ul>
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| <ul style="list-style-type: none"> <li>• Mission has been added to Cultural Heritage and Connection – potential for this mission to be strengthened in line with what is outlined in achieving the vision, suggest amending it from Promote enjoyment and understanding of the special qualities of the National Park to “Enhance equitable access to the National Park and promote the enjoyment, understanding, and health benefits of its Special Qualities for all.”</li> <li>• The Conservation partnership theme has a partnership action on “Develop nature recovery projects which also help increase the range of people able to participate in these activities.” This links in with action within the Authority’s new equality plan action on - Develop and secure funding for nature recovery projects that provide opportunity for a wider range of people to participate in action in support of nature. Building on approach taken to gain funding for Pathways project linked to supported volunteers assisting with invasive species work. It would be beneficial to make link back to result section and include following in results “We will have supported a wide range of people to take action for nature.”</li> <li>• Suggest following be added to Cultural Heritage and connection Background section: It is recognised that some groups face additional barriers to enjoying, understanding and accessing the Park. The Authority and partners can play an important role in working together and with others on initiatives to address this.</li> <li>• Suggest additional heading is added to the State of the Park section for Cultural Heritage and Public Health on Unequal Access and Public Health Benefits of the Park</li> <li>• Positive that amendments suggested in stage 1 assessment added to State of the Park section in terms of barriers noting: “Across Wales, barriers to participation include time,</li> </ul> |  |
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<p>disability, health issues and age, lack of adequate public transport, transport poverty, and barriers faced by members of the global majority, marginalised groups and faith groups. On re looking at sentence would suggest rewording it to have a more social model of disability approach in terms of interpretation of barriers and would suggest including reference to positive work that partners have carried out in this area already, referencing adequate facilities as no reference is made to toilets in challenges and adding line around budgetary pressures (something that was highlighted in partnership response): Across Wales, barriers to participation include time, lack of adequate public transport, transport poverty, adequate facilities and further barriers faced by disabled people, people with health issues, people from different age groups, people from global majority groups, marginalised groups and faith groups. The Authority and its partners have been engaged in activities to make the Park more accessible and inclusive. This includes accessible walking routes, accessible view points and beach wheelchair and all terrain equipment. Wider budgetary pressures facing partner organisations means that collaboration is required to develop creative and sustainable solutions in this area.”</p> <ul style="list-style-type: none"> <li>• Suggest for results for Cultural Heritage and Connection results that following added in ‘people from global majority, faith and marginalised groups.’ to: We will remove barriers to outdoor recreation and wellbeing opportunities and promote opportunities to more diverse audiences, e.g. people with visible or hidden disabilities, children and young families from areas of deprivation, people from global majority, faith and marginalised groups.</li> <li>• Positive amendments to H1A Enhance public awareness and enjoyment of the historic environment, including</li> </ul>	
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<p>landscapes, buildings and monuments, remove barriers to access and promote opportunities to more diverse audiences. reflecting consultation comments from partner.</p> <ul style="list-style-type: none"> <li>• Suggest for greater clarity in terms of accessible coast strategy that W1/B is amended to following, which should assist clarifying this partnership action: Deliver programmes and projects that promote an accessible coast approach creating more inclusive experiences in the Park and helping remove barriers to access for people with specific needs e.g. Get Outdoors Scheme, application of accessibility strategy within Car Park report. Visit Pembrokeshire should be added to Key delivery partners for this action. This action will include within its remit considerations related to access and toilets/ changing places as demonstrated by work carried out as part of the Car park report.</li> <li>• Suggest that W2/A is amended to: Deliver active outdoor, environmental, heritage and arts-based recreation and learning to young people and families, including targeted projects for those from areas of deprivation or facing inequalities e.g. First 1,000 Days. Suggest that lead is noted as Pembrokeshire Outdoor Schools and then that key delivery partners include Pembrokeshire Coast National Park Authority, Pembrokeshire County Council and Tirweddau Cymru. This recognises some of the current partnership work in areas such as early years, engagement with young people including through Futureworks and cross collaboration of activities in the Park for Kinship/ Springboard groups.</li> <li>• Suggest W2/B in line with suggestions relating to Health and Well-being is amended to: Deliver programmes that help people experience the 5 Ways to Well-being in the Park, focusing on nature- and heritage-based social prescribing,</li> </ul>	
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<p>e.g. walking programmes, mental health initiatives, and supporting people identified as facing barriers to accessing the National Park's health benefits, e.g. Roots to Recovery.</p> <ul style="list-style-type: none"> <li>• Due to financial pressures on provision of toilets within Pembrokeshire it is important that the Authority considers how it can best engage with relevant bodies and communities to assess progress, manage challenges and identify collaborative solutions during the plan period.</li> </ul>	
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Area to Address	Public Health – Water Quality / Pollution and Other Health Risks/ Recreational Disturbance to Tranquillity
Protected Characteristics affected/ Communities of Interest/ Communities of Place/ Intersectionality	<ul style="list-style-type: none"> <li>• Age, Disability</li> <li>• Socio economic disadvantage</li> <li>• Areas of deprivation within Pembrokeshire / those experiencing socio economic disadvantage potentially hidden in rural dispersed communities</li> <li>• Intersectionality of Characteristics</li> <li>• Health and Well-being Outcomes</li> </ul>
<b>Evidence or Issue</b>	
<b>Issues Highlighted in Stage 1 Assessment</b> <ul style="list-style-type: none"> <li>• <b>SoNaRR 2020, NRW - Role of Healthy Ecosystems and Access to Green and Blue Spaces, <a href="https://naturalresources.wales/evidence-and-data/research-and-reports/state-of-natural-resources-report-sonarr-for-wales-2020/?lang=en">NRW</a></b>            (Source: <a href="https://naturalresources.wales/evidence-and-data/research-and-reports/state-of-natural-resources-report-sonarr-for-wales-2020/?lang=en">https://naturalresources.wales/evidence-and-data/research-and-reports/state-of-natural-resources-report-sonarr-for-wales-2020/?lang=en</a> )           <ul style="list-style-type: none"> <li>○ SoNaRR 2020 highlighted the positive impact that Healthy Ecosystems can have on wider health and Well-being, in particular in terms of air pollution, waste activities, noise pollution, water pollution, land use and soil and flood risk. Many of the required actions to achieve healthier and more resilient environments for people will have co-benefits in such areas as mitigating climate change and combating the loss of biodiversity.</li> </ul> </li> </ul>	
<b>Water Quality</b>	

- **Special Qualities Consultation:** Issue of water quality, sewage discharge and impact on bathing water highlighted within responses to Special Qualities consultation, highlighting this is an area of concern:
  - ID 13/ Live in PCNP/ Q3: "pollution of the sea from dumping and sewage release" Q4: "Tighter enforcement of sewage release and water quality regulations." Q6: "These are huge issues and the responses may seem glib, but we simply cannot go on without greater regulation, enforcement and education to address pollution and ignorant and irresponsible behaviour."
  - ID 18/ Live in PCNP/ Q3: "sewage (urban and livestock) pollution of the rivers and seashore." Q4: "Provision of adequate enforcement and sanction powers, funding and staffing to address the challenges in 3. above."
  - ID 21/ Live in PCNP/ Q1: "Boulston, my home. Marloes Haven, most beautiful beach, unspoilt and no pollution. Harold stone chins, good place to swim, no pollution. These days you have to chose your swimming spots very carefully." Q3: "Pollution killing the rivers and making it toxic to swim in the sea. Sewage, agricultural and plastic pollution." Q4: "Take the polluters to court for loss of public amenity- as they are doing in the Wye Valley."
  - ID 23/ Live in PCNP/ Q2: "Less pollution being allowed to enter the rivers and coastal areas. Swimming in sewage is dangerous to people's health."
  - ID 27/ Other (Lives in Pembs and Visits Park)/ Q3: "Agricultural river pollution"
  - ID 29/Live in PCNP/ Q3: "Water pollution - overspills and field pollution run off." Q4: "Allow members of the public to get involved in water testing at all our beaches. Help with communication when there are pollution incidents. Help us to lobby farmers and Dwr Cymru to protect the beaches." Q6: "It is essential we bring back water testing at Pwllgwaelod and include Cwm yr Eglwys and Aberbach. There are many of us in the Community who would volunteer. It needs to be all year round as there are many wild swimmer groups going in all year."
  - ID 36/ Live in PCNP/ Q4: "Cleaner waterways."
  - ID 40/ Live in PCNP/ Q3: "The Afon Nyfern habitats suffer from any pollution of the river and the spreading of invasive species such as Himalayan Balsalm." Q4: "There is a huge issue with the amount of slurry that is spread indiscriminately in fields within ( and outside) the park .,this calls for much more regulation and need for the park to be actively engaged in the monitering of over slurring."
  - ID 46/ Live in PCNP / Q2: "All the coast but it is spoiled by dirty beaches and unkempt footpaths". Q3: "Lack of natioal park upkeep and their lack of response to reports of problems" Q4: "Better management of the land and testing water quality."
  - ID 48/ Live in PCNP / Q3: "Less water pollution."
  - ID 62/ Live in PCNP/ Q3: "Polution by the water authority." Q4: "Prevent sewage being dumped into the sea and watercourses so that there is not sewage in the water and on the beach like at Newport." Q6: "Sort out spolution take legal action."

- ID 66/ Live in PCNP/ Q3: “Intensive agricultural practices, slurry spreading and run-off into rivers.”
- Traeth Mawr SurveyL Issue of Water Quality/ Sewage and public health risks also came up strongly within the Traeth Mawr survey. Sample of responses included: “I love the sand, the shallow water and swimming there but I and my friends can't do this because of sewage spills on the shore.” “Why not extend the sewage pipe out further and at a greater depth to stop ruining a gem of a beach. The jewel of North Pembs.” “Biggest issue at the beach is the sewage. It had a massive impact on the ability to enjoy the sea and creates challenges to safely run events at the beach.” “I have written to our MP and all concerned parties about constant sewage discharges on this beach. It is a huge concern and immensely disappointing as a local resident.” “Sewage and pollution from farms are detrimental to the health of swimmers as well as produce of local fisher-people.” “I know a lot of people who don't visit big beach because of the sewage.” What discourages you from visiting Traeth Mawr: “The regular sewage spills on the beach stopping me from swimming there.” “Sewage problem.” “Pollution in the water from sewage.” “Sewage discharges.” “I have experienced sewerage in the sea and my Son (21 years old) and my neighbour have both been taken ill after swimming in the sea here in recent weeks so I no longer swim here and generally avoid the water. I have visited less since these occurrences for obvious reasons.” “Sewage contaminated sea and shores.” “Discharged from sewage outfall and pollution in the Nevern which is worse than I have ever seen. This has put me off the sea swimming I love.” “The sewerage discharge from the CSO when it occurs.” “sadly the sewage being released in the sea is not ideal this really needs to cut down for peoples health and for the wildlife having to swim in it.” “Reports of sewage discharge in the vicinity.” “sewage is pumped out there.” “sewage discharge” “state of the water – sewage being released into the sea.” As a local cold water dipper this beach has way too frequent sewerage discharge alerts its shocking and unhealthy “
- **Water Quality in Wales, Research Briefing – Welsh Parliament/Senedd Research (August 2023)** (source: <https://senedd.wales/media/v3fl5zes/23-12-water-quality-in-wales.pdf> ) notes that:
  - The top three types of pollution identified in water pollution incidents were crude sewage, soils and clay and slurry. Crude sewage pollution usually arises from storm overflows and sewage treatment plants spills. Soil, clay sediment and slurry usually enter waterways through soil erosion by rain draining from nearby land. This carries any pollutants from soil and slurry into watercourses, or ‘surface run-off’. Improperly stored slurry can also leak into watercourses.
  - Combined sewers take sewage and run-off water to treatment works for cleaning. If rain is heavy and exceeds a sewers’ maximum capacity, excess water can be released into the environment at storm overflows. These discharges, called ‘combined storm overflows’ (CSOs), are sometimes necessary to prevent flooding elsewhere in sewerage systems. However, they can have negative effects, including:
    - harm to river health - CSOs can introduce biological and chemical pollution into rivers, lowering their water quality;
    - harm to public health - CSOs can introduce harmful bacteria into recreational waters; and
    - social impact – from public concern.

- **News reports relating to catching E.coli following swimming in polluted sea at beach in Amroth:**  
<https://www.bbc.co.uk/news/uk-wales-66709904>

### **Other Pollution and Other Health Risks**

- **Special Qualities Survey:** Pollution issues wider than water quality were highlighted within some responses to Special Qualities in particular around litter, dog poo and light pollution:
  - ID8/ Lives in Pembs/ Q4: "Improve access to beaches, make people litter aware, they must take litter home. It would be nice to have more access to dog friendly beaches in the summer months, perhaps by time tabling, so dog walkers could access the beaches early in the morning, leaving them free for families in the day."
  - ID 19/ Live in PCNP/ Q3:"Littering" Q4: "Plenty of bins."
  - ID 13/ Live in PCNP/ Q3: "irresponsible dog ownership and recreation." Q4: "Support for community activities to promote responsible dog ownership and tourism."
  - ID 36/ Live in PCNP/ Q4: "Higher & frequent penalties for litter (also imposed on facilities that issue containers that are found to be littered)More litter pick initiatives within schools & businesses, spread the word Cleaner waterways."
  - ID 48/ Live in PCNP / Q3: "Less light pollution (too much even in Moylegrove)"
  - ID 52/ Live in PCNP / Q3: "Private "thrill seeking" company's that give no regard for wild life and as there are no facilities leave rubbish and worse..."
  - ID 55/ / Q3: "Also light pollution seems to be an increasingly issue for our dark skies status, particularly large farms seem to have very bright led lights now in their cowsheds."
  - ID 58/ Live in PCNP/ Q3: "Pollution."
  - ID 64/ Live in PCNP/ Q3: "Litter and dog poo" Q4: "Consistent reminder notices on gates."
- **Traeth Mawr Survey:** Pollution and other health risks issues wider than water quality were also highlighted within some responses to Traeth Mawr survey, in particular around litter, dog waste and behaviour of dogs: "Worries about ... and dog waste." "The shocking level of litter left by visitors." "People not watching their dogs and therefore not picking up after them is problematic. Probably need more dog waste bins to encourage owners not to dump full poo bags." "Create some dog free areas to reduce impact of poor dog management on children. I'd struggle to count the number of times dogs have spoilt a day on the beach - stealing food, jumping on kids, stealing balls, dog mess etc." "Clear the rubbish seaweed that contains dog muck." "jetskis making a lot of noise and possibly being dangerous"
- **Water Safety – National Water Safety Forum: Water safety call as number of drowning deaths in young people in Wales rises** (Source: <https://www.nationalwatersafety.org.uk/wales/news/posts/2024/may/press-release> )

- Seven people under 20 died in accidental water-related fatalities in Wales in 2023 – the highest number since comparable data became available from the National Water Safety Forum’s Water Incident Database (WAID) in 2015.
- In total, there were 28 deaths in Wales from accidental water-related fatalities in 2023 across inland and coastal locations, compared with 22 the previous year.
- The accidental deaths form part of the 55 total water-related fatalities in Wales for 2023, an increase of seven from the previous year and the first overall increase in Wales in five years.
- Across the UK there were 236 accidental water-related fatalities last year – an increase of 10 from the previous year.
- **Special Qualities Survey:** Idea of tranquillity and benefit of peace and quiet that can be found in the Park highlighted in responses, alongside fears of losing this found within some responses to Special Qualities consultation, highlighting adventure tourism as one of the areas having a negative impact in particular locations.

## Feedback from draft Plan consultation

### Water Quality and Safety

- NRW - We are concerned with some of the wording used and the message conveyed about Bathing Water quality throughout the documents. The overriding message about bathing water quality comes across as very negative and doesn’t convey the overall positive state of bathing water quality around the Pembrokeshire Coast. e.g. On page 67, under the heading ‘Bathing Waters’ there is a quote stating *‘These days you have to choose your bathing spots very carefully’*. Whilst we recognise the use of quotation from public engagement is to be welcomed, where the message taken from the quote may be misleading we recommend explanatory text to convey the correct message. In Pembrokeshire we have 29 bathing waters and 27 of them are Excellent which is the most Excellent beaches we have had in Pembrokeshire. This is a good news story to celebrate and promote rather than give an unreflective negative impression, which may then, for example, lead to unintended negative consequences for tourism.
- NRW - In addition to our overall comments above about bathing water quality you may wish to include that we have three beaches which benefit from a water quality prediction model that is run every morning by 9am. This model is based on predicted rainfall and the beaches with this facility are **Poppit Sands, Newport Sands and Broad Haven central**. This information can be accessed on our website, so it may be helpful if there was a link in the PCNPA plan to the [bathing water pages on our website](#).
- NRW - There is also a quote ‘allowing members of the public to help with testing at bathing waters’. Whilst we appreciate this is an expressed public opinion it may be helpful to increase wider understanding by explaining that although this is a good idea (citizen science can help provide valuable additional information and observations that enable a fuller picture) the test for faecal indicator organisms is very specialist and the samples have to be taken, transported and analysed in a very

prescriptive way at an accredited laboratory in order to be representative. Only samples taken by NRW can be used to classify a bathing water under the bathing water regulations.

- [NRW - Page 95 – Policy W1: Provide and promote sustainable outdoor recreation opportunities for all](#). Example Action W1/F “Improve water quality at designated bathing waters achieving less than “Excellent” status”. - We suggest rewording this action – please refer to general comments above about Bathing Water quality. Action required will be working with others or in partnership to minimise the negative impacts of pollution on the quality and recreational use of our rivers and coastal waters.
- [Initial Equality Impact Assessment: Pembrokeshire County Council](#) - It is suggested that water safety should be a consideration for all age groups, including (but not exclusive to) young people.

Impact/ Risk	Response/ Mitigation/ Any additional actions needed
<p><b>General Impact/ Risk</b></p> <ul style="list-style-type: none"> <li>• Real risk and perceived risk relating to water quality and sewage pollution that can impact on people taking up opportunities in the Park, especially relating to access to blue spaces. CSOs can introduce harmful bacteria into recreational waters resulting in public health risks for recreational users and providers.</li> <li>• Outside of planning and work with agricultural sector, and potential community / citizen science projects Authority will be reliant on actions of partners to support delivery of improvements in this area. As a result, due to the impact of poor water quality, sewage discharge etc on recreational opportunities/ accessing health benefits of blue spaces/ community concerns it is important that the Authority engages with relevant bodies to assess progress and raise concerns when required.</li> <li>• Activities that help support and protect healthy ecosystems including protecting and enhancing air, water, soil quality and preventing pollution also have a positive impact on public health, this is something highlighted in SoNNaR. A range of policies and associated outcomes within the Conservation and Climate and Natural Capital partnership will have positive wider impact in terms of public health, including areas of noise, air and light pollution. When addressing light pollution it is important that responses and</li> </ul>	<p><b>Recommended Amendment/ Action:</b></p> <ul style="list-style-type: none"> <li>• Amended Text: Suggest that following result is added to Cultural Heritage and Connection: All designated bathing water beaches achieve “Excellent” status and there is a reduction in recreation and environmental harm from storm overflow sewage discharge. This is an area that was highlighted as a particular concern for public as part of special qualities consultation, so it would be beneficial to have a result linked to action in this area.</li> <li>• Ongoing Conversation/ Monitoring: Authority will be reliant on actions of partners to support delivery of improvements in this area in terms of Water quality/ Sewage discharge. As a result, it is important that the Authority assess how it can best engage with relevant bodies to assess progress and raise concerns when required.</li> </ul>

