## PCNPA Equality Impact Assessment – National Park Management Plan

## **Title of what is being Assessed:** National Park Management Plan (Pre Consultation) **Is this a staged Integrated Assessment:** Yes. Stage 1: Pre Consultation. 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

Name of Strategic	National Park Management Plan – A Partnership Plan for the National Park 2025-2029 (Review)	
Plan, Policy or	or Each National Park Authority must prepare a five-yearly Management Plan "which formulates its policy	
Decision being for the management of the relevant Park and for the carrying out of its functions in relation to that P		
assessed (Section 66 of the Environment Act, 1995).		

<b>Department/ Service</b>	Strategic Policy		
Area			
Officer Responsible	Mair Thomas (Performance and Compliance Officer) / Michel Regelous (NPMP and Marine Officer)		
for Impact			
Assessment			
Responsible Senior	Name: Sara Morris		
Manager	Title: Director of Placemaking, Decarbonisation and Engagement		
Timetable for the	Stage 1: Pre Consultation – May 2024 in advance of consultation document going to NPA 19th June.		
Assessment	Stage 2: Assessment will be updated following consultation period prior to plan going for final approval.		
Monitoring and	Staged assessment, so assessment will be revisited after consultation period prior to final approval to		
Review of	take account of consultation feedback and any further revisions to the plan.		
Assessment Stage 1 assessment should inform any additional consultation or data gaps to consider dur			
	consultation period.		
	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.		
Chief Executive Sign	Sign off date:		
Off – Completed			
Assessment and			
Summary/			
Recommendations			
(Stage 1)			

### 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.

As part of the process, the National Park Authority has reviewed evidence and stakeholder input to identify the key issues that the Management Plan needs to address. These are described in the State of the Park section of this Plan, and include:

- promoting ecosystem recovery at scale and improving the state of wildlife on land and in the marine environment (as a milestone to clear recovery by 2050)
- achieving favourable conservation status on high nature value sites
- maintaining and enhancing species for which Pembrokeshire is uniquely important
- increasing the connectivity of the landscape for wildlife
- supporting use of the Welsh language and Pembrokeshire dialects
- providing outdoor learning opportunities, in particular for children.
- providing sustainable outdoor recreational opportunities for a full cross-section of society, and increasing the frequency of people's participation.
- managing potential / actual recreational pressures such as those arising from unauthorised camping and congestion.
- reducing the significant waiting list for affordable housing in Pembrokeshire (over 5,000 in 2024)
- addressing the issue of high numbers of poorly paid seasonal jobs and limited employment opportunities
- supporting the recovery of the increasing number of people suffering poor mental health post-Covid 19
- · adapting to the changing physical and well-being needs of residents and visitors
- maintaining and extending sustainable transport and active travel options
- halving carbon emissions within the National Park area in the lifetime of this Plan (a milestone in achieving carbonneutrality in the National Park area by 2050)
- proactively addressing the impacts of climate change on coastal communities and infrastructure reducing pollution from phosphates, nitrates and ammonia, and eliminating environmental harm from storm overflow sewage discharges

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:

- 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

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:

- Conservation Conserving and enhancing natural beauty and wildlife.
  - Policy L1: Conserve and enhance National Parks landscapes and seascapes.
  - Policy L2: Protect and enhance dark night skies.
  - Policy L3: Protect and enhance earth heritage.
  - Policy L4: Protect and enhance natural soundscapes.
  - Policy E1: Conserve and enhance biodiversity quality, extent and connectivity at scale.
  - Policy E2: Conserve and enhance marine biodiversity
- Connection Conserving and enhancing cultural heritage and Welsh language. Promoting enjoyment and understanding of the National Park.
  - Policy H1: Conserve and enhance landscapes of historic interest, Conservation Areas, monuments, buildings of interest, and their settings.
  - Policy H2: Promote the Welsh language and local dialects, and celebrate culture and creativity related to the landscape.
  - Policy W1: Provide and promote sustainable outdoor recreation opportunities for all.

- Policy W2: Provide and promote inspiring outdoor learning and personal development experiences for all.
- Climate and natural capital Managing natural resources sustainably
  - Policy N1: Contribute to a carbon-neutral Wales.
  - Policy N2: Adapt to climate change
  - Policy N3: Conserve and enhance soils and natural carbon storage.
  - Policy N4: Conserve and enhance water quality and restore natural watercourses.
  - Policy N5: Protect air quality
- Communities Landscapes for lives and livelihoods.
  - Policy SE1: Foster socio-economic wellbeing of National Park communities (in pursuit of National Park purposes).

An annex is to be included on impact monitoring – the content of the annex has not been considered as part of this assessment, but will be considered during the next stage of the assessment after the consultation.

The Plan will be subject to further formatting, including addition of quotes from special qualities survey, other supporting information and pictures. These will be considered during the next stage of consultation, however some information on formatting and design have been provided to help ensure consultation document takes account of accessibility and inclusivity considerations.

This draft Management Plan for consultation sets out the purposes of the National Park, the action to be taken over the next five years, the partners involved and the measures of success providing an opportunity for general public, stakeholders and PCNPA staff to provide comment and shape the National Park management Plan 2025-29.

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, this plan is currently under review, and 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 1: By 2024, our promotion of the National Park as a destination will be 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. Resulting in a more diverse range of people benefiting from and experiencing its Special Qualities.

- Equality Objective 2: By 2024, we will ensure that solutions developed to address opportunities and challenges identified in the National Park Management Plan are inclusive and take account of the Plans Equality Impact Assessment.
- 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.
- 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.
- 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.

### Is it new or existing and under review?

Current management Plan is for 2020-2024. This is a review for draft replacement Management Plan for 2025-2029 What will change as a result of it and/or what changes are being proposed?

- 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.
- Management Plan seeks to address following through its four themes of partnership action:
  - Promoting ecosystem recovery at scale and improving the state of wildlife on land and in the marine environment (as a milestone to clear recovery by 2050)
  - o achieving favourable conservation status on high nature value sites
  - o maintaining and enhancing species for which Pembrokeshire is uniquely important
  - o increasing the connectivity of the landscape for wildlife
  - o supporting use of the Welsh language and Pembrokeshire dialects
  - o providing outdoor learning opportunities, in particular for children.
  - providing sustainable outdoor recreational opportunities for a full cross-section of society, and increasing the frequency of people's participation.
  - managing potential / actual recreational pressures such as those arising from unauthorised camping and congestion.
  - o reducing the significant waiting list for affordable housing in Pembrokeshire (over 5,000 in 2024)
  - o addressing the issue of high numbers of poorly paid seasonal jobs and limited employment opportunities
  - o supporting the recovery of the increasing number of people suffering (experiencing) poor mental health post-Covid 19
  - o adapting to the changing physical and well-being needs of residents and visitors
  - o maintaining and extending sustainable transport and active travel options

- halving carbon emissions within the National Park area in the lifetime of this Plan (a milestone in achieving carbonneutrality in the National Park area by 2050)
- proactively addressing the impacts of climate change on coastal communities and infrastructure reducing pollution from phosphates, nitrates and ammonia, and eliminating environmental harm from storm overflow sewage discharges

### What are its anticipated notable outcomes (positive and negative)?

## Positive:

- 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
- achieving favourable conservation status on high nature value sites
- maintaining and enhancing species for which Pembrokeshire is uniquely important
- increasing the connectivity of the landscape for wildlife
- supporting use of the Welsh language and Pembrokeshire dialects
- providing outdoor learning opportunities, in particular for children.
- providing sustainable outdoor recreational opportunities for a full cross-section of society, and increasing the frequency of people's participation.
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- halving carbon emissions within the National Park area in the lifetime of this Plan (a milestone in achieving carbon-neutrality in the National Park area by 2050)
- proactively addressing the impacts of climate change on coastal communities and infrastructure reducing pollution from phosphates, nitrates and ammonia, and eliminating environmental harm from storm overflow sewage discharges
- A range of more specific outcomes for 2030 for each theme area is set out in the plan. Number of policy areas and results within the Plan should help the Park to promote public sector equality duty, particularly in terms of supporting more people to access the outdoors and experience the Park's Special Qualities

## **Negative:**

• Challenges in terms of meeting expectations of plan within a context of increasing budget pressures and competing delivery pressures.

- 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.
- 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 identifies partnership themes that the NPA and partner organisations will look to address and could affect work they carry out across these theme areas: Conservation, Connection, Climate and natural capital, Communities.
  - 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:

### External:

- Agriculture (Wales) Act 2023
- Countryside and Rights of Way Act 2000
- Environment Act 1995
- Environment (Wales) Act 20165 including the principles of sustainable management of natural resources
- Historic Environment (Wales) Act 2023
- National Parks and Access to the Countryside Act 1949
- Planning (Wales) Act 2015
- The Well-being of Future Generations (Wales) Act 2015

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

- Equality Act 2010, including compliance with Socio Economic Duty/ The Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 (the 2011 Regulations)
- Welsh Language Act 1993
- The Welsh Language (Wales) Measure 2011
- Social Partnership and Public Procurement (Wales) Act including Socially Responsible Procurement Duty

## Policy and proposals:

- Biodiversity Deep Dive 2022 (including the 30x30 target)
- 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
- Marine Area Statement

- National Parks UK Climate Emergency Response Statement
- Natural Resources Policy 2017
- Net Zero Strategic Plan 2022
- Noise and Soundscape Plan for Wales 2023-2028
- Planning Policy Wales Edition 12, February 2024
- South-West Area Statement
- Well-being of Future Generations (Wales) Act 2015 (including the five ways of working principles)
- Well-being Plan for Pembrokeshire 2023-2028
- Welsh Government's 2018 policy statement Valued and Resilient: The Welsh Government's Priorities for the Areas of Outstanding Natural Beauty and National Parks
- Welsh National Marine Plan 2019

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

- Welsh Government development of a Just Transition Framework, consultation ended March 2024. It sets out the approach on how we can move to net zero in a fair way.
- New Curriculum for Wales
- Welsh Government's Equality related plans, including development of the Climate, Rural Affairs and Environmental section of the Anti Racist Wales Action Plan once finalised
- Welsh Government Cymraeg 2050 Strategy
- Welsh Government National Framework for social prescribing
- Welsh Government Priorities for Culture 2024 2030 Currently out for consultation
- Welsh Government's Young Person Guarantee commitment to provide everyone aged 16-24, living in Wales, with support to gain a place in education or training, help to get into work or self employment.
- Welsh Language Communities Housing Plan

## Guidance and resources:

- Future Trends Report (2021)
- LANDMAP the Welsh landscape baseline
- 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.
- State of Natural Resources Report for Wales 2020 / Bridges to the Future

- The State of Nature 2023
- Third UK Climate Change Risk Assessment: Summary for Wales

## Following have not been included in the document, however relevant assessments recommends that they are added:

• Well-being of Future Generations: Well-being of Wales report (2023) and National Indicators and Milestones for Wales

### 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. Plan currently under review (Not currently referenced in the plan but reference should be made). Long term aims in the current Plan include:
  - Create a Park that is a Landscape for Everyone, this includes following equality objectives:
    - Equality Objective 1: By 2024, our promotion of the National Park as a destination will be 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. Resulting in a more diverse range of people benefiting from and experiencing its Special Qualities.
    - Equality Objective 2: By 2024, we will ensure that solutions developed to address opportunities and challenges identified in the National Park Management Plan are inclusive and take account of the Plans Equality Impact Assessment.
  - 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.
- <u>Welsh Language Promotion Strategy 2023 2028</u> 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).
- Pembrokeshire Coast Youth Manifesto, which focuses on actions for the following:
  - Youth Empowerment
  - $\circ$  Living
  - o Learning
  - Working

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

- Pembrokeshire County Council's Strategic Equality Plan and Objectives, Welsh Language Strategy and Toilet Strategy.
- Biodiversity/ nature recovery action plans linked to Pembrokeshire Nature Partnership
- Pembrokeshire Climate Adaptation Strategy (this is however referenced in results section)

# 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.

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.

