

**PEMBROKESHIRE COAST NATIONAL PARK  
AUTHORITY  
Equality Impact Assessment**



<p><b>Decision/Policy (brief outline):</b></p>	<p><b>Local Development Plan (Replacement) - end date 2031:</b> Preferred Strategy - Pre-Deposit Local Development Plan documents. The purpose of the Preferred Strategy is to set out the long term vision for the Pembrokeshire Coast National Park and the objectives and land use policies needed to deliver that vision. It is not a full draft of the replacement Local Development Plan. This will be called the Deposit Local Development Plan and will form the second formal consultation on replacement Local Development Plan preparation.</p>
<p><b>Lead Officer</b></p>	<p><b>Mair Thomas</b></p>
<p><b>Date:</b></p>	<p><b>13<sup>th</sup> March 2017</b></p> <p><b>Amended December 2017 to take account of Preferred Strategy Consultation Responses</b></p> <p><b><u>Amended September 2018 to take account of consultation responses from the replacement Deposit Local Development Plan</u></b></p>

**Note:**

Due to the nature of the LDP it has been identified that a full Equality Impact Assessment was needed and as a result a screening exercise was not undertaken.

## Table of Contents

Description of the policy/decision/proposal .....	4
Context Setting .....	5
Equality Impact Assessment.....	5
Delivery Agreement .....	6
National Planning Policy .....	6
Background Papers .....	7
Sustainability Appraisal .....	7
Welsh Language.....	7
National Wellbeing Goals .....	8
What are the Impacts of the Plan on.....	9
Customers, stakeholders and the public in general .....	9
The work undertaken by NPA.....	9
The long-term work of the NPA .....	9
Staff .....	9
Evidence base .....	11
Age .....	11
Disability .....	19
Gender Reassignment.....	29
Sex (Gender) .....	31
Pregnancy and Maternity.....	34
Race .....	35
Religion and Belief.....	40
Sexual Orientation .....	43
Data Gaps.....	46
<b>Consultation on Local Development Plan (Replacement) Preferred Strategy – Equality Feedback .....</b>	<b>47</b>
<b><u>Consultation on Replacement Deposit Local Development Plan Feedback .....</u></b>	<b><u>68</u></b>
Identifying Impact.....	68
Age .....	75
Disability .....	88
Gender Reassignment.....	98
Sex (Gender) .....	90
Pregnancy and Maternity.....	103
Race .....	104

Religion, Belief and Non Belief .....	117
Sexual Orientation .....	120
Assessing Impact in relation to the General Duty .....	122
Addressing any adverse impact.....	126
Actions & Implementation .....	126
Monitoring and Review .....	135
Declaration.....	135
Appendix 1 – Consultation response 339 .....	126

## Description of the policy/decision/proposal

1. The purpose of the Preferred Strategy is to set out the long term vision for the Pembrokeshire Coast National Park and the objectives and land use policies needed to deliver that vision.
2. The document outlines:
  - a) Where we are now
  - b) Where we want to be by 2031
  - c) How we can get there
3. It is not a full draft of the replacement Local Development Plan. This will be called the Deposit Local Development Plan and will form the second formal consultation on replacement Local Development Plan preparation.
4. The Preferred Strategy does not include site-specific allocations for example housing or employment sites. This will be included in the full draft of the Local Development Plan.
5. Details of all stages of Local Development Plan preparation can be found in the Authority's Delivery Agreement.
6. The Planning and Compulsory Purchase Act 2004 provides the framework for Local Development Plans in Wales.
7. The Plan should be seen and read as a whole. Often there will be more than one policy relevant to a proposed development, and all policies will be taken into consideration. In order to make the Plan simple to follow and easily understood policies have been expressed as directly as possible. Issues such as landscape, amenity, access, and design will arise with practically all applications for development and separate policies are included on each of these aspects.
8. This Equality Impact Assessment has been reviewed to take account of consultation responses to the Replacement Deposit Local Development Plan. The consultation ended on the 1 June 2018.
9. The Deposit Local Development Plan sets out:
  - a) Where we are now: What key issues need to be addressed?
  - b) Where we want to be: An overall vision for the future
  - c) How we get there: A land use strategy for the Park identifying the scale of overall development proposed, where it will be located and what other strategic policies are needed to help implement the strategy.
10. The document also includes detailed maps which illustrate how different areas of the National Park will be affected

11. The Deposit Local Development Plan is underpinned by a large amount of technical studies, assessments, evidence and supporting information which includes a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). It was also informed by the Equalities Impact Assessment on the preferred strategy and consultation responses received on the question relating to the equality impact assessment or responses to other questions with equality related considerations.

7.12. \_\_\_\_\_

## Context Setting

### Equality Impact Assessment

8.13. \_\_\_\_\_ The specific equality duties in Wales are set out in the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011. They place a duty on Pembrokeshire Coast National Park Authority to assess and consult on the impact its proposed policies will have on people who are protected under the Equality Act 2010 (people who share a protected characteristic of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and its ability to meet the public sector equality duty.

9.14. \_\_\_\_\_ The requirement to assess impact means that the Authority must consider relevant evidence in order to understand the likely or actual effect of policies and practices on protected groups.

10.15. \_\_\_\_\_ This includes ensuring the policy or practice does not unlawfully discriminate, identifying any adverse impacts on protected groups, considering how the policy or practice could better advance equality of opportunity and considering whether the policy will affect relations between different groups.

14.16. \_\_\_\_\_ This process requires listed bodies to consider taking action to address any issues identified such as, addressing negative impacts, where possible. The Authority must have 'due regard' to the results of this process.<sup>1</sup>

12.17. \_\_\_\_\_ Equality Impact Assessments are a systematic way of meeting this duty. The Authority has an Equality Impact Assessment template proforma for assessments which has been used. This template and process has been modified due to the nature of the LDP and plan making process to include the following stages:

**Context setting:** Information on LDP review process and wider policy

<sup>1</sup> EHRC, 4. Assessing Impact: A guide for listed Public Authorities in Wales: <http://bit.ly/2jqrMoo>

framework it operates in.

**Review of the evidence base:** Consideration of quantitative and qualitative sources and their relevancy to the LDP review to form basis for identifying impacts for the Assessment.

**Assessing potential Impact and action planning:** Officers provided responses to impacts identified and sought further information or clarification where needed. A number of actions were identified during this process.

**Equality Impact Summary Report:** Produced for Members Consideration

**Consultation on Preferred Strategy:** Questions on the Equality Impact Assessment have been included within the questionnaire. Equality organisations and community groups have been included within the list of consultees who will be contacted.

**Monitoring and Review:** The content of the Assessment will be reviewed following feedback gathered as part of the consultation. Amendments and further actions will be identified and applied where necessary. Consideration has been given to relevant consultation responses provided as part of the consultation on the replacement Deposit Local Development Plan.

**Declaration:** This will be signed following completion of above stages.

## Delivery Agreement

~~13.~~18. The Delivery Agreement sets out the way in which we propose to involve the local community and other stakeholders in the preparation of the Pembrokeshire Coast National Park Replacement Local Development Plan. It replaces the original Delivery Agreement produced for the 1<sup>st</sup> Local Development Plan and Pembrokeshire Coast National Park Management Plan. The latter is not included in this revision process.

~~14.~~19. It provides details of the various stages involved in the process, the time each part of the process is likely to take and how and when different groups, organisations and individuals can participate.

~~15.~~20. A copy of the delivery agreement can be viewed here: <http://bit.ly/2gHS8j7> A copy of the Easy Read version of the Delivery Agreement can be viewed here: <http://bit.ly/2hA3M1z>

## National Planning Policy

~~16.~~21. In producing the replacement Local Development Plan Preferred Strategy the National Park Authority has had regard to national planning policies. This includes Planning Policy Wales, Circulars and Technical Advice Notes such as TAN 12: Design (2016) and guidance on design and access statements. In accordance with guidance contained in national planning policy should have regard to national planning policies but not repeat them. The Local Development Plan should therefore be considered in

conjunction with the Planning Policy Wales Edition 9 which identifies those areas where clear statements of national development control policy should not need to be repeated in Local Development Plans. It should be noted therefore that the Local Development Plan only provides the policy framework for issues of a locally distinct nature. Development proposals that do not present specific locally distinct issues will be assessed in accordance with the requirements of national planning policy.

## **Background Papers**

17.22. The first stage in preparing the replacement plan is to review the existing information from the evidence base and then gather further evidence where necessary. This is to ensure that the development plan is based on real evidence so that the plan will be deemed to be 'sound'. They include plans and proposals by other organisations. Background Papers of particular relevance and have been considered in this equality impact assessment. Background Papers can be accessed here: <http://www.pembrokeshirecoast.org.uk/default.asp?PID=754>

## **Sustainability Appraisal**

18.23. Sustainability Appraisal has been used to select the most sustainable policy option from the alternatives examined. This involved assessing the likely performance of policy options against a framework of environmental, social and economic sustainability objectives. These sustainability objectives were arrived at through identifying sustainability issues for the National Park as indicated by national policy and guidance, current knowledge and statistics, and the views of government and non-governmental agencies working in the National Park. The development of these objectives was subject to a public consultation as part of the scoping stage of the Sustainability Appraisal.

## **Welsh Language**

19.24. Issues in relation to Technical Advice Note 20 are addressed in the Welsh Language Background Paper. Welsh Government Technical Advice Note (TAN) 20: Planning and the Welsh Language (2017) advises that adopted Local Development Plan policies will have already taken the needs and interests of the Welsh language into account, including the implications for windfall sites for various types of development that comply with the Plan's policies. This has been done through the sustainability appraisal. Neither these sites, nor sites allocated in the Plan should therefore be subject to a language impact assessment as this is already a requirement of the Plan preparation. Only large-scale development on windfall sites within the defined language-sensitive areas considered likely to have a significant effect on the Welsh language will require an assessment of the likely impact on the Welsh language to be undertaken. For the purposes of this policy 'large scale development' is 'major development' as defined in the 'Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (see Appendix 1 Land with Planning Permission or Development Consent Order for an explanation). The

National Park Authority will be responsible for undertaking any assessment it considers is required and for determining its form.

### **National Wellbeing Goals**

~~20.25.~~ Under the Planning (Wales) Act 2015 any statutory body carrying out a planning function must exercise those functions in accordance with the principles of sustainable development as set out in the Well-being of Future Generations (Wales) Act 2015. In doing so, it can contribute positively to the achievement of the Well-being goals of a prosperous Wales, a resilient Wales, a healthier Wales, a more equal Wales, a Wales of cohesive communities , a Wales of vibrant culture and thriving Welsh Language and a globally responsible Wales.

## **What are the Impacts of the Plan on**

### **Customers, stakeholders and the public in general**

- | ~~21:26.~~ 21:26. Planning applications that are submitted by or impact on public/stakeholders must be determined in accordance with the adopted plan unless material considerations indicate otherwise.
- | ~~22:27.~~ 22:27. Provide certainty for developers and the public about the type of development that will be permitted at a particular location.
- | ~~23:28.~~ 23:28. Impact on areas such as affordable housing, access to services and community facilities, quality of green spaces in the future.

### **The work undertaken by NPA**

- | ~~24:29.~~ 24:29. LDP sets the context for rational and consistent decision making in line with national policies. Planning applications must be determined in accordance with the adopted plan unless material considerations indicate otherwise.
- | ~~25:30.~~ 25:30. Annual LDP monitoring report produced by Authority.
- | ~~26:31.~~ 26:31. Adopted plan can impact on other work streams of the Authority such as tourism and recreation, health and well-being activities and community based work.

### **The long-term work of the NPA**

- | ~~27:32.~~ 27:32. 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.
- | ~~28:33.~~ 28:33. The LDP contributes to the Authorities Well-being Objectives and wider Well-being Goals under the Wellbeing of Future Generations Act and national sustainable planning objectives.

### **Staff**

- | ~~29:34.~~ 29:34. LDP sets the context for rational and consistent decision making in line with national policies. Planning applications must be determined in accordance with the adopted plan unless material considerations indicate otherwise.
- | ~~30:35.~~ 30:35. Staff will need to communicate and explain document to stakeholders and communities.

| 34.36. Impact on staff and community relations.

| 32.37. Impact on affordable housing could impact on staff in terms of attracting and enabling staff to live within the Park area (e.g. Rangers tied to specific areas) and policy around transport may impact on staff's commute to work and travel between locations.

## Evidence base

### Age

33.38. In June 2015 at a spatial policy level according to small population estimates in both Saundersfoot and Newport over a third of the population were over 65, with over 30% of the population in Amroth over 65. Two Lower Super Output Areas (LSOA) in Tenby out of the 3 (North and South 1) had over 29% of the population aged over 65, while St David's and Dinas Cross had over 28% of the population aged over 65. This compares to 24.5% of the population in Pembrokeshire being over 65 and 20.2% of the population in Wales.

34.39. Only Crymych 2 LSOA at 18.3% and Tenby South 2 at 17.5% had a population of 0-15 year olds in June 2015 above the % for Pembrokeshire of 17.3% and only Crymych 2 is above the Welsh % of 17.9%.

% Population by age band (30 June 2015) <sup>2</sup>			
LSOA	0-15	16- 64	65+
<b>Tenby (Local Services and Tourism Centre)</b>			
Tenby: North	13.6%	55.7%	30.7%
Tenby: South 1	11.2%	59.7%	29.1%
Tenby: South 2	17.5%	58.3%	24.2%
<b>Newport (Local Centre)</b>			
Newport	14.8%	48.4%	36.8%
<b>Saundersfoot (Local Centre)</b>			
Saundersfoot 1	13.2%	51.7%	35.1%
Saundersfoot 2	12.7%	53.2%	34.1%
<b>St David's (Local Centre)</b>			
St David's	13.4%	57.7%	28.9%
<b>Crymych (Local Centre)</b>			
Crymych 1	15.7%	58.6%	25.7%
Crymych 2	18.3%	56.9%	24.9%
<b>Rural Centres (Where LSOA data available)</b>			
Amroth	12.4%	56.5%	31.1%
Dinas Cross	15.0%	56.1%	28.9%
Manorbier	16.7%	57.4%	25.9%
Solva	13.9%	65.8%	20.3%
St Ishmaels	15.6%	57.6%	26.8%
Pembrokeshire	17.3	58.2	24.5
Wales	17.9	61.9	20.2

35.40. The percentage change in size of usual resident population by age for Pembrokeshire Coast National Park, 2001 to 2011 for 60- 74 year olds was +27% and +17.5% for 75 and over.<sup>3</sup> Projections for Pembrokeshire suggest a dramatic 93% increase in people aged 85 and over by 2030.<sup>4</sup>

<sup>2</sup> Info Base Wales: Local area population estimates by age: <http://bit.ly/2hxPckh>

<sup>3</sup> ONS: 2011 Census: Characteristics of National Parks: <http://bit.ly/2hzOZ6N>

<sup>4</sup> Ageing Well in Wales and Pembrokeshire County Council, Ageing Well in Pembrokeshire, 2016: <http://bit.ly/2hJYyTT>

36.41. PCNPA's Housing Background Paper notes the following from Pembrokeshire County Council Housing Strategy:

"The number of older people in the County continues to increase. Provision needed includes additional bungalow development using Social Housing Grant and providing extra care housing schemes (page 85)." The Housing Background Paper also notes that the Pembrokeshire County Council Older Persons' Commissioning Plan 2011 to 2016 identifies the following housing outcomes "People are enabled to remain living in their own homes (paragraph 2.3). The accompanying action plan refers to 'Extra care and sheltered housing developed and enhanced as viable alternatives to residential and nursing home care.' This work is to take place 'with the Council's housing commissioning service and private and 3rd sector partners to investigate and develop extra care and sheltered housing as viable alternatives to residential and nursing home care."<sup>5</sup>

37.42. Feedback from older people as part of the Ageing Well in Pembrokeshire Plan consultation noted a need for:

- a) More social housing and for a variety of options for older people throughout the county, but for consideration to be taken on where bus routes are located.
- b) They wish to see more Lifetime homes built and for private builders to also consider the needs of older people.
- c) Older people would like to see an extra care facility built in the south of the county and in an accessible location.
- d) Many older people living in supported accommodation were complimentary of the support available to them to help live independently, but an increase in this type of accommodation would be welcomed.<sup>6</sup>

38. Out of the 8 Sheltered Housing Schemes provided by Pembrokeshire Housing two are within the National Park Area. They are Acorn Heights which has 16 apartments and Hanover Court that has 34 apartments in Tenby. All of them are based in the South of the County as are Pembrokeshire Housing's 2 Homes for Life Schemes. In the North of the county Cantref (Wales and West Housing Association) provide a 32 flats sheltered scheme at Llain Las, Fishguard and Family Housing Association provide a Homes for Life scheme, Bro Preseli of 40 apartments alongside a GP practice and day care centre in Crymych. Pembrokeshire County Council has specialist built sheltered housing in Haverfordwest, Milford Haven, Johnston and Neyland and within the National Park area at Tenby, St David's and Newport.