<p>solution consider potential safety/ access (including risks relating to trips and falls) needs for some people, e.g. poor lighting in streets etc, particularly in winter months may impact on people going outdoors and could impact on social isolation.</p> <ul style="list-style-type: none"> <li>• There are concerns around impact of litter and dog waste and behaviour in the Park. Results have been included within the plan to support address these issues: L1/E Management of litter, including seaborne litter, and raise awareness of its impacts. W1/H Dog owners / walkers and dogs are supported to enjoy the Park without risk to themselves or to other visitors, farm animals or wildlife.</li> <li>• Water safety is area of concern in particular as number of drowning deaths in young people in Wales rises. Seven people under 20 died in accidental water-related fatalities in Wales in 2023 – the highest number since comparable data became available from the National Water Safety Forum’s Water Incident Database (WAID) in 2015. In total, there were 28 deaths in Wales from accidental water-related fatalities in 2023 across inland and coastal locations, compared with 22 the previous year.</li> </ul> <p><b>Positive Impact/ Recognition</b></p> <ul style="list-style-type: none"> <li>• Issues relating to Water Quality, pollution and sewage discharge are addressed in both the Cultural Heritage and Connection section and the Climate Change and Natural Resources Section of the plan. With Policy on N4: Conserve and enhance water quality and restore natural watercourses and consideration in terms of its impact on W1: Provide and promote sustainable outdoor recreation opportunities for all. With following partnership actions identified of particular relevance:</li> <li>• N4/B Significantly reduce environmental harm from storm overflow sewage discharges, including working within the framework of the</li> </ul>	
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<p>Drainage and Wastewater Management Plan for Cleddau and Pembrokeshire Rivers.</p> <ul style="list-style-type: none"> <li>• W1/F Collaborate to ensure all designated bathing water beaches achieve “Excellent” status.</li> <li>• Water Safety considerations have been recognised in W1/I Promote water safety initiatives, e.g. Respect the Water. This was an area identified in the stage 1 assessment.</li> <li>• Issues relating to litter and pollution are also address throughout the plan in particular within the Climate and Natural Resources Section and specific partnership actions in other sections including: L1/E Manage litter, including seaborne litter, and raise awareness of its impacts.</li> </ul> <p><b>Considerations as a result of changes to the draft plan</b></p> <ul style="list-style-type: none"> <li>• Suggest that following result is added to Cultural Heritage and Connection: All designated bathing water beaches achieve “Excellent” status and there is a reduction in recreation and environmental harm from storm overflow sewage discharge. This is an area that was highlighted as a particular concern for public as part of special qualities consultation, so it would be beneficial to have a result linked to action in this area.</li> <li>• Authority will be reliant on actions of partners to support delivery of improvements in this area in terms of Water quality/ Sewage discharge. As a result, it is important that the Authority assess how it can best engage with relevant bodies to assess progress and raise concerns when required.</li> </ul>	
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<b>Area to Address</b>	<b>Affordable Housing, Accessible Housing and Access to Sites /Local Lettings Policy – preventing risk of discrimination when applied</b>
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<b>Protected Characteristics affected/ Communities of Interest/ Communities of Place/ Intersectionality</b>	<ul style="list-style-type: none"> <li>• Age, Disability, Pregnancy and Maternity, Race</li> <li>• Areas of deprivation within Pembrokeshire / those experiencing socio economic disadvantage potentially hidden in rural dispersed communities</li> <li>• Socio economic disadvantage</li> <li>• Intersectionality of Characteristics</li> <li>• Health and Well-being</li> </ul>
<b>Evidence or Issue</b>	
<b>Issues Highlighted in Stage 1 Assessment</b> <ul style="list-style-type: none"> <li>• <b>UK Poverty 2022, JRF</b> (Source: <a href="https://www.jrf.org.uk/file/58886/download?token=XLbzxN7W&amp;filetype=full-report">https://www.jrf.org.uk/file/58886/download?token=XLbzxN7W&amp;filetype=full-report</a> ). Notes on housing and poverty:</li> <li>• Housing costs are a major factor in determining whether people are pulled into poverty, with the cost of housing a key driver of poverty for renters in particular. One-third (33%, 4.2 million people) of private renters are in poverty, driven by a combination of high housing costs and low incomes; almost half (46%, 1.9 million people) of private renters in poverty are pulled into poverty by their housing costs, compared with a third (33%) of social renters pulled into poverty by housing costs. The composition of poverty by tenure, has changed substantially over the last 25 years, driven by the broader tenure shift seen over the period. The number and proportion of people living in the social rented sector has declined and there has been a fall in the numbers of young households able to get onto the housing ladder. In its place, the private rented sector has doubled in size, and with it the number and proportion of people living in poverty in the private rented sector has doubled.</li> <li>• <b>Local child poverty indicators 2021/22 – estimates of rates after housing costs</b>, End Child Poverty Coalition/ Centre for Research in Social Policy at Loughborough University (Source: <a href="https://endchildpoverty.org.uk/child-poverty/?_gl=1*1dfenjx*_ga*MTk0MTA0Mjk4Mi4xNzE3MTUwODMy*_ga_556ES1G6G9*MTcxNzE1MDgzMi4xLjAuMTcxNzE1MDgzMi4wLjAuMA..">https://endchildpoverty.org.uk/child-poverty/?_gl=1*1dfenjx*_ga*MTk0MTA0Mjk4Mi4xNzE3MTUwODMy*_ga_556ES1G6G9*MTcxNzE1MDgzMi4xLjAuMTcxNzE1MDgzMi4wLjAuMA..</a> / <a href="https://endchildpoverty.org.uk/wp-content/uploads/2023/06/Child-Poverty-AHC-estimates-2015-2022_final.xlsx">https://endchildpoverty.org.uk/wp-content/uploads/2023/06/Child-Poverty-AHC-estimates-2015-2022_final.xlsx</a> )</li> <li>• Although Pembrokeshire has seen a -1.2% change since 2014/15, for 2021/22 it was the county with the fifth highest % of children living in poverty after housing costs are taken into account in Wales at 29.0%. With only the following counties having a higher percentage: Blaenau Gwent (30.30%), Ceredigion (30.00%), Merthyr Tydfil (29.20%), Newport (29.10%). It was slightly above the Welsh average of 28%. This emphasises the important role of provision of affordable housing when looking at issues of child poverty in Pembrokeshire.</li> </ul>	

	2014/15	2015/14	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	Percentage point change (2015-22)
Pembrokeshire	7785 (30.3%)	7921 (31.3%)	7276 (29.3%)	7568 (31.5%)	7292 (30.9%)	8141 (32.4%)	7282 (35.5%)	7181 (29.0%)	-1.2%
Wales	29%	29%	28%	29%	28%	31%	31%	28%	
<p>These tables are based on the DWP/HMRC statistics "Children in low income families: local area statistics" (March 2023). The DWP/HMRC data provide the number and percentage of children aged 0-15 years who are living in households with below 60% median income before housing costs.</p> <p><a href="https://www.gov.uk/government/collections/children-in-low-income-families-local-area-statistics">https://www.gov.uk/government/collections/children-in-low-income-families-local-area-statistics</a></p> <p>The tables provided here use the DWP/HMRC local indicators combined with information about housing costs at the local level to estimate poverty rates after housing costs (AHC)</p> <p>This shows many children are in households with incomes net of housing costs that are below 60% of the median.</p> <p>Estimates are provided for local authorities and parliamentary constituencies for each of eight years from 2014/15 to 2021/22</p> <p>Note that the statistics are calibrated to the regional Households Below Average Income (HBAI) statistics (two-year averages).</p> <p>Due to sampling issues during 2021/22 related to the Covid-19 pandemic, additional caution may be required in interpreting these statistics.</p> <p>DWP advise that while the data for FYE 2021 and FYE 2022 has undergone extensive quality assurance prior to publication, users exercise additional caution when using the data for FYE 2021 and FYE 2022, particularly when making comparisons with previous years and for local areas across countries.</p> <p>We further recommend particular caution in interpreting year-on-year changes in local areas, and advise focussing on longer-term trends when looking at change over time.</p>									
<ul style="list-style-type: none"> <li>• <b>Implementing the Socio-economic Duty, A review of evidence on Socio-economic Disadvantage and inequalities of outcome, Welsh Government</b> (Source: <a href="https://gov.wales/sites/default/files/statistics-and-research/2021-10/review-of-evidence-on-socio-economic-disadvantage-and-inequalities-of-outcome_0.pdf">https://gov.wales/sites/default/files/statistics-and-research/2021-10/review-of-evidence-on-socio-economic-disadvantage-and-inequalities-of-outcome_0.pdf</a> ). Identified the following key inequalities of outcome due to socio-economic disadvantage in terms of living standards: <ul style="list-style-type: none"> <li>• Living in inadequate housing affects mental and physical health;</li> <li>• People experiencing socio-economic disadvantage are more likely to live in overcrowded conditions and have higher chance of experiencing homelessness and rough sleeping;</li> <li>• It is difficult to own a home for some, especially lower-paid workers;</li> <li>• Deprived areas tend to have lower levels of access to green space;</li> <li>• Some households in Wales are still experiencing fuel poverty (where they do not have adequate heating or hot water);</li> <li>• Those from Black, Asian and Minority Ethnic communities are more likely to live in rented accommodation and;</li> </ul> </li> </ul>									

- Rented accommodation generally of poorer quality
- **Pembrokeshire Well-being Assessment** (Source: <https://www.pembrokeshire.gov.uk/public-services-board/well-being-assessment> ). Key findings from the assessment included:
  - Child poverty rates in Pembrokeshire are unacceptable
  - In work poverty is an increasingly common problem
  - The Cost of living is rising across the UK, with more working families experiencing poverty
  - In some sectors, the wages in Pembrokeshire are comparatively low in relation to neighbouring counties
  - Young people have told us that they are not confident that they will be able to live and work in Pembrokeshire in the future
  - Availability and affordability of housing in Pembrokeshire is felt to be a barrier to staying in the county by young people.
  - There are a significant number of second homes in the county, particularly in rural areas.
  - There is a lack of affordable homes in the county.
  - The need for affordable homes is projected to increase.
  - We are seeing an increasing number of families presenting as homeless in the county.
  - The growing ageing population is and will continue to put pressure on the demand for specialist accommodation
- **Pembrokeshire Youth Assembly – “What Matters to You? Consultation 2023** (Source: <https://mgenglish.pembrokeshire.gov.uk/mgConvert2PDF.aspx?ID=73946> ) The following were in the top three issues of concerns among young people in Pembrokeshire:
  - The cost of living crisis - Support for families during the cost of living crisis and work to help prevent this impacting other areas such as young people’s education, etc.
  - Housing - Youth homelessness is on the increase. Support young people and families in Pembrokeshire into housing that is suitable for their needs.
- **Pembrokeshire County Council - Strategic Equality Plan 2024 – 2028: Supporting Evidence** (Source: <https://mgenglish.pembrokeshire.gov.uk/mgConvert2PDF.aspx?ID=73946> )
  - Provides overview of homelessness in Pembrokeshire and notes:
  - “Pembrokeshire has experienced outward migration of local households and very significant increases in the levels of homelessness in recent years. The consequences of the Covid-19 pandemic and the cost of living crisis has only served to increase the pressure on homelessness services with the demand for temporary accommodation rising significantly. Additionally, ongoing cost of living crisis and high interest rates create risks around the ability of households to cover housing costs, increasing the risk of homelessness.
  - As of the end of September 2023, Pembrokeshire was among the local authorities reporting the highest number of individuals sleeping rough. Pembrokeshire was the third highest with 14 rough sleepers, after Cardiff (30) and Newport (35). However, rough sleepers in Pembrokeshire decreased from June (27), July (24) and August (18) 2023.”

- Provides overview on Accessible Housing:
- Assessment of Specialist Housing and Accommodation Need for Older People in West Wales: Housing for older people- Pembrokeshire's provision was below the national average. Pembrokeshire ranked 17 out of 22 local authorities for older people's housing. Estimated increase in need towards the national average given growing older population. Housing with care- Pembrokeshire's provision was slightly below the national average. Estimated increase to higher level of provision to match aspirations in Welsh Government Older People's Expert Housing Panel report and older people's preference for housing based options over residential care.
- Housing and Accommodation Needs Assessment for People with Learning Disabilities in West Wales to 2037: The Assessment found that of 421 adults aged 18+ with learning disabilities in Pembrokeshire: 22% live in residential care services, 4% live in adult placements, 26% live in supported housing/supported living arrangements, 13% live in independent housing with a support/care package, 34% of adults with learning disabilities live with family or informal carers. The Assessment also found that the estimated population of adults with learning disabilities aged 18+ is likely to increase to 473 by 2037.
- Provides overview on Affordable Housing and notes:
- 92 additional affordable housing units were delivered in Pembrokeshire in 2022-23. Overall, providers delivered less than the 140 additional affordable housing units that they planned to deliver in 2022-23
- In Pembrokeshire - The average house price in 2022 was around £248,315, compared to £212,752 in September 2021, representing a 16.7% increase. In regard to the number of second homes in Wales, Pembrokeshire was ranked second highest of the local authorities at 16%.
- Pembrokeshire's attractiveness as a tourist destination has led to significant numbers of residential properties being purchased as second homes or to support the tourism trade and therefore away from residential occupation by local households.
- The county has seen significant inward migration of affluent, older households from other parts of the UK, which has placed additional pressure on house prices to a point where they are unaffordable for the vast majority of local households.
- The private rented sector is unable to meet the local demand as private landlords have moved away from residential lettings due to increased government-imposed regulation and the more favourable financial returns offered by moving towards AirBnB and the short term holiday lettings market.
- Affordability for households in need is notably worse in the National Park area of Pembrokeshire
- The degree to which the lack of housing affordability is impacting on demand for social housing is evidenced by the growth in the number of applicants seeking housing through Choice Homes @ Pembrokeshire.

- The most significant demand is for households seeking 1 bedroomed accommodation, although the biggest percentage increase is for larger property.
- The impact of Covid-19 alongside legislative changes around the provision of temporary accommodation and the letting of homes have placed significant additional stress on homelessness services and the housing register. Taken with the ongoing economic downturn, the dispersal of asylum seekers and housing of refugees fleeing the war in Ukraine, the social housing market in Pembrokeshire is facing unprecedented challenges.
- Pembrokeshire County Council has social housing stock (as recorded 2022) of 5651, there are also an additional 3,396 social housing rented properties owned by Ateb and Wales & West Housing associations
- Provides overview on supported housing:
- Much of our sheltered housing stock is old and although we have modernised one scheme in St Davids, we need to invest more in our sheltered housing to ensure that it meets modern day aspirations and plays a positive part in assisting with the Council's corporate objective to promote independent living for older people. As part of this a review of the existing older persons' accommodation and the support they receive was undertaken in 2019. Initial findings from the review suggest different options for older people are required across the county. This will involve modernisation or redevelopment of existing schemes, but will also require increased numbers of properties to accommodate our ageing population. Funding for this is included in our future spending plans. It has been identified by Members at both our Housing Development Board and HRA Working Group that sheltered housing improvement is a priority activity. As part of this ongoing work planning permission has been granted for 15 new older person's flats in Milford Haven and work has started on these in 2022-23. A planning application for a further 25 units of older persons accommodation in Haverfordwest has also been submitted.
- We recognise that we need to consider the role that Council housing can have in supporting vulnerable people to live in the community, and continue to make available some general needs housing for this purpose, for example to house people with a learning disability or care leavers. In 2019-20 and 2020-21 we were successful in applying for Welsh Government funding to support the development of four new build supported living flats and the acquisition of two properties to accommodate people with learning disabilities, along with the acquisition of a property for a supported parent and baby unit. This work continued in 2021-22 with the acquisition of two more properties for supported living. Work has continued in 2022-23 to identify potential property acquisitions and, where feasible, integrate supported living accommodation alongside general needs accommodation on our new sites.
- Provides overview in terms of Gypsy Traveller Accommodation Assessment:  
Gypsy Traveller Accommodation Assessment (GTAA)
- Pembrokeshire County Council contacted over 200 household addresses as part of the GTAA. 118 households completed the survey, 70 households either refused to take part or were unable to be contacted during the survey. This provides a

total figure of 188 Gypsy and Traveller households, providing a response rate of 63%. An unmet need for 11 residential pitches, over the next five years (by the end of 2024) has been identified in this assessment. Over the plan period for PCC and PCNPA (up to the end of 2031 and 2033) this equates to an overall need for 46 residential pitches (net need from 2025 – 2033 is 35 pitches). The Authority has analysed the responses, which identified a need for additional accommodation. To help to plan future provision, respondents were asked what area within Pembrokeshire they would like to move to. The general locations identified by people in need area generally within the south of the county with Haverfordwest providing the furthest location to the north. The potential to identify sites for Gypsy and Traveller Accommodation to meet need identified within the GTAA has been through the following search:

- To consider the Council’s land register to identify land which is unused or under used in the Council’s ownership and located in places where the Gypsy Traveller community wish to reside
  - To call for candidate sites and additional candidate sites as part of the Local Development Plan review process. The assessment has shown that whilst the four assessed sites considered in detail have the scale to accommodate Gypsy and Traveller provision, they are variously constrained by landscape and visual impact, location and proximity to settlements, access and flood risk. None of the sites provided a realistic option for allocation for Gypsy and Traveller site accommodation. Proposed candidate site - there were serious concerns raised regarding deliverability.
  - The Council has undertaken a GIS search of land and has identified a suitable parcel of land to provide additional pitches for Gypsies and Travellers and is currently in negotiation with the land owner to acquire the land.
- In addition to providing Local Authority pitches, Pembrokeshire County Council has a strong record of approving private pitches. The GTAA 2019 notes that 55 pitches had gained planning permission in Pembrokeshire since the first GTAA was produced in 2010, of these, 40 were on private sites. Since the GTAA 2019 was undertaken, planning permission has been granted for 6 additional Gypsy and Traveller pitches which reduces the immediate need from 11 pitches to 5 pitches.
  - **Special Qualities Consultation:** Issue of affordable housing or factors impacting on affordable housing highlighted within some responses to Special Qualities consultation:
  - ID 36/ Live in PCNP/ Q3: “Second homes and air b&bs, anglicisation,” Q4: “Measures to protect Welsh language and culture heartlands within the national park, policies to do with housing and holiday accommodation, more jobs for local people.”
  - ID 17/ Live in PCNP/ Q6: “Reduce holiday homes that are not regularly booked (possibly those that are only used by a single family etc) as these do not contribute much to the local economy and deprive local people a home in a huge housing crisis.”

- ID 18/ Live in PCNP/ Q3: “the loss of community caused by holiday homes and second homes.” Q4: “Provision of adequate enforcement and sanction powers, funding and staffing to address the challenges in 3. above.”
- ID 28/ Live in PCNP/ Q3: “Lack of work, money for services, lack of affordable housing”. Q3: “Money and jobs”
- ID 44/ Live in PCNP/ Q4: “No more second homes.
- ID 67/ Live in PCNP: Q3: “housing.” Q4: “Housing. With Pembrokeshire having too many 2nd Home Owners and empty properties and many locals looking to buy houses something different needs to be done. Although, increasing taxes on 2nd homes may earn money. There needs to be a crackdown to turn 2nd homes that are not really used for housing locals or even for refugees, homeless if the 2nd homeowners are kind enough. There needs to be research on why there are empty properties excluding 2nd homes. Why are people not selling houses e.g. from housing conditions like too much mould, dampness, pest infestations etc and not enough money to deal with these issues?”
- **Where are we now section of draft NPMP notes the following under State of the Park - Socio-Economic Well-being:**
  - There are specific challenges regarding the provision of jobs and housing, in particular for young people. House prices and rents in the National Park are significantly higher than the rest of Pembrokeshire; the median sale price for houses in the National Park in 2023 was 9.67 times the median wage . As at March 2024, there were 5,238 households on the Pembrokeshire Housing Waiting List (excluding transfers).At the 2011 Census the National Park had one of the highest rates of second / holiday home use of its general housing stock in England and Wales, at 27.7%. This impacts negatively on housing affordability and support for local facilities.
  - While there appears to be no shortage of employment opportunities in Pembrokeshire, the jobs available are often low paid (over 25% of full-time workers earned less than £18,000 per year in 2017) and seasonal (winter benefit claimant rates are almost double those for summer).
  - The challenges facing local communities in terms of housing are very clear and the National Park Authority has acknowledged the key importance of delivering affordable housing within Local Development Plan 2 and of ensuring jobs and homes for local communities, within the wider context of landscape protection. The National Park Authority will ensure through its planning service and review of the Local Development Plan that appropriate housing and economic policies to support sustainable development are delivered. Partners such as Registered Social Landlords and building companies are essential to deliver high quality development within this sensitive environment. Ensuring that local jobs and housing are available can support the retention of Welsh speakers within language-sensitive communities. Application of local lettings policies, for exception affordable housing sites, can also assist with reducing the potential for language impacts.
- **PCNPA NPA Report, Subject: The implications of recent Welsh Government Legislative and Planning Policy Changes in relation to Second Homes and Short-term Lets (29/3/23)** (Source: [https://www.pembrokeshirecoast.wales/wp-content/uploads/2023/03/08\\_23-Planning-Policy-Changes-re-Second-Homes-](https://www.pembrokeshirecoast.wales/wp-content/uploads/2023/03/08_23-Planning-Policy-Changes-re-Second-Homes-)



[abd-Short-term-lets.pdf](#) ) - PCC 2nd home council tax and business rate holiday home percentage by LDP 2 Centre boundary

<b>Centre</b>	<b>% of Residential Properties that are second homes or business rated holiday homes in National Park</b>
Tenby (Service and Tourism Centre)	28.07%
Saundersfoot (Local Centre)	29.35%
St Davids (Local Centre)	20.86%
Newport (Local Centre)	30.6%
Rural Centres	
Amroth	47.37%
Angle	15.79%
Bosherston	28.57%
Broad Haven	36.58%
Castlemartin	6.52%
Cresswell Quay*	
Dale	39.47%
Dinas Cross	15.34%
Felindre Farchog	4.35%
Herbrandston	5.58%
Jameston	8.57%
Lawrenny	28.57%
Little Haven	62.96%
Lydstep	16.22%
Manorbier	0%
Manorbier Station	
Marloes	29.66%
Moylegrove	22.64%
Mynachlogddu*	
Nevern*	

Newgale*	
Nolton Haven	60%
Pontfaen*	
Porthgain	22.58%
Rosebush	15.52%
Solva	22.05%
St Ishmaels	11.17%
Trefin	26%
*Rural Centre without a Centre Boundary shown on Proposal Map	

Rural Centres (lying partly in the Council's planning jurisdiction)	% of Residential Properties that are second homes or business rated holiday homes in the National Park	% of Residential Properties that are second homes or business rated holiday homes outside the National Park
Carew	0%	8.06%
Cosheston	0%	2.56%
Hool	0%	1.9%
Houghton	0%	2.38%
Lamphey	0%	5.33%
Llangwm	- (no Centre boundary)	7.42%
Milton	0%	1.2%
New Hedges	4.35%	6.33%
Pleasant Valley	- (no Centre boundary)	21.31%
Roch	33.33%	7.05%
Square & Compass	25%	- No statistic available
Wisemans Bridge	35.71%	- (no Centre boundary)
*Rural Centre without a Centre Boundary shown on Proposal Map		