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.

amendments.	onsiderations / Inclusive document and imagery/ Suggested wording		
Communities of Interest/ Communities o	ge, Disability, Gender Reassignment. Pregnancy and Maternity, Race, Religion r Belief, Sex, Sexual Orientation, ntersectionality of Characteristics		
Evidence or Issue			
that 12 as minimum is used where possible.	ument provided. Especially within policy tables and list of partners. Recommend		
<ul> <li>Ensure formatted document uses accessible Accessibility Regulations.</li> </ul>	pdf format and that final html version is provided. Compliance with Web		
	<ul> <li>Check some of the complex terminology used – does a glossary or use of boxes need to be added as is done with easy read or can words be replaced with more accessible terminology: example use of term "transhumance".</li> </ul>		
<ul> <li>Ensure that images and feel of document is inclusive and representative, consider how we can overcome some of the criticism around limited range of people/ audiences depicted in the landscape and how people in landscape are represented.</li> <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> </ul>			
Cost for creation of Easy Read version have b	been included within plan development budget.		
Impact/ Risk	Response/ Mitigation/ Any additional actions needed		
<ul> <li>Negative if not mitigated in terms of accessibil risks around not having an inclusive documen opportunity to have positive impact through implementing amendments.</li> </ul>			

	<ul> <li>Review image selection and feel of document to ensure it is inclusive and representative, test it with staff working within inclusion for Authority.</li> <li>Consider what formats might be needed for consultation – young persons, easy read version.</li> <li>Consider what other formats might be needed for the final version such as young person version or easy read version. Explore potential to capture information from plan in different format such as video or through infographics. Noted that cost has been included for creation of Easy Read version within plan development version.</li> </ul>
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Area to Address	Area to Address Suggested Amendments for Forward/ About this Plan		
Area to Address       Suggested Amen         Protected Characteristics affected/         Communities of Interest/ Communities         of Place/ Intersectionality		<ul> <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>	
Evidence or Issue			
<ul> <li>Forwards positively captures key important areas relating to health emergency, linked to mental health challenges and poor health outcomes. It's positive that it notes how the award-winning Roots to Recovery project showcase – people working to support changes to places and receiving health benefits at the same time. However potential amendment needed in terms of:         <ul> <li>Mental health charities (MIND/ Mental Health Foundation) advice on wording suggests that use of term suffering might not always be appropriate, so consider rewording following in foreword from the "number of people are suffering with anxiety or other mental health challenges" to "number of people experiencing anxiety or other mental health challenges." Similarly in the about this plan section consider amending following from "supporting the recovery of the increasing number of people suffering poor mental health post-Covid 19" to "supporting the recovery of the increasing number of people experiencing poor mental health post-Covid 19"</li> </ul> </li> </ul>			

 Poor health outcomes can be the result of wider structural factors which can also impact on lifestyles and life choices. For example poor housing conditions/ housing insecurity, economic insecurity, lack of access to services, pre existing

<ul> <li>inequalities or discrimination. Suggest adding this in to following sentence: "and where our lifestyles and wider determinants of health (such as income, housing) are increasingly resulting in poor health outcomes."</li> <li>Forward captures impact of challenges relating to provision of jobs and housing, in terms of issues around seasonality, low pay etc. It would be worth considering referencing here the role of Just Transition Framework and supporting job opportunities linked to green recovery. Demonstrating that response to climate and nature emergency that are central to the NPMP offers new opportunities for skills and job creation. Similarly this link could be made in the About this Plan section in relation to "addressing the issue of high number of poorly paid seasonal jobs and limited employment opportunities.</li> </ul>		
Impact/ Risk	Response/ Mitigation/ Any additional actions needed	
<ul> <li>Forwards positively captures key important areas relating to health emergency, linked to mental health challenges and poor health outcomes.</li> <li>However, should consider amending wording in forward/ about this plan to address use of term "suffering", provide wider recognition of structural factors that impact on poor health outcomes, and provide link to how just transition framework / green recovery linked to responding to nature and climate</li> </ul>	<ul> <li>Recommended Amendment/ Action:</li> <li>Amend wording in forward from "number of people are suffering with anxiety or other mental health challenges" to "number of people experiencing anxiety or other mental health challenges."</li> <li>Amend wording in the about this plan section from "supporting the recovery of the increasing number of people suffering poor mental health post-Covid 19" to "supporting the recovery of the increasing number of people experiencing poor mental health post-Covid 19"</li> </ul>	
emergency provide new opportunities for skills and job creation.	<ul> <li>Suggest adding this in to following sentence: and where our lifestyles and wider determinants of health (such as income, housing) are increasingly resulting in poor health outcomes.</li> <li>Make reference to Just Transition Framework and supporting job opportunities linked to green recovery – demonstrating that response to climate emergency that are central to the NPMP offers new opportunities for skills and jobs creation.</li> </ul>	

	Referencing Pembrokeshire Coast Youth Manifesto and role NPMP and partnership working plays in helping to achieve calls for action within it	
Protected Characteristi Communities of Interes of Place/ Intersectional	ristics affected/ • Age erest/ Communities • Socio economic disadvantage	

Health and Well-being Outcomes		
Evidence or Issue		
<ul> <li>It is positive that an introduction from the Pembrokeshire Coast Next Generation has been included within the document.</li> <li>However, the document does not explicitly reference the Pembrokeshire Coast National Park Next Generation, Youth Committee – Youth Manifesto, A call for Change and priorities for actions within it on youth empowerment, living, learning and working.</li> </ul>		
Impact/ Risk	Response/ Mitigation/ Any additional actions needed	
• Positive that an introduction from the Pembrokeshire Coast Next Generation has been included within the document. However, document should be strengthened to include explicit reference to Youth Manifesto to ensure core themes identified within the Manifesto and by young people are captured and highlighted within the NPMP. Explaining how NPMP can support delivery against these actions. Many of these actions require partnership working to enable progress to be made, so it is important that this link is made.	<ul> <li>Recommended Amendment/ Action:</li> <li>Include explicit reference to PCNP National Park Next Generation Youth Manifesto and priorities for action on youth, empowerment, living, learning and working within it and role NPMP and partnership working can play in helping support delivery of this manifesto. It could be included under the introduction by Next Generation or as its own sub section similar to Local Development Plan 2.</li> </ul>	

Area to Address	ess List of Partners mentioned in this Plan	
Protected Characterist Communities of Interes of Place/ Intersectional	st/ Communities	<ul> <li>Age, Disability, Gender Reassignment. Pregnancy and Maternity, Race, Religion or Belief, Sex, 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> <li>Intersectionality of Characteristics</li> <li>Health and Well-being</li> </ul>
Evidence or Issue		
<ul> <li>From review of list are we potentially missing some groups and is there a need to mention that there will be new groups/ stakeholders we will engage with during the plan period.</li> </ul>		

- It would be beneficial to provide greater visibility to wider range of groups, who potentially we have previously had less of relationship with, but inclusion staff have been involved in making connections with more recently: Pembrokeshire Pride, We Move (Span Art project).
- Pembrokeshire YFC are not listed, this is an important group for us to work with in terms of engagement around conservation and sustainable farming. Young Farmers Club (YFC) is a rural youth organisation, for anyone aged between 10 and 28 years old. Pembrokeshire YFC have a dozen clubs spread over the county from Eglwyswrw in the north right down to South Pembs. It is important that we look at how we can engage with this group through our next generation activities, potentially working with our Farming Conservation Officer.
- Faith Groups haven't been mentioned and should be included as Authority is engaged with churches in terms of conservation activities, activities linked to pilgrimage routes and there are opportunities to work with faith groups to help increase access to the outdoors for example engagement with Haverfordwest Mosque and groups such as Muslim Hikers. It would also be worth mentioning EYST in the list of organisations, they work across Wales but are currently working in partnership with Haverfordwest Mosque funded by Pembrokeshire Youth Service on <u>Pembrokeshire Youth Project (PYP)</u> with the aim to build relationships and trust with diverse ethnic minority communities in Pembrokeshire and, eventually, further connect and amplify youth work for and within ethnic minority communities in the region.

٠	Some of the partnerships mentioned need to be checked as projects have now ended: Let's Walk Pembrokeshire
	Partnership, West Wales Walking for Well-being. It would be beneficial to check with Health and Well-being Officer to check
	that we have relevant health partners listed, in terms of work with GPs and health referrals.

Impact/ Risk	Response/ Mitigation/ Any additional actions needed
<ul> <li>Range of partners listed does include those who can assist with breaking down barriers to Park and supporting people to access health benefits of the Park. It also includes key stakeholders who can work collaboratively to address key challenges linked to water quality, affordable housing and transport.</li> <li>However, review of list shows that we are potentially missing some groups and that it would be beneficial to provide greater visibility to wider range of groups.</li> </ul>	<ul> <li>Recommended Amendment/ Action:</li> <li>Include note that during plan period new partners are likely to be identified to support delivery of the plan.</li> <li>Include following in plan (and review partners listed in results tables and amend where needed to include following):         <ul> <li>Add to Community and Support Groups in the brackets – Pembrokeshire Pride, Span Arts - We Move</li> <li>Pembrokeshire Young Farmers Club</li> <li>Add EYST (Ethnic Minorities and Youth Support Team Wales)</li> <li>Review supported walking projects listed with Health and Well-being Officer to ensure they are up to date and to identify</li> </ul> </li> </ul>

	if any additional health partners need to be listed in terms of GPs/ health referrals.
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Area to Address Gaps within legis	lation and policy guidance referenced in terms of Equality and Health relevant to Plan
Protected Characteristics affected/ Communities of Interest/ Communities of Place/ Intersectionality	<ul> <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**

• Review of listed legislation and policy areas revealed gaps in reference to relevant areas linked to equality, socio economic duty and health outcomes.

- Reference should be made to:
  - Equality Act 2010, including compliance with Socio Economic Duty
  - Social Partnership and Public Procurement (Wales) Act 2023 including Socially Responsible Procurement Duty: This is particularly important in terms of references later under Communities on support is in place for sustainable local supply chains.
  - Welsh Government development of a Just Transition Framework, consultation ended March 2024. It sets out the approach on how we can move to net zero in a fair way.
  - New Curriculum for Wales
    - Welsh Government's Equality related plans, including development of the Climate, Rural Affairs and Environmental section of the Anti Racist Wales Action Plan once finalised
    - Welsh Government Cymraeg 2050 Strategy
    - Welsh Government National Framework for social prescribing
    - Welsh Government Priorities for Culture 2024 2030 Currently out for consultation
    - Well-being of Future Generations: Well-being of Wales report (2023) and National Indicators and Milestones for Wales
- Reference should be made to the Authority's Equality Plan and Objectives (currently under review), Authority's Well-being Objectives and Authority's Welsh Language Promotion Strategy.

<ul> <li>Reference should be made to Pembrokeshire County Cou and toilet strategy.</li> </ul>	uncil strategic equality plan and objectives, Welsh Language Strategy
Impact/ Risk	Response/ Mitigation/ Any additional actions needed
<ul> <li>Wider policy and legislative framework linked to equality, socio economic duty and health outcomes are not fully highlighted in the policy document.</li> </ul>	<ul> <li>Recommended Amendment/ Action:</li> <li>Include reference to the following within the policy/ legislation section: <ul> <li>Equality Act 2010, including compliance with Socio Economic Duty</li> <li>Social Partnership and Public Procurement (Wales) Act 2023 – including Socially Responsible Procurement Duty</li> <li>Welsh Government development of a Just Transition Framework, consultation ended March 2024. It sets out the approach on how we can move to net zero in a fair way.</li> <li>New Curriculum for Wales</li> <li>Welsh Government's Equality related plans, including development of the Climate, Rural Affairs and Environmental section of the Anti Racist Wales Action Plan once finalised</li> <li>Welsh Government Priorities for Culture 2024 -2030 – Currently out for consultation</li> <li>Welsh Government Priorities for Culture 2024 -2030 – Currently out for consultation</li> <li>Well-being of Future Generations: Well-being of Wales report (2023) and National Indicators and Milestones for Wales</li> <li>Reference should be made to the Authority's Equality Plan and Objectives (currently under review), Authority's Well-being Objectives and Authority's Welsh Language Promotion Strategy.</li> </ul> </li> <li>Reference should be made to Pembrokeshire County Council's strategic equality plan and objectives, Welsh Language strategy and toilet strategy.</li> </ul>

	Visitors: Widening Access/ Experiencing and Benefiting from Special the Park/ Welcoming Park for All
Protected Characteristics affected/	Age, Disability, Sex, Pregnancy and Maternity, Gender Reassignment,
Communities of Interest/ Communities of	Race, Religion or Belief, Sexual Orientation
Place/ Intersectionality	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

#### Evidence or Issue

• Comments made as part of the PCNPA commissioned Experiences for all Research

""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".

## • Comments made in relation to Beach Wheelchair Service 2021:

- "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"
- "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"
- "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!"

## • PCNPA Beach Wheelchairs/ Mobility Equipment Service:

- 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.
- **Projects:** The Pembrokeshire Coast National Park Authority and Visit Pembrokeshire are working together to develop a world-leading inclusive tourism offer in Pembrokeshire. The Open to All project is working with business and organisations to make Pembrokeshire the first choice for residents and visitors who face barriers to travel and tourism. PCNPA is also 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.