---

<sup>5</sup> PCNPA, Housing Background Paper: <http://bit.ly/2h4x47h>

<sup>6</sup> Ageing Well in Wales and Pembrokeshire County Council, Ageing Well in Pembrokeshire, 2016: <http://bit.ly/2hJYyTT>

39. The Alzheimer's Disease Society reports that one in 14 people over 65, one in 6 people over 80, and one in three people over 95 has a form of dementia. In the Hywel Dda region North Pembrokeshire has the highest number of people over 65 with dementia at 931.<sup>7</sup>
40. A 2017 report by the Expert Group on Housing an Ageing population in Wales explored the role the planning system can play in terms of meeting the needs of an ageing population and also some of the constraints that Planning Authorities currently face. It noted that "The planning system has considerable untapped potential to enable a wider housing choice and increase the supply of housing that is suitable for an ageing population across all tenures. Local Planning Authority Planning Officers told us that stronger and clearer national policies and guidance could facilitate the process and help deliver a wide range of housing choices for older people. Current policies and guidance focus on securing an overall mix of housing types and tenure to meet a range of housing requirements, but do not require any special attention or priority to be given to delivering housing that is suitable for older people...Many local planning officers raised the issue of viability in relation to both the provision of general housing suitable for older persons, such as bungalows, and specialist housing for older people with associated facilities. Specialist retirement housing schemes normally include significant areas of non-saleable floor space (in the form of communal spaces) which can account for up to 30% of the total build footprint. Profit margins are thereby squeezed, challenging the economic viability of such developments."<sup>8</sup>
41. Edge Analytics produced a report in November 2017 on Pembrokeshire Coast National Park Demographic Forecasts. In terms of the population age profile it noted that,
42. "Over the 2001–2016 period, the profile of the National Park's population has aged, with the proportion of the older age groups increasing relative to the population in the younger age groups (Figure 5). Between 2001 and 2016, the proportion of the population aged 65+ living in Pembrokeshire National Park increased from 22% to 30%. This compares to an increase from 19% to 25% for Pembrokeshire UA as a whole and 17% to 20% for Wales. The National Park has an older population age profile than each of these areas, with a median 2.8 age of 53, compared to 47 in the Unitary Authority and 42 in Wales. The old age dependency ratio of 53 is also higher in the National Park than for the Unitary Authority and Wales (42 and 32 respectively)."<sup>9</sup>

---

<sup>7</sup> Ageing Well in Wales and Pembrokeshire County Council, Ageing Well in Pembrokeshire, 2016: <http://bit.ly/2hJYyTT>

<sup>8</sup> Welsh Government: Our Housing AGenda: meeting the aspirations of older people in Wales, 2017: <http://bit.ly/2oYYNx8>

<sup>9</sup> Edge Analytics, Pembrokeshire Coast National Park Demographic Forecasts, November 2017, p7-6

43. The report then goes on to note how population age structures and the ageing population of Pembrokeshire Coast National Park will impact on future housing requirements of the area,
44. “Over the 2015–2031 plan period, a greater decline in the population aged 0–69 is estimated under the demographic scenarios compared to the dwelling-led scenarios. Under the dwelling led scenarios, growth is estimated in the 30–44 age groups, as a result of increased net in migration. Under all scenarios, the older population aged 75+ is expected to experience a significant increase over the 16-year plan period.”<sup>10</sup>
45. The above data analysis supports previous evidence in relation to an ageing population within the Park.
- 41 Census data shows a decrease of 30 to 44 year-olds for Pembrokeshire Coast National Park between 2001 and 2011. ONS indicates that this may have impacted on decreases of 0-14 year olds across Parks as 30 to 40 year olds would ordinarily comprise the majority of parents for 0 to 14 year-old. Pembrokeshire National Park saw a -16% drop in 0-14 year olds in this period and a decrease of -0.9% for 15-29 year olds in this period.<sup>11</sup>
- 42 Despite decreases in the number of children in the Park it is important to consider potential trends and issues facing this age group. The % of children living in low income families for key LSOA areas in the Park in 2014 remained beneath the Welsh average of 22.5%, with only Solva at 21.3% above the Pembrokeshire average of 20.4%. However between 2013 and 2014 there was an increase in the % of children living in low income families across all key LSOA areas in the Park with significant increases in Solva, Saundersfoot 1 and Crymych 1.

% of children living in low income families <sup>12</sup>			
LSOA	31 August 2013	31 August 2014	Difference
<b>Tenby (Local Services and Tourism Centre)</b>			
Tenby: North	11.7%	16.9%	+5.2
Tenby: South 1	14.8%	18.6%	+3.8
Tenby: South 2	13.4%	18.6%	+5.2
<b>Newport (Local Centre)</b>			
Newport	9.9%	15.4%	+5.5
<b>Saundersfoot (Local Centre)</b>			
Saundersfoot 1	8.3%	12.3%	+4
Saundersfoot 2	10.3%	18.6%	+8.3
<b>St David's (Local Centre)</b>			
St David's	9.4%	11.3%	+1.9
<b>Crymych (Local Centre)</b>			
Crymych 1	9.1%	15.2%	+6.1

<sup>10</sup> Ibid, p15

<sup>11</sup> ONS: 2011 Census: Characteristics of National Parks: <http://bit.ly/2hzOZ6N>

<sup>12</sup> Info Base Wales: Children in low income families: <http://bit.ly/2h4nmSj>

<b>Crymych 2</b>	<b>9%</b>	<b>9.8%</b>	<b>+0.8</b>
<b>Rural Centres (Where LSOA data available)</b>			
<b>Amroth</b>	14.6%	16%	+1.4
<b>Dinas Cross</b>	8.1%	12.4%	+4.3
<b>Manorbier</b>	12.6%	16.7%	+4.1
<b>Solva</b>	13.7%	21.3%	+7.6
<b>St Ishmaels</b>	8.9%	11.8%	+2.9
<b>Pembrokeshire</b>	17.9%	20.4%	+2.5
<b>Wales</b>	20.5%	22.5%	+2

42. A headline action identified in the Single Integrated Plan for Pembrokeshire is to provide housing opportunities to meet the needs of young people.<sup>13</sup> An increase in children living in low income families may also have an impact longer term with a greater number of families needing to access affordable housing options. According to the housing market assessment currently the majority of demand in Pembrokeshire is for one bed properties.<sup>14</sup> Consultation responses indicate interest in promotion of self build housing as an option to help meet affordable housing need for young people.<sup>15</sup>

43. The Wales Rural Observatory report on The Experiences and Aspirations of Young People in Rural Wales which used Fishguard in Pembrokeshire as one of its study areas noted that:

a) Young people liked living in rural areas for the quality of life it afforded, including the peace and quiet, the beautiful scenery, ease of access to the high quality natural environment and the wide range of outdoor activities available nearby and the perceived safety of the rural communities, particularly compared to urban and more built-up areas.

b) Issues identified by the study for young people included:

- i. **Lack of Leisure and social opportunities:** Young people and young families emphasised the importance of securing and maintaining current levels of service provision within their areas, particularly the small core of services that they viewed as crucial to their communities, such as a shop, primary school, GP surgery and community hall or leisure centre. Issue of social isolation identified as a result of poor availability, accessibility and choice of leisure and recreation facilities and wider social activities specifically aimed at young people and children.
- ii. **Transport:** The availability of both private and public transport was identified as a major barrier to young people and young families in accessing local education and training opportunities, leisure and social activities and for travelling to educational establishments or workplaces.

<sup>13</sup> PCC, Pembrokeshire Single Integrated Plan 2013-18: <http://bit.ly/2gNm8Pt>

<sup>14</sup> PCC, Local Housing Market Assessment 2014: <http://bit.ly/2hRUltp>

<sup>15</sup> PCNPA, Report of the Head of Park Direction, Subject: local development plan review report and delivery Agreement (25/16): <http://bit.ly/2hxP3Xu>

Limited transport options impacted on young people's job search strategies who wished to secure training placements or employment after leaving formal education and on sustaining employment if placement or job involved shift work or anti-social hours and the person was reliant on public transport.

- iii. **Housing:** The research confirmed that the availability of housing, to buy or rent, that was affordable and accessible was a major and growing problem within the study areas, and was a key factor influencing young people's decisions to move out of their home communities, or discouraging their return. The findings suggest that young people and young families were disadvantaged in housing markets because they had to compete in housing markets where there was intense competition from commuters, retirees and second-home buyers. Younger households, typically those on lower incomes and with young families, were also being hard hit by a shortage of available social housing. The planning system was also seen as a major obstacle to the provision of sufficient and suitable affordable housing in the study areas and was widely viewed as inflexible with regard to local needs.
- iv. **Employment:** Specific concern for young people when considering their future work or career options and aspirations was the limited range of job opportunities available in their local areas.<sup>16</sup>

44. In 2014/15 the Child Measurement Programme showed that 30.2% of children aged 4-5 were overweight or obese in Pembrokeshire compared to 26.2% across [Wales](#).<sup>17</sup> The Planning for better health and well-being in Wales report notes that "Takeaway exposure was found to be associated with a higher consumption of fast food, and with Body Mass Indexes (BMIs) up to 1.21% higher than for those less exposed."<sup>18</sup>

45. The document also highlighted the positive benefits allotment gardening and access to green space can have on older people in particular older men.<sup>19</sup>

46. Feedback from PCNPA Youth Rangers as part of Local Authority consultation on 'Wellbeing - What's it all about' identified the following factors as being important for the wellbeing of their community. Environmental factors identified were access to beaches/nature reserves, reduced pollution, litter free society, No landfill/ Sewage works/ Nuclear energy near people, Cleanliness, Conserving Sites and protection of vulnerable species. Cultural factors identified were accessibility to places of worship, conserving sites of heritage (castles etc.), availability of bilingual documents, maintaining traditional food, holding cultural celebratory events e.g.

---

<sup>16</sup> The Wales Rural Observatory, The Experiences and Aspirations of Young People in Rural Wales, 2013: <http://bit.ly/2hzXaQy>

<sup>17</sup> InfoBaseCymru: Children who are overweight or obese: <http://bit.ly/24UK7eF>

<sup>18</sup> Town & Country Planning Association, Wales Health Impact Assessment Support Unit and Public Health Wales, Planning for better health and well-being in Wales, 2016: <http://bit.ly/2hK1AHQ>

<sup>19</sup> Ibid

Eisteddfod and Multi-Cultural acceptance – no racism. Economic factors identified were: affordability, benefits, child tax credits, rewards economically and better bus service. Social Factors identified were better support, low crime, housing, public transport, education, health, counselling service, community hubs, youth clubs, prevent disengagement of youth and leisure/ activity centres/ events.

47. The Pembrokeshire well-being assessment published in April 2017 identified a number of themes in terms of age relevant for different stages across the life course. Although the assessment relates to the whole County, key themes still have relevancy when looking at the Park area. Key areas of relevance in relation to the preferred strategy include access to childcare, childhood obesity, access to play and safer routes to play areas, transport in terms of young people and older people and impact on travel to work patterns for working age people, transport and access to services for young adult carers, affordable housing and young people/ people of working age and maintain access to services and supply of safe, suitable and affordable accommodation for older people.

Key Factors from Baseline Analysis	Implications for Local Development Plan
<p>An ageing population, with a high concentration of older people in some LSOA areas within the Park.</p> <p>A current and future demand for neighbourhoods and communities that facilitate ageing in place and promote prevention agenda through accommodation and support, neighbourhood design and layout, access to health, community and other facilities and accessible transport.</p>	<p>The need to meet the housing and support needs of an ageing population through facilitating the development of appropriate housing options for older people in locations which are accessible, have good public transport links and good services. This should be taken into account in terms of spatial policies.</p> <p>The housing market assessment only takes into account bedroom numbers. Can the mix of housing provided be influenced?</p> <p>LDP should facilitate development of Dementia Friendly Neighbourhoods, taking into account the principles found within Dementia friendly communities Guidance for councils<sup>20</sup> and Neighbourhoods for Life Designing dementia-friendly outdoor environments.<sup>21</sup></p> <p><b>Spatial Strategy</b>  <b>Policy 9 Light Pollution</b>  <b>Policy 30 Sustainable Design</b>  <b>E. Affordable Housing and Housing</b>  <b>F. Community Facilities, Retailing,</b></p>

<sup>20</sup> Local Government, innovation in Dementia, Dementia Friendly Communities, Guidance for Councils: <http://bit.ly/2h4qCwZ>

<sup>21</sup> Oxford Institute for Sustainable Development, Neighbourhoods for Life Designing dementia-friendly outdoor environments: <http://bit.ly/2h4y4bx>

Key Factors from Baseline Analysis	Implications for Local Development Plan
<p>Access to affordable housing for young people.</p> <p>Increased % of children in low income household within National Park Area may impact on need for affordable housing for families in the future.</p>	<p><b>Transport</b></p> <p>How will proposed changes within the plan impact on affordable housing provision in terms of younger people and potentially families on low income within the Park?</p> <p>Can policies within the plan help facilitate self-build opportunities?</p> <p><b>Spatial Strategy</b>  <b>E. Affordable Housing and Housing</b>  <b>D. Visitor Economy. Employment</b>  <b>F. Community Facilities, Retailing, Transport</b></p>
<p>Public health considerations including:  Impact of air (travel congestion) noise and other pollution on child health.  Mechanisms to help counter childhood obesity - access to healthy and non-healthy food and promotion of walking.  Access to play facilities and greenspaces for children in terms of Mental Wellbeing.  Access to outdoors and community facilities for older people in terms of mental wellbeing and preventing isolation.  Road safety consideration for children.</p>	<p>A need to take into account public health considerations through land use policies.</p> <p><b>Spatial Strategy</b>  <b>A. Special Qualities</b>  <b>B. Major Development, the Potential for Growth</b>  <b>C. Climate Change, Sustainable Design, Renewable Energy, Flooding</b>  <b>D. Visitor Economy, Employment</b>  <b>E. Affordable Housing and Housing</b>  <b>F. Community Facilities, Retailing, Transport</b></p>
<p>Concern for young people about limited range of job opportunities available in their local areas.</p> <p>Implication of policies for young people in certain industries e.g. young farmers</p>	<p>A need to ensure land use policy is encouraging a range of job opportunities available to young people in local areas, taking into account accessibility and transport considerations.</p> <p>What are the views of young people in farming industry or looking to go into farming industry on Policy 43A - Agricultural Diversification (Policy 46)</p> <p><b>Spatial Strategy</b>  <b>B. Major Development, the Potential for Growth</b>  <b>D. Visitor Economy, Employment</b>  <b>Policy 46 Agricultural Diversification</b>  <b>F. Community Facilities, Retailing and Transport</b></p>
<p>Transport barriers faced by older people and young people due to rural nature of area, poor public transport links and costs associated with private transport. Negative impact on people's ability to access</p>	<p>Location of developments in terms of public transport links and proximity to employment and education opportunities, community facilities and health facilities.</p>

Key Factors from Baseline Analysis	Implications for Local Development Plan
<p>facilities, recreational opportunities, health facilities, colleges, job placements and employment.</p> <p>Importance of accessible transport options in terms public transport and access to accessible car parking and drop off places in terms of facilities.</p>	<p>Promotion of accessible public transport infrastructure.</p> <p>Potential issues relating to need for car parking and accessible car parking spaces for residential units.</p> <p>Drop off places in terms of facilities.</p> <p>Storage considerations in terms of mobility scooters.</p> <p><b>Spatial Strategy</b>  <b>F. Community Facilities, Retailing and Transport</b>  <b>E. Affordable Housing and Housing</b></p>

## Disability

47. Due to the older nature of the population of the National Park and specific LSAO areas, the Census 2011 data shows as it would be expected that the LSAO areas looked at have a higher than Wales average of people whose day-to-day activities are limited. In Newport, Saundersfoot 1 and Amroth over a quarter of the population (usual residents over 16) day to day activities are limited. In Tenby North, South 1 and South 2 , Saundersfoot 2 and St Davids just under a quarter of the population's day to day activities are limited. Saundersfoot 1 (14.1%), Tenby South 2 (13.1%) and Tenby North (12.4%) have over the Wales average of 11.9% of the population whose day to day activities are limited a lot, Pembrokeshire average of 11.1% and Pembrokeshire Coast National Park average of 10.8%.

% Day to Day Activities Limited (Census 2011) <sup>22</sup>				
LSOA	% of people whose day-to-day activities are limited	% of people whose day-to-day activities are not limited	% of people whose day-to-day activities are limited a lot	% of people whose day-to-day activities are limited a little
<b>Tenby (Local Services and Tourism Centre)</b>				
Tenby: North	24.6	75.4	12.4	12.2
Tenby: South 1	24.3	75.7	11.8	12.5
Tenby: South 2	24.3	75.7	13.1	11.2
<b>Newport (Local Centre)</b>				
Newport	26.3	73.7	10.2	16.1
<b>Saundersfoot (Local Centre)</b>				
Saundersfoot 1	25.9	74.1	14.1	11.8
Saundersfoot 2	23.3	76.7	10.8	12.5

<sup>22</sup> Info Base Wales: Limited Long Term Illness: <http://bit.ly/2hoPJOP>

<b>St David's (Local Centre)</b>				
St David's	24.3	75.7	11.2	13.2
<b>Crymych (Local Centre)</b>				
Crymych 1	20.1	79.9	9	11.2
Crymych 2	19.4	80.7	8.6	10.8
<b>Rural Centres (Where LSOA data available)</b>				
Amroth	26.3	73.7	11.9	14.4
Dinas Cross	21.3	78.7	9.6	11.7
Manorbier	22.6	77.4	10.9	11.8
Solva	17.4	82.6	7.5	9.9
St Ishmaels	19.7	80.3	9.1	10.6
Pembrokeshire National Park	22.8	77.2	10.8	12
Pembrokeshire	22.5	77.5	11.1	11.4
Wales	22.7	77.3	11.9	10.8

48. Pembrokeshire National Park (8.6%) has a higher % of its population providing 1-19 hours care than Pembrokeshire (7.4%) and Wales (6.9%). The following LSOA areas Newport, Saundersfoot 1, Amroth, Dinas Cross and St Ishmaels have 9% or more of their population providing 1-19 hours of care a week with St Davids having the highest proportion at 10.1%. The following LSOA areas Tenby South 2, Saundersfoot 2, Crymych 1, Amroth and Manorbier have slightly above the Welsh, Pembrokeshire and Pembrokeshire Coast National Park % of people providing 20 - 49 hours unpaid care. The following LSOA areas of St Davids, Amroth and Manorbier have slightly above the Welsh, Pembrokeshire and Pembrokeshire Coast National Park % of people providing 50+ hours unpaid care. Amroth (15.4%), St Ishmaels (14.45%) and Manorbier (14.3%) (rural centres) and St David's (15.1%) (local centre) have the highest % of people providing some form of unpaid care in terms of LSOA areas looked at.