- **Planning Policy Wales, Welsh Government**

(Source: [https://www.gov.wales/sites/default/files/publications/2024-02/planning-policy-wales-edition-12\\_1.pdf](https://www.gov.wales/sites/default/files/publications/2024-02/planning-policy-wales-edition-12_1.pdf) )

- 4.2.35 The provision of affordable housing exception sites must be considered to help meet identified requirements and ensure the viability of the local community. Where such policies are considered appropriate it should be made clear that the release of housing sites within or adjoining existing settlements for the provision of affordable housing to meet local needs which would not otherwise be allocated in the development plan, is an exception to the policies for general housing provision. Such policies must be fully justified, setting out the type of need and the kind of development which fall within their terms. The affordable housing provided on exception sites should meet the needs of local people in perpetuity.
- 3.28 Considerations relating to the use of the Welsh language may be taken into account by decision makers so far as they are material to applications for planning permission. Policies and decisions must not introduce any element of discrimination between individuals on the basis of their linguistic ability, and should not seek to control housing occupancy on linguistic grounds.
- 4.2.13 Planning authorities should also identify where interventions may be required to deliver the housing supply, including for specific sites. There must be sufficient sites suitable for the full range of housing types to address the identified needs of communities, including the needs of older people and people with disabilities. In this respect, planning authorities should promote sustainable residential mixed tenure communities with 'barrier free' housing, for example built to Lifetime Homes<sup>31</sup> standards to enable people to live independently and safely in their own homes for longer.
- **PCNPA Welsh Language Promotion Strategy:** Authority has in place a [Welsh Language promotion strategy](#) which has a specific Objective on:
  - Objective 3: Promoting use of Welsh every day across all parts of the National Park and the following deliverables:
  - Deliverable: Development which would result in an unacceptable adverse effect on the Welsh language will not be permitted in Welsh Language Sensitive Areas identified in Policy 13 of the Local Development Plan 2
  - Deliverable: We will contribute to community language resilience through planning provision of affordable housing to address local needs and appropriate type and mix of general housing within the Park and will consider the use of rural communities local lettings policies on rural exceptions sites.
- **Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness, Welsh Government, (2016)**  
(Source: <https://www.gov.wales/sites/default/files/publications/2019-03/allocation-of-accommodation-and-homelessness-guidance-for-local-authorities.pdf> )
- **Determining Priorities**
- 3.41 Section 167(2A) of the 1996 Act allows that allocation schemes may make provision for determining priorities in relation to applicants who fall within the reasonable preference categories, and provides that the factors which the scheme may allow to be taken into account include:
  - (a) the financial resources available to the applicant to meet his/her housing

costs (e.g. a Local Authority would be able to give less priority to an applicant who was financially able to secure accommodation through buying or privately renting)

(b) any behaviour of the applicant (or a member of his or her household) which affects his/her suitability to be a tenant, which is not a decision of

ineligibility or the removal of preference – see section 2.29)

(c) any local connection (within the meaning of section 81 of the 2014 Act) which exists between the applicant and the local authority's area. (Under S.81 a person has a local connection with the area of a local authority if he/she has a connection because of normal residence there (either current or previous) of his/her own choice, employment there, family associations or special circumstances). Where circumstances warrant; housing providers can confirm the local connection claim is valid with the person to whom a connection is claimed. Normal residence in an area is not of a

person's own choice if it is the consequence of being detained in prison. (see Annex 7). For the purposes of the 2014 Act, serving members of the Armed Forces, and other persons who normally live with them as part of their household, do establish a local connection with an area by virtue of serving, or having served, there while in the Forces. Local connection

policies should comply with the Equality Act 2010 and should not be used in a way so as to detract from giving overall reasonable preference to persons set out in s.167(2) of the 1996 Act. Some Local Authorities may wish to give more priority to local connection so that people who live or work in the area or who have close family connections have a greater

chance of being rehoused than other applicants in need. While Local Authorities cannot exclude people who do not have a local connection, there is nothing to prevent them including local connection as a policy priority within their allocation scheme, provided that overall the scheme continues to meet the reasonable preference requirements in s.167(2) of the 1996 Act. This is particularly relevant for Local Authorities operating in rural locations who aim to promote community and Welsh language sustainability.

- 3.42 It would be good practice for applications to be accepted from those currently living in institutional arrangements where they have a connection with the area and they have a known date for discharge which is not unreasonably distant from the date of application. This includes people leaving the armed services, prisoners, care-leavers and hospital patients.
- **Local Lettings Policies**
- 3.68 Section 167(2E) of the 1996 Act enables Local Authorities to allocate accommodation to people of a particular description, whether or not they fall within the reasonable preference categories, provided that overall the Local Authority is able to demonstrate compliance with the requirements of section 167. This is

the statutory basis for 'local lettings policies'. This could mean setting aside or giving priority to people of a particular description, whether or not they fall within the reasonable preference categories and to certain types of property or those on an estate or within an area.

- 3.69 Local lettings policies can be used to address a number of issues such as:
- Creating more mixed communities,
- Dealing with a concentration of deprivation,
- Ensuring properties that are particularly suited to being made accessible (e.g. ground floor flats) are prioritised for those with access needs,
- Relocating essential workers such as teachers, nurses and police officers within a reasonable travelling distance from their work,
- Supporting people in work, training or volunteering or who are seeking work or to take up volunteering opportunities,
- Dealing sensitively with lettings in rural areas to sustain communities by giving priority to those with a local connection to the local area,
- Sustaining Welsh-speaking communities by giving priority to those in housing need with a local connection to the area,
- Taking account of the needs of mobile workers such as those in the armed forces.
- Child to adult ratios could be lowered on an estate where there is high child density or, conversely, young single people could be integrated into an estate via this route. Welfare benefit restrictions on under-occupation should be considered and highlighted to potential tenants.
- Under occupancy as a result of the Welfare Reform Act 2012. From April 2013 all working age tenants renting from a Local Authority, Housing Association or other registered social landlord receive Housing Benefit based on the number of people in their household and the size of their accommodation.
- 3.70 Some Housing Associations in conjunction with Local Authorities have used local lettings policies to allocate new social housing in rural areas to give priority to local people, particularly where the scheme has come about as a result of joint working between partners such as the Local Authorities, Housing Associations, Rural Housing Enablers and or rural Community Councils.
- 3.71 Where operating local lettings policies, Local Authorities will need to ensure that, overall the scheme operates to give reasonable preference for allocations to applicants in the reasonable preference categories (section 167(2) of the 1996 Act). This means that an allocation scheme may include other policy priorities such as promoting job-related mobility etc, provided that:
- They do not dominate the scheme and
- Overall, the scheme operates to give reasonable preference to those in the statutory reasonable preference categories over those who are not.

- 3.72 Local lettings policies should have clear aims linked to community sustainability and be supported by clear evidence of the need for the approach. Also, procedures should be in place to ensure that local policies fit with and inform strategic priorities. Where 'sustainability' and 'meeting housing need' objectives or priorities conflict, arrangements should be in place to ensure further consideration of the issue and a decision made in respect of it. Overall however, strategies should set out parameters for local lettings policies that do not prevent a Local Authority from meeting its statutory duties. The Welsh Government recognises that this could produce opposing policy objectives particularly in areas of high demand where an authority may not be able to discharge its statutory duties and have local lettings initiatives. In such circumstances the needs of applicants to whom a duty is owed should take priority over the objectives of local lettings initiatives. Local lettings policies must not discriminate under the equality strands listed in the Equality Act 2010. They should be monitored and reviewed and an equality impact assessment should be carried out prior to the introduction and as part of each review.
- 3.73 Local letting policies should be published, however as they are often time-limited it may not be practical to include them in the allocation scheme. A way to satisfy this would be to include a statement about the intention to implement local letting policies and to set out details in a separate document or documents which can be revoked or revised as appropriate. Authorities should include an explanation of the local letting policy which should be based on robust evidence. Where it is intended that the policy is time-limited, it should include an appropriate exit strategy.
- 3.74 Local lettings policies should be monitored as to their effectiveness and reviewed regularly so that they can be revised or revoked where they are no longer appropriate or necessary.
- **Welsh Language Communities Housing Plan (Source: <https://www.gov.wales/welsh-language-communities-housing-plan-html> )**
- Sustaining a strong economy as well as a sufficient supply of affordable homes is necessary to creating vibrant communities where the Welsh language can thrive. One of the main challenges facing rural, coastal, and Welsh-speaking communities is the constant outmigration of young people. The Arfor Interim Report reflects that migration is complex, not every young person will want to stay locally, but we need to ensure that the choice to stay is available and that the opportunities to return are also available for those who have left for university or to gain job experience.
- The co-operative and community-led housing model can help communities, registered social landlords and local authorities to work together to develop solutions for their communities. These models can create affordable homes in line with the specific needs of the community and more importantly they are owned by the community. The co-operative and community-led housing model can create new housing developments as well as a means to purchase and develop properties within the current housing stock—particularly empty properties or housing for which there is little demand. We already provide support for community-led housing groups through the Communities Creating Homes programme,

delivered by Cwmpas, and we are committed to supporting co-operative housing, community-led initiatives and community land trusts as set out in our Programme for Government.

**Pembrokeshire County Council Housing Strategy 2024-2029** - <https://www.pembrokeshire.gov.uk/housing-strategy/> / [Appendix 1 - Pembrokeshire County Council](#) – will impact on people living with the Park area. (added as part of Stage 2 assessment)

**Pembrokeshire Coast National Park Authority – Draft Review Report of Local Development Plan (LDP2)**

**Feedback from draft Plan consultation**

- Pembrokeshire County Council -The function of PCNPA's role as a Planning Authority and how it controls the quality of development is notably absent in the easy-read version. However, it is one of the areas that affects a lot of people.
- Survey response – Have we accurately captured the State of the Park, and the main challenges and opportunities? Is there other evidence that would add ? No - We do not accept the premise that second homes and holiday lets are bad for the park. They are vital to its economic health
- Equality Impacts: Pembrokeshire County Council - There are some concerns that the Plan might not bring benefits to those experiencing socio-economic disadvantage, because it (understandably) seeks to protect National Park landscapes and nature conservation assets from damage but in so doing may restrict the economic developments that provide livelihoods. However, the picture is complex, for instance as NPA planning places a strong emphasis on affordable housing provision, which will help those at a socio-economic disadvantage, so it is difficult to generalise.

**Plan notes:** There is a high level of need for affordable housing with 4,515 people on the Choice Homes @ Pembrokeshire housing waiting list in October 2024. Of these, the majority were waiting for a 1 bed (2,743) or 2 bed (1,064) property.

Impact/ Risk	Response/ Mitigation/ Any additional actions needed
<p><b>General Impact/ Risk</b></p> <ul style="list-style-type: none"> <li>• The provision of affordable housing exception sites must be considered to help meet identified requirements and ensure the viability of the local community. Where such policies are considered appropriate it should be made clear that the release of housing sites within or adjoining existing settlements for the</li> </ul>	<p>Suggested amendment identified in stage 1 assessment has been applied to SE1/A</p>

<p>provision of affordable housing to meet local needs which would not otherwise be allocated in the development plan, is an exception to the policies for general housing provision. Such policies must be fully justified, setting out the type of need and the kind of development which fall within their terms. The affordable housing provided on exception sites should meet the needs of local people in perpetuity.</p> <ul style="list-style-type: none"> <li>• Planning Policy Wales notes: “Considerations relating to the use of the Welsh language may be taken into account by decision makers so far as they are material to applications for planning permission. Policies and decisions must not introduce any element of discrimination between individuals on the basis of their linguistic ability, and should not seek to control housing occupancy on linguistic grounds.”</li> <li>• Local lettings policies should have clear aims linked to community sustainability and be supported by clear evidence of the need for the approach. Local lettings policies must not discriminate under the equality strands listed in the Equality Act 2010. They should be monitored and reviewed and an equality impact assessment should be carried out prior to the introduction and as part of each review.</li> </ul> <p><b>Considerations as a result of changes to the draft plan</b></p> <ul style="list-style-type: none"> <li>• Amendment to SE1/A takes account of addition of recommendation in stage 1 assessment to include “where appropriate and where evidence demonstrates they support delivery against desired outcomes” now reads “Apply local lettings policies applied on rural exceptions sites where appropriate and where evidence demonstrates they support delivery against desired outcomes.” This will help address risks mentioned above.</li> </ul>	
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<p><b>General Impact/ Risk</b></p> <ul style="list-style-type: none"> <li>• Lack of accessible and suitable housing provision for disabled and older people and lack of affordable housing for young people and families in the Park. The Authority has an important role in facilitating provision of affordable housing through planning and meeting affordable housing targets within its LDP2. It also may make planning decisions affecting buildings to be used for supported housing and respond to need identified within Gypsy Traveller Accommodation Assessment (GTAA) through local development planning. There is growing concern about the knock on effect that the growth in second homes and holiday homes, AirBnB and the short term holiday lettings market are having on availability of affordable housing, housing needs and communities in the Park area. This will be an area that is particularly important in terms of communities and its impact in terms of landscapes for lives and livelihoods. Housing cost is impacting on child poverty levels in Pembrokeshire and opportunities for young people in the Park.</li> </ul> <p><b>Positive Impact/ Recognition</b></p> <ul style="list-style-type: none"> <li>• Plan recognises and seeks to support responses to issue of affordable housing provision in Park area through communities theme. It highlights in State of the Park section that “There is a high level of need for affordable housing with 4,515 people on the Choice Homes @ Pembrokeshire housing waiting list in October 2024. Of these, the majority were waiting for a 1 bed (2,743) or 2 bed (1,064) property.”</li> <li>• Results under Communities include reference to: <ul style="list-style-type: none"> <li>○ We will meet all Local Development Plan targets, e.g. 60 new homes per annum, of which 23 are affordable</li> <li>○ We will reduce the significant waiting list for affordable housing in Pembrokeshire (over 4,500 in 2024).</li> </ul> </li> </ul>	<p>Plan recognises and seeks to support responses to issue of affordable housing provision in Park area. Local Development Plan plays an important role in terms of supporting delivery of this ambition and ensuring we have strong evidence base.</p> <p><b>Recommendation/ Action</b></p> <ul style="list-style-type: none"> <li>• Easy Read Version: Comment as part of consultation noted: The function of PCNPA’s role as a Planning Authority and how it controls the quality of development is notably absent in the easy-read version. However, it is one of the areas that affects a lot of people. Look to review Easy Read version to see if further amendments are needed in line with this comment</li> </ul>
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<ul style="list-style-type: none"> <li>Partnership Actions under community include (and also recognises the need for partnership working in this area both in terms of delivery and developing evidence base):             <ul style="list-style-type: none"> <li>SE1/A Deliver appropriate homes, including affordable housing, for local communities through the planning system and joint working. Apply local lettings policies applied on rural exceptions sites where appropriate and where evidence demonstrates they support delivery against desired outcomes. Key Delivery Partners include Registered Social Landlords and Home-builders.</li> <li>SE1/B - Develop an evidence base on types and needs of homes (e.g. relationship with Welsh language, sharing data on second / holiday homes, considering options regarding local shared ownership).</li> </ul> </li> </ul> <p><b>Easy Read Version</b></p> <ul style="list-style-type: none"> <li>Comment as part of consultation noted: The function of PCNPA's role as a Planning Authority and how it controls the quality of development is notably absent in the easy-read version. However, it is one of the areas that affects a lot of people. Look to review Easy Read version to see if further amendments are needed in line with this comment</li> </ul>	
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Area to Address	Transport Challenges / Affordability and access to services and opportunities
Protected Characteristics affected/ Communities of Interest/ Communities of Place/ Intersectionality	<ul style="list-style-type: none"> <li>Age, Disability, Gender Reassignment. Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation</li> <li>Carers</li> <li>Socio economic disadvantage</li> <li>Areas of deprivation within Pembrokeshire / those experiencing socio economic disadvantage potentially hidden in rural dispersed communities</li> </ul>

	<ul style="list-style-type: none"> <li>• Intersectionality of Characteristics Health and Well-being Outcomes</li> </ul>
<b>Evidence or Issue</b>	
<b>Evidence/ Issues Highlighted in Stage 1 Assessment</b>	
<ul style="list-style-type: none"> <li>• <b>UK poverty 2020/21, JRF – Access to Employment</b> (Source: <a href="https://www.jrf.org.uk/report/uk-poverty-2020-21">https://www.jrf.org.uk/report/uk-poverty-2020-21</a>) <ul style="list-style-type: none"> <li>○ JRF previous work (Crisp et al, 2019) shows that poor public transport can be a significant barrier to accessing jobs for workers in deprived neighbourhoods. Lower-income workers are more likely to use the bus or walk to work, compared with other workers. Workers in poverty are more reliant on the public transport system, which had very limited capacity during the lockdown. This is exacerbated by the fact that people on a low wage are more likely to work atypical hours, when there is a particular lack of appropriate public transport. Low-paid workers reliant on public transport find themselves shut out of better-paid work because it is too difficult to reach or because the cost is too high to manage on a low wage.</li> <li>○ Low wages can limit commuting choices.</li> <li>○ Transport will continue to be a barrier to finding work or working more hours unless public transport services improve to enable people in low pay to travel further from home for work.</li> </ul> </li> <li>• <b>Implementing the Socio-economic Duty, A review of evidence on Socio-economic Disadvantage and inequalities of outcome, Welsh Government</b> (Source: <a href="https://gov.wales/sites/default/files/statistics-and-research/2021-10/review-of-evidence-on-socio-economic-disadvantage-and-inequalities-of-outcome_0.pdf">https://gov.wales/sites/default/files/statistics-and-research/2021-10/review-of-evidence-on-socio-economic-disadvantage-and-inequalities-of-outcome_0.pdf</a> ) <ul style="list-style-type: none"> <li>○ Report identified key inequalities of outcome due to socio-economic disadvantage in relation to Participation including problems with accessibility of public transport for older and disabled people</li> </ul> </li> <li>• <b>Inequality in a Future Wales: Areas for action in work, climate and demographic Change, The Future Generations Commissioner, Public Health Wales</b> (Source: <a href="https://www.futuregenerations.wales/wp-content/uploads/2021/11/FGCW_Equalities-Report_E-UPDATED.pdf">https://www.futuregenerations.wales/wp-content/uploads/2021/11/FGCW_Equalities-Report_E-UPDATED.pdf</a> ) <ul style="list-style-type: none"> <li>○ There is potential to increase or decrease inequality in transport as we move to Net Zero. In the early 1990s and 2000s, transport disadvantage was noted as creating social exclusion from work, education, and health services (Social Exclusion Unit, 2003). The report concluded that transport disadvantage and social disadvantage interact directly and indirectly to cause transport poverty. This can be seen in the promotion of Electric Vehicles (EVs), for example, which may have lower running costs but currently are more costly to buy. A lack of attention to poverty may be because poorer communities (as well as women, ethnic minorities, and disabled people) are not included in planning and policy decision-making related to EVs. It is the most socially disadvantaged, and people from rural communities, who experience the greatest transport disadvantage, have higher emissions and are more likely to need to travel by car to work (Curl et al., 2018).</li> </ul> </li> </ul>	

- Markkanen and Anger-Kraavi (2019) call for a better understanding of the complex relationships between poverty, transport choice and travel needs. This means understanding how different social groups in Wales use transport and travel, and how they are affected by transport policies (Arsenio et al., 2016; Ryan et al., 2019).
- We advocate an approach to transport policy that accounts for the varied socio-economic and environmental factors that result from shifting to low carbon transport alternatives. Transport modality is not a neutral 'choice' for many people, and the inequality dimensions of travel in an area and for certain groups can profoundly shape the uptake of alternative travel solutions including EV's, public transport and active travel (cycling, walking). Planning solutions need to recognise that work is likely to be the furthest away for those with the lowest incomes and that different social groups travel in different ways with different purposes (Shaw, 2016). The aim is to ensure that those most in need have access to effective transport for recreation, care, and work, which does not further exacerbate existing inequalities.
- **Being disabled in Britain, EHRC (2017)** (Source: <https://www.equalityhumanrights.com/sites/default/files/being-disabled-in-britain.pdf>)
  - Poor access to transport, leisure and other services can affect the community and social life of disabled people, creating a barrier to independence and their enjoyment of day-to-day activities. Across Great Britain, there was an overall increase between 2009-11 and 2012-14 in the percentage of disabled and non-disabled adults who reported having difficulty accessing services in the areas of health, benefits, tax, culture, sport and leisure. In 2012-14 this was 45.3% for disabled people compared with 31.7% for non-disabled people.
  - Access to transport is an important part of independent living and participation in family and community. Transport options for disabled people are very limited because of the need to use only transport forms that are accessible, and these tend to be expensive. Disabled people report feeling 'trapped' by these high costs and limited options.
  - Cuts to concessionary fares and local transport services have left some disabled people isolated (JCHR, 2012).
  - The UK Independent Mechanism (2014) has acknowledged the steps put in place to improve accessibility of transport. However, it noted that: 'Disabled people continue to experience significant barriers when trying to use transport including the lack of accessible railway stations, difficulties getting in or out of transport, getting to and from bus stops or bus/train stations, the lack of integration between the different modes of transport, and the attitudes of staff' (p.13).
  - There are also attitudinal or psychological barriers that prevent or discourage disabled people from using transport services. This could involve the behaviour and attitudes of some transport staff or concerns that people have about using transport, such as fear of crime, abuse or attack (SATA, 2015).
- **General Comments – intersectionality and transport**
  - People with certain protected characteristics may fear that they will be vulnerable to or experience hate crime and harassment, including sexual harassment when on public transport.