•	•	different groups and welcoming/ inclusive environment
	me responses to Special Qualities consultation	
	os/ Q3: "Accessibility - terrain, slope, public tra	
		beaches , e.g. Newgale, as it's very difficult for anyone with
	get across high pebble defences." Q4: "Improv	
		nal park more accessible for people with a disabillity."
	P/ Q4: "Improving accessibility using public tra	
	P/ Q2: "Its friendly and welcoming environmen	
	P/ Q1: "An accessible place to walk in all weat	
	•	cribing etc to encourage more beneficial understanding,
		utside the Park, particularly young people living elsewhere,
		courage hope and drive actions to stop the harm of our
interdependent fut		
	IP/ Q3: "How do we share this lovely place with	
	IP / Q3: "maintaining access for all and the foo	
		t business owners, attracting less tourism to the area,
		lisabled people from using a resource that should be
		, improve the system for beach parking and enforce safety,
-	s to continue as before whilst managing the sa	
		ws in terms of how site could be made more accessible and
		to barriers and developing appropriate solutions. It also
0 0 0	1 0	reational management decisions. Some of the response
	nder the question what would make Traeth Ma	
		Sample of Quotes
General layout	<ul> <li>less gravel surfaces.</li> </ul>	"Proper Wheelchair access from the Iron bridge to
	<ul> <li>improved information boards</li> </ul>	the beach and carpark. Ensure appropriate suitable
	<ul> <li>better toilers / toilet facilities/ changes</li> </ul>	wheelchairs and suitable on site hoist. Proper
	places	changing room facilities shower and changing
	<ul> <li>changing facilities</li> </ul>	disabled bench."
	<ul> <li>better steps</li> </ul>	"Proper accessible access, proper safe wheelchairs
	<ul> <li>ramp incline to beach,</li> </ul>	with five point harness plus recliner option with
	picnic benches	proper footplates with straps. Changing facilities

	<ul> <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> <li>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</li> </ul>
Transport	<ul><li>Cycle routes &amp; cycle racks</li><li>Public transport and buses</li><li>Footpath</li></ul>	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
Car park	<ul> <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>	get your breath back without getting in the way of other people using the slope. I don't think I'd
Drop off access.	<ul> <li>Requests have been made in relation to beach drop offs for horses and boats.</li> </ul>	
Outdoor mobility equipment	Issues raised regarding awareness off the equipment, type and access all year.	the door). Changing rooms to prevent people changing in toilets and getting everything wet and being in there a long Time. New seating is great,
Dogs access	<ul> <li>Dog behaviour management and cleanliness is a repeating issue.</li> </ul>	allows me to take in the view even on a bad day, however, there are not enough to accommodate
Cleanliness	<ul> <li>Sewage, pollution and litter</li> <li>Dog mess</li> </ul>	<ul> <li>need."</li> <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>

(Source: <u>DEFRA - Landscapes Review - Final Report 2019 (publishing.service.gov.uk)</u>) 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.
- o 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]
- 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:
  - <u>Changing Landscapes Actioning Change, Backbone CIC's Symposium</u> (2021)
  - o 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: <u>outside-voices-report.pdf</u> (<u>vha.org.uk</u>)

- o 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)
- o Who has a public rights of way, Ramblers
- Surfing for Diversity, Waves Wahines CIC (2022)
- <u>Adapt my Beach Report, How to create manage, sustain and improve inclusive beach</u>, Mae Murray Foundation (2023) Muslim Hikers – <u>Muslim Hikers x Wales Cost Path Partnership</u>, <u>What are 'Proper Walkers' (BBC News)</u>, <u>Mount</u> <u>Snowdon inaugural trek</u>, <u>The Countryside Code</u>,
- o Dementia-Friendly environment checklist, Alzheimer's Society
- o Pembrokeshire Coastal Forum commissioned Ethnic Diversity Toolkit
- Hate Crime Figures for Dyfed Powys 2022/23
   (Source: <u>https://assets.publishing.service.gov.uk/media/65425d08d36c910012935bad/hate-crime-england-and-wales-2022-to-2023-data-tables-second-edition.ods</u>) Dyfed Powys Police Force Area Hate Crimes Reported 2022/23

	<u>2023-0</u>	lata-tables-seco	<u>na-edition.oas</u> ) -	Dyfed Powys Pol	Ice Force Area –	Hate Crimes Rep	orted 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
I	mpact/ R	lisk			Response/ Mi	tigation/ Any add	ditional actions	needed
-	<ul> <li>There terms of Park a become Everyor experies addition and feed comports that fact howev</li> </ul>	are awareness, of tourism and re- nd a need to pro- le an inclusive P one. Some people encing socio eco nal barriers to a eling welcome wounded by interse ed projects and s to the Park in s ce potential barri er there is a nee	mote and support ark that is a Land from protected momic disadvants ccessing opportu- ithin the Park (this ectionality consid schemes can hel hort term and lon iers to engaging vertices of to ensure the lo	tunities within the rt the Park to Iscape for groups or age face nities in the Park is can be erations). p increase og term for those with the Park, ong term legacy	<ul> <li>Recommender</li> <li>List of partrimight need Address: Li</li> <li>The Special enhanced to Park that miclude that include the requirer</li> <li>State of the faced by et</li> </ul>	Amendment/ A ners should be rev to involve is capt ist of Partners me al Qualities section to include reference to include reference eet different need Pembrokeshire Ri es references to the ments of those with Park section cou hnic minority/ man not current recogn	Action: viewed to ensure ured (see previou ntioned in this Pla o on Rights of Wa ce to pathways av ds. This should be ghts of Way Impro- ne ability of the ne th disabilities. Ild be enhanced t rginalised groups	depth of who we is Area to an) y could be vailable in the e seen in the ovement Plan etwork to serve o include barriers and some faith
	of thes	e projects (learn	ing from some of		barriers to	not current recogn participation inclue t could benefit from	de time, disability	, health issues

for National Park Authorities involved and issue that projects tend to be time bound and reliant on securing project funding).

- 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.)
- Issue of lack of diversity in PCNPA workforce and wider outdoor/ environmental workforce can create additional barriers, particularly for diversity in terms of ethnicity.
- 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.
- 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

included in terms of some of the statements made within the Recreation and discovery section.

• The Conservation theme for partnership action makes no reference to role of people in delivering nature recovery and within this engaging wider range of people in support of nature recovery activities. Lack of representation within environment sector for some groups and barriers to participation are highlighted within range of reports relating to the sector. It would be beneficial to have an outcome for 2030 and policy around: "A wide range of people are supported to participate in taking action for nature." With result framed around development of nature recovery projects which also help increase range of people able to participate in these activities

### Partnership Framework:

Use stakeholder analysis work of Engagement and Inclusion Team linked to experiences for all work and wider work of strategic advisor to review partners we are engaging with to ensure depth across protected groups and support/ community/ grassroots organisations in terms of who we might need to involve in this area.

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 Countryside Code.

- Following within the plan should support addressing above, however list of partners should be reviewed to ensure depth of who we might need to involve is captured, currently focus is of those listed is disability and young people (see previous Area to Address: List of Partners mentioned in this Plan):
  - Key outcomes for 2030: provide sustainable outdoor recreational opportunities for a full crosssection of society, and increase the frequency of people's participation.
  - W1/A Barriers to outdoor recreation and wellbeing opportunities are removed, and opportunities promoted to more diverse audiences, e.g. children and young families from deprived areas.
  - W1/B An Accessible Coast strategy, offering good access for people with specific needs, is delivered.
     E.g. access for wheelchair users, changing places and toilets at key locations.
  - 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.
  - W1/E The Rights of Way Improvement Plan 2018-2028 is delivered.

<ul> <li>Special Qualities: Although includes reference under</li> </ul>
recreational opportunities in terms of "Recreation and
discovery are enhanced by a broad and inclusive range
of outdoor activities, making Pembrokeshire Coast a top
destination for people seeking relaxation, exploration, or
adventure." The Special Qualities section on Rights of
Way could be enhanced to include reference to pathways
available in the Park that meet different needs. This
should be seen in the context of Pembrokeshire Rights of
Way Improvement Plan that includes references to the
ability of the network to serve the requirements of those
with disabilities.
• State of the Park section could be enhanced to include
barriers faced by ethnic minority/ marginalised groups
and some faith groups, as not current recognised within:
"Across Wales, barriers to participation include time,
disability, health issues and age." It could benefit from
references to source data being included in terms of
some of the statements made within the Recreation and
discovery section.
Positively wider reference is made under Socio
Economic Well-being to "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. Operators can support accessibility and inclusion by working to consider the needs of visitors who
may have additional needs. Broadening access to the
National Park can take many forms, from providing
access for people with disabilities to providing sensory-
friendly activities and events."
• The Conservation theme for partnership action makes no
reference to role of people in delivering nature recovery
and within this engaging wider range of people in support

of nature recovery activities. Lack of representation	
within environment sector for some groups and barriers	
to participation are highlighted within range of reports	
relating to the sector. It would be beneficial to have an	
0	
outcome for 2030 and policy around: "A wide range of	
people are supported to participate in taking action for	
nature." With result framed around development of	
nature recovery projects which also help increase range	
of people able to participate in these activities (example	
of this in practice include Pathways project securing	
funding to support INNS work, Natur am Byth project	
which outcomes include <i>"inspired people in Wales from</i>	
all walks of life to take action and mobilised diverse	
communities to care for the wildlife on their doorstep",	
exploring skills development opportunities/ pathways to	
employment for underrepresented groups in terms of	
nature recovery.)	

Area to Address Access to toilet	s and changing places facilities
Protected Characteristics affected/ Communities of Interest/ Communities	Age, Disability, Gender Reassignment. Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation
of Place/ Intersectionality	<ul> <li>Carers</li> <li>Socio economic disadvantage</li> <li>Intersectionality of Characteristics</li> <li>Health and Well-being Outcomes</li> </ul>
Evidence or Issue	

• NPMP Special Qualities Consultation - Issue of access to toilets, highlighted within some responses to Special Qualities consultation:

- 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: Issue of Toilets and access came up within Traeth Mawr survey:
  - o 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 PEMBROKESHITE 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."
- Map of Public Toilets in Pembrokeshire: <u>https://www.pembrokeshire.gov.uk/map-data/public-toilets-map</u>
- Changing Place Toilets in Pembrokeshire: Tenby The Green Car Park/ Whitesands Beach Car Park (Source: <u>https://www.pembrokeshire.gov.uk/public-conveniences-changing-facilities</u>)
- Changing Places Toilets Why Changing Places toilets are important (Source: <a href="https://www.changing-places.org/pages/view/why-are-changing-places-toilets-important">https://www.changing-places.org/pages/view/why-are-changing-places-toilets-important</a>) "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."</a>
- Changing Places are also highlighted within Alzheimer Society <u>Dementia-Friendly Environment Checklist</u>.
- The Provision of Toilets in Wales: Local Toilets Strategies, Statutory Guidance, Welsh Government (2018) Information on Population need

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

- 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.
- Pembrokeshire County Council Cabinet Report on Public Toilet Funding
- <u>PCNPA NPA Report PCNPA facilities voluntary payment to PCC regarding public toilets update on joint working</u>

- 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.
- The following specific projects are the current focus of Officer work:
  - A specific project at Traeth Mawr / Newport Sands which was approved in principle by the National Park Authority in its March 20th meeting. This project includes the wider development of Traeth Mawr / Newport Sands as an Accessible location using capital grant funding to provide new toilets and a changing places facility alongside a new accessible ramp to the beach, car parking and wheelchair provision as well as environmental and biodiversityimprovements. A drainage study will potentially identify options for improved foul water disposal/treatment which it is anticipated will reduce the running costs of the facility. As part of this scheme PCC officers have helped with the design and specification of a new toilet block and inputted into consideration of options including using solar pv on the roof and including charging for their use.
  - PCNPA officers have tendered on Sell 2 Wales for a Coastal Car Park Study using grant funding available to the National Park. This study seeks to identify how pay and display car park locations can provide accessible gateways to the National Park. This study will identify opportunities to enhance inclusivity and accessibility including analysis of potential delivery of improved toilet facilities' and changing places. It is anticipated that the outcomes of this study will provide a clear evidence base to support further grant funding applications for other sites in the National Park.
- PCNPA supported walking projects have used portable toilets in the past to help support access.
- 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 nonbinary 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

volunteering session. For young Muslim women, the need for clean spaces to complete ablution at to a site that lacks adequate facilities as they wou "It's difficult with things like wudu [ablution] if ther around the limitations of the space." For women a being able to use facilities without worrying about organisation that genuinely aims to engage with t will therefore inherently exclude women and non-	
Impact/ Risk	Response/ Mitigation/ Any additional actions needed
<ul> <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 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.</li> <li>Following within the plan should support addressing above:         <ul> <li>W1/A Barriers to outdoor recreation and wellbeing opportunities are removed, and opportunities promoted to more diverse audiences, e.g. children and young families from deprived areas.</li> <li>W1/B An Accessible Coast strategy, offering good access for people with specific needs, is</li> </ul> </li> </ul>	<ul> <li>Recommended Amendment/ Action:</li> <li>Due to financial pressures on provision of toilets it would be beneficial for this challenge to be captured. Consider making reference to current situation relating to toilets in Where are we now? Section under either recreation and discovery or socio-economic well-being.</li> <li>Partnership Framework Monitoring:</li> <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>