<b>% of people that provide unpaid care (March 2011)<sup>23</sup></b>				
LSOA	% of people that provide no unpaid care	% of people that provide 1 - 19 hours unpaid care a week	% of people that provide 20 - 49 hours unpaid care a week	% of people that provide 50+ hours unpaid care a week
<b>Tenby (Local Services and Tourism Centre)</b>				
Tenby: North	87.6	8	1.4	0.3
Tenby: South 1	90.3	6.3	1.1	2.3
Tenby: South 2	87.6	6.8	2.1	3.4
<b>Newport (Local Centre)</b>				
Newport	86.4	9.0	1.7	2.8
<b>Saundersfoot (Local Centre)</b>				
Saundersfoot 1	87.8	9.0	1.7	2.8
Saundersfoot 2	88.5	7.9	2	2.3
<b>St David's (Local Centre)</b>				
St David's	85	10.1	1.4	3.6
<b>Crymych (Local Centre)</b>				
Crymych 1	87.2	7.5	2.2	3.2

<sup>23</sup> Info Base Wales: Health and provision of unpaid care: <http://bit.ly/2hxJfx9> and ONS: Key statistics for national parks in England and Wales: <http://bit.ly/2gcJd9B>

<b>Crymych 2</b>	89.4	6.9	1.3	2.5
<b>Rural Centres (Where LSOA data available)</b>				
<b>Amroth</b>	84.6	9	2	4.4
<b>Dinas Cross</b>	86.2	9.3	1.2	3.3
<b>Manorbier</b>	85.7	8.1	2.5	3.7
<b>Solva</b>	88.8	7.3	1.6	2.5
<b>St Ishmaels</b>	85.6	9.9	1.6	2.9
<b>Pembrokeshire National Park</b>	86.4	8.6	1.6	3.2
<b>Pembrokeshire</b>	87.6	7.4	1.7	3.3
<b>Wales</b>	87.9	6.9	1.8	3.4

49. The Welsh Government's Planning Policy Wales Edition 9, Chapter 9 on Housing notes that Local Planning Authorities should promote:

“‘barrier free’ housing developments, for example built to Lifetime Homes standards” noting that “The ‘Lifetime Homes’ concept promoted by the Joseph Rowntree Foundation comprises 16 major standards that aim to provide homes which are flexible and can cater for people with a wide range of disabilities.”<sup>24</sup>

50. The 2014 Local Housing Market Assessment for Pembrokeshire does not provide information on need for accessible housing in the area or need for bungalows.<sup>25</sup>

51. The significance of meeting accessible housing provision through Life Time Homes and specific design features in terms of both affordable and market housing is noted within a report providing a new perspective on the market case for accessible homes. It noted that:

- a) Significant numbers of people with needs for accessible features also have the means to consider the purchase of a home.
- b) Amongst households with an identified need for accessible housing, 39% (700,000) have incomes in the top half of the income distribution of the population as a whole. In addition, 55% of owner occupiers living in a household including a disabled person and 33% of working age households containing a disabled person have incomes above this level.
- c) 360,000 households containing a disabled person have savings of £12,000 or more.
- d) 1 in 4 households needing accessible housing (480,000) have incomes above the median income after housing costs of all owner occupier households (£448 per week).
- e) Disabled people are significantly more likely to be dissatisfied with their current home than non-disabled people – 14% say they are dissatisfied compared to 8% of non-disabled people. Satisfaction levels are lowest among disabled people under 45 and those currently renting from a private landlord.

<sup>24</sup> Welsh Government, Planning Policy Wales Edition 9, Chapter 9 Housing, November 2016: <http://bit.ly/2hxMuVi>

<sup>25</sup> PCC, Local housing Market Assessment 2014: <http://bit.ly/2hRUltp>

- f) What distinguishes this market segment is their specific requirements for features that make it possible for them to buy with the confidence that their new home will meet their needs into the future. Many also found the proximity of family and friends – their support network – an essential factor in choice of location.
- g) The survey found that a number of people of all tenures see a move to social rented housing as a likely future option, that would meet their accessibility needs as they grow older.
- h) Regardless of current housing situation the public in general do acknowledge their potential future need for accessible housing features to some degree.
- i) The majority (59%) of disabled people who are 65 and over say that they will need accessible housing features in the next five years, with 46% of all disabled people and 20% of the general public saying the same.
- j) Of people with caring responsibilities, 47% say that the person they care for will need accessible housing features within the next five years or so.
- k) 50% of people said they would most favour staying in their current home with some adaptations to allow them to live independently.
- l) Around 19% of the public (or 9.8 million people across Great Britain) would most favour moving to different property specifically designed or adapted to enable them to live independently.
- m) Among the public at large, a significant minority indicate in principle interest in living in inclusive accessible housing schemes if they need care and support at some point in their life. 38% say they would be interested in living in a scheme for disabled and non-disabled people of a similar age range. 35% indicate an interest in living in a scheme for disabled and non-disabled people of any age.
- n) Nearly half of the British public (47%) say they would be more likely to consider moving to a property if it had a downstairs bathroom,
- o) More than a third would be more likely to consider a property if it had adaptations to make it easier to use a bathroom, or step free access at the front of the property.
- p) People with unmet need for accessible housing are four times more likely to be unemployed or not seeking work because they are sick or disabled than those whose needs are met or who are disabled but do not need accessible housing.
- q) Developers, planners, and health and social care commissioners should take note of the overwhelming desire of the general public to maintain independence in mainstream housing as they age and/or develop needs for care and support. We need to ensure that the homes of the future enable people to age in place, or have genuine choice to move to a home that is designed and built to support their ongoing independence – not only for the sake of the household but to minimise public spending on the alternative.<sup>26</sup>

---

<sup>26</sup> Habinteg and Popworth Trust: The hidden housing market. A new perspective on the market case for accessible homes: <http://bit.ly/2hS21M8>

52. However it is also important to view this within the context of wider welfare reform and for those on lower incomes affected by under occupancy charge there is a need to develop one or two bed accessible affordable accommodation.

53. Linked to accessible housing is the need for wider neighbourhoods and facilities to be accessible. A RNIB report noted that Blind and partially sighted people told them that, on a day to day basis, they face the following problems when out and about:

- a) Street obstacles, both permanent and temporary, injuring blind and partially sighted people, sometimes seriously – such as bollards, advertising boards (a-boards), bins, cars parked on pavements and street furniture.
- b) Dangerous roads which do not have adequate, safe or accessible pedestrian crossings.
- c) Developments that remove kerbs and crossing points making an area more difficult for blind and partially sighted people to walk around – including developments sometimes called shared space or shared surfaces.<sup>27</sup>

54. In terms of active travel A Living Streets report, from May 2016 on overcoming barriers and identifying opportunities for everyday walking for disabled people, noted a number of physical barriers and other issues that prevented people from accessing and using their neighbourhood:

- a) At crossings the absence of dropped kerbs on the other side of the road was a particular problem for people in wheelchairs. Drop kerbs at junctions being too steep.
- b) For pedestrians with visual impairments the sounds generated by high traffic volumes can be frightening.
- c) Absence of safe places to cross on busy roads was a big concern for participants with limited mobility. Even with the design features, such as build outs which narrow the road carriageway and reduce the distance pedestrians need to travel, it is impossible to step out in the face of steady traffic. Disabled pedestrians are left waiting for a driver to notice them, slow down and stop to enable them to cross the road.
- d) New puffin crossings are able to detect pedestrians and to allow more time to cross. However, their design also situates the red and green men at a lower level – out of the line of sight of people in wheelchairs when there are other pedestrians around. This led to the recommendation from wheelchair users that all controlled crossings should have an audio signal.
- e) In high footfall areas and residential locations uneven surfaces were a concern due to a fear of tripping (e.g. over raised flagstones). It could discourage people from getting off the bus and walking instead. For those who through choice or necessity walked anyway, that worry was expressed by the need to constantly look down and check their footing – reducing their pleasure in walking. This was a particular issue for people recovering from stroke.

---

<sup>27</sup>RNIB, The barriers to blind and partially sighted people getting out and about: <http://bit.ly/2gNxOBA>

- f) Difficulties caused by temporary obstructions, such as wheelie bins, advertising boards (A-boards) and cars parked on the pavement, resulting in people having to go on the road or facing an obstruction and not being able to move.
- g) Cycling on pavements and mobility scooters were seen as a menace. This was a particular concern for carers.
- h) Design considerations intended to help people with one type of sensory impairment may conflict with the needs of people with other types of impairment. Tactile paving, for example, is known to cause discomfort for those with arthritis. The raised blisters on steps and at crossings can cause trips and falls too, but their need is accepted.
- i) The issue of shared space or shared surfaces (in particular the absence of kerbs) is contentious for many blind and partially sighted people.
- j) For people with visual impairments, the lack of colour contrast could make it difficult to detect uneven surfaces:
- k) Well designed pedestrian environments support functional mobility and boost psychological recovery from limiting conditions. Participants identified how low cost measures, such as the provision of handrails could make a big difference in hilly areas.
- l) For carers, the physical demands of pushing wheelchairs up steep slopes influences travel decisions. Volunteers helping multiple residents find it easier to use a car. Where mitigation measures (e.g. ramps) have been put in place, these need to be consistent.
- m) The availability of accessible toilets (or lack thereof) was identified as an issue that can limit everyday walking opportunities.
- n) The provision of seating might encourage disabled people to walk more
- o) Consideration needs to be given to the „door-to-door“ journey and the links between buildings, streets, and public transport services. People with different mobility and accessibility needs are more at risk of „community severance, consequently, an inclusive, accessible outdoor environment is one that allows an older person to travel from their home to any chosen destination without risk or worry.
- p) Walking routes and interchanges with public transport need to be easy to use and direct in order to compete with the convenience offered by the car.<sup>28</sup>

55. Lack of accessible routes will impact on people being able to access wider facilities such as health care facilities, education facilities, employment opportunities, recreational and community facilities and wider independence. Each year 1.4 million people miss, turn down or choose not to seek medical help because of transport problems.<sup>29</sup> Alongside accessible routes it is also important that facilities themselves are accessible.

---

<sup>28</sup> Living Streets, Overcoming barriers and identifying opportunities for everyday walking for disabled people, May 2016: <http://bit.ly/2hak8Og>

<sup>29</sup>Town & Country Planning Association, Wales Health Impact Assessment Support Unit and Public Health Wales, Planning for better health and well-being in Wales, 2016: <http://bit.ly/2hK1AHQ>

56. The number of Vehicle badges on issue to individuals at 31<sup>st</sup> March 2015 in Pembrokeshire was 9699.<sup>30</sup> 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.
57. Access to the outdoors can have positive mental health and wellbeing benefits. A report on 'Planning for better health and well-being in Wales' notes in relation to wider research that:
- a) Mixed land use, higher population densities and highly connected street layouts are associated with a greater likelihood of walking, of between 25% and 100%.
  - b) That research shows that mental health patients reported reduced levels of rumination after taking part in a 90-minute nature walk, while patients taking part in similar walk in an urban environment reported no improvements.
  - c) Access to green space can also result in improvements in mental health and well-being, and has positive effects on depression, stress and dementia (White et al., 2013).
  - d) Researchers who undertook a longitudinal study found that people who walked or cycled to work benefited from improved mental well-being in comparison with those who travelled by car (Martin et al., 2014).
  - e) Regular walking can reduce the risk of mortality by up to 20%, and the risk of cardiovascular disease by up to 30%. It also reduces the risk of high blood pressure, stroke and high cholesterol (Sinnott et al. 2011).
  - f) Access to green space has a range of positive health effects, via increased levels of exercise, and has a series of positive impacts on body mass index (Coomes et al. 2010) and other conditions typically associated with inactivity, such as diabetes, cardiovascular disease, musculoskeletal conditions and cancers (Department of Health, 2011).
  - g) A number of studies have found that allotment gardening is positively linked to health. One study found that less than 30 minutes of allotment gardening can result in improvements in self esteem and mood via reductions in tension and depression (Wood et al., 2015).<sup>31</sup>
58. In terms of access to tourism opportunities The Recreational Audit for disabled access in Pembrokeshire Survey Report, 2016 highlighted a number of barriers to access for Disabled people including:

---

<sup>30</sup> Stats Wales, Vehicle badges on issue by local authority and measure (pre 2015-16):

<http://bit.ly/2gNBumS>

<sup>31</sup> Town & Country Planning Association, Wales Health Impact Assessment Support Unit and Public Health Wales, Planning for better health and well-being in Wales, 2016: <http://bit.ly/2hK1AHQ>

- a) Difficulties with public transport: A lack of regular, public transport services, particularly to rural areas, during hours of desired participation, i.e. weekends, evenings, out of the holiday season, etc.
- b) Lack of appropriate facilities: Some of the providers reported that the natural environment can provide great challenges due to the varying landscapes, either encountered while conducting the activity or attempting to access a site. Appropriate sites that are available are not always geographically suitable. Though there are venues that are better suited than others they are not always geographically situated to be used efficiently for all providers.<sup>32</sup>

59. Results of the activity providers survey within the report noted the following relevant areas:

- a) The most common provision of opportunities for disabled individuals made was the ability for wheelchair users to access some trails/activities (50%). Forty five percent offered provision for wheel chair users to indoor facilities while only 9% offered the ability to use all outdoor trails and activities due the landscape of the natural terrain either used to access an area or during the activity itself.
- b) Activity providers were asked if they faced 'physical barriers' that prevent participation in activities at their location if they provided activities on-site, 43% of the responses showed that there are areas within the facilities or on the property that are inaccessible. Health and safety concerns over the appropriateness of the activity for all users was cited 37%, and 31% of providers stated that they face no issues with physical barriers in regards to onsite provision of activities. Comments: *"Most onsite habitats accessible," "Rough terrain leading to the activity location"*
- c) 81% of businesses stated that they faced issues with offsite facilities, and generally felt that the natural environment presented challenges in terms of use and access.
- d) 24% of those surveyed felt that health and safety concerns prevent participation to offsite activities compared to 37% of activities provided onsite. This could be due to the opportunity to use a variety of different venues in Pembrokeshire which can allow for varying abilities of participants. The ability to access appropriate equipment accounted for 43% of the responses, and only 9% of the businesses surveyed felt they face no issues with physical barriers.
- e) A number of comments related to access to beaches and water including:
  - i. *"Impossible to use Newgale beach because of pebble bank but other locations such as Broadhaven are better. Each site is risk assessed for health and safety"*
  - ii. *"The shingle bank at Newgale beach presents an issue."*
  - iii. *"Access to the water/sea, especially for wheelchair users"*<sup>33</sup>

60. PCNPA's Access for all guide shows that in the National Park there are

- a) Wheelchair Walk routes that have been improved for use by wheelchairs and meet the BT/Fieldfare Trust 'Countryside for all' standard. These standards relate to surface condition, slopes, path furniture, and a range of other criteria.

<sup>32</sup> PCF, Recreational audit for Disabled access in Pembrokeshire survey report, 2016: <http://bit.ly/2hAQz8l>

<sup>33</sup> Ibid

- b) Five Adventure Wheelchair Walks routes. These paths have had the least modification to enable the passage of wheelchairs. They generally have an unimproved natural surface and are therefore best used when ground conditions are dry. All introduced obstacles to wheelchairs have been removed. There is little cross-fall and slopes are modest. These routes may not be suitable for all types of wheelchairs.
- c) Nine Gentle Strolls routes these routes are not suitable for wheelchairs but are sections of the Coast Path that are considered to be easily accessible for pedestrians as they do not entail too many steps and have no stiles or long steep gradients.
- d) Thirty six Easy Access viewpoint locations in the Park that can all be reached by car and have a lay-by or parking
- e) Eighteen Easy Access Beaches are available within the Park.<sup>34</sup>

61. Eleven disability related hate crimes were recorded by the Dyfed- Powys police force area in 2015/16.<sup>35</sup> Promotion of “Secure by Design” principles and community safety as part of good design can help create a safer more secure environment in terms of buildings, public transport facilities such as bus stops and layout of neighbourhoods.

62. It is important that engagement mechanisms for consultation process are accessible to people across the disability spectrum with reasonable adjustments made where needed. An Easy Read version of the delivery agreement<sup>36</sup> has been produced and a summary version of the preferred strategy will also be made available in Easy Read (following advice from Pembrokeshire People First.)