- The rural and small town nature of National Park means people are likely to be travelling further afield to access LGBT scene of bars, clubs and events and support in more urbanised areas. People may have to travel within Pembrokeshire to access community and support groups within the county.
- Due to the rural nature of the National Park and limited accessible public transport disabled people are likely to be more reliant on private transport, this has implication in terms of parking spaces needed in terms of homes and drop off points in terms of facilities. Disabled people with certain conditions may require access to treatment out of area and as a result integrated transport links with other areas/regions will be important.
- A significant percentage of people in National Park Area show religious affiliation in particular with Christian faith. Due to the rurality of the National Park area good public and private transport links will be important for access to religious places of worship within the Park and Pembrokeshire.
- **PCNPA Experiences for All Report**
  - 'No parking / too expensive' was the second most common thing people said stopped them from spending more time outdoors in the Experiences for All online survey (23% chose the option, second only to 'too busy working'). It was the top barrier for people likely to be on a low income and more likely to be a barrier for under 25s. Transport was one of the two barriers that were regularly mentioned in the stakeholder conversations for this research. Although 'no transport' was not a top barrier for the online survey respondents overall, it was more likely to be a barrier for: Under 25s; People likely to be on a low income; and D/deaf or hard of hearing people (or people who care for someone who is D/deaf or hard of hearing); it was also one of the top barriers for people who spend time in green and natural spaces less than once a week.
- **Welsh Index of Multiple Deprivation (WIMD) (2019) (Source: <https://wimd.gov.wales/?lang=en> )**
  - Multiple Deprivation and LSOA areas in Pembrokeshire - Access to Services: Due to the rural nature of Pembrokeshire a significant number of LSOA areas are within the 10% most deprived in Wales in terms of access to services, this includes LSOA's in the Park area. The 28 LSOA in Pembrokeshire ranked in the 10% overall most deprived in Wales for access to services are: St Dogmeals (85 of 1909), Cilgerran (124 of 1909), Clydau (82 of 1909), Crymych 1 (86 of 1909), Crymych 2 (177 of 1909), Maenclochog 1 (3 of 1909), Maenclochog 2 (145 of 1909), Lampeter Velfrey (78 of 1909), Amroth (88 of 1909), Martletwy (33 of 1909), East Williamston 1 (76 of 1909), Carew (143 of 1909), Manorbier (154 of 1909), Lamphey (70 of 1909), Hundleton (4 of 1909), Wiston (37 of 1909), Rudbaxton (165 of 1909), Camrose 1 (188 of 1909), Camrose 2 (91 of 1909), St Ishmael's (20 of 1909), The Havens (199 of 1909), Solva (95 of 1909), Letterston (151 of 1909), Llanrhian (97 of 1909), Scloddau (57 of 1909), Dinas Cross (36 of 1909)
- Issue of access to services, including cost highlighted within some responses to Special Qualities consultation:
  - ID16/ Other (Live in Pembs?)/ Q3: "Need more focus on locals as well as tourism - support for businesses, and infrastructure remaining open/accessible out of season, with support for next generation to live and work locally." Q4: "Funding"

- ID 28/ Live in PCNP/ Q3: “Lack of work, money for services, lack of affordable housing”. Q3: “Money and jobs”
- ID 29/Live in PCNP/ Q3:”Threats of closing public toilets. The World Health Organisation website says these are essential.” Q4: “Help us keep toilets open.” Q6: “It is also essential we keep all the beach toilets open.”.
- ID 57/Live in PCNP / Q4: “Keeping the toilets open and not charging expensive car parking charges. Being aware that there are areas where there is no mobile signal.”
- ID 61/ Live in PCNP /Q3: “Closure of public toilets and lack of investment in renewing important infrastructure such as public toilets.”
- ID 67/ Live in PCNP/ Q3: “Climate change, housing, closing and reducing services.” Q4: “Closing and reducing services. From reducing certain library times to closing physical banks. This may be due to financial constraints but if you ask for volunteers to keep the services going or ask for help for funding from other places, if due to financial constraints, the people will help”
- **Traeth Mawr Survey:** Issue of Cost of Parking came up in terms of some responses and issues around public transport
- **Authority:** Provides funding to Greenways partnership to support coastal buses etc. It has its own minibus which plays important to enable more people to access inclusion and volunteering opportunities provided by the Authority, and to access parts of the Park they would not normally have access to.
- **PACTO:** Pembrokeshire's Community Transport services help people and groups who don't have access to their own transport and who don't have or can't use conventional public transport services.
- **Pembrokeshire Well-being Assessment** (Source: <https://www.pembrokeshire.gov.uk/public-services-board/well-being-assessment> ) Key findings from the assessment include:
  - Public transport in rural areas is a barrier to accessing services and employment opportunities
  - Child poverty rates in Pembrokeshire are unacceptable
  - In work poverty is an increasingly common problem
  - The Cost of living is rising across the UK, with more working families experiencing poverty
  - From a survey of our residents, affordability and accessibility to leisure services can be a barrier to healthy behaviours
  - Public transport networks impact upon people's ability to attend arts and culture events.
- **Regional Consultation to inform Equality Plans (Pembrokeshire Results)**  
 (Source: <https://www.pembrokeshire.gov.uk/Strategic-Equality-Plan-2024-28/sepdevelopobjectives>) - Young Voices for Choices Youth Forum respondents made these comments in response to the survey questions including:
  - Transport – cost, some villages only have a weekly bus, not enough hospital transport
  - Leisure an access to the coast and countryside – more choices if you have money and transport, don't have money or transport

<ul style="list-style-type: none"> <li>○ Health – can't see a GP, access to a dentist, waiting lists, and long term effects of Covid on services.</li> <li>● <b>Regional Consultation to inform Equality Plans (Pembrokeshire Results)</b> (Source: <a href="https://www.pembrokeshire.gov.uk/Strategic-Equality-Plan-2024-28/sepdevelopobjectives">https://www.pembrokeshire.gov.uk/Strategic-Equality-Plan-2024-28/sepdevelopobjectives</a>) - Young Voices for Choices Youth Forum respondents made these comments in response to the survey questions including: <ul style="list-style-type: none"> <li>○ Work – not enough support for disabled people and young people under 25, more job opportunities</li> <li>○ Pay – cost of living and inflation, household bills, food and everything</li> </ul> </li> </ul> <p>Summary of findings from the South West Wales Regional Transport Plan public consultation - <a href="http://www.cjcsouthwest.wales/media/19530/summer-2024-public-consultation-summary-of-findings.pdf">http://www.cjcsouthwest.wales/media/19530/summer-2024-public-consultation-summary-of-findings.pdf</a></p> <p><b>Feedback from draft Plan consultation</b></p> <p><b>Transport</b></p> <ul style="list-style-type: none"> <li>○ NRW - <b>Page 56</b> – Transport – We consider this to be more of a wish list rather than specifying if they are challenges or opportunities and if opportunities how they will be realised. (Please also refer to general comments above on consistency and clarity of presenting State Challenges and Opportunities.)</li> <li>○ Pembrokeshire County Council - P18 – Consideration could also be given to include reference to the forthcoming Regional Transport Plan (2025-2030) and the forthcoming LDP2 Pembrokeshire.</li> <li>○ Pembrokeshire County Council - P41 – Additional barriers to participation include lack of adequate public transport and transport poverty.</li> <li>○ Pembrokeshire County Council -P56 – Mention could be made to improved DRT services in the area or community transport options to assist with accessibility issues.SE/G (also N1/E)- should probably include PCC and Bus operators, TfW and NWR.</li> </ul>	
Impact/ Risk	Response/ Mitigation/ Any additional actions needed
<p><b>General Impact/ Risk</b></p> <ul style="list-style-type: none"> <li>● There is a need to promote good accessible and affordable public transport and private transport links within the Park, linked to wider Pembrokeshire and regional networks. This has particular relevance in terms of the regional work of CJsCs. Transport needs to be considered in the context of promotion of active travel and sustainability to accessing these options. Lack of</li> </ul>	<p><b>Recommended Amendment/ Action:</b></p> <ul style="list-style-type: none"> <li>● Amendment to Text: Suggest that additional partnership action is added to Communities workstream on Socio-economic well-being: Support once approved the delivery and monitoring of South West Wales Regional Transport Plan through the Corporate Joint Committee for South West Wales. Lead: Corporate Joint Committee for South West Wales. (Note both</li> </ul>

<p>access to transport including accessible and affordable transport may act as a barrier to people in the Park, Pembrokeshire and visitors accessing opportunities within the Park such as volunteering and employment opportunities, access to wellbeing initiatives, recreation, events and activities alongside community facilities. People with certain protected characteristics may fear that they will be vulnerable too or experience hate crime and harassment, including sexual harassment when on public transport. Increases in car parking charges are likely to have greater negative impact on some groups than others whose situation means that they are less able to absorb increases. There is a need to ensure that sustainable transport activities related to reducing carbon emissions meet the needs of local community alongside the needs of visitors. Including issues relating to affordability and accessibility.</p> <ul style="list-style-type: none"> <li>• Partnership working at a local, regional and national level will be central to being able to address issues relating to securing accessible, affordable, reliable and sustainable public transport and low emission transport in the Park and transport links with areas outside the park area.</li> </ul> <p><b>Positive Impact/ Recognition</b></p> <ul style="list-style-type: none"> <li>• State of the Park section for Cultural Heritage and Connection includes reference in barriers to adequate public transport and transport poverty, inclusion of this was highlighted in consultation response.</li> <li>• Actions within Climate and Natural Resources will help contribute to responding to some of the challenges re transport and takes account of need for them to be</li> </ul>	<p>Pembrokeshire County Council and Pembrokeshire National Park Authority are part of the CJS for South West Wales)</p> <ul style="list-style-type: none"> <li>• Amendment to Text: Pembrokeshire Association for Community Transport Organisations carry out a lot of initiative relating to accessible transport and it is recommended that they are added as a key delivery partner to SE1/G</li> <li>• Amendment to Text: SE1/F Local community services are viable and accessible, e.g. shops, schools, play facilities and community halls, etc. should support provision of community services.- has been removed from the partnership actions. Some concerns in the stage 1 assessments in terms of how delivering this would be impacted in terms of budget pressures and need to consider how it would be developed in practice. As a result it is recommended that following action is added in terms of community focused action: Deliver the Strengthening Communities Project under the Pembrokeshire Well-being Plan, this work will impact on communities in the Park. Lead: Pembrokeshire Public Services Board.</li> </ul>
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<p>accessible and affordable: N1/E Deliver accessible and affordable public transport, active travel and low-carbon vehicle initiatives.</p> <ul style="list-style-type: none"> <li>• Transport and its interrelationship with access to facilities is highlighted in section within Communities State of the Park and makes explicit reference to -Public transport options need to be affordable and accessible to all, including older and disabled people</li> <li>• Results for communities include - We will maintain and extend sustainable transport and active travel options to achieve the target of 45% of journeys being undertaken by sustainable modes by 2040.</li> <li>• Partnership Action under Communities includes SE1/G Support the delivery of accessible and affordable public transport, active travel and low-carbon vehicle initiatives.</li> <li>• Initiatives under W1/B, W2/A and W2/B could also help remove some barriers to accessing the park through transport related support – bursary for schools, project use of minibuses.</li> <li>• N1/D Continue to use the Sustainable Development Fund to support community low carbon projects - has potential to support sustainability of community projects, through interventions in areas such as renewable energy contributing to reduction in longer term running costs for organisations.</li> </ul> <p><b>Considerations as a result of changes to the draft plan</b></p> <ul style="list-style-type: none"> <li>• Suggest that additional partnership action is added to Communities workstream on Socio-economic well-being: Support once approved the delivery and monitoring of</li> </ul>	
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<p>South West Wales Regional Transport Plan through the Corporate Joint Committee for South West Wales. Lead: Corporate Joint Committee for South West Wales. (Note both Pembrokeshire County Council and Pembrokeshire National Park Authority are part of the CJS for South West Wales)</p> <ul style="list-style-type: none"> <li>• Pembrokeshire Association for Community Transport Organisations carry out a lot of initiative relating to accessible transport and it is recommended that they are added as a key delivery partner to SE1/G</li> <li>• SE1/F Local community services are viable and accessible, e.g. shops, schools, play facilities and community halls, etc. should support provision of community services.- has been removed from the partnership actions. Some concerns in the stage 1 assessments in terms of how delivering this would be impacted in terms of budget pressures and need to consider how it would be developed in practice. As a result it is recommended that following action is added in terms of community focused action: Deliver the Strengthening Communities Project under the Pembrokeshire Well-being Plan, this work will impact on communities in the Park. Lead: Pembrokeshire Public Services Board.</li> </ul>	
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Area to Address	Pathways to employment for young people and underrepresented groups/ those facing barriers to accessing employment opportunities/ Access to 'fair work' - in work poverty/ seasonality/ child poverty
<b>Protected Characteristics affected/ Communities of Interest/ Communities of Place/ Intersectionality</b>	<ul style="list-style-type: none"> <li>• Age, Disability, Gender Reassignment. Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation</li> <li>• Carers</li> </ul>

	<ul style="list-style-type: none"> <li>• Socio economic disadvantage</li> <li>• Areas of deprivation within Pembrokeshire / those experiencing socio economic disadvantage potentially hidden in rural dispersed communities</li> <li>• Intersectionality of Characteristics Health and Well-being Outcomes</li> </ul>
<b>Evidence or Issue</b>	
<b>Evidence/ Issues Highlighted in Stage 1 Assessment</b>	
<ul style="list-style-type: none"> <li>• <b>Pembrokeshire Youth Assembly – “What Matters to You? Consultation 2023</b> (Source: <a href="https://mgenglish.pembrokeshire.gov.uk/mgConvert2PDF.aspx?ID=73946">https://mgenglish.pembrokeshire.gov.uk/mgConvert2PDF.aspx?ID=73946</a> ) Identified that the top issues of concerns among young people are: <ul style="list-style-type: none"> <li>○ The cost of living crisis - Support for families during the cost of living crisis and work to help prevent this impacting other areas such as young people's education, etc.</li> </ul> </li> <li>• <b>Pembrokeshire Coast Next Generation Youth Manifesto – A call for change</b> (Source: <a href="https://www.pembrokeshirecoast.wales/get-involved/next-generation/youth-manifesto/">https://www.pembrokeshirecoast.wales/get-involved/next-generation/youth-manifesto/</a> ) Identifies areas for action on: <ul style="list-style-type: none"> <li>○ Working – Job Opportunities, More training, low wages</li> </ul> </li> <li>• <b>Pembrokeshire Well-being Assessment</b> (Source: <a href="https://www.pembrokeshire.gov.uk/public-services-board/well-being-assessment">https://www.pembrokeshire.gov.uk/public-services-board/well-being-assessment</a> )Key findings from the assessment include: <ul style="list-style-type: none"> <li>• Public transport in rural areas is a barrier to accessing services and employment opportunities</li> <li>• Child poverty rates in Pembrokeshire are unacceptable</li> <li>• In work poverty is an increasingly common problem</li> <li>• The Cost of living is rising across the UK, with more working families experiencing poverty</li> <li>• In some sectors, the wages in Pembrokeshire are comparatively low in relation to neighbouring counties</li> <li>• Young people have told us that they are not confident that they will be able to live and work in Pembrokeshire in the future</li> <li>• Accessible and affordable childcare can be a barrier to parents returning to work,</li> <li>• There is an opportunity to increase skills levels especially through apprenticeships.</li> </ul> </li> <li>• <b>Pembrokeshire County Council – Strategic Equality Plan 2024 – 2028 Supporting Evidence</b> (Appendix 2) (Source: <a href="https://mgenglish.pembrokeshire.gov.uk/mgConvert2PDF.aspx?ID=73946">https://mgenglish.pembrokeshire.gov.uk/mgConvert2PDF.aspx?ID=73946</a> ) . Employment, National Picture <ul style="list-style-type: none"> <li>○ The overall employment rate in the UK is estimated to be around 75.7%, but remains slightly lower in Wales at 72.5%. The employment rate in the UK has generally been higher than in Wales over the last 10 years. In the year ending June</li> </ul> </li> </ul>	

2023, the employment rate for disabled people in Wales was 49.6%, an increase in 0.3 percentage points from the year before. However, the unemployment rate for disabled people in Wales decreased by 0.3 percentage points, to 6.3%. The unemployment rate in the UK as a whole is estimated to be around 4.2%. The unemployment rate in Wales slightly higher at around 4.8%. The most recent data reflects that the youth (16-24 year olds) unemployment rate in Wales is 9.4%, decreasing from the previous year. This is lower than the overall UK youth unemployment rate, which sits at 11.2%. The proportion of young people in insecure and low paid work remains higher than among other age groups.

- Disabled people are more likely than non-disabled people to be: • Working in health, retail and education • Working in lower-skilled occupations • Self-employed • Working part-time (and subsequently less hours) • Working in the public sector • Working for a smaller employer. A Welsh Government report found that, during the COVID-19 pandemic, disabled people were represented in significant numbers in occupations and industries most affected by the pandemic. The poor pre-pandemic position of disabled people in the labour market also suggests that pandemic-related recession will have a disproportionately negative impact on disabled people's employment. Disabled people are over-represented in insecure and low paid jobs and many opt for self-employment or freelance roles because they can provide increased opportunities to accommodate an impairment.
- Women are more likely than men to work in health and social occupations, wholesale and retail trade, and education, which tend to have lower pay.
- Women continue to earn less than men on average. The gender pay gap for all employees in the UK is 14.3%, although this is partly because more women than men tend to be employed part time, and part-time workers tend to earn less per hour than full time workers. The gender pay gap for full time employees is 7.7%. Gender pay gaps are narrower in Wales than the UK as a whole. In 2023, the pay gap in Wales was 5.6% for full-time employees. Average earnings can vary by gender, disability, ethnicity and religion or belief. In 2019, Wales had the smallest ethnicity pay gap of all regions in the UK. Average earnings are also lower for disabled than non-disabled people.
- In Wales, responsibility for apprenticeships is devolved to the Welsh Government. Regional Skills Partnerships in North, South and Mid, and South East Wales have oversight of apprenticeships. Apprenticeships are delivered and administered through a procedure network of quality assured training providers. The Apprenticeship Levy is a levy on UK employers, with annual pay-bills in excess of £3 million, to fund new apprenticeships. Welsh Government has achieved its target to deliver a minimum of 100,000 quality all age apprenticeships. By 2026, it wants to deliver 125,000 apprenticeships. It's priorities are: Increasing the number of apprentices aged 16-19: increasing the take-up of apprenticeships amongst 16-19 year olds and raising the number of school leavers going on to high quality apprenticeships. Addressing skills shortages: developing apprenticeships, particularly in growth sectors
  - and emerging job categories, in line with priorities determined by Regional Skills Partnerships, Developing higher-level skills: focusing on apprenticeships at level 4 and above, where returns tend to be higher and at the level most

successful European countries deliver, Continuing to monitor the effectiveness and relevance of Foundation Apprenticeships (Level 2) and Developing skills pathways: integrating apprenticeships into the wider education system.

- **Special Qualities Consultation:** Issue of employment, in particular for young people, highlighted within some responses to Special Qualities consultation:
  - ID7/ Lives in Pembs/ Q3: “Career pathways into PCNPA. “
  - ID15/ Visit Pembs (Overnight stay)/ Q3: “Money and attracting younger generations to stay in those towns. “
  - ID16/ Other (Live in Pembs?)/ Q3: “Need more focus on locals as well as tourism - support for businesses, and infrastructure remaining open/accessible out of season, with support for next generation to live and work locally.” Q4: “Funding”
  - ID 28/ Live in PCNP/ Q3: “Lack of work, money for services, lack of affordable housing”. Q3: “Money and jobs”
  - ID 67/ Live in PCNP/ Q4: “A range of jobs for especially young people. In Pembrokeshire, there isn't a dream job I can think for me here or if there is there isn't any advertising about it e.g. More academic jobs like marine biologist, scientists that can help the national park through research.” Q6: “For jobs related to the National Park, there needs to be a wide range of people employed from young to old, from different ethnic, social backgrounds to get different perspectives in the National Park.”
- A guide to fair work, Welsh Government, 2023 (Source: <https://www.gov.wales/guide-fair-work> )
- PLANED Project: [Catalyst for Care project](#) supports people with a caring nature and a good ideas to set up their own care or support enterprise. The offer two free programmes to set up a care or support enterprise: Community Micro-Enterprise Programme and Social Enterprise Programme.
- **UK Poverty 2024, JRF** (Source: <https://www.jrf.org.uk/uk-poverty-2024-the-essential-guide-to-understanding-poverty-in-the-uk>)
  - Some groups of people face particularly high levels of poverty. This includes:
    - Larger families - 43% of children in families with 3 or more children were in poverty in 2021/22. A number of benefit policies, including the two-child limit and the benefit cap, have a disproportionate impact on larger families.
    - Families whose childcare responsibilities limit their ability to work – 44% of children in lone-parent families were in poverty in 2021/22, as were 32% of children in families where the youngest child was aged under 5.
    - Many minority ethnic groups – around half of people in Pakistani (51%) and Bangladeshi households (53%) and around 4 in 10 people in households headed by someone from an Asian background other than Indian, Pakistani, Bangladeshi or Chinese (39%) or households from Black African backgrounds (42%) were in poverty between 2019/20 and 2021/22. These households also have higher rates of child poverty, very deep poverty and persistent poverty.