Due to financial pressures on provision of toilets it would be beneficial for this challenge to be captured. Consider making reference to current situation relating to toilets in Where are we now? Section under either recreation and discovery or socio-economic well-
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Area to Address Health and Well-being - Access to the Outdoors / Connecting with Nature	
Protected Characteristics affected/	Age, Disability, Gender Reassignment. Pregnancy and Maternity, Race, Religion
<b>Communities of Interest/ Communities</b>	or Belief, Sex, Sexual Orientation
of Place/Intersectionality	Carers
	Socio economic disadvantage
	<ul> <li>Areas of deprivation within Pembrokeshire / those experiencing socio economic disadvantage potentially hidden in rural dispersed communities</li> </ul>
	Intersectionality of Characteristics
	Health and Well-being Outcomes
Evidence or Issue	
SoNaRR 2020, NRW - Role of Healthy Ecosystems and Access to Green and Blue Spaces, <u>NRW</u> (Source: https://patural.rosources.wales/ouidenee.and.data/rosoarch.and.reports/state.of.patural.rosources.report.conart.for	

(Source: <u>https://naturalresources.wales/evidence-and-data/research-and-reports/state-of-natural-resources-report-sonarr-for-wales-2020/?lang=en</u>)

- 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 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. Socioeconomic 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: <a href="https://gov.wales/sites/default/files/statistics-and-research/2021-11/review-of-evidence-on-socio-economic-disadvantage-and-inequalities-of-outcome-revised.pdf">https://gov.wales/sites/default/files/statistics-and-research/2021-11/review-of-evidence-on-socio-economic-disadvantage-and-inequalities-of-outcome-revised.pdf</a>) 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;
  - o 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: <u>https://mgenglish.pembrokeshire.gov.uk/mgConvert2PDF.aspx?ID=73946</u>) 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: <u>https://www.pembrokeshire.gov.uk/public-services-board/well-being-assessment</u>) found that:
  - o 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.
  - $\circ$  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: <u>https://www.gov.wales/national-survey-wales-headline-results-april-2022-march-2023-html#126294</u>)
  - 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
- o Be physically active
- o Learn new skills
- o Give to others
- o 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 <u>Gypsy and</u> <u>Travellers – Travelling to better health</u>.
- Welsh Government National Framework for Social prescribing (2024) (Source: <u>https://www.gov.wales/national-framework-social-prescribing-html#135357</u>)
- 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: <a href="https://www.wildlondon.org.uk/news/seeding-change-report">https://www.wildlondon.org.uk/news/seeding-change-report</a> )

- **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: <a href="https://theearlyyearsnetwork.co.uk/knowledge-hub/embracing-nature-the-benefits-of-outdoor-learning">https://theearlyyearsnetwork.co.uk/knowledge-hub/embracing-nature-the-benefits-of-outdoor-learning</a> )
  - 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.

Impact/ Risk	Response/ Mitigation/ Any additional actions needed
<ul> <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</li> </ul>	<ul> <li>Recommended Amendment/ Action:</li> <li>Consider adding well-being to Policy W2: Provide and promote inspiring outdoor learning, well-being and personal development experiences for all.</li> <li>The Conservation theme for partnership action makes no</li> </ul>

	them to remove these barriers. Tailored projects can assist in this area and the National Park due to its	participate in these activities. Projects designed to support Nature
		recovery are well suited to incorporating the 5 steps to mental well-being.
	Special Qualities is especially suited for the	weil-beilig.
	development of projects that support the 5 steps to	
	mental well-being.	
•	Following within the plan should support action in this	
	area:	
	<ul> <li>Key outcomes 2030: provide outdoor learning</li> </ul>	
	opportunities, in particular for children. provide	
	sustainable outdoor recreational opportunities for	
	a full cross-section of society, and increase the	
	frequency of people's participation.	
	<ul> <li>Policy W1: Provide and promote sustainable</li> </ul>	
	outdoor recreation opportunities for all. Results:	
	W1/A Barriers to outdoor recreation and wall being a structure in the structure of the s	
	wellbeing opportunities are removed, and	
	opportunities promoted to more diverse	
	audiences, e.g. children and young families	
	from deprived areas.	
	W1/B An Accessible Coast strategy, offering good access for people with appeific people in	
	good access for people with specific needs, is	
	delivered. E.g. access for wheelchair users,	
	<ul> <li>changing places and toilets at key locations.</li> <li>W1/D The Pembrokeshire Coast Path National</li> </ul>	
	Trail, part of the Wales Coast Path, provides a	
	diversity of experiences, and is promoted to	
	new audiences.	
	W1/E The Rights of Way Improvement Plan 2018-2028 is delivered.	
	W1/F Water quality at designated bathing waters achieving loss than "Excellent" status is	
	waters achieving less than "Excellent" status is	
	improved.	