Key Factors from Baseline Analysis	Implications for Local Development Plan
<p>High % of people whose day-to-day activities are limited in some LSOA areas. Amroth and Manorbier both rural centres have the highest % of people providing some form of unpaid care.</p> <p>Implications of this in terms of accessible affordable and market housing and developing accessible neighbourhoods and facilities.</p>	<p>A need to ensure adequate provision of accessible housing in terms of affordable housing and market housing. Taking into account a need to future proof housing through Life Time Homes principles and promoting certain design features.</p> <p><b>Spatial Strategy</b>  <b>Policy 9 Light Pollution</b>  <b>E. Affordable Housing and Housing</b></p>
<p>A number of barriers in neighbourhood and street design impact on access to the outdoors and active travel opportunities for disabled people across a range of disabilities.</p>	<p>Taking into account accessible design features at a street and neighbourhood level including distances to public transport will help overcome barriers to active travel for disabled people.</p>

<sup>34</sup> PCNPA, Access for all Guide: <http://bit.ly/2gND2xu>

<sup>35</sup> Hate crime, England and Wales, 2015/16 - Appendix Tables: <http://bit.ly/2hoUQOi>

<sup>36</sup> PCNPA, Easy Read Version of Delivery Agreement : <http://bit.ly/2hA3M1z>

Key Factors from Baseline Analysis	Implications for Local Development Plan
<p>As a result this can limit active travel opportunities and increase reliance of private car travel.</p> <p>However due to rural nature of area and limited public transport, accessible parking and drop off points at homes and facilities will be important.</p>	<p>A need to consider access to accessible parking and drop of points at homes and facilities.</p> <p><b>Spatial Strategy</b>  <b>C. Climate Change, Sustainable Design, Renewable Energy, Flooding</b>  <b>F. Community Facilities, Retailing and Transport</b>  <b>Policy 9 Light Pollution</b>  <b>E. Affordable Housing and Housing</b></p>
<p>Access to green spaces, active walking opportunities and allotments can have a positive effect on people’s mental health and wellbeing.</p>	<p>Positive impact of policies that promote greenspaces, active walking opportunities and allotments. A need to ensure that access to these opportunities is available to all e.g. policies that remove barriers to accessibility.</p> <p><b>Spatial Policy</b>  <b>A. Special Qualities</b>  <b>E. Affordable Housing and Housing</b>  <b>F. Community Facilities, Retailing, Transport</b></p>
<p>Potential access issues in terms of tourism and recreational opportunities within the Park.</p> <p>Positive identification and creation of wheelchair walks and easy access view points within National Park area.</p>	<p>A need to ensure that policies related to tourism industry take into account accessibility considerations.</p> <p>Policy 18 and 19 will relate to access to shoreline and beaches.</p> <p><b>Special Qualities</b>  <b>Policy 18 Shore Based Facilities</b>  <b>Policy 19 Porthgain, Saundersfoot, Solva and Tenby Harbours</b>  <b>C. Community Facilities, Retailing, Transport</b>  <b>D. Visitor Economy, Employment</b></p>
<p>Residents and tourists may be targeted in terms of disability hate crime. This may impact on their use of public transport and access to opportunities and facilities within the Park and further afield.</p>	<p>A need to promote Secure by Design principles and community safety considerations as part of good design and neighbourhood layouts to create a safe environment. This will be particularly important in terms of public transport</p>

Key Factors from Baseline Analysis	Implications for Local Development Plan
	<p>related facilities.</p> <p><b>Policy 30 Sustainable Design Spatial Strategy</b>  <b>F. Community Facilities, Retailing, Transport</b>  <b>E. Affordable Housing and Housing</b></p>
<p>Consultation methods need to be accessible and take reasonable adjustments into account.</p> <p>Documentation on LDP and its policies need to be accessible. Delivery Agreement is available in Easy read and a summary version of the preferred strategy will also be made available in Easy Read (following advice from Pembrokeshire People First.)</p>	<p>A need to ensure views of Disabled people are captured and that Disabled people do not face barriers to participation.</p> <p>A summary version of the preferred strategy will be made available in Easy Read (following advice from Pembrokeshire People First.)</p> <p>A need to respond to reasonable adjustment requests relating to format of LDP documentation once adopted.</p> <p><b>Consultation elements within Delivery Agreement</b></p>

## Gender Reassignment

63. Statistics on the number of trans people in the National Park or Pembrokeshire are not available. There is currently a lack of good quality statistical data regarding Trans people in the UK as a whole. According to The House of Commons Transgender Equality inquiry current estimates indicate that some 650,000 people are “likely to be gender incongruent to some degree”.<sup>37</sup>
64. In the UK wide Trans Mental Health Study, 81% of participants avoided certain situations due to fear, 51% worried they would have to avoid social situations or places in the future due to fear of being harassed, read as trans, or being outed.<sup>38</sup> No Transgender related hate crimes were recorded by the Dyfed-Powys police force area in 2015/16.<sup>39</sup> However the All Wales Hate Crime Research in 2013 showed there are significant barriers for transgender people to report hate crimes and identified the significant impact upon victims. Nearly half (46%) of victims disclosed suicidal thoughts, with over a third (37.5%) of victims stating violent crimes were the most

<sup>37</sup> House of Commons, Women and Equalities Committee, Transgender Equality, First Report of Session 2015: <http://bit.ly/1TX6NoC>

<sup>38</sup> Welsh Government, Welsh Government Action Plan Welsh Government Action Plan to advance equality for transgender people: <http://bit.ly/2gNFHap>

<sup>39</sup> Hate crime, England and Wales, 2015/16 - Appendix Tables: <http://bit.ly/2hoUQOi>

serious they had experienced.<sup>40</sup> The House of Commons Transgender Equality inquiry noted that confidential surveys of trans people suggest experience of hate crime is pervasive and everyday. The EHRC told them a study found that 40 per cent of transgender respondents had experienced verbal abuse, 30 per cent had experienced threatening behaviour, 25 per cent had experienced physical abuse and 4 per cent had experienced sexual abuse. While victims of transphobia can be targeted up to 50 times in one year, only three in 10 report the incident.<sup>41</sup> In the Welsh Government Consultation for their Welsh Government Action Plan to advance equality for transgender people respondents were particularly concerned about safety and harassment on public transport.<sup>42</sup>

65. There is an uneven geographical distribution of Gender Identity Clinics, meaning that many people have to travel long distances in order to access treatment.<sup>43</sup> This means people will be travelling out of the National Park area, Pembrokeshire and Wales to access treatment and access to good transport links will be important. The rural nature of the National Park also means that people will be reliant on good transport links to access community and support networks and groups within Pembrokeshire or further afield.
66. Evidence suggests that incidence of mental health problems is high for Trans people. For example, the Scottish Evidence Review survey found that 88 per cent of respondents had suffered from depression, 80 per cent from stress and 75 per cent from anxiety at some time. While the EHRC Transgender Research Review found that rates of self-harm and of attempted suicide were high (Isolation, discrimination and transphobia were thought to contribute to this).<sup>44</sup> Research has shown that access to greenspace, allotments and nature walks can have a positive impact on mental health and wellbeing.<sup>45</sup>

Key Factors from Baseline Analysis	Implications for Local Development Plan
Trans people may feel unsafe in public spaces and be targeted in terms of hate crime. This may impact on their use of public transport and access to opportunities and facilities within the Park and further afield.	A need to promote Secure by Design principles and community safety considerations as part of good Design and neighbourhood layouts to create a safe environment. This will be particularly important in terms of public transport

<sup>40</sup> Welsh Government, Welsh Government Action Plan Welsh Government Action Plan to advance equality for transgender people: <http://bit.ly/2gNFHap>

<sup>41</sup> House of Commons, Women and Equalities Committee, Transgender Equality, First Report of Session 2015: <http://bit.ly/1TX6NoC>

<sup>42</sup> Welsh Government, Welsh Government Action Plan Welsh Government Action Plan to advance equality for transgender people: <http://bit.ly/2gNFHap>

<sup>43</sup> House of Commons, Women and Equalities Committee, Transgender Equality, First Report of Session 2015: <http://bit.ly/1TX6NoC>

<sup>44</sup> EHRC, Transgender Research Review, 2009: <http://bit.ly/2e0t2jN>

<sup>45</sup> Town & Country Planning Association, Wales Health Impact Assessment Support Unit and Public Health Wales, Planning for better health and well-being in Wales, 2016: <http://bit.ly/2hK1AHQ>

Key Factors from Baseline Analysis	Implications for Local Development Plan
	related facilities.  <b>Policy 30 Sustainable Design Spatial Strategy F. Community Facilities, Retailing, Transport E. Affordable Housing and Housing</b>
People may have to travel within Pembrokeshire and out of area to access community and support groups.  People accessing Gender Identity Clinics will have to travel out of county and currently Wales to access them.	A need to promote good accessible public transport and private transport links within the Park, linked to wider Pembrokeshire and regional networks.  <b>F. Community Facilities, Retailing, Transport</b>
Importance of being able to access health facilities for Trans people.  Inequalities in mental health outcomes for Trans people.	A need to promote access to health facilities. Land use policies that have positive impact on health and wellbeing outcomes may contribute to better mental health outcomes for Trans people.  <b>Spatial Policy Special Qualities E. Affordable Housing and Housing F. Community Facilities, Retailing, Transport</b>

## Sex (Gender)

67. Pembrokeshire National Park follows the trend found in Pembrokeshire and Wales of an almost even split between genders, but with there being slightly more females than males. At LSOA the most significant difference in terms of population make up by gender is Solva where 57.1% of the population is male.

% Population by gender (30 June 2015) <sup>46</sup>		
LSOA	Female	Male
<b>Tenby (Local Services and Tourism Centre)</b>		
Tenby: North	52.3	47.7
Tenby: South 1	51.3	48.7
Tenby: South 2	52.6	47.4
<b>Newport (Local Centre)</b>		
Newport	52.5	47.5
<b>Saundersfoot (Local Centre)</b>		
Saundersfoot 1	49.5	50.5
Saundersfoot 2	50.4	49.6
<b>St David's (Local Centre)</b>		

<sup>46</sup> Info Base Wales: Local area population estimates by age: <http://bit.ly/2hxPckh>

<b>St David's</b>	49.9	50.1
<b>Crymych (Local Centre)</b>		
<b>Crymych 1</b>	49.3	50.7
<b>Crymych 2</b>	49.6	50.4
<b>Rural Centres (Where LSOA data available)</b>		
<b>Amroth</b>	50.5	49.5
<b>Dinas Cross</b>	52.7	47.3
<b>Manorbier</b>	51.1	48.9
<b>Solva</b>	42.9	<b>57.1</b>
<b>St Ishmaels</b>	49.8	50.2
<b>Pembrokeshire National Park Authority</b>	<b>51.2</b>	<b>48.8</b>
<b>Pembrokeshire</b>	<b>50.9</b>	<b>49.1</b>
<b>Wales</b>	<b>50.8</b>	<b>49.2</b>

68. Research for the RTPI Gender Toolkit showed that the following issues feature highly for women:

- a) Safety (personal safety, fear of crime)
- b) Environmental justice
- c) Access and mobility
- d) Affordable housing
- e) Local facilities including shops, community facilities for children and elder care, schools, meeting places, parks, leisure facilities and play spaces, accessible recycling facilities, seating and shelter
- f) Public toilets.<sup>47</sup>

69. In terms of safety consideration nearly half a million adults are sexually assaulted each year and around 85,000 women and 12,000 men are raped each year in England and Wales.<sup>48</sup> The Crime Survey for England and Wales for year ending March 2015; estimates that 8.2% of women and 4.0% of men reported experiencing any type of domestic abuse in the last year (that is, partner / ex-partner abuse (non-sexual), family abuse (non-sexual) and sexual assault or stalking carried out by a current or former partner or other family member). This is equivalent to an estimated 1.3 million female victims and 600,000 male victims. The number of incidents of domestic abuse in Wales for Dyfed Powys Police was 7174.<sup>49</sup> Promotion of "Secure by Design" principles and community safety as part of good design can help create a safer more secure environment in terms of buildings, public transport facilities such as bus stops and layout of neighbourhoods. Due to the rural nature of the National Park access to good transport links will be important in terms of people looking for support who may have to travel to other areas within Pembrokeshire County to access it.

70. The highest suicide rate in the UK in 2014 was for men aged 45-49 at 26.5 per 100,000. Overall and female suicide rates in Wales in 2014 were at their lowest since

<sup>47</sup> RTPI, Gender and Spatial Planning Good Practice Briefing: <http://bit.ly/2hAYken>

<sup>48</sup> Welsh Government, EIA on National Strategy on Violence against Women, Domestic Abuse and Sexual Violence <http://bit.ly/2gNJYKQ>

<sup>49</sup> Ibid

1981. The male suicide rate is the second lowest in this time.<sup>50</sup> From data from the Wales Welsh Health Survey it has been estimated that more women than men are not meeting guidelines on physical activity (half of all women and a third of all men in Wales.)<sup>51</sup> Research has shown that access to greenspace, allotments and nature walks can have a positive impact on mental health and wellbeing particular stress.<sup>52</sup>

71. Chwarae Teg research into “Working Women’s Journeys, An Overview of the Relationship between Commuting and Gender” notes that:

- a) For both men and women, the local authority where the highest proportion live and work is Pembrokeshire, while the lowest is the Vale of Glamorgan.
- b) A considerably higher proportion of women work closer to home than men, and the fact that women still undertake the lion’s share of caring responsibilities is the most likely reason. Working closer to home makes it easier for women to balance caring and work but it also limits their employment opportunities and earning potential, and often results in the under-utilisation of women’s skills.
- c) Women are also far more likely than men to take their children to school, with women making an average of 70 such trips a year compared to men making an average of 31.1 Women are more likely, therefore, to drop off their children at school on their way to work, making their commute more complicated.<sup>53</sup>

72. Consideration of access to child care facilities and location of employment in terms of schools and homes could help to have a positive impact on women with caring responsibilities. The Well-being Assessment for Pembrokeshire highlighted the issue of access to adequate childcare facilities in Pembrokeshire and the impact on working parents, noting:

“The most recent Childcare Sufficiency Assessment for Pembrokeshire showed that at March 2015 there were 2,775 childcare places available in the County for 0-15 year olds. There has been a recent reduction in demand for childcare in the County due to the current economic climate. The majority of childcare available in Pembrokeshire operates within standard hours, which does not meet all the needs of working parents. In particular, there is a lack of childcare available prior to 8:00am and after 6:00pm, which does not always correspond with working hours. In addition, opening hours do not meet the requirements of shift workers and there is very limited provision available on weekends. A further area of concern is the uneven distribution of provision, which results in a lack of choice and availability, particularly in the North of the County and some areas in the South. Adequate childcare provision is essential for parents who are out of work and looking to gain skills and qualifications to enter the workplace.”<sup>54</sup>

---

<sup>50</sup> Samaritans, Suicide Statistics Report, <http://bit.ly/1VfwwDT>

<sup>51</sup> <sup>51</sup> Town & Country Planning Association, Wales Health Impact Assessment Support Unit and Public Health Wales, Planning for better health and well-being in Wales, 2016: <http://bit.ly/2hK1AHQ>

<sup>52</sup> Ibid

<sup>53</sup> Chwarae Teg, Working Women’s Journeys: <http://bit.ly/2gHRGBi>

<sup>54</sup> Pembrokeshire Public Services Board, Well-being Assessment for Pembrokeshire, April 2017: [https://www.pembrokeshire.gov.uk/objview.asp?object\\_id=2607&language=](https://www.pembrokeshire.gov.uk/objview.asp?object_id=2607&language=)

Key Factors from Baseline Analysis	Implications for Local Development Plan
<p>The importance of safety considerations in terms of public spaces and neighbourhoods in relation to sexual harassment and assault and domestic violence.</p>	<p>A need to promote Secure by Design principles and community safety considerations as part of good design and neighbourhood layouts to create a safe environment.</p> <p><b>Policy 30 Sustainable Design Spatial Strategy F. Community Facilities, Retailing, Transport E. Affordable Housing and Housing</b></p>
<p>Importance of location and access to child care and other facilities, commuting times between employment and also schools.</p> <p>Promotion of employment opportunities.</p>	<p>Location of developments in terms of public transport links and proximity to child care facilities and employment opportunities.</p> <p><b>Spatial Strategy B. Major Development, the Potential for Growth E. Affordable Housing and Housing F. Community Facilities, Retailing, Transport</b></p>
<p>Access to green spaces, active walking opportunities and allotments can have a positive effect on people’s mental health and wellbeing.</p>	<p>Positive impact of policies that promote greenspaces, active walking opportunities and allotments. A need to ensure that access to these opportunities is available to all e.g. policies that remove barriers to accessibility.</p> <p><b>Spatial Policy Special Qualities Affordable Housing and Housing F. Community Facilities, Retailing, Transport</b></p>

## Pregnancy and Maternity

73. There were 1229 live births in Pembrokeshire in 2014, 7% of live births had low birth weight above the Wales average of 6.7%.<sup>55</sup>

74. As noted in the Welsh Government’s Building a Brighter Future: Early Years and Childcare Plan “children’s health and well-being – is strongly influenced by their parents’ health and behaviour particularly their mothers. A baby born after a

<sup>55</sup> InfoBase Cymru, Births: <http://bit.ly/2hC8vj6>

pregnancy with good nutrition, free of smoking, alcohol and drugs, at normal birth weight, fully breastfed and immunised, in safe and warm surroundings, receiving emotional warmth from their parents is more likely to achieve their full potential throughout childhood and adult life.”<sup>56</sup>

75. Access to transport, health and community facilities, greenspace and healthy food options will play a part in this. As the RPTI report into poverty and place noted:

“Each year 1.4 million people miss, turn down or choose not to seek medical help because of transport problems. Similarly, alongside other factors, ‘food poverty’ (defined as the inability to obtain healthy affordable food) is significantly affected by whether people lack shops in their area or have trouble reaching them.”<sup>57</sup>

Key Factors from Baseline Analysis	Implications for Local Development Plan
<p>Importance of location and access to health facilities, community facilities, greenspace and shops in terms of healthy food options.</p> <p>Access to transport links important in terms of ensuring pregnant women and new mums don't miss health care appointments.</p>	<p>Location of developments in terms of public transport links and proximity to health and community facilities and shops.</p> <p>Promotion of accessible public transport infrastructure.</p> <p><b>F. Community Facilities, Retailing, Transport</b></p> <p><b>E. Affordable Housing and Housing</b></p>

## Race

76. According to Census 2011 data only 1.4% of the population in Pembrokeshire Coast National Park is not from a White background making it less ethnically diverse than Pembrokeshire (1.9% population are non-White) and Wales (4.4% of its population being non White.) However at a LSOA area certain areas are more ethnically diverse in particular Tenby South 1 and Saundersfoot 2. 5.2% of population of Tenby South identify as non-white, and 3.8% of population of Saundersfoot identify as non-white, with both having over 2% of the population identifying as Asian/Asian British.