- Disabled people – in 2021/22, 31% of disabled people were in poverty. This was even higher (38%) for people with a long-term, limiting mental health condition. Higher poverty rates for disabled people are partly due to the additional costs associated with disability and ill health and partly due to the barriers to work they face.
- Informal carers – 28% of people with caring responsibilities were in poverty in 2021/22. Informal carers face a financial penalty, because of their limited ability to work, with unpaid social-care givers experiencing an average pay penalty of nearly £5,000 a year.
- Families not in work – more than half of working-age adults (56%) in workless households were in poverty in 2021/22, compared with 15% in working households. However, because a high share of the population is in work, around two-thirds of working-age adults in poverty actually lived in a household where someone was in work.
- Part-time workers and the self-employed - amongst people in work, the poverty rate for part-time workers was double that for full-time workers (20% compared with 10%) and self-employed workers were more than twice as likely to be in poverty as employees (23% compared with 10%).
- People living in rented accommodation – in 2021/22, more than 4 in 10 social renters (43%) and around a third of private renters (35%) were in poverty after housing costs. Around a third of these social renters and half of these private renters were only in poverty after their housing costs were factored in, so appear to be pushed into poverty by the amount they have to spend on housing.
- Families claiming income-related benefits – their high poverty rates may be expected given the ‘low income’ eligibility criteria for claiming these benefits, but it demonstrates that benefit levels are frequently not sufficient to enable recipients to escape poverty. Indeed, the basic rate of Universal Credit is even below destitution thresholds.
- In October 2023, around: 2.8 million of the poorest fifth of households (47%) were in arrears with their household bills or behind on scheduled lending repayments. 4.2 million households (72%) were going without essentials. 3.4 million households (58%) reported not having enough money for food.
- **Welsh Language Communities Housing Plan (Source: <https://www.gov.wales/welsh-language-communities-housing-plan-html> )**
  - Sustaining a strong economy as well as a sufficient supply of affordable homes is necessary to creating vibrant communities where the Welsh language can thrive. One of the main challenges facing rural, coastal, and Welsh-speaking communities is the constant outmigration of young people. The Arfor Interim Report reflects that migration is complex, not every young person will want to stay locally, but we need to ensure that the choice to stay is available and that the opportunities to return are also available for those who have left for university or to gain job experience.
  - The greater emphasis on remote working that has occurred in recent years as a result to the pandemic presents an opportunity in this area in the form of Welsh-medium and bilingual work hubs. These can support people to work closer to

their homes and create the right conditions and opportunities for people who wish to return to live in the areas where they were brought up.

- The Arfor pilot programme trialled numerous interventions for example the Llwyddo'n Lleol programme which supported young people to gain the necessary skills and confidence to start businesses in their communities. Business grant schemes in Ceredigion saw a particularly high level of interest from young people who had faced challenges in accessing capital to start their own ventures. In the same way the Enterprising Communities scheme empowered local social enterprises to develop new and innovative approaches to make communities more sustainable. The Arfor funding helped turn ideas into projects that ensured the money was circulated locally as well as creating new job opportunities.
- Social enterprises and co-operatives are already an important part of the social and economic landscape in Wales. There is a strong tradition of communities coming together to safeguard local amenities and local services, as well as benefiting from the natural resources in providing economic benefits to local communities. There are examples of community-based social enterprises: Cwmni Bro Ffestiniog, Partneriaeth Ogwen and Galeri in Caernarfon, for instance, illustrate how social enterprises and co-operatives can support and provide a valuable service to a local area. The Welsh language is the language of work – both formally and informally within their organisations and the organisations provide good quality job opportunities, in relation to pay and fair work policies, supporting the local economy and safeguarding vital community services.

### **Feedback from draft Plan consultation**

- **Job Creation,**

- Section 7: Communities: National Trust Cymru - As with above sections, there are no tangible, SMART targets outlined in this section to ensure progress and delivery of the plan objectives; and it is not easy to follow the path between outcomes, policies and example actions. For example, there is nothing in the policy or example actions section relating to job opportunities, despite that featuring within the key outcomes and much earlier in the plan introductory sections.
- Equality Impacts: Pembrokeshire County Council - There are some concerns that the Plan might not bring benefits to those experiencing socio-economic disadvantage, because it (understandably) seeks to protect National Park landscapes and nature conservation assets from damage but in so doing may restrict the economic developments that provide livelihoods. However, the picture is complex, for instance as NPA planning places a strong emphasis on affordable housing provision, which will help those at a socio-economic disadvantage, so it is difficult to generalise.

- Welsh Government – Visit Wales: Not much to add, but I think the fact that Tourism is a critical economic driver for the National Park could be strengthened in the doc. There is also no reference to the overarching plan for the visitor economy [Welcome to Wales: priorities for the visitor economy 2020-2025](#) as far as I can see, although the overarching goals of Welcome to Wales are reflected in the Partnership Plan.

**State of the Park section for Communities notes the following:**

### **6.2.1 Population**

- The resident population of the National Park at the 2021 census was 20,933, a population decline of 7.6% on the 2011 Census (22,644) and the largest population decline of all the National Parks in England and Wales between the two censuses.
- The 2021 Census indicates that 33.2% of usual residents are 65 and over.

### **6.2.2 Economy**

- Gross Domestic Product for Pembrokeshire was £3.6 billion for 2021.
- The top two ranked employment classes in the National Park for people in work aged 16-74 are: human health and social work activities (13.8%); accommodation and food service activities (13.2%)
- The tourism economy is a critical economic driver for Pembrokeshire and the beauty of the National Park is a key reason for many to visit the area.
- Jobs are often low paid (over 25% of full-time workers earned less than £18,000 per year in 2017) and seasonal (winter benefit claimant rates are almost double those for summer).

### **6.2.3 Poverty**

- The economy, equality and poverty are inextricably linked. There are also strong links between poverty and poorer health and well-being outcomes which if not addressed, can exacerbate existing inequalities.
- In-work poverty is an increasing problem, exacerbated by the cost of living. Rural poverty is often less visible than urban poverty.
- The End Child Poverty Coalition analysis of 2021/22 data showed Pembrokeshire as the county with the fifth highest percentage of children living in poverty in Wales after housing costs are considered at 29.0%. Child poverty is on course to increase in most of the UK.



<ul style="list-style-type: none"> <li>Housing costs are playing a role in child poverty rates in Pembrokeshire. The provision of affordable housing particularly for young people and families continues to be an issue identified at a national and local level.</li> </ul>	
Impact/ Risk	Response/ Mitigation/ Any additional actions needed
<p><b>General Impact/ Risk</b></p> <ul style="list-style-type: none"> <li>Status of Social and economic well-being of the Park and its communities as a result of issues around child poverty, in work poverty linked to low pay and issue of seasonality of opportunities, and challenges for young people in terms of being able to live and work in Pembrokeshire in the future.</li> <li>Pembrokeshire College have a new Energy Transition Hub, and Pembrokeshire Coastal Curriculum includes activities related to Careers and businesses.</li> <li>Actions supporting delivery of outcomes and results within partnership themes for conservation and climate objectives could lead to training and job opportunities. This could help address issues around underrepresentation of some groups particularly in environmental sector jobs and provide new job and skills development opportunities for young people in the Park area.</li> <li>Climate and communities policies with results linked to supporting accessible and affordable public transport should support greater access to education, training and employment opportunities within the Park.</li> </ul> <p><b>Positive Impact/ Recognition</b></p>	<p>Recommended Amendment/ Action:</p> <ul style="list-style-type: none"> <li>Amendment to Text: Add following to Communities Background Section: Public bodies in Wales also need to pay regard to the Socio-Economic Duty under the Equality Act. This requires them to think about how their strategic decisions can improve inequality of outcome for people who suffer socio-economic disadvantage. The Socio-economic well-being of communities in the Park is affected by challenges relating to coastal and rural poverty, affordable housing, cost of living, seasonality of jobs and in work poverty. Partners are involved in engaging young people in new employment opportunities linked to green jobs transition and Marine energy. Through taking a socially responsible approach to procurement, public bodies operating in the Park and surrounding area can have a positive impact on local businesses and economic well-being of the Park. The Destination Management Plan for Pembrokeshire has the ambition to “Grow Tourism for the good of Pembrokeshire” and is guided by the following principles for the visitor economy: <ul style="list-style-type: none"> <li>Benefit local communities generating sustainable livelihoods and income opportunities</li> <li>Help protect and celebrate unique cultural identities and traditions</li> <li>Support the circular economy in Pembrokeshire helping businesses to develop and thrive,</li> <li>Conserve and respect our environment and help to restore ecosystems and natural resource</li> <li>Be welcome and inclusive to all.</li> </ul> </li> </ul>

<ul style="list-style-type: none"> <li>• Strong reference in forward to issues relating to this area and this reflects through to State of the Park narrative in Communities.</li> <li>• Communities theme results include:</li> <li>• We will meet all Local Development Plan targets, e.g. 60 new homes per annum, of which 23 are affordable.</li> <li>• We will reduce the significant waiting list for affordable housing in Pembrokeshire (over 4,500 in 2024).</li> <li>• We will contribute to delivery of Tackling Poverty: Our Strategy to 2023.</li> <li>• We will develop and deliver projects and schemes that benefit those facing inequalities and deprivation, in particular children and young families from deprived areas.</li> <li>• We will address the issue of high numbers of poorly paid seasonal jobs and limited employment opportunities.</li> <li>• SE1/A and SE1/B support actions that should benefit affordable housing provision in the park</li> <li>• SE1/D includes reference Deliver Tackling Poverty: Our Strategy re Pembrokeshire Well-being Plan project</li> <li>• SE1/ C references fair work</li> <li>• Action included relating to Pembrokeshire Destination Management Plan included</li> <li>• W2/c references offer volunteering/ citizen science and formal training opportunities</li> <li>• Conservation theme includes: E1/L Develop nature recovery projects which also help increase the range of people able to access these activities,</li> </ul>	<p>Local and Regional strategic partnerships such as the Pembrokeshire Public Services Board and Corporate Joint Committee for South West Wales provide an important opportunity for public bodies to work with one another to address complex challenges facing communities.</p> <ul style="list-style-type: none"> <li>• Amendment to Text: Include following result in communities section: We will implement procurement strategies that have positive impact on local businesses contributing to delivery of the Socially Responsible Procurement Duty.</li> <li>• Amendment to Text: Addition of following partnership action under communities: Promote skills development and pathways to employment and fair work opportunities within existing and developing industries in the Park including marine energy sector. Lead: Pembrokeshire College. Pembrokeshire Coastal Forum. Key Delivery Partners: Pembrokeshire county Council. Pembrokeshire Coast National Park Authority</li> <li>• Amendment to Text: Amend reference to Pembrokeshire Destination Management Plan so action reads: Deliver the <i>Pembrokeshire Destination Management Plan 2024-28</i> in support of regenerative tourism and a visitor economy that benefits local communities, generating sustainable livelihoods and income opportunities.</li> <li>• Amendment to Text: Addition of following action: Implementation of Procurement Strategies in support of Socially Responsible Procurement Duty</li> <li>• Amendment to Text: Strengthen W2/A and note how it also contributes to SE1/D (similarly note how W2/B contributes to SE 1/D): Deliver active outdoor, environmental, heritage and arts-based recreation and learning to young people and families,</li> </ul>
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<p>approaches developed in response could help increase diversity of people engaged within and then employed in the environment sector.</p> <p><b>Considerations as a result of changes to the draft plan</b></p> <ul style="list-style-type: none"> <li>• Strengthen Community background section so that it makes explicit reference to socio economic duty, factors linked to poverty/ employment issues, work partners are doing to engage young people in new employment opportunities linked to green jobs transition, socially responsible procurement duty and positive potential impact on local businesses and destination management plan.</li> <li>• Include following result in communities section: We will implement procurement strategies that have positive impact on local businesses contributing to delivery of the Socially Responsible Procurement Duty.</li> <li>• Although result has been included under Community on: We will address the issue of high numbers of poorly paid seasonal jobs and limited employment opportunities. The current partnership actions only have limited impact on this and the background section could also be strengthened. To strengthen partnership actions suggest: <ul style="list-style-type: none"> <li>○ Addition of following action: Promote skills development and pathways to employment and fair work opportunities within existing and developing industries in the Park including marine energy sector. Lead: Pembrokeshire College. Pembrokeshire Coastal Forum. Key</li> </ul> </li> </ul>	<p>including targeted projects for those from areas of deprivation or facing inequalities e.g. First 1,000 Days.</p>
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<p>Delivery Partners: Pembrokeshire county Council. Pembrokeshire Coast National Park Authority (Note: Pembrokeshire College has opened an Energy Transition Hub on the college site in Haverfordwest, which aims to train 600 individuals by July 2026, providing Pembrokeshire and West Wales with a pool of talent that will have the knowledge and experience of control systems needed for projects such as offshore floating wind farms and the Haven hydrogen power plants.)</p> <ul style="list-style-type: none"> <li>○ Amend reference to Pembrokeshire Destination Management Plan so action reads: Deliver the <i>Pembrokeshire Destination Management Plan 2024-28</i> in support of regenerative tourism and a visitor economy that benefits local communities, generating sustainable livelihoods and income opportunities.</li> <li>○ Addition of following action: Implementation of Procurement Strategies in support of Socially Responsible Procurement Duty</li> <li>• Strengthen W2/A and note how it also contributes to SE1/D (similarly note how W2/B contributes to SE 1/D): Deliver active outdoor, environmental, heritage and arts-based recreation and learning to young people and families, including targeted projects for those from areas of deprivation or facing inequalities e.g. First 1,000 Days.</li> </ul>	
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<b>Area to Address</b>	<b>Representation in Arts and Heritage Opportunities/ Protection of Religious Sites of Importance/ Engagement with Faith groups</b>
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<b>Protected Characteristics affected/ Communities of Interest/ Communities of Place/ Intersectionality</b>	<ul style="list-style-type: none"> <li>• Age, Disability, Gender Reassignment. Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation</li> <li>• Carers</li> <li>• Socio economic disadvantage</li> <li>• Areas of deprivation within Pembrokeshire / those experiencing socio economic disadvantage potentially hidden in rural dispersed communities</li> <li>• Intersectionality of Characteristics</li> <li>Health and Well-being Outcomes</li> </ul>
<b>Evidence or Issue</b>	
<b>Evidence/ Issues Highlighted in Stage 1 Assessment</b> <ul style="list-style-type: none"> <li>• Welsh Government Priorities for Culture 2024 -2030 – Currently out for consultation - <a href="#">Consultation on the draft Priorities for Culture 2024-2030 (gov.wales)</a> <ul style="list-style-type: none"> <li>○ A1: Culture is inclusive, accessible and diverse - The Welsh Government is committed to respecting, protecting and fulfilling everyone's right to equitable inclusion in their choice of cultural activity. Many people already benefit from the positive impacts of creativity and cultural participation in their everyday lives, but barriers and challenges continue to prevent some groups and communities from fully accessing these benefits. The Welsh Government is committed to promoting and embedding the Social Model of Disability within government and public bodies, and to removing barriers for disabled people. Hynt, the Arts Council of Wales initiative managed by Creu Cymru in partnership with Diverse Cymru, is a national access scheme for disabled customers and their carers, rooted in the Social Model of Disability. Research has demonstrated the social and economic value of Hynt, with cardholders visiting theatres 75% more as a result of the scheme. We are already seeing arts organisations developing flexible programming, including pay what-you-can performances, relaxed performances for neuro-divergent audiences, sub-titling, translation and BSL interpretation. All other areas of the culture sector also work extensively with historically marginalised and vulnerable groups to provide inclusive cultural experiences. We want to focus on creating meaningful, inclusive opportunities for people to engage with culture, to participate in cultural activity and to benefit from the expertise and enthusiasm of our wide-ranging culture sector. We want all people to feel valued and represented in our cultural organisations. We want to address barriers to participation – whether they be physical, perceived or financial, and take action to tackle inequalities and discrimination. Many of these issues are long-standing and require a determined, proactive, and long-term approach to inclusivity and diversity which takes the lived experience of people with intersecting identities into account. Our goal is to embed fully inclusive and equitable practice right across our culture sector. From building design to programming, through to the use of appropriate communication and workforce training, we will lay the</li> </ul> </li> </ul>	

foundations for exemplar inclusive cultural services, events, and experiences. The Welsh Government's Anti-Racist Wales Action Plan sets out our commitment to creating an anti-racist Wales. It recognises the historic and ongoing contributions made by Black, Asian, and Minority Ethnic communities. The detailed actions within the Anti-Racist Wales Action Plan offer a framework for transformation, with work already underway to ensure that the culture sector in Wales is inclusive and diverse. Wales also has an ambition of being the most LGBTQ+ friendly nation in Europe as set out in the LGBTQ+ Action Plan for Wales. Wales has the legislative and policy context in place to provide real sector leadership in driving forward inclusivity, accessibility and diversity. Our cultural workforce, collections, spaces and places must promote a modern and diverse Wales, reflecting the variety of people and cultures who call our country home.

- A2: Cultural democracy and cultural rights are central to culture in Wales / A3: Culture takes an inclusive and balanced approach to interpreting, commemorating and presenting our past. - The Welsh Government wants the culture sector to embrace the values of cultural democracy and to support cultural rights. Alongside fulfilling its statutory responsibilities, the sector should empower communities to take the lead on what holds cultural value for them. We encourage national bodies and local authorities to value local involvement in decision-making – this should include individuals, local communities and cultural providers who are affected by decisions that are made. Decisions should be based on democratic, equal partnerships. The principles of cultural democracy commit us to involving everyone in decision-making about what counts as culture. We want this to be reflected in approaches to creating, celebrating, interpreting and presenting our diverse culture and heritage. The benefits of sharing decision-making include higher footfall, long-term engagement and increased revenue, and contribute to community belonging and educational attainment. The Welsh Government's Anti-Racist Wales and LGBTQ+ action plans have highlighted the importance of adjusting the lens through which we see and interpret our past, and addressing the imbalance which has historically existed in how we have expressed and celebrated culture. We also need to consider how our approaches to commemoration shape our understanding of the past. Welsh Government's Public Commemoration in Wales: Guidance for Public Bodies helps public bodies make informed decisions about present and future commemoration, and to seek opportunities to create a more balanced relationship with our history.

- **Pembrokeshire Well-being Assessment** (Source: <https://www.pembrokeshire.gov.uk/public-services-board/well-being-assessment>) Key findings from the assessment include:
  - Volunteering numbers in Pembrokeshire is increasing though the majority are over 65.
  - There is evidence that levels of health impacts our resident's ability to take part in cultural events.
  - Public transport networks impact upon people's ability to attend arts and culture events.
  - People who regularly attend arts and culture events report higher levels of well-being

- Welsh language speakers report that the ability to use Welsh informally and in the work place has a positive effect on their well-being.
- **Well-being of Wales, 2023, Welsh Government** (Source: <https://www.gov.wales/wellbeing-wales-2023-wales-vibrant-culture-and-thriving-welsh-language-html> )
  - In 2022-23, 72% of adults attended or took part in arts, culture or heritage activities at least three times a year. This compares to 71% in 2019-20 and 75% in 2017-18. Whilst there was a fall in attendance and participation from 2017-18 to 2019-20, there are no statistically significant changes in this indicator between 2022-23 and previous times it was measured.
  - There continue to be large differences in attendance and participation between groups. Younger adults, people with higher qualifications, people with higher life satisfaction or people living in the least deprived areas of Wales were more likely to attend or participate in these activities. However, there is no difference between males and females, and differences in estimates for ethnic groups were not statistically significant.
  - In 2021-22, the National Survey for Wales asked about barriers to going to or taking part in the arts. A lack of interest and difficulty finding time were the most common barriers mentioned, with 28% and 22% of people citing these reasons. However, for older adults, health reasons were reported as their biggest barrier after a lack of interest.
- [Ancient Connections Project](#) – Supported creation of new pilgrim route (The Wexford Pembrokeshire Pilgrim Way)
- [Span Arts We Move](#) is a youth-led project for Black children and young people across West Wales to come together, connect, and make a positive change in the world through social action.
- [Pembrokeshire Pride](#) - Pembrokeshire Pride aim to bring the conversation to our county. We aim to provide services, support and education to all. We will work to create an inclusive county, where all can find a community and have somewhere to turn in times of need
- [Pembrokeshire Youth Project](#) – EYST Wales and Haverfordwest Mosque with the aim to build relationships and trust with diverse ethnic minority communities in Pembrokeshire
- [The National Centre for Learning Welsh – Welcome to Welsh](#) provides courses and resources available in different languages is someone is new to Wales and would like to learn Welsh and don't speak much English. People can learn more about Wales by following an online self-study unit through the medium of: Ukrainian, Cantonese, Syrian Arabic, Farsi, Pashto.
- 22 known heritage crime occurrences were reported in 2022/23. National Park and Dyfed Powys Police to joint patrols to sites.

**Feedback from Consultation responses:**

- **Promoting Heritage to more diverse audiences**

- Cadw - H1/A – partners – you could add RCAHMW and Cadw. Should this policy echo policy W/1A (remove barriers to outdoor recreation ... and promote opportunities to more diverse audiences) – should the HE policy include not just enhancing public awareness and enjoyment but also removing barriers (real or perceived) and promoting heritage to a more diverse audience?
- Pembrokeshire County Council - There appears to be no mention about promoting the arts and seems very cultural heritage heavy which is more about the past and preserving the past. It is through the arts that new things are created, and where a lot of vibrancy comes from. It is worth noting that there are more artists in Pembrokeshire per capita than any other county in the UK.