0	Policy W2: Provide and promote inspiring outdoor	
	learning and personal development experiences for all. Results:	
	<ul> <li>W2/A Active outdoor, environmental, heritage</li> </ul>	
	and arts-based recreation and learning is	
	delivered to young people and families.	
	W2/B Nature-based health services are	
	delivered, e.g. walking programmes, mental	
	health initiatives, and supporting people living	
	with dementia.	
	W2/C Offer volunteering / citizen science and	
	formal training opportunities.	
	onsider adding well-being to Policy W2: Provide and	
	omote inspiring outdoor learning, well-being and	
	ersonal development experiences for all.	
	ne Conservation theme for partnership action	
	akes no reference to role of people in delivering	
	ature recovery and within this engaging wider range	
	people in support of nature recovery activities.	
	olunteering and having opportunity to support	
	ature recovery can have positive impact on people's	
	ell-being. It would be beneficial to have an outcome r 2030 and policy around: "A wide range of people	
	e supported to participate in taking action for	
	ature." With result framed around development of	
	ature recovery projects which also help increase	
	nge of people able to participate in these activities	
	xample of this in practice include Pathways project	
```	ecuring funding to support INNS work, Natur am	
	th project which outcomes include "inspired people	
	Wales from all walks of life to take action and	
	obilised diverse communities to care for the wildlife	
or	n their doorstep", exploring skills development	

opportunities/ pathways to employment for underrepresented groups in terms of nature	
recovery.) Projects designed to support Nature	
recovery are well suited to incorporating the 5 steps	
to mental well-being.	

Area to Address Public Health - Tranquillity	Public Health – Water Quality / Pollution and Other Health Risks/ Recreational Disturbance to Tranguillity		
Protected Characteristics affected/	Age, Disability		
<b>Communities of Interest/ Communities</b>	Socio economic disadvantage		
of Place/ Intersectionality	<ul> <li>Areas of deprivation within Pembrokeshire / those experiencing socio economic disadvantage potentially hidden in rural dispersed communities</li> <li>Intersectionality of Characteristics</li> </ul>		
	Health and Well-being Outcomes		
Evidence or Issue			

 SoNaRR 2020, NRW - Role of Healthy Ecosystems and Access to Green and Blue Spaces, <u>NRW</u> (Source: <u>https://naturalresources.wales/evidence-and-data/research-and-reports/state-of-natural-resources-report-sonarr-for-wales-2020/?lang=en</u>)

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.

## Water Quality

- **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."
- o 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."
- o 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 slurrying."
- 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."
- o 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."
- o 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 fisherpeople." "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: <u>https://www.bbc.co.uk/news/uk-wales-66709904</u>

## **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."
- o 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."
- o 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."
- o 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: <u>https://www.nationalwatersafety.org.uk/wales/news/posts/2024/may/press-release</u>)
  - 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	e and quiet that can be found in the Park highlighted in
responses, alongside fears of losing this found within some respo	
tourism as one of the areas having a negative impact in particular	
Impact/ Risk	Response/ Mitigation/ Any additional actions needed
Real risk and perceived risk relating to water quality and sewage	
pollution that can impact on people taking up opportunities in the	<ul> <li>Where are we now section? on Bathing Water</li> </ul>
Park, especially relating to access to blue spaces. CSOs can	Quality should be enhanced to contain information
introduce harmful bacteria into recreational waters resulting in	and overview of impact of Sewer Storm Overflows
public health risks for recreational users and providers.	and discharge and potential impact in terms of risks
Data on water quality is highlighted within Where are we now	for public health and access to enjoying blue spaces.
section? Including status of water bodies in national park and	Due to the significant concern around storm overflow
bathing water. Section on Bathing Water Quality notes: "Natural	sewage discharges for recreational users of the Park
Resources Wales assesses bathing water quality at 29 locations	and within survey responses, consideration should
around the National Park coast between May and September ea	ch be made as to whether outcome under climate on
year. The results are then used to project an annual rating /	eliminate environmental harm from storm overflow
classification, based primarily on the concentrations of faecal	sewage discharges should also be included under
coliforms present in the water. In 2022 all of the bathing water	Connection and result "N4/B Environmental harm
locations assessed in the National Park were classified as "Good	
or "Excellent" (2 or 3 stars)." This section should be enhanced to	
contain information and overview of impact of Sewer Storm	the Drainage and Wastewater Management Plan for
Overflows and discharge and potential impact in terms of risks fo	
public health and access to enjoying blue spaces	section. As potentially importance of this work for
(https://corporate.dwrcymru.com/en/community/environment/stor	
overflow-map / https://www.sas.org.uk/water-quality/sewage-	through it being within the Climate and natural capital
pollution-alerts/).	section
<ul> <li>To address issue plan does identify key outcome relating to 2030</li> </ul>	
tied to water pollution and quality, including bathing waters and keep	
areas that impact on them and associated results under policy	nature of the Park and role of recreation in blue
areas expected with list of partners to be involved (s:	spaces within the Park an additional result should be
<ul> <li>Conservation: reduce pollution from phosphates, nitrates</li> </ul>	considered under: Policy W1: Provide and promote
and ammonia.	sustainable outdoor recreation opportunities for all,

•	<ul> <li>E2/C The Milford Haven Waterway meets water quality standards and its environmental state is improved</li> <li>Connection: improve water quality at designated bathing beaches.</li> <li>W1/F Water quality at designated bathing waters achieving less than "Excellent" status is improved.</li> <li>Climate and natural capital: improve water quality at designated bathing beaches and eliminate environmental harm from storm overflow sewage discharges Policy N4: Conserve and enhance water quality and restore natural watercourses.</li> <li>N4/A The quality of water bodies in the National Park classed as poor or moderate are improved, within the context of the Western Wales River Basin Management Plan 2021 – 2027.</li> <li>N4/B Environmental harm from storm overflow sewage discharges is eliminated, including working within the framework of the Drainage and Wastewater Management Plan for Cleddau and Pembrokeshire Rivers.</li> <li>Due to the significant concern around storm overflow sewage discharges for recreational users of the Park and within survey responses, consideration should be made as to whether outcome under climate on eliminate environmental harm from storm overflow sewage discharges should also be included under Connection and result "N4/B Environmental harm from storm overflow sewage discharges is eliminated, including working within the framework of the Drainage and Wastewater Management Plan for Cleddau and Pembrokeshire Rivers.</li> </ul>	<ul> <li>linked to promotion of Respect the Water campaign and other Water safety initiatives.</li> <li>Partnership Framework: <ul> <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> <li>Consultation on special qualities demonstrated strong community/ public feeling on this topic, with potential to develop citizen science level monitoring opportunities (this could build on approaches used for SWEPT project).</li> </ul> </li> </ul>
	the Park is lost through it being within the Climate and natural	
	capital section.	
•	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.	
	<ul> <li>Activities that help support and protect healthy ecosystems</li> </ul>	
	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	
	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.	
	<ul> <li>There are concerns around impact of litter and dog waste and</li> </ul>	
	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.	
	<ul> <li>Water safety is area of concern in particular as number of drowning</li> </ul>	
	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. Pembrokeshire Water Safety	
L	compared with 22 the previous year. I emprokeshile Water Salety	

for all, linked to promotion of <u>Respect the Water campaign</u> and other Water safety initiatives.
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Area to Address Affordable Housing, Accessible Housing and Access to Sites /Local Lettings Policy – preventing risk of discrimination when applied					
Protected Characteristics affected/ Communities <ul> <li>Age, Disability, Pregnancy and Maternity, Race</li> <li>Age, Disability, Pregnancy and Maternity, Race</li> </ul>					
of Interest/ Communities of Place/ Intersectionality	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				

Evidence or Issue

• UK Poverty 2022, JRF (Source: <u>https://www.jrf.org.uk/file/58886/download?token=XLbzxN7W&filetype=full-report</u>). Notes on housing and poverty:

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.

- Local child poverty indicators 2021/22 estimates of rates after housing costs, End Child Poverty Coalition/ Centre for Research in Social Policy at Loughborough University (Source: <u>https://endchildpoverty.org.uk/child-poverty/?\_gl=1\*1dfenjx\*\_ga\*MTk0MTA0Mjk4Mi4xNzE3MTUw0DMy\*\_ga\_556ES1G6G9\*MTcxNzE1MDgzMi4xLjAuMTcxNz E1MDgzMi4wLjAuMA.. / <u>https://endchildpoverty.org.uk/wp-content/uploads/2023/06/Child-Poverty-AHC-estimates-2015-</u>2022\_final.xlsx )
  </u>
  - 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.

	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%	

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.

https://www.gov.uk/government/collections/children-in-low-income-families-local-area-statistics

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)

This shows many children are in households with incomes net of housing costs that are below 60% of the median.

Estimates are provided for local authorities and parliamentary constituencies for each of eight years from 2014/15 to 2021/22

Note that the statistics are calibrated to the regional Households Below Average Income (HBAI) statistics (two-year averages).

Due to sampling issues during 2021/22 related to the Covid-19 pandemic, additional caution may be required in interpreting these statistics.

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.

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.

- Implementing the Socio-economic Duty, A review of evidence on Socio-economic Disadvantage and inequalities of outcome, Welsh Government (Source: <a href="https://gov.wales/sites/default/files/statistics-and-research/2021-10/review-ofevidence-on-socio-economic-disadvantage-and-inequalities-of-outcome\_0.pdf">https://gov.wales/sites/default/files/statistics-and-research/2021-10/review-ofevidence-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:
  - Living in inadequate housing affects mental and physical health;
  - People experiencing socio-economic disadvantage are more likely to live in overcrowded conditions and have higher chance of experiencing homelessness and rough sleeping;
  - o It is difficult to own a home for some, especially lower-paid workers;
  - o Deprived areas tend to have lower levels of access to green space;
  - Some households in Wales are still experiencing fuel poverty (where they do not have adequate heating or hot water);
  - Those from Black, Asian and Minority Ethnic communities are more likely to live in rented accommodation and;
  - o Rented accommodation generally of poorer quality
- **Pembrokeshire Well-being Assessment** (Source: <u>https://www.pembrokeshire.gov.uk/public-services-board/well-being-assessment</u>). 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: <u>https://mgenglish.pembrokeshire.gov.uk/mgConvert2PDF.aspx?ID=73946</u>) 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."
  - o ID 28/ Live in PCNP/ Q3: "Lack of work, money for services, lack of affordable housing". Q3: "Money and jobs"
  - $\circ~$  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: <a href="https://www.pembrokeshirecoast.wales/wp-content/uploads/2023/03/08\_23-Planning-Policy-Changes-re-Second-Homes-abd-Short-term-lets.pdf">https://www.pembrokeshirecoast.wales/wpcontent/uploads/2023/03/08\_23-Planning-Policy-Changes-re-Second-Homes-abd-Short-term-lets.pdf</a>) - PCC 2nd home council tax and business rate holiday home percentage by LDP 2 Centre boundary

Centre	% of Residential Properties that are second homes or business rated holiday homes in National Park				
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 Bounda	ary shown on Proposal Map

Rural Centres (lying partly in the	% of Residential Properties that are	% of Residential Properties that are
Council's planning jurisdiction)	second homes or business rated	second homes or business rated
	holiday homes in the National Park	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	<ul> <li>(no Centre boundary)</li> </ul>	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)

- 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 Homes31 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 <u>Welsh Language promotion strategy</u> 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: <u>https://www.gov.wales/sites/default/files/publications/2019-03/allocation-of-accommodation-and-homelessness-guidance-for-local-authorities.pdf</u>)

### • 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 s167(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: <u>https://www.gov.wales/welsh-language-communities-housing-plan-html</u>)
  - 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

	<ul> <li>every young person will want to stay locally, but we need to ensu opportunities to return are also available for those who have left f</li> <li>The co-operative and community-led housing model can help cor authorities to work together to develop solutions for their community with the specific needs of the community and more importantly th community-led housing model can create new housing developm properties within the current housing stock—particularly empty pr already provide support for community-led housing groups throug delivered by Cwmpas, and we are committed to supporting co-operative.</li> </ul>	for university or to gain job experience. mmunities, registered social landlords and local inities. These models can create affordable homes in line ley are owned by the community. The co-operative and inents as well as a means to purchase and develop roperties or housing for which there is little demand. We gh the Communities Creating Homes programme,
	land trusts as set out in our Programme for Government.	
Imp	pact/ Risk	Response/ Mitigation/ Any additional actions needed
•	The provision of affordable housing exception sites must be	Recommended Amendment/ Action:
	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	<ul> <li>Where reference is made to local lettings policies in: "SE1/A Appropriate homes for local communities are delivered through the planning system and joint</li> </ul>
	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	working, and local lettings policies applied." It is recommended that it is amended to: "SE1/A Appropriate homes for local communities are delivered through the planning system and joint working. Local lettings policies applied on rural exceptions sites where appropriate and where
	housing provided on exception sites should meet the needs of local people in perpetuity.	evidence demonstrates they support delivery against desired outcomes."
•	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."	<ul> <li>Partnership Framework</li> <li>Authority and relevant partners should carry out equality impact assessment prior to introductions of any local lettings policy with cumulative considerations taken into account if a large number of local letting policies are implemented.</li> </ul>
•	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	

<ul> <li>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> <li>Where reference is made to local lettings policies in: "SE1/A Appropriate homes for local communities are delivered through the planning system and joint working, and local lettings policies applied." It is recommended that it is amended to: "SE1/A Appropriate homes for local communities are delivered through the planning system and joint working. Local lettings policies applied on rural exceptions sites where appropriate and where evidence demonstrates they support delivery against desired outcomes." Authority and relevant partners should carry out equality impact assessment prior to introductions of any local lettings policy with cumulative considerations taken into account if a large number of local letting policies are implemented.</li> <li>Lack of accessible and suitable housing provision for disabled and older people and lack of affordable housing through planning and meeting affordable housing through planning and meeting affordable housing and respond to need identified within Gypsy Traveller Accommodation Assessment (GTTA) 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 landscapes for lives and its impact in terms of and the short term holiday lettings on child poverty levels in Pembrokeshire and opportunities for young people in the Park.</li> </ul>	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.         Partnership Framework:         • Continued work with RSLs, PCC and Community Land Trusts to support affordable housing provision in Park and Pembrokeshire and to respond to different factors impacting on it and potential new solutions.
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	an recognises and seeks to support responses to issue of	
	fordable housing provision in Park area. Issue of affordable pusing, particularly for young people is highlighted in forward, key	
	sues identified that the management plan is trying to address	
	clude: "reducing the significant waiting list for affordable housing	
	Pembrokeshire (over 5,000 in 2024)", reference is also made to	
	fordable housing and factors that impact on it, and its impact on	
	ung people under State of the Park – Socio- Economic Well-	
	ing. Following policy and results have been included alongside	
•	y outcome for 2030 on "provide an appropriate range of homes	
	support local communities": Policy SE1: Foster socio-economic	
	ellbeing of National Park communities (in pursuit of National Park	
	irposes). Results:	
• SE	SE1/A Appropriate homes for local communities are delivered	
thr	through the planning system and joint working, and local	
	lettings policies applied.	
	SE1/B An evidence base on types and needs of homes is	
	developed (e.g. relationship with Welsh language, sharing data	
	on second / holiday homes, considering options regarding local	