Ethnicity (Census 2011) - % of all usual residents <sup>58</sup>					
LSOA	White	Mixed/ multiple ethnic group	Asian/Asian British	Black/ African/ Caribbean/ Black British	Other Ethnic Group
<b>Tenby (Local Services and Tourism Centre)</b>					
Tenby North	97.5	0.8	1.5	0.1	0.2

<sup>56</sup> Welsh Government, Building a Brighter Future: Early Years and Childcare Plan: <http://bit.ly/2hNwX4g>

<sup>57</sup> RTPI, Poverty, place and inequality: <http://bit.ly/2hATeS8>

<sup>58</sup> Info Base Cymru, Ethnic Group: <http://bit.ly/2hASMU9>

<b>Tenby South 1</b>	94.8	0.4	2.3	0.2	2.3
<b>Tenby South 2</b>	97.2	1.2	1.4	0.1	0.2
<b>Newport</b>					
<b>Newport</b>	99.1	0.3	0.6	0.0	0.0
<b>Saundersfoot (Local Centre)</b>					
<b>Saundersfoot 1</b>	98.0	0.7	0.5	0.5	0.3
<b>Saundersfoot 2</b>	96.2	0.7	2.9	0.1	0.1
<b>St David's (Local Centre)</b>					
<b>St David's</b>	99.1	0.3	0.5	0.0	0.0
<b>Crymych (Local Centre)</b>					
<b>Crymych 1</b>	99.4	0.3	0.0	0.1	0.2
<b>Crymych 2</b>	99.0	0.4	0.4	0.0	0.2
<b>Rural Centres (Where LSOA data available)</b>					
<b>Amroth</b>	99.5	0.2	0.2	0.0	0.0
<b>Dinas Cross</b>	99.2	0.5	0.2	0.0	0.1
<b>Manorbier</b>	98.4	0.6	0.9	0.1	0.1
<b>Solva</b>	98.5	1.1	0.2	0.2	0.1
<b>St Ishmaels</b>	99.6	0.1	0.2	0.1	0.0
<b>Pembrokeshire National Park Authority</b>	98.4	0.4	0.8	0	0.2
<b>Pembrokeshire</b>	98.1	0.6	1.0	0.2	0.2
<b>Wales</b>	95.6	1.0	2.3	0.6	0.5

77. Eighty eight race related hate crimes were recorded by the Dyfed-Powys police force area in 2015/16.<sup>59</sup> Due to the low number of people from BME backgrounds in the National Park Area there is potential that people may be targeted in terms of racist hate crimes, this includes not only residents but also tourists and visitors to the National Park. Promotion of “Secure by Design” principles and community safety as part of good design can help create a safer more secure environment in terms of buildings, public transport facilities such as bus stops and layout of neighbourhoods. Pembrokeshire is now hosting refugees in relation to Syrian Vulnerable Persons Resettlement scheme who may be particularly vulnerable to being targeted in terms of hate crime.

78. When compared with Wales as a whole, Pembrokeshire has a relatively large resident Gypsy and Traveller population, as demonstrated by accommodation needs assessments, caravan count surveys<sup>60</sup> and the 2011 Census. The assessment of Gypsy and Traveller accommodation needs, and the duty to make provision for sites where the assessment identifies need, became statutory requirements under the Housing (Wales) Act 2014. Pembrokeshire County Council 2015 Gypsy Traveller Accommodation Need Assessment for Pembrokeshire notes that:

- a) There are 74 residential pitches across five existing Local Authority-run residential sites in Pembrokeshire none of which are in the National Park Area.

<sup>59</sup> Hate crime, England and Wales, 2015/16 - Appendix Tables: <http://bit.ly/2hoUQOj>

<sup>60</sup> Welsh Government, Gypsy and Traveller Caravan Count: July 2016, Statistical First Release; <http://bit.ly/2hNhOjg>

- b) There are 12 private sites in Pembrokeshire with planning permission. Freestone Meadow, Teagues Cross, near Carew is located in the National Park.
- c) Planning permission was granted for a new site of five pitches on land adjacent to Adams Road, Monkton on 12th November 2015. At the time of the survey one unauthorised encampment and one unauthorised development (two households) were identified in the Haverfordwest / Portfield Gate area.
- d) From the survey of 91 households which gave their ethnicity, 43 (47.3%) identified as Romani or as a variant thereof. The 32 households (35.2%) which identified as Gypsy, Welsh Gypsy, Traveller or Welsh Traveller tended to share strong family links and/or sites with Romani households. These groups, interconnected by family and/or locational ties, together comprise 82.5% of all respondents. None of the households that gave responses in the survey identified as having Irish Traveller ethnicity. The Council is however aware that an Irish Traveller acquired planning permission for one private site comprising six pitches in 2013. None of the households that gave responses in the survey identified as having New Traveller ethnicity either. The Council is however aware of one New Traveller pitch within Pembrokeshire.
- e) The assessment identified an unmet need for 32 residential pitches, plus two Travelling Showpeople's yards, over the next five years (by the end of 2020).
- f) Up to the end of 2021 a need for 37 residential pitches and two Travelling Showpeople's yards was identified for the Pembrokeshire area.
- g) The unmet need for the Pembrokeshire area up to the end of 2031 is projected to be 101 pitches, plus the two aforementioned yards.
- h) Respondents to the survey generally identified a need for more transit pitches and sites in Wales. The Council considered that the questions within the survey surrounding need for transit pitches/sites were not comprehensive enough to establish meaningful results for this aspect of the survey.
- i) The Council has analysed the responses which identified a need for additional accommodation. To help to plan future provision, this need has been grouped into three geographic areas. These are: Haverfordwest, Pembroke/ Pembroke Dock and Kilgetty. These areas reflect the general locations within which residents have expressed a desire to live. Although there are family connections between areas, typically residents have a closer association and a preference to live within one area, usually linked to the existing Local Authority site in that area.
- j) The more significant areas of need are in the Pembroke/ Pembroke Dock and Kilgetty areas (outside the National Park) which reflect the locations of the two larger Local Authority sites. Planning permission for an additional nine private pitches is already in place in the Pembroke and Pembroke Dock area. To address the need in the Kilgetty area Pembrokeshire County Council has identified an allocation for 15 pitches as an extension to the Kingsmoor Common site within its Local Development Plan. This area is currently common land and is the subject of an application to de-register and enclose the common. Approval for deregistration of the Common was received from Welsh Government in December 2015 and work is now progressing towards the submission of a planning application and a grant funding application for the Gypsy and Traveller site extension at Kingsmoor Common.

- k) As well as progressing the Kingsmoor Common allocation, the Local Authority will look at the potential to deliver a number of smaller sites to meet the need identified in this report. Desk-based geographical information system (GIS) appraisals of Council-owned land have already taken place and further analysis of potential sites will be progressed. The Local Authority will also closely examine the results of the surveys from private sites and explore whether there is any potential to expand existing private sites. Where unauthorised encampments and unauthorised developments have been identified officers will seek to work with residents to apply for planning permission and regularise the site (where appropriate). Pre-application discussions are already taking place in some cases.
- l) Two unauthorised sites were located in the National Park in this Gypsy Traveller count.<sup>61</sup> Neither site was successful at appeal. Further information is provided below.
- m) Both PCC and the PCNPA have policies which allow for private sites to be developed where they meet certain criteria. The PCNPA policy is policy 46 (no change is proposed in the preferred strategy):  
 “Gypsy Sites - Proposals for Gypsy and Traveller sites will be permitted where:
- i. evidence of need to locate or provide transitory arrangements in the area has been identified; and
  - ii. the site is well located to serve the needs of Gypsy and Travellers including the need to access local services; and
  - iii. the site is suitable for the development and on site services facilities can be adequately provided; and
  - iv. amenity issues for both residents on the site and neighbouring properties are adequately addressed; and
  - v. the proposal does not cause significant visual intrusion, is sensitively sited in the landscape and satisfactory landscaping is provided.”
- n) Almost all existing sites are located outside the PCNPA; one private site with planning permission exists within the National Park currently .In recent years a significant number of private sites have gained planning permission under the Council’s policy framework. Inevitably issues surrounding landscape are a greater constraint within the National Park than it is outside; an appeal against a decision by PCNPA to refuse planning permission for a private site at Manorbier was dismissed because of the impact on the landscape in November 2015. A further site’s appeal within the National Park, near Manorbier Newton was dismissed in May 2016. Issues related to landscape impact, impact on a Scheduled Ancient Monument which were of a nature that they did not outweigh the need for the development.

79. An opportunity to help address the shortage of Gypsy and Traveller sites has been provided with the National Park Authority inviting the submission of Gypsy Traveller sites as part of the Candidate Sites submission process. No candidate sites have been submitted.

---

<sup>61</sup> Welsh Government, Gypsy and Traveller Caravan Count: July 2016: <http://bit.ly/2hNhOjg>

80. No reference to indicators around Gypsy Traveller sites and Policy 46 are currently contained within the Monitoring section.
81. A new Policy 38A Caravan, Camping and Chalet Development is proposed. Consideration is needed on how Policy 38A interrelates and impacts on Policy 46 and enforcement related to unauthorised Gypsy and Traveller Sites.
82. Access to appropriate sites can have positive impact on health and education outcomes for Gypsies and Travellers. It is noted in Welsh Government ‘Designing Gypsy and Traveller Sites’ guidance that:

“Gypsies and Travellers are amongst the most socially excluded groups, with health and education outcomes significantly worse than the settled population. Some evidence suggests where they are able to settle on well managed and maintained sites, Gypsies and Travellers are better able to access health and education services and this leads to a better quality of life. As recognised by Estyn, children should benefit through better attendance and attainment within the education system as education professionals are able to build stable and trusting relationships with families. Better health will result from, for example, uptake of preventative healthcare, including vaccinations of children as health visitors are able to access families which they couldn’t access previously. Greater integration of Gypsies and Travellers is also likely as individuals access local facilities, which can also lead to the reduced likelihood of children having to live or play in unsafe environments.”<sup>62</sup>

85. The above document also provides guidance on consulting with Gypsy and Traveller community and the need to take into account low literacy levels within communities and a preference for face to face contact. An Easy Read version of the delivery agreement<sup>63</sup> has been produced and a summary version of the preferred strategy will also be made available in Easy Read (following advice from Pembrokeshire People First.)

Key Factors from Baseline Analysis	Implications for Local Development Plan
Pembrokeshire National Park is not ethnically diverse as a whole. However both Tenby South 1 and Saundersfoot have a higher than Pembrokeshire average of BME residents.	A need to consider potential community infrastructure needs at a spatial level within Tenby and Saundersfoot.  <b>Spatial Policy 2 and 4</b>
Residents and tourists may be targeted in terms of racist hate crime. This may impact on their use of public transport and access to opportunities and facilities within the Park and further afield.	A need to promote Secure by Design principles and community safety considerations as part of good design and neighbourhood layouts to create a safe environment. This will be particularly important in terms of public

<sup>62</sup>Welsh Government, Designing Gypsy and Traveller Sites: <http://bit.ly/2hr0q2M>

<sup>63</sup> PCNPA, Easy Read Version of Delivery Agreement: <http://bit.ly/2hA3M1z>

Key Factors from Baseline Analysis	Implications for Local Development Plan
	<p>transport related facilities.</p> <p><b>Policy 30 Sustainable Design Spatial Strategy</b>  <b>F. Community Facilities, Retailing, Transport</b>  <b>E. Affordable Housing and Housing</b></p>
<p>Should the title for Policy 46 be reworded to Gypsy and Traveller Sites. This is now Policy 51 and has been amended to refer to Gypsy Traveller and show people sites</p>	<p>Rewording of title to Policy 46 (now Policy 51)</p> <p><b>Policy 51 Gypsy Traveller and Show People Sites (Formerly Policy 46 Gypsy Sites)</b></p>
<p>Lower number of private sites granted permission in National Park area than in Pembrokeshire Council Planning area. Many of the local authority and private sites are located close to National Park boundaries.</p>	<p>A need to ensure that Gypsies and Travellers seeking permission for private sites are treated fairly under Policy 46. A consideration of differences between approach within Authority and Council in terms of their policies on private sites</p> <p><b>Policy 51 Gypsy Traveller and Show People Sites</b>  <b>Monitoring Section</b></p>
<p>No reference to indicators around Gypsy Traveller sites and Policy 46 (now Policy 51) are currently contained within the Monitoring section.</p>	<p>A need to include an indicator for Policy 46 (now policy 51)</p> <p><b>Policy 51 Gypsy Traveller and Show People Sites</b>  <b>Monitoring Section</b></p>
<p>Although no change is proposed to Policy 46 (now Policy 51) changes are proposed for Policy 38A Caravan, Camping and Chalet Development (now Policy 42) will this have any implications for Policy 46 (now Policy 51).</p>	<p>A consideration of how Policy 38A (Now policy 42) interrelates and impacts on Policy 46 (now Policy 51) and enforcement related to unauthorised Gypsy and Traveller Sites.</p> <p><b>Policy 42 Caravan, Camping and Chalet Development</b>  <b>Policy 51 Gypsy Traveller and Show People Sites</b></p>
<p>Gypsies and Traveller experience worse health and education outcomes than the settled community.</p> <p>Access to safe and appropriate sites and</p>	<p>Importance of meeting need for sites to prevent unauthorised encampments in unsafe areas or without adequate facilities.</p> <p>Policy 46 (now Policy 51) notes: the site is</p>

Key Factors from Baseline Analysis	Implications for Local Development Plan
facilities can assist in helping to improve outcomes in these areas.	well located to serve the needs of Gypsy and Travellers including the need to access local services;  <b>Policy 51 Gypsy Traveller and Show People Sites</b> <b>F. Community Facilities, Retailing, Transport</b>

## Religion and Belief

86. According to Census 2011 data Pembrokeshire National Park (65%) has a higher percent of people identifying as Christian than in Pembrokeshire (63%) and Wales (57.6%). In terms of LSOA areas only Solva has a lower than Wales % of people identifying as Christian at 57.2%, although this may be due to the number of people who did not state their religion which is higher than any of the other LSOA areas. In Tenby North and Saundersfoot 2 over 70% of the population identified as Christian. Except in Newport all LSOA areas noted below the Wales average of 32.1% in terms of having no religion. In terms of the National Park and non Christian faiths the two religions with the highest % are Buddhist at 0.4% and Other religion at 0.7%. In terms Buddhist the two LSOA areas with the highest % is Solva at 0.8% and Dinas Cross 0.7% and the areas with 1% or more of people identifying with Other Religion are Newport, St Davids, Crymych 2 and St Ishmaels. Tenby South 1 has the highest concentration of people identifying as Muslims at 1.6%.