Impact/ Risk	Response/ Mitigation/ Any additional actions needed
<p><b>Positive Impact/ Recognition</b></p> <ul style="list-style-type: none"> <li>• The National Park area contains a number of historic religious buildings, sites and scheduled monuments of importance both locally and in terms of pilgrimage for those visiting outside of area (in particular for Christian and Pagan faiths). Through policy H1/ H2 and supporting partnership actions the plan will support activities relating to conserving of historic buildings and scheduled monuments that will impact on these sites including activities to reduce heritage crime at sites. It will also support people to sensitively engage with these sites through following results. This includes H2/D Provide guidance on the sympathetic enjoyment of monuments considered sacred and their settings. With Faith groups added as a key delivery partner. <ul style="list-style-type: none"> <li>○ H1: Conserve and enhance landscapes of historic interest, Conservation Areas,</li> </ul> </li> </ul>	<p>Positive amendments made to H1/A following comment from partner as part of consultation in terms of need for it to also reference removing barriers and promoting heritage to a more diverse audience. It now reads: Enhance public awareness and enjoyment of the historic environment, including landscapes, buildings and monuments, remove barriers to access and promote opportunities to more diverse audiences.</p>



Historic Parks and Gardens, Scheduled Monuments, buildings of interest, non-designated heritage assets and their settings.

- It is important that we explore opportunities for us to look at representation in our art, culture and heritage opportunities, this is particularly important when we consider and think about the connection partnership theme and what this means for people from a variety of backgrounds. Are there opportunities for us to reframe how we look at the heritage and history of the Park, hidden histories or relationship people from different backgrounds have with landscapes in the Park – for examples Gypsies and Travellers, disabled people, LGBT people. Policy H1 includes partner action H2/B Share and celebrate landscape, cultural heritage, natural history and the arts with more diverse audiences. W2/A and W2/B in their amended forms can also support this: Deliver active outdoor, environmental, heritage and arts-based recreation and learning to young people and families, including targeted projects for those from areas of deprivation or facing inequalities e.g. First 1,000 Days. / Deliver programmes that help people experience the 5 Ways to Well-being in the Park, focusing on nature- and heritage-based social prescribing, e.g. walking programmes, mental health initiatives, and supporting people identified as facing barriers to accessing the National Park's health benefits, e.g. Roots to Recovery.

<p><b>Considerations as a result of changes to the draft plan</b></p> <ul style="list-style-type: none"> <li>• Positive amendments made to H1/A following comment from partner as part of consultation in terms of need for it to also reference removing barriers and promoting heritage to a more diverse audience. It now reads: Enhance public awareness and enjoyment of the historic environment, including landscapes, buildings and monuments, remove barriers to access and promote opportunities to more diverse audiences.</li> </ul>	
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Area to Address	Gaps in Annex 1 in terms of Equality/ Health
<p><b>Protected Characteristics affected/ Communities of Interest/ Communities of Place/ Intersectionality</b></p>	<ul style="list-style-type: none"> <li>• Age, Disability, Gender Reassignment. Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation,</li> <li>• Carers</li> <li>• Areas of deprivation within Pembrokeshire / those experiencing socio economic disadvantage potentially hidden in rural dispersed communities</li> <li>• Socio economic disadvantage</li> <li>• Intersectionality of Characteristics</li> <li>• Health and Well-being Outcomes</li> </ul>
Evidence or Issue	
<ul style="list-style-type: none"> <li>• Some additions have been made in terms of gaps in list of legislation and policy and proposals (now set out in Annex 1)</li> <li>• However there remains some gaps in terms of equality/ health in the policy and proposal section and it is recommended following be added: <ul style="list-style-type: none"> <li>○ Curriculum for Wales</li> <li>○ Equality Plans and Objectives - Welsh Government (and other associated plans e.g. Anti Racist Wales Action Plan), Pembrokeshire National Park Authority, Pembrokeshire County Council and other Public Bodies</li> <li>○ National Framework for Social Prescribing</li> <li>○ National Indicators and Milestones for Wales</li> <li>○ Pembrokeshire Coast National Park Next Generation Youth Manifesto</li> </ul> </li> </ul>	

<ul style="list-style-type: none"> <li>○ Pembrokeshire Coast National Park Authority's Well-being Objectives</li> <li>○ Pembrokeshire Rights of Way Improvement Plan</li> </ul>	
<b>Impact/ Risk</b>	<b>Response/ Mitigation/ Any additional actions needed</b>
<ul style="list-style-type: none"> <li>• Wider policy and legislative framework linked to equality and health outcomes are not fully highlighted in the policy document.</li> </ul>	<p><b>Recommended Amendment/ Action:</b></p> <ul style="list-style-type: none"> <li>• Add following to Annex 1 policy and proposal section list: <ul style="list-style-type: none"> <li>○ Curriculum for Wales</li> <li>○ Equality Plans and Objectives - Welsh Government (and other associated plans e.g. Anti Racist Wales Action Plan), Pembrokeshire National Park Authority, Pembrokeshire County Council and other Public Bodies</li> <li>○ National Framework for Social Prescribing</li> <li>○ National Indicators and Milestones for Wales</li> <li>○ Pembrokeshire Coast National Park Next Generation Youth Manifesto</li> <li>○ Pembrokeshire Coast National Park Authority's Well-being Objectives</li> <li>○ Pembrokeshire Rights of Way Improvement Plan</li> </ul> </li> </ul>

### Public Sector Equality Duty Considerations

How does the Strategic Plan, Policy or Decision being assessed promote equality of opportunity?	<ul style="list-style-type: none"> <li>• Number of areas under the partnership themes will help promote equality of opportunity and suggested amendments in this assessment if applied could also strengthen this (Policies/ actions below reflect suggested amendments). In particular: <ul style="list-style-type: none"> <li>○ E1/L Develop nature recovery projects which also help increase the range of people able to participate in these activities</li> <li>○ Policy W1: Provide and promote sustainable outdoor recreation opportunities for all. <ul style="list-style-type: none"> <li>➢ W1/A Deliver programmes and projects that promote an accessible coast approach creating more inclusive experiences in the Park and helping remove barriers to access for people with specific needs e.g. Get Outdoors Scheme, application of accessibility strategy within Car Park report.</li> </ul> </li> </ul> </li> </ul>
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	<ul style="list-style-type: none"> <li>➤ W1/D The Pembrokeshire Coast Path National Trail, part of the Wales Coast Path, provides a diversity of experiences, and is promoted to new audiences.</li> <li>➤ W1/E The Rights of Way Improvement Plan 2018-2028 is delivered.</li> <li>○ Policy W2: Provide and promote inspiring outdoor learning, <b>well-being</b> and personal development experiences for all. <ul style="list-style-type: none"> <li>➤ W2/A Deliver active outdoor, environmental, heritage and arts-based recreation and learning to young people and families, including targeted projects for those from areas of deprivation or facing inequalities e.g. First 1,000 Days.</li> <li>➤ W2/B Deliver programmes that help people experience the 5 Ways to Well-being in the Park, focusing on nature- and heritage-based social prescribing, e.g. walking programmes, mental health initiatives, and supporting people identified as facing barriers to accessing the National Park's health benefits, e.g. Roots to Recovery.</li> <li>➤ W2/C Offer volunteering / citizen science and formal training opportunities.</li> </ul> </li> <li>○ H1/A Enhance public awareness and enjoyment of the historic environment, including landscapes, buildings and monuments, remove barriers to access and promote opportunities to more diverse audiences.</li> <li>○ H2/B Share and celebrate landscape, cultural heritage, natural history and the arts with more diverse audiences.</li> <li>○ N1/E Accessible and affordable public transport, active travel and low-carbon vehicle initiatives are delivered. / SE1/G Support the delivery of accessible and affordable public transport, active travel and low-carbon vehicle initiatives.</li> <li>○ SE1/D Deliver <i>Tackling Poverty: Our Strategy</i> that was developed as part of the Well-being plan for Pembrokeshire Reducing Poverty and Inequalities Project.</li> <li>• The stage 1 assessment when assessing impacts has identified a number of areas where promotion of equality of opportunity could be enhanced and these were applied to the amended plan. Further areas have also been identified as part of the stage 2 assessment as a result of wider changes/ amendments made to the plan following consultation and application of feedback from partner organisations. For example suggestions around amending the mission statement for Cultural Heritage and connection to Enhance equitable access to the National Park and promote the enjoyment, understanding, and health benefits of its Special Qualities for all.</li> </ul>
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<p>How does the Strategic Plan, Policy or Decision promote good relations?</p>	<ul style="list-style-type: none"> <li>• Following policies will help support and increase understanding of needs of different groups and barriers they face: <ul style="list-style-type: none"> <li>○ E1/L Develop nature recovery projects which also help increase the range of people able to participate in these activities</li> <li>○ Policy W1: Provide and promote sustainable outdoor recreation opportunities for all. <ul style="list-style-type: none"> <li>➤ W1/A Deliver programmes and projects that promote an accessible coast approach creating more inclusive experiences in the Park and helping remove barriers to access for people with specific needs e.g. Get Outdoors Scheme, application of accessibility strategy within Car Park report.</li> <li>➤ W1/D The Pembrokeshire Coast Path National Trail, part of the Wales Coast Path, provides a diversity of experiences, and is promoted to new audiences.</li> <li>➤ W1/E The Rights of Way Improvement Plan 2018-2028 is delivered.</li> </ul> </li> <li>○ Policy W2: Provide and promote inspiring outdoor learning, <b>well-being</b> and personal development experiences for all. <ul style="list-style-type: none"> <li>➤ W2/A Deliver active outdoor, environmental, heritage and arts-based recreation and learning to young people and families, including targeted projects for those from areas of deprivation or facing inequalities e.g. First 1,000 Days.</li> <li>➤ W2/B Deliver programmes that help people experience the 5 Ways to Well-being in the Park, focusing on nature- and heritage-based social prescribing, e.g. walking programmes, mental health initiatives, and supporting people identified as facing barriers to accessing the National Park's health benefits, e.g. Roots to Recovery.</li> <li>➤ W2/C Offer volunteering / citizen science and formal training opportunities.</li> </ul> </li> </ul> </li> <li>• Assessment identified that recreational management tensions between visitors and communities can impact on creating a wider more welcoming experience for new users of the Park who previously may have limited experience of accessing National Park and countryside. It is important to engage with communities and visitors to identify and manage issues and to ensure appropriate messaging is given to new users and support to communities to ensure that a welcoming environment is created and people are aware of potential conflict/ pressure point. Muslim Hikers for example have created a video on <a href="#">Countryside Code</a></li> <li>• Affordable housing issues within the Park can exacerbate tensions between communities, visitors and second home owners/ holiday let providers. Plan seeks to support activities to</li> </ul>
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	increase affordable housing provision, in doing so this will help alleviate some tensions, but may create new tensions between different stakeholders with different interests.
Does this Strategic Plan, Policy or Decision have the potential to cause unlawful direct or indirect discrimination?	<ul style="list-style-type: none"> <li>The rewording of SE1/A takes account of risks identified in the stage 1 assessment relating to local letting policies: Deliver appropriate homes, including affordable housing, for local communities through the planning system and joint working. Apply local lettings policies applied on rural exceptions sites where appropriate and where evidence demonstrates they support delivery against desired outcomes.</li> </ul>
Does this Strategic Plan, Policy or Decision have the potential to exclude certain group of people from obtaining services, or limit their participation in any aspect of public life?	<ul style="list-style-type: none"> <li>The rewording of SE1/A takes account of risks identified in the stage 1 assessment relating to local letting policies: Deliver appropriate homes, including affordable housing, for local communities through the planning system and joint working. Apply local lettings policies applied on rural exceptions sites where appropriate and where evidence demonstrates they support delivery against desired outcomes</li> <li>Approaches to respond to recreation management or other pressures on the Park can place additional barriers on certain groups, this came through in terms of Traeth Mawr survey. It is important that equality impact assessments are carried out when looking to introduce recreation management tools and that cross section of users are engaged with to inform decision making.</li> </ul>
Will any of what is being assessed by wholly or partly carried by contractors or in partnership with other organisations. If yes, what steps will you take to comply with the General Equality Duty in regard to procurement and/ or partnerships?	<p>Yes – This is a partnership plan.</p> <p>There are opportunities to work with other public bodies involved in terms of new duties around Socially Responsible Procurement Duty and considerations linked to existing public sector equality duties.</p> <p>Public bodies listed within the plan will be subject to general public equality duty.</p> <p>Some of the activities within the plan should support partners to develop more inclusive approaches and meeting reasonable adjustment requirements.</p> <p>Authority is exploring project checklist to support development of inclusive policies that could be used by both Authority and partners when developing projects in response to National Park Management Plan.</p>

## Data/ Engagement Gaps

Do you have any data/ engagement gaps?	Assessment has taken account of information from range of sources and consultation on Special Qualities and consultation (including detailed responses provided by partner organisation).
If yes, can further information be obtained or additional engagement to fill any of these data gaps?	Partnership actions/ monitoring will be informed by ongoing review of data.

## Section 4 – Follow up Actions

### Recommended Amendment/ Action

Area to Address	Action	Responsible Officer	Timescales	Status
Accessible Document and Promotion of Plan	Document Format: Final document available in HTML format and easy read version is available.	NPMP and Marine Officer	Post approval	
	Amendment to Text/ Additional Supporting Information: Double check terminology for any complex ones that could benefit from explanation and consider developing a glossary (this could be separate website page for html version and could be developed as an education resource)	NPMP and Marine Officer	Pre approval / Glossary post approval	
	Ongoing conversation/ monitoring: Engage with youth committee, engagement and inclusion team and communications team to consider post approval how to bring the management plan and its monitoring/ impact alive to wider audiences, particularly young people.	NPMP and Marine Officer	Post approval	
Referencing Pembrokeshire	Amendment to Text: Include Pembrokeshire Coast National Park Next Generation Youth	NPMP and Marine Officer	Pre approval	

Coast Youth Manifesto	Manifesto in the examples of relevant legislation, policy and guidance in the policy and proposal section (Annex 1).			
Health and Well-being - Access to the Outdoors / Connecting with Nature/ Partners Mentioned in the Plan/ Community/ Visitors: Widening Access/ Experiencing and Benefiting from Special Qualities in the Park/ Welcoming Park for All / Access to Toilets and Changing Places	Amendment to Text: A vision for the National Park: The Park is for everyone and is a welcoming place, where people can enjoy and help protect its Special Qualities.	NPMP and Marine Officer	Pre approval	
	Amendment to Text: Suggest amending “Inclusive access to the National Park is a cornerstone of this vision, enabling everyone, regardless of background or ability, to experience and connect with this unique environment.” to “Inclusive access and removing barriers to the National Park is a cornerstone of this vision, enabling everyone, regardless of background, to experience and connect with this unique environment.” So it fits more with social model of disability.	NPMP and Marine Officer	Pre approval	
	Amendment to text: Amend Cultural Heritage and Connection mission to “Enhance equitable access to the National Park and promote the enjoyment, understanding, and health benefits of its Special Qualities for all.”	NPMP and Marine Officer	Pre approval	
	Amendment to text: Suggest adding following to Cultural Heritage and Connection Background Section: “The Welsh Government has in place a national framework for social prescribing. The consultation on the partnership plan highlighted the role that partners can play in contributing to the social prescribing and wider well-being agenda in Wales linked to heritage, nature and	NPMP and Marine Officer	Pre approval	



	<p>outdoor activities. Many of the key partners involved in delivery of this plan are engaged with Public Health Wales's Hapus platform in support of mental well-being."</p>			
	<p>Amendment to Text: Suggest following be added to Cultural Heritage and connection Background section: It is recognised that some groups face additional barriers to enjoying, understanding and accessing the Park. The Authority and partners can play an important role in working together and with others on initiatives to address this.</p>			
	<p>Amendment to Text: In state of the Park amend from "Across Wales, barriers to participation include time, disability, health issues and age, lack of adequate public transport, transport poverty, and barriers faced by members of the global majority, marginalised groups and faith groups." To "Across Wales, barriers to participation include time, lack of adequate public transport, transport poverty, adequate facilities and further barriers faced by disabled people, people with health issues, people from different age groups, people from global majority groups, marginalised groups and faith groups. The Authority and its partners have been engaged in activities to make the Park more accessible and inclusive. This includes accessible walking routes, accessible view points and beach wheelchair and all terrain equipment. Wider budgetary pressures facing partner organisations means that collaboration</p>	NPMP and Marine Officer	Pre approval	

	is required to develop creative and sustainable solutions in this area.”			
	<p>Amendment to text: State of the Park section suggest Additional title heading is created for Connection of Unequal Access and Public Health Benefits of the Park. To strengthen well-being references suggest adding as part of this: The National Park provides a great asset that can be used to support both mental and physical well-being. Opportunities and projects by National Park Authority and partners within the park can support people to experience both the Park’s special qualities and the 5 steps to mental well-being:</p> <ul style="list-style-type: none"> <li>○ Connect</li> <li>○ Be Active</li> <li>○ Keep Learning</li> <li>○ Give</li> <li>○ Take Notice</li> </ul>	NPMP and Marine Officer	Pre approval	
	Amendment to Text: Add following to results section - We will deliver projects and opportunities that embed the 5 steps to well-being in their approach contributing to National Milestones on mean mental well-being score, percentage of people who volunteer and health lifestyle behaviours.	NPMP and Marine Officer	Pre approval	
	Amendment to Text: Suggest for results for Cultural Heritage and Connection that following added in ‘people from global majority, faith and marginalised groups.’ to: We will remove barriers to outdoor recreation and wellbeing opportunities and promote opportunities to	NPMP and Marine Officer	Pre approval	

	more diverse audiences, e.g. people with visible or hidden disabilities, children and young families from areas of deprivation, people from global majority, faith and marginalised groups.			
	Amendment to Text: Amend title of workstream from Understanding the National Park to: Understanding and promoting health benefits of the National Park	NPMP and Marine Officer	Pre approval	
	Amendment to Text: Suggest for greater clarity in terms of accessible coast strategy that W1/B is amended to following, which should assist clarifying this partnership action: Deliver programmes and projects that promote an accessible coast approach creating more inclusive experiences in the Park and helping remove barriers to access for people with specific needs e.g. Get Outdoors Scheme, application of accessibility strategy within Car Park report. Visit Pembrokeshire should be added to Key delivery partners for this action. This action will include within its remit considerations related to access and toilets/ changing places as demonstrated by work carried out as part of the Car park report.	NPMP and Marine Officer	Pre approval	
	Amendment to Text: Suggest that W2/A is amended to: Deliver active outdoor, environmental, heritage and arts-based recreation and learning to young people and families, including targeted projects for those from areas of deprivation or facing inequalities e.g. First 1,000 Days. Suggest that lead is noted as Pembrokeshire Outdoor Schools and	NPMP and Marine Officer	Pre approval	

	then that key delivery partners include Pembrokeshire Coast National Park Authority, Pembrokeshire County Council and Tirweddau Cymru. This recognises some of the current partnership work in areas such as early years, engagement with young people including through Futureworks and cross collaboration of activities in the Park for Kinship/ Springboard groups.			
	Amendment to Text: Amend W2/B to “Deliver programmes that help people experience the 5 Ways to Well-being in the Park, focusing on nature- and heritage-based social prescribing, e.g. walking programmes, mental health initiatives, and supporting people identified as facing barriers to accessing the National Park’s health benefits, e.g. Roots to Recovery.” Suggest Lead as: Pembrokeshire Coast National Park Authority. Key Delivery Partners: Public Health Wales, Hywel Dda Health Board, Mind, Tirweddau Cymru, National Trust Cymru	NPMP and Marine Officer	Pre approval	
	Amendment to Text: Add in following partnership action to workstream on understanding and promoting health benefits of the Park: Support and engage with <a href="#">Public Health Wales Hapus</a> platform to promote role heritage, nature and outdoor opportunities in the National Park can play in supporting well-being. Suggest Lead as: Public Health Wales. Key Delivery Partners: Amgueddfa Cymru – Museum Wales, Cadw, National Trust Cymru,	NPMP and Marine Officer	Pre approval	