	shared ownership).	
	SE1/CPembrokeshire Coast National Park Authority's Local	
	Development Plan 2 policy is applied when determining	
	planning applications. Local Development Plan 2 policy covers	
	for example major development, defence sites, lighting,	
	amenity, employment, housing allocations, housing windfall	
SIL	sites and exceptional land releases for affordable housing.	

Area to Address Transport Challenges / Affordability and access to services and opportunities	
Protected Characteristics affected/	• Age, Disability, Gender Reassignment. Pregnancy and Maternity, Race, Religion
<b>Communities of Interest/ Communities</b>	or Belief, Sex, Sexual Orientation
of Place/Intersectionality	Carers
	Socio economic disadvantage

Areas of deprivation within Pembrokeshire / those experiencing socio economic
disadvantage potentially hidden in rural dispersed communities
Intersectionality of Characteristics
Health and Well-being Outcomes

#### **Evidence or Issue**

- UK poverty 2020/21, JRF Access to Employment (Source: <u>https://www.jrf.org.uk/report/uk-poverty-2020-21</u>)
  - 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.
  - Low wages can limit commuting choices.
  - 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.
- Implementing the Socio-economic Duty, A review of evidence on Socio-economic Disadvantage and inequalities of outcome, Welsh Government (Source: <u>https://gov.wales/sites/default/files/statistics-and-research/2021-10/review-of-</u> evidence-on-socio-economic-disadvantage-and-inequalities-of-outcome\_0.pdf)
  - 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
- Inequality in a Future Wales: Areas for action in work, climate and demographic Change, The Future Generations Commissioner, Public Health Wales (Source: <u>https://www.futuregenerations.wales/wp-</u> content/uploads/2021/11/FGCW\_Equalities-Report\_E-UPDATED.pdf )
  - 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).

- 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 polices (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: <a href="https://www.equalityhumanrights.com/sites/default/files/being-disabled-in-britain.pdf">https://www.equalityhumanrights.com/sites/default/files/being-disabled-in-britain.pdf</a>)
  - 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: <a href="https://wimd.gov.wales/?lang=en">https://wimd.gov.wales/?lang=en</a> )
  - 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), Scleddau (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"
  - o 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.
- <u>PACTO</u>: 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: <u>https://www.pembrokeshire.gov.uk/public-services-board/well-being-assessment</u>) 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: <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:
  - 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
  - o Health can't see a GP, access to a dentist, waiting lists, and long term effects of Covid on services.

<ul> <li>Choices Youth Forum respondents made these comments</li> <li>Work – not enough support for disabled people and you</li> <li>Pay – cost of living and inflation, household bills, food a</li> </ul>	ality-Plan-2024-28/sepdevelopobjectives) - Young Voices for in response to the survey questions including: ung people under 25, more job opportunities and everything
<ul> <li>Impact/ Risk</li> <li>There is a need to promote good accessible and</li> </ul>	Response/ Mitigation/ Any additional actions needed Recommended Amendment/ Action:
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 CJCs. Transport needs to be considered in the context of promotion of active travel and sustainability to accessing these options. Lack of 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. Following results under Partnership theme policies should support activity in this	<ul> <li>Result 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. However, this needs to be viewed against impact of wider budget pressures on partners involved in delivering these services as shown with challenges relating to public toilets, closure of banks or pressure on leisure services, including libraries. Further engagement is needed with relevant partners to explore how this result could be delivered in practice. For example, is there a role for community and mobile hubs, where range of services and opportunities are co located. It would also be beneficial to list Health Board and PLANED as partners for this result.</li> <li>Partnership Framework</li> <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>

active travel and low-carbon vehicle initiatives are delivered. N1/E Accessible and affordable public transport, active travel and low-carbon vehicle initiatives are delivered. It is also likely to be an issue that will be explored in terms of development of accessible coast strategy: W1/B An Accessible Coast strategy, offering good access for people with specific needs, is delivered. E.g. access for wheelchair users, changing places and toilets at key locations.

- 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.
- Result 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. However, this needs to be viewed against impact of wider budget pressures on partners involved in delivering these services as shown with challenges relating to public toilets, closure of banks or pressure on leisure services, including libraries. Further engagement is needed with relevant partners to explore how this result could be delivered in practice. For example, is there a role for community and mobile hubs, where range of services and opportunities are co located. It would also be beneficial to list Health Board and PLANED as partners for this result.
- Result N1/D The Sustainable Development Fund continues 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.	
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Area to Address Pathways to emp	Pathways to employment for young people and underrepresented groups/ those facing barriers to accessing employment opportunities/ Access to 'fair work' - in work poverty/ seasonality	
to accessing em		
Protected Characteristics affected/ Communities of Interest/ Communities of Place/ Intersectionality	<ul> <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 Health and Well-being Outcomes</li> </ul>	
Evidence or Issue		
https://mgenglish.pembrokeshire.gov.uk young people are:	<b>What Matters to You? Consultation 2023</b> (Source: <u>(mgConvert2PDF.aspx?ID=73946</u> ) Identified that the top issues of concerns among families during the cost of living crisis and work to help prevent this impacting other ation. etc.	
	n Youth Manifesto – A call for change (Source:	
	get-involved/next-generation/youth-manifesto/) Identifies areas for action on:	
	ent (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
- 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
- Accessible and affordable childcare can be a barrier to parents returning to work,
- There is an opportunity to increase skills levels especially through apprenticeships.
- Pembrokeshire County Council Strategic Equality Plan 2024 2028 Supporting Evidence (Appendix 2) (Source: <u>https://mgenglish.pembrokeshire.gov.uk/mgConvert2PDF.aspx?ID=73946</u>). Employment, National Picture
  - 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 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:
  - o ID7/ Lives in Pembs/ Q3: "Career pathways into PCNPA. "
  - o 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"
  - o 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 )
- Draft NPMP: "Where we are now section" under Socio-economic well-being notes: "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)."
- PLANED Project: <u>Catalyst for Care project</u> supports people with a caring nature and a good ides 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: <u>https://www.jrf.org.uk/uk-poverty-2024-the-essential-guide-to-understanding-poverty-in-the-uk</u>)
  - 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: <u>https://www.gov.wales/welsh-language-communities-housing-plan-html</u>)

- 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.

Impact/ Risk	Response/ Mitigation/ Any additional actions needed
<ul> <li>Where we are now section" under Socio-economic well-being notes: "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). Potentially outcomes and results section under Communities could be strengthened to identify "fair</li> </ul>	<ul> <li>Recommended Amendment/ Action:</li> <li>Where we are now section" under Socio-economic well-being notes: "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). Potentially outcomes and results section under Communities could be strengthened to identify "fair work" in order to seek to help address above issue.</li> </ul>

work" in order to seek to help address above issue. Fair work is an amendment applied to Well-being Goal as part of Social Partnership and Public Procurement (Wales) Act 2023. Outcome is included on "support an appropriate range of employment opportunities", so this could be amended to reference "fair work" with an additional result and key partners added to the table.

- It would be beneficial to explore with partners potential opportunities linked to Community Micro-Enterprise Programmes and Social Enterprise Programme, cooperatives building on the work PLANED is already doing in this area and whether this could be added to as part of additional result created about fair work.
- 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. The Conservation theme for partnership action makes no reference to role of people in delivering nature recovery and within this engaging wider range of people in support of nature recovery activities. Lack of representation within environment sector for some groups and barriers to participation are highlighted within range of reports relating to the sector. It would be beneficial to have an outcome for 2030 and policy around: "A wide range of people are supported to participate in taking action for nature." With result framed around development of nature recovery projects which also help increase range of people able to participate in these activities, including

Fair work is an amendment applied to Well-being Goal as part of Social Partnership and Public Procurement (Wales) Act 2023. Outcome is included on "support an appropriate range of employment opportunities", so this could be amended to reference "fair work" with an additional result and key partners added to the table.

- It would be beneficial to explore with partners during consultation period potential opportunities linked to Community Micro-Enterprise Programmes and Social Enterprise Programme, cooperatives building on the work PLANED is already doing in this area and whether this could be added to as part of additional result created about fair work.
- 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. The Conservation theme for partnership action makes no reference to role of people in delivering nature recovery and within this engaging wider range of people in support of nature recovery activities. Lack of representation within environment sector for some groups and barriers to participation are highlighted within range of reports relating to the sector. It would be beneficial to have an outcome for 2030 and policy around: "A wide range of people are supported to participate in taking action for nature." With result framed around development of nature recovery projects which also help increase range of people able to participate in these activities, including exploring skills development opportunities/ pathways to employment for underrepresented groups in terms of nature recovery. It is noted that a result has been included under connection on W2/C Offer volunteering / citizen science and formal training opportunities and

<ul> <li>exploring skills development opportunities/ pathways to employment for underrepresented groups in terms of nature recovery. It is noted that a result has been included under connection on W2/C Offer volunteering / citizen science and formal training opportunities and although partners linked include conservation partners it would be beneficial to have additional outcome/ result under conservation.</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>	although partners linked include conservation partners it would be beneficial to have additional outcome/ result under conservation.
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	Representation in Arts and Heritage Opportunities/ Protection of Religious Sites of Importance/ Engagement with Faith groups			
Protected Characteristics affected/ Communities of Interest/ Communities	<ul> <li>Age, Disability, Gender Reassignment. Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation</li> </ul>			
of Place/ Intersectionality	<ul> <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 Health and Well-being Outcomes</li> </ul>			
Evidence or Issue				

 Welsh Government Priorities for Culture 2024 -2030 – Currently out for consultation - <u>Consultation on the draft Priorities for</u> <u>Culture 2024-2030 (gov.wales)</u>

 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 whatyou-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 longterm 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 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: <u>https://www.pembrokeshire.gov.uk/public-services-board/well-being-assessment</u>) 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: <u>https://www.gov.wales/wellbeing-wales-2023-wales-vibrant-culture-and-thriving-welsh-language-html</u>)
  - 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 Wayl
- <u>Span Arts We Move</u> 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.
- <u>Pembrokeshire Pride</u> 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

- <u>Pembrokeshire Youth Project</u> EYST Wales and Haverfordwest Mosque with the aim to build relationships and trust with diverse ethnic minority communities in Pembrokeshire
- <u>The National Centre for Learning Welsh Welcome to Welsh</u> 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: Ukranian, 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.

Impact/ Risk	Response/ Mitigation/ Any additional actions needed		
<ul> <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). 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: H2/D Provide guidance on the sympathetic enjoyment of monuments considered sacred and their settings / H1/I Heritage crime is reduced and appropriate action taken if it occurs. Actions to support result "Barriers to outdoor recreation and wellbeing opportunities are removed, and opportunities promoted to more diverse audiences, e.g. children and young families from deprived areas." have potential to support people from different faith groups to access the Park.</li> <li>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</li> </ul>	<ul> <li>Recommended Amendment/ Action:</li> <li>Consideration should be made as to whether following result could be amended to reference heritage: "W1/A Barriers to outdoor recreation, heritage and wellbeing opportunities are removed, and opportunities promoted to more diverse audiences, e.g. children and young families from deprived areas" or consider if "H2/B Landscape, cultural heritage, natural history and the arts are shared celebrated." result could be expanded to take account of removing barriers and promoting opportunities to more diverse audiences.</li> <li>In addition could "H2/B Landscape, cultural heritage, natural history and the arts are shared celebrated."/ "Policy H2: Promote the Welsh language and local dialects, and celebrate culture and creativity related to the landscape"/ "H1/A Public awareness and enjoyment of historic landscapes, buildings and monuments is enhanced" be expanded to take greater account of proposed ambitions within the Welsh Government consultation document - Welsh Government Priorities for Culture 2024 -2030 of A1: Culture is inclusive, accessible and diverse / 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.</li> </ul>		

<ul> <li>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. In response to this, consideration should be made as to whether following result could be amended to reference heritage: "W1/A Barriers to outdoor recreation, heritage and wellbeing opportunities are removed, and opportunities promoted to more diverse audiences, e.g. children and young families from deprived areas" or consider if "H2/B Landscape, cultural heritage, natural history and the arts are shared celebrated." result could be expanded to take account of removing barriers and promoting opportunities to more diverse audiences.</li> <li>In addition could "H2/B Landscape, cultural heritage, natural history and the arts are shared celebrated."/"Policy H2: Promote the Welsh language and local dialects, and celebrate culture and creativity related to the landscape"/"H1/A Public awareness and enjoyment of historic landscapes, buildings and monuments is enhanced" be expanded to take greater account of proposed ambitions within the Welsh Government consultation document - Welsh Government Priorities for Culture 2024 -2030 of A1: Culture is inclusive, accessible and diverse / 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.</li> <li>It would be beneficial to provide greater visibility to wider range of partners who we can engage with to</li> </ul>	<ul> <li>It would be beneficial to provide greater visibility to wider range of partners who we can engage with to increase access and gain new perspectives in terms of Park's heritage including: Pembrokeshire Pride, We Move (Span Art project), Welsh Refugee Council, EYST and work with Haverfordwest Mosque funded by Pembrokeshire Youth Service on Pembrokeshire Youth Project (PYP) alongside groups already listed such as MIND.</li> </ul>

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Move (Span Art project), Welsh Refugee Council,	
EYST and work with Haverfordwest Mosque funded by	
Pembrokeshire Youth Service on Pembrokeshire	
Youth Project (PYP) alongside groups already listed	
such as MIND.	

### Public Sector Equality Duty Considerations

How does the Strategic	<ul> <li>Number of areas under the partnership themes will help promote equality of opportunity. In</li> </ul>
Plan, Policy or Decision	particular:
being assessed promote	<ul> <li>Policy W1: Provide and promote sustainable outdoor recreation opportunities for all.</li> </ul>
equality of opportunity?	W1/A Barriers to outdoor recreation and wellbeing opportunities are removed, and opportunities promoted to more diverse audiences, e.g. children and young families from deprived areas.
	W1/B An Accessible Coast strategy, offering good access for people with specific needs, is delivered. E.g. access for wheelchair users, changing places and toilets at key locations.
	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.
	W1/E The Rights of Way Improvement Plan 2018-2028 is delivered.
	<ul> <li>Policy W2: Provide and promote inspiring outdoor learning and personal development</li> </ul>
	experiences for all.
	W2/A Active outdoor, environmental, heritage and arts-based recreation and learning is delivered to young people and families.
	W2/B Nature-based health services are delivered, e.g. walking programmes, mental health initiatives, and supporting people living with dementia.
	W2/C Offer volunteering / citizen science and formal training opportunities.