% - Religion (Census 2011) <sup>64</sup>									
LSOA	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other Religion	No Religion	Religion not stated
<b>Tenby (Local Services and Tourism Centre)</b>									
Tenby North	70.8	0.3	0	0	0.1	0.1	0.6	21.2	7
Tenby South 1	63.5	1	0.2	0.1	1.6	0	0.4	25.2	8.1
Tenby South 2	68.2	0.3	0	0	0	0	0.2	22.8	8.6
<b>Newport (Local Centre)</b>									
Newport	56.9	0.6	0.1	0	0.1	0.3	1	32.3	8.6
<b>Saundersfoot (Local Centre)</b>									
Saundersfoot 1	67.7	0.2	0.1	0	0.7	0	0.3	22	9.2
Saundersfoot 2	72.6	0.5	0.2	0	0.1	0	0.3	19.4	7

<sup>64</sup>InfoBaseCymru, Religion: <http://bit.ly/2hC2frE> and ONS, Key statistics for national parks in England and Wales: <http://bit.ly/2gcJd9B>

<b>St David's (Local Centre)</b>									
<b>St David's</b>	64.8	0.5	0	0.2	0	0	1.4	24.7	8.5
<b>Crymych (Local Centre)</b>									
<b>Crymych 1</b>	64.2	0.5	0	0.1	0.1	0	0.8	25.8	8.6
<b>Crymych 2</b>	62.7	0.4	0	0.2	0	0.2	1	27.6	8
<b>Rural Centres (Where LSOA data available)</b>									
<b>Amroth</b>	65.8	0.2	0	0	0	0	0.6	26.2	7.3
<b>Dinas Cross</b>	64.2	0.7	0	0	0	0	0.9	25.2	9
<b>Manorbier</b>	65.7	0.1	0.3	0.1	0.4	0	0.4	23	10.2
<b>Solva</b>	57.2	0.8	0	0	0.1	0	0.6	27.7	13.7
<b>St Ishmaels</b>	65.8	0.2	0	0.1	0.1	0	1	24.8	7.9
<b>Pembrokeshire</b>	63	0.3	0.2	0	0.4	0	0.5	27.3	8.2
<b>Pembrokeshire National Park</b>	65	0.4	0	0.1	0	0	0.7	24.5	8.5
<b>Wales</b>	57.6	0.3	0.3	0.1	1.5	0.1	0.4	32.1	7.6

87. As an area with a significant percentage of people showing some form of religious affiliation, particularly Christianity in some LSOA areas, the key points highlighted in the Faith Groups and the Planning System Policy Briefing for planning frameworks are particularly relevant:

- a) Local planning authorities to protect space for social infrastructure, including places of worship
- b) Section 106 agreements and the community infrastructure levy are legitimate means for supporting places of worship provision
- c) Proactive approach to social infrastructure provision in new developments.<sup>65</sup>

88. 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.

89. The National Park area contains a number of historic religious buildings and sites of importance both locally and in terms of pilgrimage for those visiting outside of area.

90. Six religious related hate crimes were recorded by the Dyfed- Powys police force area in 2015/16.<sup>66</sup> Due to the low number of people from non Christian faiths in the National Park Area there is potential that people from other faiths may be targeted in terms of hate crime, this includes not only residents but also tourists and visitors to the National

<sup>65</sup> AHRC Faith and Place network , Faith Groups and the Planning System, Policy Briefing: <http://bit.ly/2h7rg4e>

<sup>66</sup> Hate crime, England and Wales, 2015/16 - Appendix Tables: <http://bit.ly/2hoUQOj>

Park. Promotion of “Secure by Design” principles and community safety as part of good design can help create a safer more secure environment in terms of buildings, public transport facilities such as bus stops and layout of neighbourhoods.

<b>Key Factors from Baseline Analysis</b>	<b>Implications for Local Development Plan</b>
<p>Significant percentage of people in National Park Area show religious affiliation in particular with Christian faith.</p> <p>Access to places of worship likely to be important.</p>	<p>A need to protect space for social infrastructure, including places of worship, promote Section 106 agreements and the community infrastructure levy as legitimate means for supporting places of worship provision and proactive approach to social infrastructure provision in new developments including consideration of transport links.</p> <p><b>Spatial Strategy</b>  <b>F. Community Facilities, Retailing, Transport</b>  <b>E. Affordable Housing and Housing</b></p>
<p>Access to good transport links (public and private) to access religious places of worship and facilities</p>	<p>A need to promote good accessible public transport and private transport links within the Park, linked to wider Pembrokeshire and regional networks.</p> <p><b>F. Community Facilities, Retailing, Transport</b>  <b>Policy 57 Sustainable Transport</b></p>
<p>Protection of Religious sites of importance</p>	<p>Protection of historic buildings and sites through land use policy.</p> <p><b>Policy 15 Protection of Buildings of Local Importance</b></p>
<p>Residents and tourists may be targeted in terms of hate crime due to their religion or belief. This may impact on their use of public transport and access to opportunities and facilities within the Park and further afield.</p>	<p>A need to promote Secure by Design principles and community safety considerations as part of Good Design and neighbourhood layouts to create a safe environment. This will be particularly important in terms of public transport related facilities.</p> <p><b>Policy 30 Sustainable Design</b>  <b>Spatial Strategy</b>  <b>F. Community Facilities, Retailing, Transport</b>  <b>E. Affordable Housing and Housing</b></p>

## Sexual Orientation

91. Statistics on Sexual Identity are not available at a Pembrokeshire level due to concerns around small sample sizes and robustness of the data for the Integrated Household Survey at this level. Data is available at NUTS3 geographical level for South West Wales region which includes Ceredigion, Pembrokeshire and Carmarthenshire. For the region 94.19% of people identified themselves as heterosexual/straight, 1.24% as gay/lesbian or bisexual and 0.51% as other. 1.21% did not respond. The figures are very similar for those of Wales as a whole.

Sexual identity by area and identity status - % people aged 16+ <sup>67</sup>					
NUTS3 geographic level	Heterosexual/ Straight	Gay/ Lesbian/ Bisexual	Don't know/ Refusal	No response	Other
South West Wales: Ceredigion, Pembrokeshire, Carmarthenshire	94.19	1.24	2.86	1.21	0.51
Wales	93.93	1.52	2.99	1.11	0.44
United Kingdom	92.80	1.57	3.89	1.42	0.32

92. A write up from Stonewall Cymru's Have your say event 2014-15 highlighted that experiences of LGBT community life and culture are vastly different in rural and urban areas:

“LGBT people living outside of major cities have less access to a local LGBT scene of bars, clubs and diverse cultural events, and so are more dependent on initiatives such as community groups. However, community groups in all areas struggle with costs and funding, which limits opportunities.”<sup>68</sup>

93. This means people could be travelling out of the National Park area and Pembrokeshire to access LGBT scene of bars, clubs and events and support or be at risk of isolation. To enable people to access opportunities access to strong transport links will be important in terms of public and private transport.

94. At the events local authorities were praised for continuing to consider ways in which public spaces can be made to feel safe and welcoming for LGBT people however it was agreed that they should continue to tackle anti-social behaviour and hate crime in public spaces.<sup>69</sup>

95. Sixteen hate crimes related to sexual orientation were recorded by the Dyfed- Powys police force area in 2015/16.<sup>70</sup> An NIESR report noted that “Analyses of data from the British Crime Survey suggest LGB people are at greater risk of being victim to hate

<sup>67</sup> Integrated Household Survey: Sexual Identity (NUTS3 areas)

<https://statswales.gov.wales/Catalogue/Equality-and-Diversity/Sexual-Identity/SexualIdentity-by-Area-IdentityStatus>

<sup>68</sup> Stonewall Cymru, Have your say: <http://bit.ly/2hNewwh>

<sup>69</sup> Ibid

<sup>70</sup> Hate crime, England and Wales, 2015/16 - Appendix Tables: <http://bit.ly/2hoUQOi>

crime when compared to heterosexual people.”<sup>71</sup> Promotion of “Secure by Design” principles and community safety as part of good design can help create a safer more secure environment in terms of buildings, public transport facilities such as bus stops and layout of neighbourhoods.

96. In terms of access to health facilities it is noted in the NIESR report that:  
 “the need for health services may be greater amongst LGB people. Because of their more limited familial support networks (see Section 10.3), LGB people are more likely than heterosexual people to expect to have to get help from formal sources if they were ill and needed help around the home: amongst those aged over 55, twice as likely (Stonewall, 2010a). This included 18% who expected to have to turn to their GP for help, compared with 10% of heterosexual people.”<sup>72</sup>
97. The report also noted that there was evidence of inequalities in health outcomes, with LGB people’s general and mental health being identified as worse than that of heterosexual people. With evidence of higher incidence of attempted suicide, self-harm, anxiety and depression amongst LGB people compared with heterosexual people.<sup>73</sup>

Key Factors from Baseline Analysis	Implications for Local Development Plan
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.	A need to promote good accessible public transport and private transport links within the Park, linked to wider Pembrokeshire and regional networks.  <b>Policy 57 Sustainable Transport Spatial Strategy</b> <b>E. Affordable Housing and Housing</b>
LGB people may feel unsafe in public spaces and be targeted in terms of hate crime. This may impact on their use of public transport and access to opportunities and facilities within the Park and further afield.	A need to promote Secure by Design principles and community safety considerations as part of Good Design and neighbourhood layouts to create a safe environment. This will be particularly important in terms of public transport related facilities.  <b>Spatial Strategy</b> <b>Policy 30 Sustainable Design</b> <b>E. Affordable Housing and Housing</b>

<sup>71</sup> NIESR, Inequality among lesbian, gay bisexual and transgender groups in the UK: a review of evidence, 2016: <http://bit.ly/2bk4r85>

<sup>72</sup> Ibid

<sup>73</sup> NIESR, Inequality among lesbian, gay bisexual and transgender groups in the UK: a review of evidence, 2016: <http://bit.ly/2bk4r85>

Key Factors from Baseline Analysis	Implications for Local Development Plan
	<b>F. Community Facilities, Retailing, Transport</b>
Importance of being able to access health facilities for some LGB people.  Inequalities in mental health outcomes for LGB people.	A need to promote access to health facilities.  Land use policies that have positive impact on health and wellbeing outcomes may contribute to better mental health outcomes for LGB people.  <b>F. Community Facilities, Retailing, Transport</b> <b>A. Special Qualities</b>

## Data Gaps

98. There are data gaps at a local level in terms of Sexual Orientation and Gender Identity, however this relates to wider national gaps in data.

99. Pembrokeshire Housing Market Assessment does not provide information on accessible housing or older persons accommodation need within the area

## Engagement

### Feedback on key themes from engagement with specific groups/ organisations

Organisation/ Group/ Person	Feedback Provided	Relevancy to Assessment
Pembrokeshire People First	Provided guidance on whether Easy Read version of full draft preferred strategy document or summary document should be created. (January 2017)	Consultation elements within Delivery Agreement

100. The following organisations were contacted in March 2017 to provide comments about specific areas identified within the initial assessment. No comments on the assessment were received back from these groups. These groups had a further opportunity to provide feedback on the assessment through questions on the Local Development Plan (Replacement) Preferred Strategy consultation questionnaire. The organisations contacted were:

The Affordable Housing Group in terms of issues highlighted relating to age and disability and housing in the assessment.
Pembrokeshire Young Farmers and Wales YFC to gain views of young people in farming industry or looking to go into farming industry on Policy 43A - Agricultural Diversification
Pembrokeshire Gypsy Traveller Accommodation Needs Assessment Group over Policy 46 and 38A.
Pembrokeshire Access Group

## **Consultation on Local Development Plan (Replacement) Preferred Strategy – Equality Feedback**

101. Below is a list of organisations that were contacted as part of the consultation on the preferred strategy.

<b>Organisation/ Group/ Person</b>
Pembrokeshire Young Farmers
Pembrokeshire Access Group
Pembrokeshire's 50+ Forum
The Youth Assembly for Pembrokeshire
Mind Pembrokeshire
Pembrokeshire People First
LGBT+ Youth Pembrokeshire
Pembrokeshire Voices for Equality
Gypsy Traveller Education
Pembrokeshire Association of Community Transport Organisations (PACTO)
Older Person's Commissioner for Wales
Children's Commissioner for Wales
West Wales Action for Mental Health
Learning Disability Wales
RNIB Cymru
Action on Hearing Loss
Disability Wales (
Stonewall Cymru
Unity Group Wales
Diverse Cymru
Women's Equality Network Wales
Chwarae Teg
Victim Support
Public Health Wales
Wales YFC
Churches Together in Wales
Evangelical Alliance Wales
Buddhist Council of Wales
Bahá'í Council for Wales
Muslim Council for Wales
Church in Wales
Hindu Council of Wales

<b>Organisation/ Group/ Person</b>
Free Church Council of Wales
South Wales Jewish Representative Council
Race Council Cymru
Welsh Refugee Council

102. No responses were received from the above organisations however other respondents did provide comment of relevance to the assessment.

103. The content of the assessment has been reviewed and actions amended following feedback from the consultation process. See consultation comments and Officer response and recommendation below:

<b>Representor – number (Organisation where relevant)</b>	<b>Commenting on:</b>	<b>Include Remove Amend</b>	<b>Comment</b>	<b>Relevancy for the Assessment</b>	<b>Officer Response and Recommendation</b>
<b>1663 Dwr Cymru Welsh Water</b>	4 E Policy 46		Policy 46 – Gypsy and Traveller sites Should any gypsy and traveller sites propose to connect to our infrastructure then an assessment will need to be undertaken to determine if there is enough capacity available.	Race; Policy 51 – Gypsy Traveller and Show People Sites	Noted.
<b>4542</b>	4E		The introduction to the ‘All Party Parliament group report on housing for older people’ <a href="#">HAPPI3 Report 2016</a> states “Local planning authorities should also recognise the demographic changes that necessitate stronger encouragement for older people’s housing”.  My comment on the Local Plan is that it should specifically include consideration of the need	Assessing Impact Section: Meeting the needs of ageing population in terms of suitable accommodation (Age)	Below are the relevant recommendations:  Councils need to ensure their Local Plan gives the necessary priority to older people’s housing needs – not least as a core component of any new settlements and that new developments of retirement housing embrace HAPPI design principles.  Exemption of retirement housing from the requirement to build Starter Homes – or to pay a

			<p>for housing designed for older people – as outlined in this report.</p>		<p>commuted sum in lieu – would provide the opportunity to prioritise this age group.</p> <p>Response: The issues around such provision is highlighted in the Equalities Impact Assessment for the Plan. The housing market assessment only takes into account bedroom numbers which include any older persons' needs.</p> <p>There are limitations on the ability to influence the mix of housing. Beyond providing a suitable layout where a mix of dwellings normally provides for a better layout the planning authority can only seek to achieve an element of affordable housing to meet the need as shown in the Local Housing Market Assessment. The Housing Market Assessment provides numbers for overall affordable housing need. The mix (i.e., providing suitable properties for older people) comes when need is addressed for an individual project by the housing authority.</p> <p>Properties will also need to comply with building regulations standards. Compliance with</p>
--	--	--	--	--	--

					<p>alternative standards would need to be brought forward through Welsh Government.</p> <p>National planning policy asks that all new dwellings should contribute to the delivery of affordable housing. Affordable housing is for those young and old that cannot afford to accommodate their needs on the open market. The approach suggested does not seem to match the situation in this Plan area.</p>
<b>339</b>	4 Newport		For comments see Appendix 1, p121	Assessing Impact Section: Meeting the needs of ageing population in terms of suitable accommodation (Age)	<p>Please see above response to submission 4542.</p> <p>Analysing the condition of existing housing stock would be a matter for the housing authority.</p> <p>The Preferred Strategy refers to traffic management improvements more generally but the lead for such would be with the relevant highways authority</p> <p>On specific proposals Policies 52 and 53 provide a context for dealing with some of these issues.</p> <p>The Authority has adopted Supplementary Planning Guidance on Parking which</p>

				<p>requires the appropriate levels and type of parking facilities for each development type, taking into account users of the development and availability of public transport. The Guidance will be updated for the adopted Replacement Plan.</p> <p>Building Regulations require both domestic and nondomestic buildings to be built so that people, including disabled people, can reach the principal, or suitable alternative, entrance to a building from the point of access. For the adaptation of historic buildings however, accessibility measures are balanced against the impact upon the historical character and interest of those buildings.</p> <p>Dwellings that are built to the Lifetime Homes standards, such as those built by a Registered Social Landlord, include additional requirements to Building Regulations, for example requiring entrances to be lit and covered. This is not a national requirement at present. Technical Advice Note 12: Design promotes key design principles</p>
--	--	--	--	---

					<p>such as ease of access for all, community safety and safe and clear movement routes that are fit for purpose.</p> <p>The Authority consults with an 'Access officer' to advise on the accessibility of proposed buildings when considering planning applications for buildings and public open spaces.</p> <p>Building Regulations does not require scooter storage areas. Any amendments to Planning Policy Wales or other national planning policy in response to The Expert Group on Housing an Aging Population will need to be considered by the Authority when published.</p> <p>The Authority would be willing to consider being part of any wider pilot initiatives.</p>
<b>1569 Welsh Government, Plans Branch</b>	4E		<p><b>Gypsy and Travellers</b></p> <p>The Housing Background Paper highlights that in accordance with the provisions of the Housing (Wales) Act 2014, a Gypsy Traveller Accommodation Assessment (GTAA) has</p>	Race – Evidence Section	<p>Officers here have been awaiting PCC's uploading the final version of the Gypsy Traveller Assessment. The Authority can ensure the document is uploaded for the Deposit Plan. There is no need to allocate in the National Park. Policy 46 Gypsy and Traveller sites has been amended</p>

		<p>been undertaken for the whole of Pembrokeshire including the National Park, yet <b>no GTAA has been included in the evidence base to inform any identified or future need over the plan period.</b> The aforementioned paper notes the GTAA projects an unmet need across the whole of Pembrokeshire for 32 pitches, plus 2 Travelling Showpeople's yards over the first 5-years of the plan period (2015-2020). This would result in a total need for 101 pitches across Pembrokeshire up to 2031. The need is grouped into three geographical areas; Haverfordwest, Pembroke/Pembroke Dock and Kilgetty, which reflects the location of the two larger sites in the County Council. Whilst we note these areas lie predominately outside the National Park, <b>the Authority should clarify if there is an element of unmet need for Gypsy and Traveller accommodation in the</b></p>		<p>to make this clear. Amendment done.</p>
--	--	--	--	--