	Natural Resources Wales, Pembrokeshire Coast National Park Authority.			
	Ongoing Conversation/ Monitoring: Explore how to involve health partners in future partnership plan meetings and capture the positive work of partners in this area.	NPMP and Marine Officer – With assistance from Health and Well-being Officer and Chief Executive	Post approval – Partnership Engagement and Monitoring	
	Amendment to Text: Add following to conservation results: We will have supported a wide range of people to take action for nature.	NPMP and Marine Officer	Pre approval	
	Ongoing Conversation/ Monitoring: Explore how to involve health partners in future partnership plan meetings and capture the positive work of partners in this area.	NPMP and Marine Officer – With assistance from Health and Well-being Officer and Chief Executive	Post approval – Partnership Engagement and Monitoring	
	Ongoing Conversation/ Monitoring: Explore how key partners will engage with range of smaller organisations, community groups, support groups who can help delivery of the plan and ensure that activities aimed at increasing access or supporting health and well-being actively are designed and informed by those they seek to benefit. It is also important to consider as part of partnership plan monitoring are their opportunities to set up way of capturing case studies of work of smaller organisations, community and support groups	NPMP and Marine Officer	Post approval – Partnership Engagement and Monitoring	
	Ongoing Conversation/ Monitoring: Due to financial pressures on provision of toilets within Pembrokeshire it is important that the Authority	NPMP and Marine Officer	Post approval – Partnership Engagement	

	considers how it can best engage with relevant bodies and communities to assess progress, manage challenges and identify collaborative solutions during the plan period.		and Monitoring	
Public Health – Water Quality / Pollution and Other Health Risks/ Recreational Disturbance to Tranquillity	Amended Text: Suggest that following result is added to Cultural Heritage and Connection: All designated bathing water beaches achieve “Excellent” status and there is a reduction in recreation and environmental harm from storm overflow sewage discharge. This is an area that was highlighted as a particular concern for public as part of special qualities consultation, so it would be beneficial to have a result linked to action in this area.	NPMP and Marine Officer	Pre approval	
	Ongoing Conversation/ Monitoring: Authority will be reliant on actions of partners to support delivery of improvements in this area in terms of Water quality/ Sewage discharge. As a result, it is important that the Authority assess how it can best engage with relevant bodies to assess progress and raise concerns when required.	NPMP and Marine Officer	Post approval – Partnership Engagement and Monitoring	
Affordable Housing, Accessible Housing and Access to Sites /Local Lettings Policy – preventing risk of discrimination when applied	Easy Read Version: Comment as part of consultation noted: The function of PCNPA’s role as a Planning Authority and how it controls the quality of development is notably absent in the easy-read version. However, it is one of the areas that affects a lot of people. Look to review Easy Read version to see if further amendments are needed in line with this comment	NPMP and Marine Officer	Post approval – Amendments to Easy Read version	

Transport Challenges / Affordability and access to services and opportunities	Amendment to Text: Suggest that additional partnership action is added to Communities workstream on Socio-economic well-being: Support once approved the delivery and monitoring of South West Wales Regional Transport Plan through the Corporate Joint Committee for South West Wales. Lead: Corporate Joint Committee for South West Wales. (Note both Pembrokeshire County Council and Pembrokeshire National Park Authority are part of the CJCz for South West Wales)	NPMP and Marine Officer	Pre approval	
	Amendment to Text: Pembrokeshire Association for Community Transport Organisations carry out a lot of initiative relating to accessible transport and it is recommended that they are added as a key delivery partner to SE1/G	NPMP and Marine Officer	Pre approval	
	Amendment to Text: Add following to community partnership actions: Deliver the Strengthening Communities Project under the Pembrokeshire Well-being Plan, this work will impact on communities in the Park. Lead: Pembrokeshire Public Services Board.	NPMP and Marine Officer	Pre approval	
Pathways to employment for young people and underrepresented groups/ those facing barriers to accessing employment	Amendment to Text: Add following to Communities Background Section: Public bodies in Wales also need to pay regard to the Socio-Economic Duty under the Equality Act. This requires them to think about how their strategic decisions can improve inequality of outcome for people who suffer socio-economic disadvantage. The Socio-economic well-being	NPMP and Marine Officer	Pre approval	

<p>opportunities/ Access to 'fair work' - in work poverty/ seasonality/ child poverty</p>	<p>of communities in the Park is affected by challenges relating to coastal and rural poverty, affordable housing, cost of living, seasonality of jobs and in work poverty. Partners are involved in engaging young people in new employment opportunities linked to green jobs transition and Marine energy.</p> <p>Through taking a socially responsible approach to procurement, public bodies operating in the Park and surrounding area can have a positive impact on local businesses and economic well-being of the Park.</p> <p>The Destination Management Plan for Pembrokeshire has the ambition to “Grow Tourism for the good of Pembrokeshire” and is guided by the following principles for the visitor economy:</p> <ul style="list-style-type: none"> <li>○ Benefit local communities generating sustainable livelihoods and income opportunities</li> <li>○ Help protect and celebrate unique cultural identities and traditions</li> <li>○ Support the circular economy in Pembrokeshire helping businesses to develop and thrive,</li> <li>○ Conserve and respect our environment and help to restore ecosystems and natural resource</li> <li>○ Be welcome and inclusive to all.</li> </ul>			
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	Local and Regional strategic partnerships such as the Pembrokeshire Public Services Board and Corporate Joint Committee for South West Wales provide an important opportunity for public bodies to work with one another to address complex challenges facing communities.			
	Amendment to Text: Include following result in communities section: We will implement procurement strategies that have positive impact on local businesses contributing to delivery of the Socially Responsible Procurement Duty	NPMP and Marine Officer	Pre approval	
	Amendment to Text: Addition of following partnership action under communities: Promote skills development and pathways to employment and fair work opportunities within existing and developing industries in the Park including marine energy sector. Lead: Pembrokeshire College. Pembrokeshire Coastal Forum. Key Delivery Partners: Pembrokeshire county Council. Pembrokeshire Coast National Park Authority	NPMP and Marine Officer	Pre approval	
	Amendment to Text: Amend reference to Pembrokeshire Destination Management Plan so action reads: Deliver the <i>Pembrokeshire Destination Management Plan 2024-28</i> in support of regenerative tourism and a visitor economy that benefits local communities,	NPMP and Marine Officer	Pre approval	

	generating sustainable livelihoods and income opportunities.			
	Amendment to Text: Addition of following action: Implementation of Procurement Strategies in support of Socially Responsible Procurement Duty	NPMP and Marine Officer	Pre approval	
	Amendment to Text: Strengthen W2/A and note how it also contributes to SE1/D (similarly note how W2/B contributes to SE 1/D): Deliver active outdoor, environmental, heritage and arts-based recreation and learning to young people and families, including targeted projects for those from areas of deprivation or facing inequalities e.g. First 1,000 Days.	NPMP and Marine Officer	Pre approval	
Gaps in Annex 1 in terms of Equality/ Health	<p>Add following to Annex 1 policy and proposal section list:</p> <ul style="list-style-type: none"> <li>• Curriculum for Wales</li> <li>• Equality Plans and Objectives - Welsh Government (and other associated plans e.g. Anti Racist Wales Action Plan), Pembrokeshire National Park Authority, Pembrokeshire County Council and other Public Bodies</li> <li>• National Framework for Social Prescribing</li> <li>• National Indicators and Milestones for Wales</li> <li>• Pembrokeshire Coast National Park Next Generation Youth Manifesto</li> <li>• Pembrokeshire Coast National Park Authority's Well-being Objectives</li> <li>• Pembrokeshire Rights of Way Improvement Plan</li> </ul>	NPMP and Marine Officer		

## Section 5 - Summary/ Recommendations from Assessment: Equality/ Socio Economic Disadvantage and Inequality of Outcomes/ Health Inequalities and Outcomes

The stage 1 and stage 2 assessments identified a range of impact that the plan could have in terms of Equality, Socio Economic Disadvantage and Health Inequalities and outcomes.

Themes included:

- Range of partners included
- Removing barriers and widening access to support people to experience and benefit from Special Qualities in the Park
- Creating a Welcoming Park for All
- Access to toilets and changing places facilities
- Health benefits from accessing the outdoors and connecting with nature
- Responding to issues and concerns around water quality and pollution on public health
- Water safety particularly for young people
- Affordable housing and interventions to help support affordable housing provision in the Park
- Transport challenges and affordability and access to services
- Pathways to employment, particularly for young people or people facing barriers to accessing employment opportunities
- Issues around low wages, seasonality, in work poverty and access to fair work
- Representation in Arts and Heritage opportunities and protection of religious sites of importance

Despite significant changes to the format of the plan, many of the amendments suggested as part of the stage 1 assessment had been applied, strengthening the plans response to recommendations around above issues. This included the rewording of SE1/A takes account of risks identified in the stage 1 assessment relating to local letting policies: Deliver appropriate homes, including affordable housing, for local communities through the planning system and joint working. Apply local lettings policies, applied on rural exceptions sites where appropriate and where evidence demonstrates they support delivery against desired outcomes.

Positive amendments made to H1/A following comment from partner as part of consultation in terms of need for it to also reference removing barriers and promoting heritage to a more diverse audience. It now reads: Enhance public awareness and enjoyment of the historic environment, including landscapes, buildings and monuments, remove barriers to access and promote opportunities to more diverse audiences.

The stage 2 assessment did identify further amendments to strengthen the plan in terms of positive impact and some were the result of the format changes to the plan. In particular

- Strengthening the vision to include following: The Park is for everyone and is a welcoming place, where people can enjoy and help protect its Special Qualities.
- Amending some phrasing within sentences to make it fit more with the social model of disability
- Suggested amendment to the Cultural Heritage and Connection mission to: Enhance equitable access to the National Park and promote the enjoyment, understanding, and health benefits of its Special Qualities for all.”
- Strengthening references in the document in terms of health impacts particularly in terms of social prescribing and role of partners in terms of this (in particular in response to some of the consultation responses) and references to the 5 steps to well-being. With suggested addition to connection results section of: We will deliver projects and opportunities that embed the 5 steps to well-being in their approach contributing to National Milestones on mean mental well-being score, percentage of people who volunteer and health lifestyle behaviours. Strengthening elements of W1 and W2 partnership actions and recommending that W2/B include reference to Public Health Wales and Hywel Dda Health Board. Inclusion of additional partnership action on - Support and engage with Public Health Wales Hapus platform to promote role heritage, nature and outdoor opportunities in the National Park can play in supporting well-being. The assessment also identified need to explore how to involve health partners in future partnership plan meetings and capture the positive work of partners in this area.
- Suggest for greater clarity in terms of accessible coast strategy that W1/B is amended to following, which should assist clarifying this partnership action: Deliver programmes and projects that promote an accessible coast approach creating more inclusive experiences in the Park and helping remove barriers to access for people with specific needs e.g. Get Outdoors Scheme, application of accessibility strategy within Car Park report. Visit Pembrokeshire should be added to Key delivery partners for this action. This action will include within its remit considerations related to access and toilets/ changing places as demonstrated by work carried out as part of the Car park report and case study from Open to All referenced in the assessment in terms of Mobiloo Tour.
- In support of impact of action E1/L Develop nature recovery projects which also help increase the range of people able to participate in these activities, it suggests that we add to conservation result – we will have supported a wide range of people to take action for nature
- Suggested that additional results be added to Cultural Heritage and Connection to reflect actions relating to public health and water quality - All designated bathing water beaches achieve “Excellent” status and there is a reduction in recreation and environmental harm from storm overflow sewage discharge. This is an area that was highlighted as a particular concern for public as part of special qualities consultation, so it would be beneficial to have a result linked to action in this area.

- In terms of transport suggested that additional partnership action is added to Communities workstream on Socio-economic well-being: Support once approved the delivery and monitoring of South West Wales Regional Transport Plan through the Corporate Joint Committee for South West Wales. Lead: Corporate Joint Committee for South West Wales. (Note both Pembrokeshire County Council and Pembrokeshire National Park Authority are part of the CJs for South West Wales). Include reference to Pembrokeshire Association for Community Transport Organisations to SE 1/6.
- Add following to community partnership actions: Deliver the Strengthening Communities Project under the Pembrokeshire Well-being Plan, this work will impact on communities in the Park. Lead: Pembrokeshire Public Services Board.
- Although result was included under Community - We will address the issue of high numbers of poorly paid seasonal jobs and limited employment opportunities, it was felt that partnership actions identified only had limited impact on this and the background section could also be strengthened. Suggested additional actions included: Promote skills development and pathways to employment and fair work opportunities within existing and developing industries in the Park including marine energy sector. Lead: Pembrokeshire College. Pembrokeshire Coastal Forum. Key Delivery Partners: Pembrokeshire county Council. Pembrokeshire Coast National Park Authority. Note: Pembrokeshire College have recently opened there Energy Transition Hub and Pembrokeshire Coastal Forum are engaged with Marine Energy Wales in terms of promoting career opportunities in the sector to young people via their coastal curriculum work). Implementation of Procurement Strategies in support of Socially Responsible Procurement Duty. Note: Through taking a socially responsible approach to procurement, public bodies operating in the Park and surrounding area can have a positive impact on local businesses and economic well-being of the Park. Action also included on: Deliver the *Pembrokeshire Destination Management Plan 2024-28* in support of regenerative tourism and a visitor economy that benefits local communities, generating sustainable livelihoods and income opportunities
- Additions in terms of gaps within Annex 1

## Appendix 1 – Demographic Profile and Other Key Data

### Demographic Profile of Pembrokeshire

- Protected Characteristics in Pembrokeshire is outlined in [Pembrokeshire County Council – Strategic Equality Plan 2024-2028 Supporting Evidence \(Appendix 2\) \(page 4-7\)](#).

### Demographic Profile Park – Census 2021 Figures

- Updated Census data for National Park Authorities show
- The population declined in several national parks between 2011 and 2021, Pembrokeshire Coast saw the biggest % decline in population of -7.6%
- Residents of national parks tended to be older than those elsewhere. This is true for Pembrokeshire Coast National Park.
- National parks tended to be less ethnically diverse than other areas. This is true of Pembrokeshire Coast National Park. With White Ethnic Group at 98.06% (Wales 93.74%), Mixed or Multiple Ethnic Group 0.79% (Wales 1.58%), Asian, Asian British, or Asian Welsh 0.73% (Wales 2.91%), Black, Black British, Black Welsh, Caribbean or African 0.14% (Wales 0.91%), Other Ethnic Group 0.27% (Wales 0.87%).
- Pembrokeshire has a higher % of people identifying as White: Gypsy or Irish Traveller at 0.5% (560) than Wales at 0.1%.
- For religion, there tended to be more people who identified a “Christian” in national parks than elsewhere. This is true for Pembrokeshire Coast National Park with 52.9% (Wales 43.6%) of people identifying as Christian. Correspondingly there tended to be fewer non-Christian religious groups in national parks and in Pembrokeshire fewer people who identified as having no religion 39.0% (Wales 46.5%) than Wales as a whole. However, this pattern did not hold for people who identified as “Buddhist” and “other religion” where Pembrokeshire Coast National Park had higher proportions of residents identifying as “Buddhist” (PCNP: 0.4. Wales: 0.3) and “other religion” (PCNP: 0.6%. Wales: 0.5%) than Wales as a whole.
- National park residents were typically in better health than those elsewhere. However, there were variation for Pembrokeshire Coast which had the highest percentage of people reporting "Very bad health" compared to all the other parks and matching the England and Wales figure of 1.2%.
- In Wales the Age Standardised proportions of the population who were disabled was lower in Eryri (16.1%), Bannau Brycheiniog (17.4%), and the Pembrokeshire Coast (17.5%) than it was elsewhere in Wales (21.3%). However, when looking at Day to Day activities limited a lot, ASP population Pembrokeshire Coast had the highest percentage at 7.4 % (Wales – 10%), compared to all the other National Parks in England and Wales. In terms of disabled people in household (disabled under the Equality Act), in Pembrokeshire Coast National Park 27.5% of households had 1 disabled person in the household and 7.2% had 2 or more disabled people in the household.
- Based on Age Standardised proportions Pembrokeshire Coast has the highest % of all national parks of usual residents aged 5 and over providing unpaid care at 10.7%. With 5.7% (above overall Wales figure of 4.7%) providing 19 or less hours unpaid care a week, 2% (less than overall Wales figure 2.2%) providing 20 to 49 hours unpaid care a week, 3% (less than overall Wales figure 3.6%) providing 50 or more hours of unpaid care a week.

- Not data has been released for National Park Areas on Sexual Orientation. However data is available at Local Authority level for Pembrokeshire, for all usual residents aged 16 and over. With breakdown as follows: Straight or Heterosexual 89.8% (Wales 89.4%), Straight or Heterosexual 1.1% (Wales 1.5%), Bisexual 1% (Wales 1.2%), All other sexual orientation 0.2% (Wales 0.3%), Not answered 7.9% (Wales 7.6%).
- No data has been released for National Park Areas on Gender identity. However data is available at Local Authority level for Pembrokeshire, for all usual residents aged 16 and over. With breakdown as follows Gender identity the same as sex registered at birth 93.4% (Wales 93.3%), Gender identity different from sex registered at birth but no specific identity given 0.1% (Wales 0.2%), Trans Women 0.1% (Wales 0.1%), Trans Man 0.1% (Wales 0.1%), All other gender identities 0.1% (Wales 0.1%), Not answered 6.3% (Wales 6.3%).
- Pembrokeshire Coast (49%) has a higher % of households not in deprivation by any dimension than Pembrokeshire (46%) and Wales (45.9) as a whole. 35.5% of households in Pembrokeshire Coast is deprived in one dimension (Pembrokeshire 34.7%, Wales 33.4%) , 12.9% households are deprived in two dimensions (Pembrokeshire 15.4%, Wales 16%), 2.5 % households are deprived in three dimensions (Pembrokeshire 3.6%, Wales 4.5%), and 0.1% of households are deprived in four dimensions (Pembrokeshire 0.2%, Wales 0.2%).

## Visitor Data

- **Domestic GB Tourism Statistics: Wales Tourism Day Visits, Annual Report 2022**  
(Source: <https://www.gov.wales/sites/default/files/statistics-and-research/2024-05/domestic-gb-tourism-statistics-wales-tourism-day-visits-annual-report-2022.pdf> )
  - 1 in 5 tourism day visits to Wales were made up of older independents. In contrast to other nations, these visits have the highest average spend at £52 per visit, es apart, as the big spend visits in England and Scotland are by younger pre-nesters.
- **Domestic GB tourism statistics, Wales overnight tourism: annual report: 2022**  
(Source: <https://www.gov.wales/sites/default/files/statistics-and-research/2024-05/domestic-gb-tourism-statistics-wales-overnight-tourism-survey-annual-report-2022.pdf> )
  - Trips by those in the family lifestage make up the largest proportion of trips to Wales, however, these trips have the lowest average spend and shortest duration. Trips by older independents, on the other hand, have the highest average spend and duration (average of 3.5 days versus 3 overall). One in five trips are made up of 16-24 year olds,

these trips tend to look significantly different to those of other groups, for example, a higher proportion took package holidays (34% versus 18% overall)

### **Key PCNPA Indicators 2023/24**

- 1,403 volunteer and social action days contributing to nature recovery in the Park and surrounding areas by volunteers and social action participants
- # participants engaged with sessions and activities facilitated by PCNPA focused on appreciating and protecting nature and biodiversity in the Park
  - 3,487 participants in sessions – outreach/ inclusion programme
  - 1,716 participants in sessions – community engagement
  - 3,479 participants in sessions – learning programme
  - 2,400 participants in sessions – public and visitor activities
- 10 SDF community decarbonisation projects complete in 2023/24, with cumulative completed projects since 2021/22 at 29.
- 574.5 Volunteer and Social action days contributing to decarbonisation/removals (including community tree planting activities and litter picks) by volunteers and social action participants
- 3,518 Volunteer and Social action days contributed by volunteers and social action participants
- 490 Outreach/ Social inclusion sessions supported by volunteers (including supported walking activity leaders and volunteer mentors)
- 399 Beach Wheelchair and Mobility Equipment Bookings
- # participants in Outreach/ Social Inclusion sessions facilitated by the Authority 2023/24
  - 1,677 participants in sessions – Inclusion, Outreach and Increasing Access for Underrepresented Groups
  - 450 participants in sessions – Learning Programme, Inclusion/ Outreach
  - 448 participants in sessions – Next Generation Activities (Engagement with Young People)
  - 904 participants in sessions – Supported Volunteering
  - 2,498 participants in sessions – Early Years
  - 3,519 participants in sessions – CHC quiet hour
- # participants in PCNPA learning programme sessions
  - 6,863 participants in sessions - Education Programme – Schools in Pembrokeshire



- 2,860 participants in sessions - Education Programme – Schools outside of Pembrokeshire
- 63 participants in sessions – D of E
- 105 participants in sessions – Further Education/ University
- 136 participants in sessions – Teachers
- 3,063 participants in sessions – Community/ Visitor Learning Programme
- 460.5 Volunteer and Social action days supporting heritage assets in park by volunteers and social action participants
- 349 volunteers and social action days supporting access work in the park by volunteers and social action participants

## Well-being of Wales

- [Well-being of Wales update 2023](#), including updates on progress for The goal for [a more equal Wales](#) ,[The goal for a more healthier Wales](#) , [The goal for a Wales of cohesive communities](#).
- [Well-being of Wales, 2024](#) (addition as part of stage 2 of the assessment)

## Pembrokeshire Well-being Assessment

(Source: <https://www.pembrokeshire.gov.uk/public-services-board/well-being-assessment> )

Key findings from the assessment include:

- Young people's participation in democracy needs to be strengthened
- Pembrokeshire is amongst the least ethnically diverse areas in Wales
- Democratic representation in Pembrokeshire, particularly within the Council, is not diverse.
- Pembrokeshire has an ageing population, which will have impacts on public services and local labour market
- Public transport in rural areas is a barrier to accessing services and employment opportunities
- Covid 19 has exacerbated issues such as mental health, loneliness and health inequalities
- Child poverty rates in Pembrokeshire are unacceptable
- In work poverty is an increasingly common problem
- The Cost of living is rising across the UK, with more working families experiencing poverty
- In some sectors, the wages in Pembrokeshire are comparatively low in relation to neighbouring counties
- Young people have told us that they are not confident that they will be able to live and work in Pembrokeshire in the future

- The importance of digital connectivity is a priority for carers and people with disability
- Accessible and affordable childcare can be a barrier to parents returning to work,
- From a survey of our residents, affordability and accessibility to leisure services can be a barrier to healthy behaviours
- Rates of diagnosis of dementia are projected to significantly increase over the coming years.
- Population projections suggest that the number of people aged 80 or over will increase significantly by 2040.
- There are year on year increases in the demand for domiciliary care packages.
- The number of unpaid carers is increasing and likely underestimated by official figures.
- Waiting lists for diagnostic and therapy services have increased significantly, this is likely due to the pandemic and will be monitored.
- Availability and affordability of housing in Pembrokeshire is felt to be a barrier to staying in the county by young people.
- There are a significant number of second homes in the county, particularly in rural
- areas.
- There is a lack of affordable homes in the county.
- The need for affordable homes is projected to increase.
- We are seeing an increasing number of families presenting as homeless in the county.
- The growing ageing population is and will continue to put pressure on the demand for specialist accommodation
- The pandemic has had a significant impact on young people's education.
- Educational attainment for Pembrokeshire learners needs to improve, in particular for those on Free School Meals and those more able.
- There is an opportunity to increase skills levels especially through apprenticeships.
- There is an increase in public order offences (committed via social media or other digital means) and violence against the person.
- There is an increase in antisocial behaviour, particularly in our main towns.
- Domestic abuse related crimes are increasing. There is an increase in drug abuse, particularly in our main towns.
- Volunteering numbers in Pembrokeshire is increasing though the majority are over 65.
- There is evidence that levels of health impacts our resident's ability to take part in cultural events.
- Public transport networks impact upon people's ability to attend arts and culture events.