	<ul> <li>N1/E Accessible and affordable public transport, active travel and low-carbon vehicle initiatives are delivered. / SE1/G Accessible and affordable public transport, active travel and low-carbon vehicle initiatives are delivered.</li> </ul>

	The stage 1 assessment when assessing impacts has identified a number of areas where		
	promotion of equality of opportunity could be enhanced.		
How does the Strategic Plan, Policy or Decision promote good relations?	<ul> <li>Following policies will help support and increase understanding of needs of different groups and barriers they face:         <ul> <li>Policy W1: Provide and promote sustainable outdoor recreation opportunities for all.</li> <li>W1/A Barriers to outdoor recreation and wellbeing opportunities are removed, and opportunities promoted to more diverse audiences, e.g. children and young families from deprived areas.</li> <li>W1/B An Accessible Coast strategy, offering good access for people with specific needs, is delivered and to be a provide and the provide and a provide and the provide and a provide a provide and a pr</li></ul></li></ul>		
	<ul> <li>is delivered. E.g. access for wheelchair users, changing places and toilets at key locations.</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>Policy W2: Provide and promote inspiring outdoor learning and personal development</li> </ul>		
	<ul> <li>experiences for all.</li> <li>W2/A Active outdoor, environmental, heritage and arts-based recreation and learning is delivered to young people and families.</li> <li>W2/B Nature-based health services are delivered, e.g. walking programmes, mental health initiatives, and supporting people living with dementia.</li> <li>W2/C Offer volunteering / citizen science and formal training opportunities.</li> </ul>		
	<ul> <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 <u>Countryside Code</u></li> </ul>		
	<ul> <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 increase affordable housing provision, in doing so this will help alleviate some tensions, but may create new tensions between different stakeholders with different interests.</li> </ul>		
Does this Strategic Plan, Policy or Decision have the	<ul> <li>There are potential risks related to implementation of local letting policies, and implementation must be in line with relevant guidance and be informed by evidence.</li> </ul>		

potential to cause unlawful direct or indirect discrimination?	<ul> <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> <li>Stage 1 of the assessment in impact section has recommended that: Where reference is made to local lettings policies in: "SE1/A Appropriate homes for local communities are delivered through the planning system and joint working. And local lettings policies applied." It is recommended that it is amended to: "SE1/A Appropriate homes for local communities are delivered through the planning system and joint working. Local lettings policies applied on rural exceptions sites where appropriate and where evidence demonstrates they support delivery against desired outcomes." Authority and relevant partners should carry out equality impact assessment prior to introductions of any local lettings policy with cumulative considerations taken into account if a large number of local letting policies are implemented.</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> <li>See above in terms of local letting policies and recommendation from stage 1 assessment in terms of wording and that Authority and relevant partners should carry out equality impact assessment prior to introductions of any local lettings policy with cumulative considerations taken into account if a large number of local letting policies are implemented.</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	Yes – This is a partnership plan. 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.

steps will you take to comply with the General	Public bodies listed within the plan will be subject to general public equality duty.
Equality Duty in regard to	Some of the activities within the plan should support partners to develop more inclusive approaches
procurement and/ or partnerships?	and meeting reasonable adjustment requirements.
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.

### Data/ Engagement Gaps

Do you have any data/	Assessment has taken account of information from range of sources and consultation on Special
engagement gaps?	Qualities.
If yes, can further	Additional information will be gathered from public consultation, consideration should be made for
information be obtained or	any opportunities for further engagement with equality related stakeholders during this consultation
additional engagement to	period.
fill any of these data gaps?	

### Section 4 – Follow up Actions

#### **Recommended Amendment/ Action**

Area to Address	Action	Responsible Officer	Timescales	Status
Accessible formatting considerations /	Increase font size across document to 12 where feasible (particularly for list of partners and policy tables)	NPMP and Marine Officer		
Inclusive document and imagery/ Suggested wording	Ensure consultation version is in accessible pdf version and that final document is available in HTML format.	NPMP and Marine Officer		
amendments	Review some of the terminology used for ease of understanding, consider use of glossary for	NPMP and Marine Officer		

	complex term, or use of boxes as done in easy read versions.	
	Review image selection and feel of document to ensure it is inclusive and representative, test it with staff working within inclusion for Authority.	NPMP and Marine Officer
	Consider what formats might be needed for consultation – young persons, easy read version.	NPMP and Marine Officer
	Consider what other formats might be needed for the final version such as young person version or easy read version. Explore potential to capture information from plan in different format such as video or through infographics. Noted that cost has been included for creation of Easy Read version within plan development version.	NPMP and Marine Officer
Suggested Amendments for Forward/ About this Plan	Amend wording in forward from "number of people are suffering with anxiety or other mental health challenges" to "number of people experiencing anxiety or other mental health challenges."	NPMP and Marine Officer
	Amend wording in the about this plan section from "supporting the recovery of the increasing number of people suffering poor mental health post-Covid 19" to "supporting the recovery of the increasing number of people experiencing poor mental health post-Covid 19"	NPMP and Marine Officer
	Suggest adding this in to following sentence: and where our lifestyles and wider determinants of health (such as income, housing) are increasingly resulting in poor health outcomes.	NPMP and Marine Officer
	Make reference to Just Transition Framework and supporting job opportunities linked to green	NPMP and Marine Officer

	recovery – demonstrating that response to climate emergency that are central to the NPMP offers new opportunities for skills and jobs creation.		
Referencing Pembrokeshire Coast Youth Manifesto and role NPMP and partnership working plays in helping achieve calls for action within it	Include explicit reference to PCNP National Park Next Generation Youth Manifesto and priorities for action on youth, empowerment, living, learning and working within it and role NPMP and partnership working can play in helping support delivery of this manifesto. It could be included under the introduction by Next Generation or as its own sub section similar to Local Development Plan 2.	NPMP and Marine Officer	
List of Partners mentioned in this Plan	Include note that during plan period new partners are likely to be identified to support delivery of the plan.	NPMP and Marine Officer	
	<ul> <li>Include following in plan (and review partners listed in results tables and amend where needed to include following):</li> <li>Add to Community and Support Groups in the brackets – Pembrokeshire Pride, Span Arts - We Move</li> <li>Pembrokeshire Young Farmers Club</li> <li>Add EYST (Ethnic Minorities and Youth Support Team Wales)</li> <li>Review supported walking projects listed with Health and Well-being Officer to ensure they are up to date and to identify if any additional health partners need to be listed in terms of GPs/ health referrals.</li> </ul>	NPMP and Marine Officer	

Gaps within legislation and policy guidance referenced in terms of Equality and Health relevant to Plan	<ul> <li>Include reference to the following within the policy/ legislation section:</li> <li>Equality Act 2010, including compliance with Socio Economic Duty</li> <li>Social Partnership and Public Procurement (Wales) Act 2023 – including Socially Responsible Procurement Duty</li> <li>Welsh Government development of a Just Transition Framework, consultation ended March 2024. It sets out the approach on how we can move to net zero in a fair way.</li> <li>New Curriculum for Wales</li> <li>Welsh Government's Equality related plans, including development of the Climate, Rural Affairs and Environmental section of the Anti Racist Wales Action Plan once finalised</li> <li>Welsh Government Priorities for Culture 2024 -2030 – Currently out for consultation</li> <li>Well-being of Future Generations: Wellbeing of Wales report (2023) and National Indicators and Milestones for Wales</li> <li>Authority's Equality Plan and Objectives (currently under review), Authority's Wellbeing Objectives and Authority's Wel</li></ul>	NPMP and Marine Officer		
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Community/ Visitors: Widening Access/ Experiencing and	List of partners should be reviewed to ensure depth of who we might need to involve is captured (see previous Area to Address: List of Partners mentioned in this Plan)	NPMP and Marine Officer
Benefiting from Special Qualities in the Park/ Welcoming Park for All	The Special Qualities section on Rights of Way could be enhanced to include reference to pathways available in the Park that meet different needs. This should be seen in the context of Pembrokeshire Rights of Way Improvement Plan that includes references to the ability of the network to serve the	NPMP and Marine Officer
	requirements of those with disabilities. State of the Park section could be enhanced to include barriers faced by ethnic minority/ marginalised groups and some faith groups, as not current recognised within: "Across Wales, barriers to participation include time, disability, health issues and age." It could benefit from references to source data being included in terms of some of the statements made within the Recreation and discovery section.	NPMP and Marine Officer
	The Conservation theme for partnership action makes no reference to role of people in delivering nature recovery and within this engaging wider range of people in support of nature recovery activities. Lack of representation within environment sector for some groups and barriers to participation are highlighted within range of reports relating to the sector. It would be beneficial to have an outcome and policy for 2030 around: "A wide range of people are supported to participate in taking action for nature." With result framed	NPMP and Marine Officer

	around development of nature recovery projects		
	which also help increase range of people able		
	to participate in these activities		
Access to toilets	Due to financial pressures on provision of toilets	NPMP and Marine	
and changing	it would be beneficial for this challenge to be	Officer	
places facilities	captured. Consider making reference to current		
	situation relating to toilets in Where are we		
	now? Section under either recreation and		
	discovery or socio-economic well-being.		
Health and Well-	Consider adding well-being to Policy W2:	NPMP and Marine	
being - Access to	Provide and promote inspiring outdoor learning,	Officer	
the Outdoors /	well-being and personal development		
Connecting with	experiences for all.		
Nature	The Conservation theme for partnership action	NPMP and Marine	
	makes no reference to role of people in	Officer	
	delivering nature recovery and within this		
	engaging wider range of people in support of		
	nature recovery activities. Volunteering and		
	having opportunity to support nature recovery		
	can have positive impact on people's well-		
	being. It would be beneficial to have an		
	outcome for 2030 and policy around: "A wide		
	range of people are supported to participate in		
	taking action for nature." With result framed		
	around development of nature recovery projects		
	which also help increase range of people able		
	to participate in these activities. Projects		
	designed to support Nature recovery are well		
	suited to incorporating the 5 steps to well-being.		
Public Health –	Where are we now section? on Bathing Water	NPMP and Marine	
Water Quality /	Quality should be enhanced to contain	Officer	
Pollution and Other	information and overview of impact of Sewer		
Health Risks/	Storm Overflows and discharge and potential		

Recreational	impost in terms of risks for public booth and	
	impact in terms of risks for public health and	
Disturbance to	access to enjoying blue spaces.	
Tranquillity	Due to the significant concern around storm	NPMP and Marine
	overflow sewage discharges for recreational	Officer
	users of the Park and within survey responses,	
	consideration should be made as to whether	
	outcome under climate on eliminate	
	environmental harm from storm overflow	
	sewage discharges should also be included	
	under Connection and result "N4/B	
	Environmental harm from storm overflow	
	sewage discharges is eliminated, including	
	working within the framework of the Drainage	
	and Wastewater Management Plan for Cleddau	
	and Pembrokeshire Rivers." moved to this	
	section. As potentially importance of this work	
	for recreational users and communities in the	
	Park is lost through it being within the Climate	
	and natural capital section	
	In terms of Water Safety – RNLI and	NPMP and Marine
	Coastguards should be added to list of	Officer
	partners. Due to coastal nature of the Park and	
	role of recreation in blue spaces within the Park	
	an additional result should be considered	
	under: Policy W1: Provide and promote	
	sustainable outdoor recreation opportunities for	
	all, linked to promotion of Respect the Water	
	campaign and other Water safety initiatives	
Local Lettings	Where reference is made to local lettings	NPMP and Marine
Policy – preventing	policies in: "SE1/A Appropriate homes for local	Officer
risk of discrimination	communities are delivered through the planning	
when applied	system and joint working, and local lettings	
	policies applied." It is recommended that it is	
	policies applied. It is recommended that it is	

	amended to: "SE1/A Appropriate homes for		
	local communities are delivered through the		
	planning system and joint working. Local		
	lettings policies applied on rural exceptions		
	sites where appropriate and where evidence		
	demonstrates they support delivery against		
	desired outcomes."		
Access to services	Result SE1/F Local community services are	NPMP and Marine	
and opportunities	viable and accessible, e.g. shops, schools, play	Officer	
	facilities and community halls, etc. should		
	support provision of community services.		
	However, this needs to be viewed against		
	impact of wider budget pressures on partners		
	involved in delivering these services as shown		
	with challenges relating to public toilets, closure		
	of banks or pressure on leisure services,		
	including libraries. Further engagement is		
	needed with relevant partners to explore how		
	this result could be delivered in practice. For		
	example, is there a role for community and		
	mobile hubs, where range of services and		
	opportunities are co located. It would also be		
	beneficial to list Health Board and PLANED as		
	partners for this result.		
Pathways to	Where we are now section" under Socio-	NPMP and Marine	
employment for	economic well-being notes: "While there	Officer	
young people and	appears to be no shortage of employment		
underrepresented	opportunities in Pembrokeshire, the jobs		
groups/ those facing	available are often low paid (over 25% of full-		
barriers to			
	time workers earned less than £18,000 per year		
accessing	in 2017) and seasonal (winter benefit claimant		
employment	rates are almost double those for summer).		
opportunities/	Potentially outcomes and results section under		

Access to 'fair work' - in work poverty/ seasonality	Communities could be strengthened to identify "fair work" in order to seek to help address above issue. Fair work is an amendment applied to Well-being Goal as part of Social Partnership and Public Procurement (Wales) Act 2023. Outcome is included on "support an appropriate range of employment opportunities", so this could be amended to reference "fair work" with an additional result and key partners added to the table.		
	It would be beneficial to explore with partners during consultation period potential opportunities linked to Community Micro- Enterprise Programmes and Social Enterprise Programme, building on the work PLANED is already doing in this area and whether this could be added to as part of additional result created about fair work.	NPMP and Marine Officer	
	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. The Conservation theme for partnership action makes no reference to role of people in delivering nature recovery and within this engaging wider range of people in support of nature recovery activities. Lack of representation within environment sector for some groups and barriers to participation are	NPMP and Marine Officer	

Representation in Arts and Heritage Opportunities/ Protection of Religious Sites of Importance/ Engagement with Faith groups	highlighted within range of reports relating to the sector. It would be beneficial to have an outcome for 2030 and policy around: "A wide range of people are supported to participate in taking action for nature." With result framed around development of nature recovery projects which also help increase range of people able to participate in these activities, including exploring skills development opportunities/ pathways to employment for underrepresented groups in terms of nature recovery. It is noted that a result has been included under connection on W2/C Offer volunteering / citizen science and formal training opportunities and although partners linked include conservation partners it would be beneficial to have additional outcome/ result under conservation. Consideration should be made as to whether following result could be amended to reference heritage: "W1/A Barriers to outdoor recreation, heritage and wellbeing opportunities are removed, and opportunities promoted to more diverse audiences, e.g. children and young families from deprived areas" or consider if "H2/B Landscape, cultural heritage, natural history and the arts are shared celebrated." result could be expanded to take account of removing barriers and promoting opportunities to more diverse audiences. In addition could "H2/B Landscape, cultural	NPMP and Marine Officer	
	heritage, natural history and the arts are shared celebrated."/ "Policy H2: Promote the Welsh language and local dialects, and celebrate	Officer	

culture and creativity related to the landscape"/ "H1/A Public awareness and enjoyment of historic landscapes, buildings and monuments is enhanced" be expanded to take greater account of proposed ambitions within the Welsh Government consultation document - Welsh Government Priorities for Culture 2024 -2030 of A1: Culture is inclusive, accessible and diverse / 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.		