			<p><b>Park?</b> The duty to meet any assessed need is outlined in Section 103 of the Housing (Wales) Act 2014. National policy also states that “where there is an assessment of unmet need....local planning authorities should allocate sufficient sites to ensure the identified pitch requirements can be met” (Circular 30/2007). The Authority should ensure any unmet need is identified through the provision of appropriate sites in the Deposit plan.</p>		
<p><b>1569, Welsh Government, Plans Branch</b></p>	4E		<p><b>Policy 46 Gypsy and Traveller Sites:</b> The Welsh Government supports the inclusion of criteria based Policy 46 to assess any proposals for new Gypsy and Traveller sites. However, Criterion A does not accord with Welsh Government Circular 30/2007 and should be considered for deletion in the Deposit Plan. Annex B in the Circular notes that policy requirements to demonstrate ‘evidence of need’ would act against</p>	<p>Assessing Impact Section - Race</p>	<p>The justification for deleting criterion a) in the email clarification above actually refers to the Welsh Assembly Government not approving of a criterion that advises 'Applications from Gypsies and Travellers with no local connection will not normally be allowed.' The supporting text quite rightly refers to the fact that Gypsies and Travellers are nomadic and do not necessarily have local connections. Given this context it is still argued by this Authority that the criterion is appropriate as it does not apply this restriction.</p>

			<p>freedom of movement for Gypsies and Travellers who may wish to develop their own sites. Such restrictions would not be placed on non-Gypsies and Travellers.</p> <p><b>Further clarification from WG:</b> Policy 46 Gypsy and Travellers – As worded, Criterion A could be considered not to promote the same rights in the planning system as other citizens (Bullet 1, Annex B). The requirement to ‘evidence need’ would not be a restriction placed on non-Gypsy and Travellers, so would this requirement be fair and reasonable in the plan? By their very nature, Gypsy and Travellers are nomadic and will not always have local connections. On this basis, Authorities should determine all applications from anyone who submits them (Bullet 6, Annex B).</p>		<p>The purpose of the criterion is to ensure that proposals for Gypsies and Travellers are planned for in a co-ordinated fashion and if there is a suitable plot already available in the area then it would be better to utilise this than create a new site on an ad hoc basis where there was no justification for it. This would not prevent Gypsies and Travellers providing a justification for why they needed to be in that particular location, for example the need to have a transitory site for potato picking on the St David’s peninsula.</p> <p>Further Clarification asked for from officer and provided below</p> <p>These types of proposals come forward in a countryside location which in planning terms requires justification of need. Housing in countryside locations similarly requires evidence of need. Welsh Government has advised that it needed to seek legal advice on the issue.</p> <p>Response from Welsh Government on 4/01/2018 noted</p> <p>“The requirement to ‘evidence</p>
--	--	--	---	--	--

					<p>need' for new gypsy and traveller sites is an issue being considered as part of the updated circular. To my understanding, this is due to be published in the New Year.</p> <p>Whilst the findings of the updated circular should be incorporated in your Deposit plan, this may not be feasible due to the timing of its release. In this case, the LDP process and examination itself will allow for any amendments to be made.”</p>
--	--	--	--	--	---

104. The consultation questionnaire on the preferred strategy included a specific question about the equality impact assessment.

105. The content of the assessment has been reviewed and actions amended following feedback from the consultation process. See consultation comments and Officer response and recommendation below:

<b>Representor – number (Organisation where relevant)</b>	<b>Commenting on:</b>	<b>Include Remove Amend</b>	<b>Comment</b>	<b>Relevancy for the Assessment</b>	<b>Officer Response and Recommendation</b>
<b>2708 Pembrokeshire County Council</b>	Page 35 Item j)		Approval for deregistration of the Common was received from Welsh Government in December 2015 and work is now progressing	Evidence section on Race	Noted.  Information added to evidence section of the EIA.

<b>Representor – number (Organisation where relevant)</b>	<b>Commenting on:</b>	<b>Include Remove Amend</b>	<b>Comment</b>	<b>Relevancy for the Assessment</b>	<b>Officer Response and Recommendation</b>
			towards the submission of a planning application and a grant funding application for the Gypsy and Traveller site extension at Kingsmoor Common.		
<b>2708 Pembrokeshire County Council</b>	Page 49		In the right hand column, the statement is made that ‘as planning authority a requirement to include self-build proposals is not possible, although these can be pursued by landowners / developers’. The following sentence adds that ‘it is difficult to obtain mortgages for such proposals’. Is the basis for the first statement that there is uncertainty over deliverability because of the potential difficulty in securing finance?	Identifying impact section and officer response on age	It is advising that the planning system cannot require a proposal for housing to be a self-build proposal. Mortgages are an additional issue.  Query and response added to identifying impact section
<b>2708 Pembrokeshire County Council</b>	Pages 68, 69 and 84		Regarding the re-wording of the title to Policy 46, should reference also be	Identifying impact section on Race	Agree to amending title. Amendment done.

Representor – number (Organisation where relevant)	Commenting on:	Include Remove Amend	Comment	Relevancy for the Assessment	Officer Response and Recommendation
			made to Travelling Show-people?		Noted in impact section
<b>2910 St Davids City Council</b>	St Justinian's	Include	Consistent with our answer in relation to Question 1, the City Council remains concerned about the lack of suitable parking and toilet facilities at St Justinians and in relation to Question 4 and the Equality Impact Assessment, how people who are protected under the Equality Act 2010 can have appropriate and necessary facilities in the St Justinians area.	Impact Section in terms of Age and Disability	<p>Toilets:</p> <p>In principle Policy 53 Community Facilities and Infrastructure Requirements supports provision of community facilities outside built up areas as long as they are suitably located.</p> <p>The provision of improved facilities in St Justinian's area is dependent on suitable proposals coming forward and Policy 53 would apply.</p> <p>Car Parking:</p> <p>The Authority is working with Pembrokeshire County Council and the community to find a sustainable solution for access to St Justinians and will include full consideration of accessible parking provision</p> <p>Noted in impact section for age and disability</p>

Representor – number (Organisation where relevant)	Commenting on:	Include Remove Amend	Comment	Relevancy for the Assessment	Officer Response and Recommendation
3468 Campaign for Protection of Rural Wales	B)		<p>CPRW Comments  <b>Wales Government Toolkit for Planners 2015 – Planning for Renewable and Low Carbon Energy</b></p> <p>In preparing this draft of the Local Development Plan replacement it appears that the up-dated <b>Wales Government Toolkit for Planners</b> has not been used. Powys are using it to guide their LDP. We expect consistency throughout Wales especially where it gives greater protection to residents from intrusive developments.</p> <p>With regard to wind energy installations for example, <b>the Toolkit</b> identifies the following:  Page 145 places a restraint on all wind</p>	Impact Section Disability (Mental Health)	<p>The 500m buffer zone referred to in the Toolkit relates to large scale installations or a turbine with an output of 2MW. Reference No. 41 within the Toolkit states that this was the figure used for the assessment of Strategic Search Areas contained in Technical Advice Note 8. Similarly the reference to 7km distance between turbines is in relation to large scale unconstrained wind resources. There are no Strategic Search Areas identified within the National Park and this scale of turbine development would not be considered appropriate within the National Park landscape or its outliers. For small scale turbine development, defined as turbines under 25m to blade tip in the supporting table to Policy 33 within the Local Development Plan Preferred Strategy, each case will be determined on its merits, against the relevant ETSU Guidance, with regard to noise impact upon neighbouring</p>

Representor – number (Organisation where relevant)	Commenting on:	Include Remove Amend	Comment	Relevancy for the Assessment	Officer Response and Recommendation
			<p>clusters of 7km apart.</p> <p>Page 139 it identifies a Buffer zone of 500m between wind turbines. And any residential property.</p> <p>Unless a Buffer Zone is included in Policy 33, a necessity recognised by LPAs elsewhere in Wales, the residents of the National Park will be severely disadvantaged.</p>		<p>properties. It is not considered appropriate to apply a blanket buffer zone distance in this respect as it could prohibit suitable small scale schemes being developed.</p> <p>Comment added to impact section on disability</p>
<p><b>3468 Campaign for Protection of Rural Wales</b></p>	<p>c)</p>		<p>Yes</p> <p>We are asking you to amend Policy 33 to add to the end of the Policy statement the word: To protect residents and tourism within the National Park a Buffer Zone will be required in line with Wales Planning guidance.</p> <p>Leaving protection of</p>	<p>Impact Section Disability (Mental Health)</p>	<p>The 500m buffer zone referred to in the Toolkit relates to large scale installations or a turbine with an output of 2MW. Reference No. 41 within the Toolkit states that this was the figure used for the assessment of Strategic Search Areas contained in Technical Advice Note 8. Similarly the reference to 7km distance between turbines is in relation to large scale unconstrained wind resources. There are no Strategic Search</p>

<b>Representor – number (Organisation where relevant)</b>	<b>Commenting on:</b>	<b>Include Remove Amend</b>	<b>Comment</b>	<b>Relevancy for the Assessment</b>	<b>Officer Response and Recommendation</b>
			residents' interests to the word 'amenity' is not enough, when in other areas in Wales they are protected by a Buffer zone.		<p>Areas identified within the National Park and this scale of turbine development would not be considered appropriate within the National Park landscape or its outliers. For small scale turbine development, defined as turbines under 25m to blade tip in the supporting table to Policy 33 within the Local Development Plan Preferred Strategy, each case will be determined on its merits, against the relevant ETSU Guidance, with regard to noise impact upon neighbouring properties. It is not considered appropriate to apply a blanket buffer zone distance in this respect as it could prohibit suitable small scale schemes being developed.</p> <p>Comment added to impact section on disability</p>
<b>3468 Campaign for Protection of Rural Wales</b>	b)		<b>Updated Agricultural Land Classification and Division of grade 3 into 3a (BMV land) and 3b.</b> Work on this upgrading is	Impact Section Age	Comment noted. The assessment of sites for development includes an appraisal of agricultural land value.

<b>Representor – number (Organisation where relevant)</b>	<b>Commenting on:</b>	<b>Include Remove Amend</b>	<b>Comment</b>	<b>Relevancy for the Assessment</b>	<b>Officer Response and Recommendation</b>
			<p>now well advanced. The LDP should use the new and more sophisticated Predictive maps being produced to up- grade Land Classification data. Otherwise BMV land will be seriously at risk. We understand also that some LDPs in process are already taking note of this upgrading of data. The ability of the National Park to grow local food for local residents could be compromised if the Predictive maps now being produced are ignored. Keeping to the old Provisional maps which did not divide grade 3 is unsustainable</p>		<p>Comment and Officer response added to impact section on age</p>
<p><b>3468 Campaign for Protection of Rural Wales</b></p>			<p>Language and Culture Welsh language decline CPRW Comments.</p>	<p>Impact Section Race</p>	<p>Policy 14 is in accordance with scope of what a Local Planning Authority can do under National Planning Policy as set out in Planning Policy Wales and TAN 20: Planning and the Welsh</p>

<b>Representor – number (Organisation where relevant)</b>	<b>Commenting on:</b>	<b>Include Remove Amend</b>	<b>Comment</b>	<b>Relevancy for the Assessment</b>	<b>Officer Response and Recommendation</b>
			<p>CPRW is dismayed by the decline in Welsh speakers within much of the National Park. South Pembrokeshire is noted as an English Speaking area but residents should be encouraged to view Welsh positively as it is a part of a bi-lingual country. Of great concern is the decline in the north of the National Park.</p> <p>Policy 12 attempts to prevent further decline in some areas but what is needed is positive promotion of Welsh culture first within the English speaking area of south Pembrokeshire, and then the language in those areas where less than 30% speak Welsh.</p> <p>In a bi-lingual nation,</p>		<p>Language.</p> <p>Comment added to impact section on race</p>

Representor – number (Organisation where relevant)	Commenting on:	Include Remove Amend	Comment	Relevancy for the Assessment	Officer Response and Recommendation
			<p>those speaking only one of the languages are culturally and economically disadvantaged. This decline needs to be reversed</p> <p>The South Pembrokeshire Culture with its own often unique words is also being lost.</p>		
3820	Site 142 and Site 097 St Davids		Question 4 Safeguarding of children @ Ysgol BD from people on sex offenders register in such close proximity to the school this happened in Bishops Castle Shropshire.	Impact Section in terms of Age	<p>This issue lies outside the scope of planning land use policy for generic market housing allocations.</p> <p>Should a specific proposal be received for housing of this nature, the appropriateness of the location would form a material planning consideration.</p> <p>Comment added to impact section on age</p>
4436	Site 018	Amend	Comments on SA8: “We understand that there are 51 permanent residents	Impact Section in term of Age	Negligible scoring in sustainability appraisal based on number of factors not only the 8% increase,

Representor – number (Organisation where relevant)	Commenting on:	Include Remove Amend	Comment	Relevancy for the Assessment	Officer Response and Recommendation
			in Little Haven. An additional, say, 4 person family which could reasonably be accommodated in a new dwelling would provide an 8% increase in the number of residents in the village, An 8% increase is not in our view negligible and should at least be considered to be a positive association with sustainability objectives.”		including issues relating to no control of residency for whole occupation.  Comment added to impact section on age
3251	Site 027	Amend	Comments on SA8: “We understand that there are 51 permanent residents in Little Haven. An additional, say, 4 person family which could reasonably be accommodated in a new dwelling would provide an 8% increase in the number of residents in the village, An 8% increase is not in our	Impact Section in term of Age	Negligible scoring in sustainability appraisal based on number of factors not only the 8% increase, including issues relating to no control of residency for whole occupation.  Comment added to impact section on age

<b>Representor – number (Organisation where relevant)</b>	<b>Commenting on:</b>	<b>Include Remove Amend</b>	<b>Comment</b>	<b>Relevancy for the Assessment</b>	<b>Officer Response and Recommendation</b>
			view negligible and should at least be considered to be a positive association with sustainability objectives.”		
<b>4579/ 3882/4576/ 3372</b>	0 General	N/A	No adverse comment	No amendment needed	Noted.
<b>4583</b>	0 General	N/A	No change needed.	No amendment needed	Noted.
<b>3617 /4556</b>	General		No amendment needed.		Noted.
<b>4538 /2916</b>	4a 4b 4c	No No No	-		Support for approach noted.
<b>3468 Campaign for Protection of Rural Wales</b>	a)		No		Support for content noted.

## September 2018 Update - Consultation on replacement Deposit Local Development – Equality Feedback

103. The content of the assessment has been reviewed and actions amended following feedback from the consultation process. The consultation ended on the 1<sup>st</sup> June 2018. See consultation comments and Officer response and recommendation below:

<u>Representation – number (Organisation where relevant)</u>	<u>Commenting on:</u>	<u>Support Object</u>	<u>Summary of comment/ Suggested Change by the Representor</u>	<u>Relevancy for the Assessment</u>	<u>Office Response (Agree/ Disagree/ Compromise) Pre-Examination Contact</u>
<u>3788 NAEG</u>	<u>Chapter 41 Spatial Strategy Newport Policy 3a) LDP2 Deposit Version \$4.31 C29 Newport Trefdraeth New Site Location – Land adjacent to Newport Business Park Numerous documentation is referred to – see representation</u>	<u>Objection</u>	<u>“The marked demographic imbalance continues with exodus of young people and increase in the proportion of the resident population over retirement age. The availability of homes designed for their needs or suitable for older people to downsize into is severely limited. Improvements are urgently needed to make the town’s environment all-age-friendly”</u>	<u>Assessing Impact Section: Age</u>	<u>There are limitations on the ability to influence the mix and design of housing. A Welsh Government response is needed regarding this issue.</u>  <u>Many of the issues raised are outside the remit of the planning authority and some would need changes to national planning policy. Those issues that can be addressed are. The Authority is willing to contribute to wider initiatives.</u>

<p><u>2708 – Pembrokeshire County Council</u></p>	<p><u>Chapter 4E Housing 4.254 Housing Background paper para 52 Older People</u></p>		<p><u>The Plan recognises the significant growth in older age-groups remains a feature of all scenarios. It fails however to demonstrate how it intends to plan for the specific housing needs of older people. For objections only - which tests of soundness does it fail? Test 2 Why? Does not flow from the evidence or respond to this local issue (Test 2)</u></p>	<p><u>Assessing Impact Section: Age</u></p>	<p><u>The issues around such provision are highlighted in the Equalities Impact Assessment for the Plan.</u></p> <p><u>The current housing market assessment only takes into account bedroom numbers for affordable housing requirements. It would however include any older person’s affordable housing needs where applicable.</u></p> <p><u>There are limitations on the ability to influence the mix of housing. Beyond providing a suitable layout where a mix of dwellings normally provides for a better layout the planning authority can only seek to achieve an element of affordable housing to meet the need as shown in the Local Housing Market Assessment. The Housing Market Assessment provides numbers for overall affordable housing need. The mix (i.e., providing suitable properties for older people) comes when need is addressed for an individual project by the housing authority.</u></p> <p><u>Properties will also need to comply with building regulations standards.</u></p> <p><u>Compliance with alternative standards would need to be brought forward through Welsh Government.</u></p>
---	--	--	--	---	---