- People who regularly attend arts and culture events report higher levels of well-being
- Welsh language speakers report that the ability to use Welsh informally and in the work place has a positive effect on their well-being.
- Pembrokeshire has the highest number of blue flag beaches and green coast awards in Wales.
- The presence of the National Park has a positive impact on the well-being of young people in the county, with many citing it as the best thing about Pembrokeshire.

### **Pembrokeshire Youth Assembly – “What Matters to You? Consultation 2023**

(Source: <https://mgenglish.pembrokeshire.gov.uk/mgConvert2PDF.aspx?ID=73946> )

Identified that the top issues of concerns among young people are:

- The cost of living crisis - Support for families during the cost of living crisis and work to help prevent this impacting other areas such as young people’s education, etc.
- Mental health, emotional health and well-being - Services should be improved with young people’s help and mental health education should be compulsory and challenge stereotypes
- Housing - Youth homelessness is on the increase. Support young people and families in Pembrokeshire into housing that is suitable for their needs.

### **Pembrokeshire Coast Next Generation Youth Manifesto – A call for change**

(Source: <https://www.pembrokeshirecoast.wales/get-involved/next-generation/youth-manifesto/> )

Identifies areas for action on:

- Youth Empowerment
- Living – including infrastructure, affordability, community
- Learning – Aspire to inspire, nature education, support
- Working – Job Opportunities, More training, low wages

## Regional Consultation to inform Equality Plans (Pembrokeshire Results)

(Source: <https://www.pembrokeshire.gov.uk/Strategic-Equality-Plan-2024-28/sepdevelopobjectives>)

Key areas of relevance:

- Disabled people: It was felt (by the largest number of respondents) that disabled people had a worse experience of education, work, levels of pay, access to care and support, housing, access to transport, health leisure and access to coast and countryside, crime, justice services, influencing decisions, information and digital services, getting on in a community and quality of life since 2019.
- People from an ethnic minority: It was felt (by the largest number of respondents) that people from an ethnic minority had a worse experience of education, levels of pay, access to care and support, health, leisure and access to coast and countryside, crime, justice, influencing decisions, information and digital services, getting on in the community, and quality of life since 2019.
- People who are lesbian, gay or bisexual (LGB): It was felt (by the largest number of respondents) that LGB people had a worse experience of getting on in the community.
- People who are non-binary: It was felt (by the largest number of respondents) people who are non-binary had a worse experience of education.
- People who are trans-gender: It was felt (by the largest number of respondents) that people who are trans-gender had a worse experience of education and getting on together in a community.
- Younger people (under 25 years): It was felt (by the largest number of respondents) that younger people had a worse experience of levels of pay, access to care and support, housing and influencing decisions.
- Older people (65 years or older): It was felt (by the largest number of respondents) that older people had a worse experience of work, access to care and support, access to transport, health, leisure and access to coast and countryside, information and digital services and quality of life since 2019.
- People who are pregnant or have recently given birth: It was felt (by the largest number of respondents) that people who are pregnant or have recently given birth had a worse experience of work, levels of pay, and health.
- Females: It was felt (by the largest number of respondents) that people who are female had a worse experience of crime.

Additional feedback from Young Voices for choices Youth Forum who took part in the consultation:

As part of the consultation, it was felt by participants that:

- Disabled people had a worse experience of education, work, care and support, leisure and access to the coast and countryside and crime
- People from ethnic minorities had a worse experience of education and crime
- LGB people had a worse experience of education and leisure and access to the coast and countryside
- Young people under 25, transgender and religious people had a worse experience of crime
- Female, male and transgender people had a worse experience of Education
- All protected characteristics groups had a much worse experience of pay, housing, transport, health, good information and quality of life since 2019.

Young Voices for Choices Youth Forum respondents made these comments in response to the survey questions including:

- Work – not enough support for disabled people and young people under 25, more job opportunities
- Pay – cost of living and inflation, household bills, food and everything
- Care and Support – not enough support available e.g. emotional health, and sometimes difficult to find information
- Housing – lack of social housing, rent is high or unaffordable, youth homelessness is third highest issue concerning young people in Pembrokeshire in the “What Matters to You” consultation.
- Transport – cost, some villages only have a weekly bus, not enough hospital transport
- Leisure an access to the coast and countryside – more choices if you have money and transport, don’t have money or transport
- Health – can’t see a GP, access to a dentist, waiting lists, and long term effects of Covid on services.
- Crime – Hate crime has increased for protected characteristics, increase in online crime and older people vulnerable to financial crime
- Justice – like to think people are treated fairly, evidence more black people are stopped and searched by police
- Having a voice – internet available for people to have a voice, less people respecting each other, not living in kind times
- Good information and technology – more people learnt to use it during Covid, most people have smart phones, parking costs more when you use the app, should be information in different formats, easy read and know where to get right information

- Community – came together during Covid but everything seems to be reverting back
- Public Services – more training around protected characteristics and mental health, be honest and transparent about future plans, listen to public, make better use of resources, protect green spaces, make parking free.

## **Appendix 2: Summary of Consultation on the draft Pembrokeshire Coast National Park Partnership Plan – Relevant to Equality, Socio-Economic Disadvantage and Health impacts.**

### **1. Consultation materials**

The following consultation documents and supporting materials were made available for comment.

- 1 Consultation draft National Park Partnership Plan 2025-2029
- 2 Easy Read version of the Partnership Plan and Easy Read response form
- 3 Response form (online)
- Assessments:
- Draft Sustainability Appraisal (incorporating Strategic Environmental Assessment):
- 4a Draft Initial Sustainability Appraisal Report Executive Summary
- 4b Draft Initial Sustainability Appraisal Report
- 4c Appendix A – Review of Relevant Plans, Policies and Programmes
- 4d Appendix B – Baseline Information
- 4e Appendix C – Detailed Policy Assessments
- 5 Draft Habitats Regulation Assessment
- 6 Draft Equality Impact Assessment
- 7 Draft Welsh Language Impact Assessment
- 8 Draft Well-being of Future Generations Assessment
- 9 Summary of the Equality, Welsh Language and Well-being of Future Generations impact assessments

Supporting information

- 10 Interactive maps
- 11 Report of consultation on the Special Qualities survey (spring 2024)
- 12 Draft Scoping Report (This document should be read in conjunction with the Report of Consultation on the Scoping Report.)
- 13 Report of Consultation on the Scoping Report

2. Consultation period: 2/8/24 – 30/9/24.
3. Raising awareness of the consultation: Organisations and groups were emailed, including individuals who had registered an interest in PCNPA planning. In total, 300+ letters were posted and approximately 900 emails sent to database clients with legitimate interest. The consultation was featured on PCNPA social media and via press release. Exhibits and leaflets were available at the County Show and at local shows attended by PCNPA staff. An evening Teams meeting was held for Town, City and Community Councils. Meetings and calls were held with other organisations, e.g. CNP.
4. Options to respond: People could respond via an online form, in writing or by email. The option to reply anonymously (or to receive a report of consultations but not be associated with comments) was provided.
5. The response

30 organisations / individuals responded. The responses consisted of 400 distinct representations, totalling about 30,000 words.

The following respondents (who agreed to be named) commented on the consultation materials:

- British Mountaineering Council
- Butterfly Conservation
- Cadw
- Campaign for National Parks
- The Cleddau Project
- The Coal Authority
- Friends of Pembrokeshire Coast National Park
- Heneb
- Natural Resources Wales
- National Trust Cymru
- Pembrokeshire County Council
- Pembrokeshire Coastal Forum
- Welsh Government: Housing policy team

- Welsh Government: Landscapes & Countryside branch (policy team)
- Welsh Government – Visit Wales
- Welsh Government – Water Branch (including Land Management practices, bathing water quality, nutrient management boards and Sustainable Drainage Systems)
- Wildlife Trusts Wales

A further eight individuals / organisations who are not identified and / or preferred not to be associated with comments in this report also responded.

A further organisation asked for an extension to the deadline but was ultimately unable to respond.

6. It is proposed to convene a Plan Partnership in January 2025 to establish terms of reference and review suggested amendments before Plan adoption by Authority. Partnership will subsequently collaborate on implementation and new projects and establish a dedicated monitoring framework with metrics to evaluate success.
7. Structure of the plan has been amended as a result of consultation responses, and this stage 2 assessment takes account of these changes.
8. Themes from consultation relevant to Equality, Socio-Economic Disadvantage and Health impacts.

#### **Promoting Heritage to more diverse audiences**

- Cadw - H1/A – partners – you could add RCAHMW and Cadw. Should this policy echo policy W/1A (remove barriers to outdoor recreation ... and promote opportunities to more diverse audiences) – should the HE policy include not just enhancing public awareness and enjoyment but also removing barriers (real or perceived) and promoting heritage to a more diverse audience?
- Pembrokeshire County Council - There appears to be no mention about promoting the arts and seems very cultural heritage heavy which is more about the past and preserving the past. It is through the arts that new things are created, and where a lot of vibrancy comes from. It is worth noting that there are more artists in Pembrokeshire per capita than any other county in the UK.



### **Positive impact of nature/ heritage/ wilderness of well-being - Role of partners in delivering social prescribing and well-being initiatives, including heritage alongside nature, positive impact of outdoor education opportunities**

- Cadw - W2/B – potentially broaden – Deliver nature and heritage based social prescribing and wellbeing initiatives, this would then also broaden delivery partners.
- Section 5 Connection: National Trust Cymru - As with the conservation section, NTC believe we can offer real partnership opportunities in this section – though we have a basic question as to whether ‘Connection’ is the most appropriate title for this section. Many features within this section would fit within the other sections and could create a more cohesive and cross cutting plan. We have been involved in nature based social prescribing programmes in areas of North Wales, and there is a huge opportunity here to build on lessons we have learnt. There is a very clear opportunity to link with health authorities, and evolution of how we would like to offer up our places, ownership and links with the other landscapes and resources such as the coastal path to facilitate this, and in doing so create SMART targets or key deliverables.
- Special Qualities: NRW - We feel that the explanations of special qualities would benefit from more detail to better encapsulate what is so special about the landscapes and seascapes of PCNP. Further information, including more detailed headlines e.g. ‘landscapes and seascapes of exceptional diversity and quality’ and ‘outstanding coastal scenery’, to highlight the diversity of landscapes/seascapes in Pembrokeshire and to draw out what the special qualities mean is suggested. We also recommend that the sense of remoteness and wildness is reinstated as a headline special quality, in recognition of the importance for human health and well-being of being able to experience untamed or ‘wild’ places such as those in PCNP.
- Equality Impacts: Pembrokeshire County Council - In terms of people’s health outcomes, the provisions of the Partnership Plan would be likely to bring positive health benefits, particularly if efforts are made to ensure that the National Park is accessible to as many people as possible, including both tourists and residents. In a disability and mobility context, access to some of Pembrokeshire’s fine beaches in the National Park remains a challenge that will require innovative solutions.
- The Cleddau Project CIC - We are in agreement that the following headline issues require a meaningful response [this included]: Providing outdoor learning opportunities, in particular for children
- Butterfly Conservation - We strongly support the Key Outcome “Provide and promote inspiring outdoor learning, well-being and personal development experiences for all”, particularly Action W2/C. Butterfly Conservation, in collaboration with the University of Derby, have demonstrated the positive impact of citizen science on mental health and nature connectedness.

### **Citizen Engagement**

- Campaign for National Parks - Limited citizen engagement in setting the vision for the National Park. No evidence of public meetings, citizens assemblies or much in the way of deliberative democracy to ensure that a breadth of voices are heard.
- Comments on initial equality impact assessment: Campaign for National Parks - More opportunities to engage in the delivery of the plan need to be made available through deliberative democracy tools such as citizens’ or peoples assemblies in order

to regularly engage with a broader cross section of local people who may not otherwise engage in the Management Plan. The wellbeing assessment is honest and should be more closely integrated into the Partnership Plan's actions. We remain concerned by the lack of engagement in the Partnership Plan a reliance on existing structures of democratic engagement are clearly not allowing deeper and more meaningful engagement in the Plan and its design. We are concerned by the budget attributed to the development of the Plan and this therefore has a significant impact on the ability of the plan to break through boundaries and involve more people through citizen engagement events.

- Friends of the National Park - There is no evidence of serious engagement with stakeholders (beyond statutory obligations) in the preparation of this plan, particularly those groups and individuals less familiar with the National Park beyond the familiar agencies, authorities and NGOs.

### **Accessibility of Terms**

- Special Qualities: National Trust Cymru - We feel that this section is too complex, with words that are complicated and hold little meaning to most. For example 'Earth Heritage' could be called geology which would be clearer to most

### **Job Creation, Affordable Housing**

- Section 7: Communities: National Trust Cymru - As with above sections, there are no tangible, SMART targets outlined in this section to ensure progress and delivery of the plan objectives; and it is not easy to follow the path between outcomes, policies and example actions. For example, there is nothing in the policy or example actions section relating to job opportunities, despite that featuring within the key outcomes and much earlier in the plan introductory sections.
- Equality Impacts: Pembrokeshire County Council - There are some concerns that the Plan might not bring benefits to those experiencing socio-economic disadvantage, because it (understandably) seeks to protect National Park landscapes and nature conservation assets from damage but in so doing may restrict the economic developments that provide livelihoods. However, the picture is complex, for instance as NPA planning places a strong emphasis on affordable housing provision, which will help those at a socio-economic disadvantage, so it is difficult to generalise.
- Pembrokeshire County Council -The function of PCNPA's role as a Planning Authority and how it controls the quality of development is notably absent in the easy-read version. However, it is one of the areas that affects a lot of people.
- Welsh Government – Visit Wales: Not much to add, but I think the fact that Tourism is a critical economic driver for the National Park could be strengthened in the doc. There is also no reference to the overarching plan for the visitor economy [Welcome to Wales: priorities for the visitor economy 2020-2025](#) as far as I can see, although the overarching goals of Welcome to Wales are reflected in the Partnership Plan.

- Survey response – Have we accurately captured the State of the Park, and the main challenges and opportunities? Is there other evidence that would add ? No - We do not accept the premise that second homes and holiday lets are bad for the park. They are vital to its economic health

### Water Quality and Safety

- NRW - We are concerned with some of the wording used and the message conveyed about Bathing Water quality throughout the documents. The overriding message about bathing water quality comes across as very negative and doesn't convey the overall positive state of bathing water quality around the Pembrokeshire Coast. e.g. On page 67, under the heading 'Bathing Waters' there is a quote stating '*These days you have to choose your bathing spots very carefully*'. Whilst we recognise the use of quotation from public engagement is to be welcomed, where the message taken from the quote may be misleading we recommend explanatory text to convey the correct message. In Pembrokeshire we have 29 bathing waters and 27 of them are Excellent which is the most Excellent beaches we have had in Pembrokeshire. This is a good news story to celebrate and promote rather than give an unreflective negative impression, which may then, for example, lead to unintended negative consequences for tourism.
- NRW - In addition to our overall comments above about bathing water quality you may wish to include that we have three beaches which benefit from a water quality prediction model that is run every morning by 9am. This model is based on predicted rainfall and the beaches with this facility are **Poppit Sands, Newport Sands and Broad Haven central**. This information can be accessed on our website, so it may be helpful if there was a link in the PCNPA plan to the [bathing water pages on our website](#).
- NRW - There is also a quote 'allowing members of the public to help with testing at bathing waters'. Whilst we appreciate this is an expressed public opinion it may be helpful to increase wider understanding by explaining that although this is a good idea (citizen science can help provide valuable additional information and observations that enable a fuller picture) the test for faecal indicator organisms is very specialist and the samples have to be taken, transported and analysed in a very prescriptive way at an accredited laboratory in order to be representative. Only samples taken by NRW can be used to classify a bathing water under the bathing water regulations.
- NRW - Page 95 – Policy W1: Provide and promote sustainable outdoor recreation opportunities for all. Example Action W1/F "Improve water quality at designated bathing waters achieving less than "Excellent" status". - We suggest rewording this action – please refer to general comments above about Bathing Water quality. Action required will be working with others or in partnership to minimise the negative impacts of pollution on the quality and recreational use of our rivers and coastal waters.

- Initial Equality Impact Assessment: Pembrokeshire County Council - It is suggested that water safety should be a consideration for all age groups, including (but not exclusive to) young people.

### **Transport**

- NRW - **Page 56** – Transport – We consider this to be more of a wish list rather than specifying if they are challenges or opportunities and if opportunities how they will be realised. (Please also refer to general comments above on consistency and clarity of presenting State Challenges and Opportunities.)
- Pembrokeshire County Council - P18 – Consideration could also be given to include reference to the forthcoming Regional Transport Plan (2025-2030) and the forthcoming LDP2 Pembrokeshire.
- Pembrokeshire County Council - P41 – Additional barriers to participation include lack of adequate public transport and transport poverty.
- Pembrokeshire County Council -P56 – Mention could be made to improved DRT services in the area or community transport options to assist with accessibility issues.
- SE/G (also N1/E)- should probably include PCC and Bus operators, TfW and NWR.

### **Budget Pressures impact on addressing equality impacts identified**

- Initial Equality Impact Assessment: Pembrokeshire County Council - The list is comprehensive and links into many aspects of the council's work. Whilst the questions/issues raised through the impact assessment are all valid addressing them won't necessarily be straightforward. Budget pressures on the council itself and/or uncertainty around external funding programmes may mean that in future additional pressure is put on services like public toilets.

### **Accessibility/ Coastal Access Strategy**

- Pembrokeshire County Council - there appears to be no real mention of the Coastal Access Strategy within the Plan which may be a route for delivering some of the objectives
- Welsh Government – Visit Wales - Also welcome the focus on accessibility from a provision perspective.
- The Cleddau Project CIC - We are in agreement that the following headline issues require a meaningful response [this included]: Providing sustainable outdoor recreational opportunities for a full cross-section of society, and increasing the frequency of people's participation

- Survey response – Have we accurately captured the State of the Park, and the main challenges and opportunities? Is there other evidence that would add ? No – Toilets
- Survey response - What comments do you have on the proposed policies, actions and partnerships for Communities? More disabled access and amenities like toilets
- Survey Response: What impact do you think the Plan will have on protected groups - Only if you provide the means for people to enjoy the park by encouraging the less abled and providing facilities will this work
- Survey Response: While many actions listed represent an improved delivery of services to these groups e.g. an Accessible Coast Strategy and also there are statements from those who would be affected, we feel that more detail is needed and measurable outcomes.

### **Impact on equality**

- Survey Response: What impact do you think the Plan will have on protected groups - Hopefully a positive one. More specific actions on how PCNPA will achieve this with partners would be good to see in the plan.
- Survey Response: What impact do you think the Plan will have on protected groups - Only if you provide the means for people to enjoy the park by encouraging the less abled and providing facilities will this work
- Survey Response: While many actions listed represent an improved delivery of services to these groups e.g. an Accessible Coast Strategy and also there are statements from those who would be affected, we feel that more detail is needed and measurable outcomes.
- Survey Response: What comments do you have on the initial Equality impact assessment? - PCF supports the removing barriers and widening access to support people (including those with multiple protected characteristics) to experience and benefit from the special qualities of the National Park
- Survey Response: What comments do you have on the initial Equality impact assessment? - More opportunities to engage in the delivery of the plan need to be made available through deliberative democracy tools such as citizens' or peoples assemblies in order to regularly engage with a broader cross section of local people who may not otherwise engage in the Management Plan. - The wellbeing assessment is honest and should be more closely integrated into the Partnership Plan's actions. - We remain concerned by the lack of engagement in the Partnership Plan a reliance on existing structures of democratic engagement are clearly not allowing deeper and more meaningful engagement in the Plan and its design. - We are concerned by the budget attributed to the development of the Plan and this therefore has a significant impact on the ability of the plan to break through boundaries and involve more people through citizen engagement events.
- Survey Response: What comments do you have on the initial Equality impact assessment? - PCNPA has no power and influence over any of these things. You are invisible, hiding away in Pembroke Dock writing pointless policy documents. You spend more time thinking about your own pay packets and job descriptions than anything else.