It would be beneficial to provide greater visibility to wider range of partners who we can engage with to increase access and gain new perspectives in terms of Park's heritage including: Pembrokeshire Pride, We Move (Span Art project), Welsh Refugee Council,	NPMP and Marine Officer	
EYST and work with Haverfordwest Mosque funded by Pembrokeshire Youth Service on Pembrokeshire Youth Project (PYP) alongside groups already listed such as MIND.		

### Partnership Framework:

Area to Address	Action	Responsible Officer	Timescales	Status
Community/	Use stakeholder analysis work of Engagement	NPMP and Marine		
Visitors: Widening	and Inclusion Team linked to experiences for all	Officer/ Head of		
Access/	work and wider work of strategic advisor to	Engagement and		
Experiencing and	review partners we are engaging with to ensure	Inclusion/ Strategic		
Benefiting from	depth across protected groups and support/	Advisor		

Special Qualities in the Park/ Welcoming Park for All Access to toilets and changing places facilities	community/ grassroots organisations in terms of who we might need to involve in this area. 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	NPMP and Marine Officer / Director of Placemaking, Decarbonisation and Engagement	
Public Health - Water Quality	<ul> <li>collaborative solutions during the plan period.</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> <li>Consultation on special qualities demonstrated strong community/ public feeling on this topic, with potential to develop citizen science level monitoring opportunities (this could build on approaches used for SWEPT project).</li> </ul>	NPMP and Marine Officer / Director of Placemaking, Decarbonisation and Engagement	
Local Lettings Policy – preventing risk of discrimination when applied	Authority and relevant partners should carry out equality impact assessment prior to introductions of any local lettings policy with cumulative considerations taken into account if a large number of local letting policies are implemented.	Head of Placemaking, Decarbonisation and Engagement Relevant partner organisations	
Affordable Housing	Continued work with RSLs, PCC and Community Land Trusts to support affordable housing provision in Park and Pembrokeshire and to	Head of Placemaking, Decarbonisation and Engagement.	

	respond to different factors impacting on it and potential new solutions.	Strategic Policy Manager. Development Management	
Transport Challenges	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.	Manager. Head of Placemaking, Decarbonisation and Engagement. Head of Decarbonisation.	

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

#### General

Assessment identified a number of suggestions for improving accessible formatting and ensuring feel of document in terms of imagery and phraseology is inclusive. It also recommended that explicit reference be made to Pembrokeshire Coast Youth Manifesto and role National Park Management Plan and partnership working plays in helping to achieve calls for actions within it.

#### Partners

Range of partners listed does include those who can assist with breaking down barriers to Park and supporting people to access health benefits of the Park. It also includes key stakeholders who can work collaboratively to address key challenges linked to water quality, affordable housing and transport. However, review of list shows that we are potentially missing some groups and that it would be beneficial to provide greater visibility to wider range of groups. Examples include Pembrokeshire Young Farmers Club, Pembrokeshire Pride, Span Arts – We Move, Faith Groups, EYST.

#### Legislation/ Policy gaps

Wider policy and legislative framework linked to equality, socio economic duty and health outcomes are not fully highlighted in the policy document. Assessment recommends additions be made to the plan within the legislation/ policy section.

## Community/ Visitors: Widening Access/ Experiencing and Benefiting from Special Qualities in the Park/ Welcoming Park for All

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).

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). 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.) Issue of lack of diversity in PCNPA workforce and wider outdoor/ environmental workforce can create additional barriers, particularly for diversity in terms of ethnicity. 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. 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 Countryside Code.

Following within the plan should support addressing above, however list of partners should be reviewed to ensure depth of who we might need to involve is captured, currently focus is of those listed is disability and young people (see previous Area to Address: List of Partners mentioned in this Plan): W1/A Barriers to outdoor recreation and wellbeing opportunities are removed, and opportunities promoted to more diverse audiences, e.g. children and young families from deprived areas. W1/B An Accessible Coast strategy, offering good access for people with specific needs, is delivered. E.g. access for wheelchair users, changing places

and toilets at key locations. 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. W1/E The Rights of Way Improvement Plan 2018-2028 is delivered.

The Conservation theme for partnership action makes no reference to role of people in delivering nature recovery and within this engaging wider range of people in support of nature recovery activities. Lack of representation within environment sector for some groups and barriers to participation are highlighted within range of reports relating to the sector. It would be beneficial to have an outcome for 2030 and policy around: "A wide range of people are supported to participate in taking action for nature." With result framed around development of nature recovery projects which also help increase range of people able to participate in these activities (example of this 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", exploring skills development opportunities/ pathways to employment for underrepresented groups in terms of nature recovery.)

#### Access to toilets and changing places facilities

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.

Following within the plan should support addressing above: W1/A Barriers to outdoor recreation and wellbeing opportunities are removed, and opportunities promoted to more diverse audiences, e.g. children and young families from deprived areas. / W1/B An Accessible Coast strategy, offering good access for people with specific needs, is delivered. E.g. access for wheelchair users, changing places and toilets at key locations.

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. Due to financial pressures on provision of toilets it would be beneficial for this challenge to be captured in Where are we now? Section under either recreation and discovery or socio-economic well-being

#### Health and Well-being - Access to the Outdoors / Connecting with Nature

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. 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. The following policies and their associated results should support action in this area: Policy W1: Provide and promote sustainable outdoor recreation opportunities for all /Policy W2: Provide and promote inspiring outdoor learning and personal development experiences for all. Assessment recommends adding well-being to Policy W2: Provide and promote inspiring outdoor learning and personal development experiences for all.

The Conservation theme for partnership action makes no reference to role of people in delivering nature recovery and within this engaging wider range of people in support of nature recovery activities. Volunteering and having opportunity to support nature recovery can have positive impact on people's well-being. It would be beneficial to have an outcome for 2030 and policy around: "A wide range of people are supported to participate in taking action for nature." With result framed around development of nature recovery projects which also help increase range of people able to participate in these activities. Projects designed to support Nature recovery are well suited to incorporating the 5 steps to mental well-being.

#### Public Health – Water Quality / Pollution and Other Health Risks/ Recreational Disturbance to Tranquillity

There is a 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. Data on water quality is highlighted within Where are we now section? Including status of water bodies in national park and bathing water. It is recommended that this section is enhanced to contain information and overview of impact of Sewer Storm Overflows and discharge and potential impact in terms of risks for public health and access to enjoying blue spaces.

To address issue plan does identify key outcome relating to 2030 tied to water pollution and quality, including bathing waters and key areas that impact on them and associated results under policy areas expected with list of partners to be involved. Due to the significant concern around storm overflow sewage discharges for recreational users of the Park and within survey responses, consideration should be made as to whether outcome under climate on eliminate environmental harm from storm overflow sewage discharges should also be included under Connection as potentially importance of this work for recreational users and communities in the Park is lost through it being within the Climate and natural capital section. 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.

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 solution consider potential safety/ access 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.

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.

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. Pembrokeshire Water Safety Forum is recognised within the list of partners, consideration should also be made to adding RNLI and Coastguards. Due to coastal nature of the Park and role of recreation in blue spaces within the Park an additional result should be considered under: Policy W1: Provide and promote sustainable outdoor recreation opportunities for all, linked to promotion of <u>Respect the Water Campaign</u> and other Water safety initiatives.

#### Affordable Housing, Accessible Housing and Access to Sites

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 (GTTA) 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. Housing cost is impacting on child poverty levels in Pembrokeshire and opportunities for young people in the Park.

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. Continued work with RSLs, PCC and Community Land Trusts to support affordable housing provision in Park and Pembrokeshire and to respond to different factors impacting on it and potential new solutions will be an important area of partnership working during the Plan period.

#### Local Lettings Policy - preventing risk of discrimination when applied

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. 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." 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.

Where reference is made to local lettings policies in: "SE1/A Appropriate homes for local communities are delivered through the planning system and joint working, and local lettings policies applied." It is recommended that it is amended to: "SE1/A Appropriate homes for local communities are delivered through the planning system and joint working. Local lettings policies applied on rural exceptions sites where appropriate and where evidence demonstrates they support delivery against desired outcomes." Authority and relevant partners should carry out equality impact assessment prior to introductions of any local lettings policy with cumulative considerations taken into account if a large number of local letting policies are implemented.

#### Transport Challenges / Affordability and access to services and opportunities

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 CJCs. Lack of 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. Following results under Partnership theme policies should support activity in this area: SE1/G Accessible and affordable public transport, active travel and low-carbon vehicle initiatives are delivered. N1/E Accessible and affordable public transport, active travel and low-carbon vehicle initiatives are delivered. It is also likely to be an issue that will be explored in terms of development of accessible coast strategy: W1/B An Accessible Coast strategy, offering good access for people with specific needs, is delivered. E.g. access for wheelchair users, changing places and toilets at key locations.

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.

Result "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. However, this needs to be viewed against impact of wider budget pressures on partners involved in delivering these services as shown with challenges relating to public toilets, closure of banks or pressure on leisure services, including libraries. Further engagement is needed with relevant partners to explore how this result could be delivered in practice. The Health Board and PLANED should be added to this result. Result "N1/D The Sustainable Development Fund continues 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.

## Pathways to employment for young people and underrepresented groups/ those facing barriers to accessing employment opportunities/ Access to 'fair work' - in work poverty/ seasonality

Where we are now section" under Socio-economic well-being notes: "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). Potentially outcomes and results section under Communities could be strengthened to identify "fair work" in order to seek to help address above issue. Fair work is an amendment applied to Well-being Goal as part of Social Partnership and Public Procurement (Wales) Act 2023. Outcome is included on "support an appropriate range of employment opportunities", so this could be amended to reference "fair work" with an additional result and key partners added to the table.

It would be beneficial to explore with partners potential opportunities linked to Community Micro-Enterprise Programmes and Social Enterprise Programme, building on the work PLANED is already doing in this area and whether this could be added to as part of additional result created about fair work.

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. The Conservation theme for partnership action makes no reference to role of people in delivering nature recovery and within this engaging wider range of people in support of nature recovery activities. Lack of representation within environment sector for some groups and barriers to participation are highlighted within range of reports relating to the sector. It would be beneficial to have an outcome for 2030 and policy around: "A wide range of people are supported to participate in taking action for nature." With result framed around development of nature recovery projects which also help increase range of people able to participate in these activities, including exploring skills development opportunities/ pathways to employment for underrepresented groups in terms of nature recovery. It is noted that a result has been included under connection on "W2/C Offer volunteering / citizen science and formal training" opportunities and although partners linked include conservation partners it would be beneficial to have additional outcome/ result under conservation.

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.

# Representation in Arts and Heritage Opportunities/ Protection of Religious Sites of Importance/ Engagement with Faith groups

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). 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: H2/D Provide guidance on the sympathetic enjoyment of monuments considered sacred and their settings / H1/I Heritage crime is reduced and appropriate action taken if it occurs. Actions to support result "Barriers to outdoor recreation and wellbeing opportunities are removed, and opportunities promoted to more diverse audiences, e.g. children and young families from deprived areas." have potential to support people from different faith groups to access the Park.

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. In response to this, consideration should be made as to whether following result could be amended to reference heritage: "W1/A Barriers to outdoor recreation, heritage and wellbeing opportunities are removed, and opportunities promoted to more diverse audiences, e.g. children and young families from deprived areas" or consider if "H2/B Landscape, cultural heritage, natural history and the arts are shared celebrated." result could be expanded to take account of removing barriers and promoting opportunities to more diverse audiences. In addition consideration should be made to whether "H2/B Landscape, cultural heritage, natural history and the arts are shared celebrated."/ "Policy H2: Promote the Welsh language and local dialects, and celebrate culture and creativity related to the landscape"/ "H1/A Public awareness and enjoyment of historic landscapes, buildings and monuments is enhanced" can be expanded to take greater account of proposed ambitions within the Welsh Government consultation document - Welsh Government Priorities for Culture 2024 - 2030 of A1: Culture is inclusive, accessible and diverse / 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. It would be beneficial to provide greater visibility to wider range of partners who we can engage with to increase access and gain new perspectives in terms of Park's heritage including: Pembrokeshire Pride, We Move (Span Art project), Welsh Refugee Council, EYST and work with Haverfordwest Mosque funded by Pembrokeshire Youth Service on Pembrokeshire Youth Project (PYP) alongside groups already listed such as MIND.

#### Appendix 1 – Demographic Profile and Other Key Data

**Demographic Profile of Pembrokeshire** 

 Protected Characteristics in Pembrokeshire is outlined in <u>Pembrokeshire County Council – Strategic Equality Plan 2024-</u> 2028 Supporting Evidence (Appendix 2) (page 4-7).

#### Demographic Profile Park – Census 2021 Figures

- o 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: <u>https://www.gov.wales/sites/default/files/statistics-and-research/2024-05/domestic-gb-tourism-statistics-wales-tourism-day-visits-annual-report-2022.pdf</u>)
  - 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: <u>https://www.gov.wales/sites/default/files/statistics-and-research/2024-05/domestic-gb-tourism-statistics-wales-overnight-tourism-survey-annual-report-2022.pdf</u>

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
- o 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
- o 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)
- o 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
- o # 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
- o 460.5 Volunteer and Social action days supporting heritage assets in park by volunteers and social action participants
- o 349 volunteers and social action days supporting access work in the park by volunteers and social action participants

#### Well-being of Wales

• <u>Well-being of Wales update 2023</u>, including updates on progress for The goal for <u>a more equal Wales</u>, <u>The goal for a more healthier Wales</u>, <u>The goal for a Wales of cohesive communities</u>.

#### **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.