					<p><u>The difficulties with the introduction of sprinkler systems illustrate the issues that arise with prescribing matters such as a lifetime homes standard.</u></p> <p><b><u>Conclusion: Disagree</u></b></p>
<u>1569 – Welsh Government</u>	<u>Chapter 4E Housing Delivery: Gypsy and Traveller Accommodation Assessment (GTAA) / Policy 51 Gypsy and Travellers</u>	<u>Objection Category C</u>	<u>Criterion a) is contrary to national policy. It implies Gypsies and Travellers have restricted freedom of movement to develop sites in other local authorities. This could be deemed as indirect discrimination under the Equality Act 2010 as Gypsies and Travellers are nomadic in nature and less likely to have a local connection to any particular local authority.</u>	<u>Assessing Impact Section - Race</u>	<p><u>The purpose of the criterion in the Local Development Plan is to ensure that proposals for Gypsies and Travellers are planned for in a co-ordinated fashion and if there is a suitable plot already available in the area then it would be better to utilise this than create a new site on an ad hoc basis where there was no justification for it. This would not prevent Gypsies and Travellers providing a justification for why they needed to be in that particular location, for example the need to have a transitory site for potato picking on the St David's peninsula.</u></p> <p><u>Our current criterion which is causing difficulties advises:</u></p> <p><u>'a) evidence of need to locate or provide transitory arrangements in the area has been identified; and'</u></p> <p><u>Appeal decisions looked at refer to (in terms of establishing need):</u>  <u>- Establishing a general need in the most recent Gypsy Traveller Accommodation Assessment to justify a</u></p>

				<p><u>site that can't be provided for by the LDP provision – for us this would be within a Pembrokeshire context. The criterion used in Policy 51 is flexible enough to consider other needs identified as well.</u></p> <p><u>- Establishing an individual need – only applying to those who meet the planning definition of a Gypsy. What alternative accommodation might be available in a reasonable time frame (enforcement appeal)? Are the applicants listed on the Gypsy Traveller Waiting list?</u></p> <p><u>-Considering personal circumstances.</u></p> <p><u>-Considering granting temporary permission where alternative provision is likely in the future</u></p> <p><u>That approach reflects paragraph 36 onwards of Circular 30/2007(now superseded) and paragraph 58 onwards of the new Circular 005/2018.</u></p> <p><u>'58. Section 38 of the Planning and Compulsory Purchase Act 2004 provide that determinations of applications for planning permission shall be made in accordance with the development plan unless material considerations indicate otherwise. Other considerations for Gypsy and Traveller site applications will usually include the impact on the surrounding area, the existing level of</u></p>
--	--	--	--	---

				<p><u>provision and need for sites which is evidenced as part of the Gypsy and Traveller Accommodation Assessment for the area.'</u></p> <p><u>One option to address the objection is to suggest, that to ensure explicit consistency with the advice in 005/2018 Appendix B, that the Authority prefixes the criterion with 'where the proposal is in a location where housing development would not normally be permitted' This would address the specific issue highlighted by Welsh Government regarding placing restrictions on proposals that would not be placed on non-Gypsies and Travellers in Appendix B page 29 last reference to examples unacceptable criteria. It wouldn't however reconcile the obligations upon the planning authority and any Inspector to consider the matters set out in paragraph 58 onwards in the Circular.</u></p> <p><u>Note Paragraph 61 of the Circular also refers to needing to explore if there are alternative sites available before allowing proposals outside settlement boundaries.</u></p> <p><u>Policy 7 Countryside (TIER 5) (Strategy Policy) advises in criterion 'm) There is a need for a Gypsy and</u></p>
--	--	--	--	---

				<p><u>Traveller site in a countryside location (see Policy 51). ' which would be consistent with the suggested amendment above.</u></p> <p><u>Another option would be to delete the criterion and instead to cross refer in the reasoned justification to the need to comply in particular with requirements for submitting a planning application as set out in Circular 005/2018 which would cover requirements set out in paragraphs 58 to 69 of the Circular. Other cross referencing to national planning policy and guidance can be found in the Plan.</u></p> <p><u>A discussion at Examination to clarify what the expectations are from the Circular/WG would be helpful.</u></p> <p><u>Also to note in Criterion d) there is a typographical error 'and on site services and facilities' needs addressing.</u></p> <p><u>The site sustainability criteria in paragraph 37 of the new Circular against the Deposit Plan policy text and the wording is considered to be adequate.</u></p> <p><u>Proposals considered by the Authority tend to be one off proposals in countryside locations. The reference to</u></p>
--	--	--	--	--

					<u>ensuring that proposals are in proportion to settled communities (Good Practice Criteria- Annex B, paragraph 5) is unlikely to arise. Conclusion: The Authority would welcome a discussion on these matters at Examination.</u>
<u>1569 – Welsh Government</u>	<u>Chapter 4E Housing</u>  <u>Gypsy and Traveller Accommodation Assessment (GTAA) / Policy 51 Gypsy and Travellers</u>	<u>Objection Category C</u>	<u>The GTAA states there is a need for 101 pitches across Pembrokeshire (2031) with an immediate need (by 2020) for 32 residential pitches and 2 Travelling Showpeople’s yards. The Deposit Plan states “no need has been identified in the PCNP” (paragraph 4.301). This statement should be supported by a Statement of Common Ground with Pembrokeshire County Council and the Welsh Government’s Equality and Prosperity Division in advance of the LDP examination.</u>	<u>Assessing Impact Section – Race / Evidence section on Race</u>	<u>Conclusion: Agree. See signed copy of the <b>Statement of Common Ground</b> – Appendix 4.</u>
<u>2708 -</u>	<u>Chapter 4E</u>	<u>Support</u>	<u>PCC support the</u>		<u>Support noted.</u>

<a href="#"><u>Pembrokeshire County Council</u></a>	<a href="#"><u>Housing Policy 51 Gypsy Traveller and Showpeople Sites</u></a>		<a href="#"><u>policy approach set out in relation to accommodation for Gypsy Travellers and Showpeople. There is an identified need for additional accommodation in Pembrokeshire and this policy approach will enable any applications to be considered.</u></a>		
---	---	--	--	--	--

## Identifying Impact

106. This section shows how this policy / decision / practice could have an impact (positive or negative) on the protected groups.

### Age

Protected Group: Age			
Evidence/ Areas to Address	How might it impact?	Positive/ Negative/ None	Response/ Action
<p>An ageing population, with a high concentration of older people in some LSOA areas within the Park.</p> <p>A current and future demand for neighbourhoods and communities that facilitate ageing in place and promote prevention agenda through accommodation and support, neighbourhood design and layout,</p>	<p>The need to meet the housing and support needs of an ageing population through facilitating the development of appropriate housing options for older people in locations which are accessible, have good public transport links and good services. This should be taken into account in terms of spatial policies. Issue highlighted by Consultation response 339 and 4542.</p>	<p>+/-</p>	<p>Housing Need of Older Population: Beyond providing a suitable layout where a mix of dwellings normally provides for a better layout the planning authority can only seek to achieve an element of affordable housing to meet the need as shown in</p>

<b>Protected Group: Age</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
<p>access to health, community and other facilities and accessible transport.</p> <p><b>Consultation Response 339:</b>            “The Expert Group on Housing an Aging Population recommends designation of particular sites in town centres for older people’s housing. There are already precious few sites left in Newport suitable for the purpose.            But demand for appropriately designed older people’s housing in Newport is undoubtedly set to increase. Many older people in Newport seek to downsize. The social benefit to Newport of older people freeing up larger stock, could be significant.            Whilst the Authority does list an ageing population as an issue in the text to Policy 3, nothing is said about the implications of this in planning terms.            Whilst PPW gives little encouragement to a planning authority to tackle this issue at the moment, The Welsh Government Report from the Expert Group on Housing an Ageing Population in Wales January 2017, has called for a planning</p>	<p>The housing market assessment only takes into account bedroom numbers. Can the mix of housing provided be influenced?</p> <p>LDP should facilitate development of Dementia Friendly Neighbourhoods, taking into account the principles found within Dementia friendly communities Guidance for councils<sup>74</sup> and Neighbourhoods for Life Designing dementia-friendly outdoor environments.<sup>75</sup></p> <p>Consultation response 4542 about lack of suitable parking and toilet facilities at St Justinians.</p> <p><b>Spatial Strategy            Priority A Special Qualities            Policy 5 St Davids Local Centre (Tier 3) (Strategy Policy)            Priority C Climate Change, Sustainable Design, Flooding, Sustainable Energy            E. Affordable Housing and Housing            F. Community Facilities, Retailing, Transport</b></p>		<p>the Local Housing Market Assessment. The Housing Market Assessment provides numbers for overall affordable housing need. The mix (i.e., providing suitable properties for older people) comes when need is addressed for an individual project by the housing authority. No further action is proposed.            Pembrokeshire Affordable Housing Group contacted March 2017 – no comments provided.</p> <p>See response to consultation responses 4542 on p47 and 339 on p49.</p> <p>Neighbourhoods and facilities:            The Plan’s Spatial strategy seeks to focus development in locations that have facilities and are supported</p>

<sup>74</sup> Local Government, innovation in Dementia, Dementia Friendly Communities, Guidance for Councils: <http://bit.ly/2h4gCwZ>

<sup>75</sup> Oxford Institute for Sustainable Development, Neighbourhoods for Life Designing dementia-friendly outdoor environments: <http://bit.ly/2h4y4bx>

Protected Group: Age			
Evidence/ Areas to Address	How might it impact?	Positive/ Negative/ None	Response/ Action
<p>system which realigns with health, social care and wellbeing of future generations policy, and which prioritises the ageing population, with key actions including a clear national policy; <u>amendment of PPW</u> to encourage mixed, Age-friendly, lifetime neighbourhoods and to attach greater national weight to older person's housing provision and to encourage a range of innovative solutions to meet the housing needs of an older population; <u>strengthens practice guidance</u> through assessment of full housing demand and need of older people and reflects this in the overall housing and five year land supply, separately identifying specific needs and setting numerical requirements for older people in the LDP; <u>writes criteria based policies in LDPs</u> clarifying the circumstances in which schemes will be allowed with a presumption that planning permission will be granted for properly formulated proposals; <u>identifies and targets specific areas and particular sites suitable for such provision</u>; and <u>formulates of local 'exceptions policies'</u> for housing for older people in rural areas. (Section 4 Pages 36 to 37)"</p> <p><b>Consultation Response 4542:</b></p>			<p>by a public transport network. (see the Plan's Vision and Spatial Strategy). Policies seek to conserve key attributes of the natural environment that promote healthy environments, promote specific sustainable design elements such as legible layouts that are pedestrian friendly, accessible buildings, natural surveillance and open spaces. The plan also seeks to safeguard community facilities. No further action is proposed.</p> <p><u>September update on above: There are limitations on the ability to influence the mix and design of housing. A Welsh Government response is needed regarding this issue.</u></p> <p><u>Many of the issues raised are outside the remit of the planning authority and some would need changes to</u></p>

<b>Protected Group: Age</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
<p>“Being ahead of others in replacing its LDP, PCNPA could also be leading the way by looking, together with local communities, justifiably using Newport as a pilot, at the connections between housing, health and well-being in the Park, and the challenges that our ageing population poses for housing needs.”</p> <p>“The introduction to the ‘All Party Parliament group report on housing for older people’ <a href="#">HAPPI3 Report 2016</a> states “Local planning authorities should also recognise the demographic changes that necessitate stronger encouragement for older people’s housing. My comment on the Local Plan is that it should specifically include consideration of the need for housing designed for older people – as outlined in this report.”</p> <p><b>Consultation Response 2910:</b>  “Consistent with our answer in relation to Question 1, the City Council remains concerned about the lack of suitable parking and toilet facilities at St Justinians and in relation to Question 4 and the Equality Impact Assessment, how people who are protected under the Equality Act 2010 can have appropriate and necessary facilities in the St</p>			<p><a href="#"><u>national planning policy. Those issues that can be addressed are. The Authority is willing to contribute to wider initiatives</u></a></p> <p>St Justinians and facilities:</p> <p>Toilets:  In principle Policy 53  Community Facilities and Infrastructure Requirements supports provision of community facilities outside built up areas as long as they are suitably located.</p> <p>The provision of improved facilities in St Justinian’s area is dependent on suitable proposals coming forward and Policy 53 would apply.</p> <p>Car Parking:  The Authority is working with Pembrokeshire County Council and the community to find a sustainable solution for access to St</p>

Protected Group: Age			
Evidence/ Areas to Address	How might it impact?	Positive/ Negative/ None	Response/ Action
<p>Justinians area.”</p> <p><u>September 2018 Update: Consultation Response 2910 (Replacement Deposit Local Development Plan) –</u></p> <p><u>3788 NAEG: Chapter 41 Spatial Strategy Newport Policy 3a) LDP2 Deposit Version §4.31 C29 Newport Trefdraeth New Site Location – Land adjacent to Newport Business Park Numerous documentation is referred to – see representation: “The marked demographic imbalance continues with exodus of young people and increase in the proportion of the resident population over retirement age. The availability of homes designed for their needs or suitable for older people to downsize into is severely limited. Improvements are urgently needed to make the town’s environment all-age-friendly”</u></p> <p><u>2708 Pembrokeshire County Council: Chapter 4E Housing 4.254 Housing Background paper para</u></p>			<p>Justinians and will include full consideration of accessible parking provision</p>

Protected Group: Age			
Evidence/ Areas to Address	How might it impact?	Positive/ Negative/ None	Response/ Action
<p><u>52 Older People: “The Plan recognises the significant growth in older age-groups remains a feature of all scenarios. It fails however to demonstrate how it intends to plan for the specific housing needs of older people. For objections only - which tests of soundness does it fail? Test 2 Why? Does not flow from the evidence or respond to this local issue (Test 2)”</u></p>			
<p>Access to affordable housing for young people.</p> <p>Increased % of children in low income household within National Park Area may impact on need for affordable housing for families in the future.</p> <p><b>Consultation Responses 4436 on Site 018 and 3251 on Site 027 on SA8:</b> “We understand that there are 51 permanent residents in Little Haven. An additional, say, 4 person family which could reasonably be accommodated in a new dwelling would provide an 8% increase in the number of residents in the village, An 8% increase is not in our view negligible and should at least be considered to be a positive association with sustainability objectives.”</p>	<p>How will proposed changes within the plan impact on affordable housing provision in terms of younger people and potentially families on low income within the Park?</p> <p>Opportunities for self build.</p> <p>Consultation response on Site 018 and Site 027.</p> <p><b>Spatial Strategy</b>  <b>Site 108 and SA8</b>  <b>E. Affordable Housing and Housing</b>  <b>D. Visitor Economy. Employment</b>  <b>F. Community Facilities, Retailing, Transport</b></p>	+/-	<p>Affordable Housing: The Housing Market Assessment provides overall figures for affordable housing need. At an individual planning application stage the mix of units in terms of number of bedrooms that each affordable house has can be negotiated.</p> <p>Nominations come from the housing waiting list rather than the Plan specifying who occupies in terms of social housing.</p> <p>Private affordable housing will have occupants nominated from the housing</p>

<b>Protected Group: Age</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
			<p>waiting list. Local occupancy criteria are normally applied as per Technical Advice Note 2.</p> <p>Self-build: As planning authority a requirement to include self-build proposals is not possible although these can be pursued by landowners/developers. It is difficult to obtain mortgages for such proposals.</p> <p>Consultation response 2708 queried above response noting 'Is the basis for the first statement that there is uncertainty over deliverability because of the potential difficulty in securing finance?</p> <p>Officer response to the query: "It is advising that the planning system cannot require a proposal for housing to be a self-build</p>

<b>Protected Group: Age</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
			<p>proposal. Mortgages are an additional issue.” No further action is proposed.</p> <p>Pembrokeshire Affordable Housing Group contacted March 2017 – no comments provided.</p> <p>Site 108 and Site 027:</p> <p>Negligible scoring in sustainability appraisal based on number of factors not only the 8% increase, including issues relating to no control of residency for whole occupation.</p>
<p>Public health considerations including: Impact of air (travel congestion), noise and other pollution on child health, mechanisms to help counter childhood obesity (access to healthy and non-healthy food and promotion of walking), access to play facilities and greenspaces for children in terms of Mental Wellbeing, access to outdoors and community facilities for older people in terms of mental wellbeing and preventing</p>	<p>A need to take into account public health and safeguarding considerations through land use policies.</p> <p>Consultation comment on Site 142 and Site 097 St Davids .</p> <p><b>Spatial Strategy</b> <b>A. Special Qualities</b> <b>Major Development, the Potential for Growth</b> <b>C. Climate Change, Sustainable Design,</b></p>	+	<p>Public Health: The Plan’s Spatial strategy seeks to focus development in locations that have facilities accessible by means other than private car. Policies seek to conserve key attributes of the natural environment that promote healthy environments, promote</p>

<b>Protected Group: Age</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
<p>isolation, road safety consideration for children.</p> <p>Consultation Response 3820:</p> <p><b>Consultation Response 4436 on Site 142 and Site 097 St Davids:</b> “Question 4 Safeguarding of children @ Ysgol BD from people on sex offenders register in such close proximity to the school this happened in Bishops Castle Shropshire.”</p>	<p><b>Renewable Energy, Flooding</b>  <b>D. Visitor Economy, Attractions, Leisure Activities and Recreation</b>  <b>E. Affordable Housing and Housing</b>  <b>F. Community Facilities, Retailing, Transport</b></p>		<p>pedestrian friendly layouts and provide and protect open spaces for recreation. Anything ugly, dirty, noisy, crowded, intrusive or uncomfortable that would adversely affect public amenity would not be supported. Affordable housing policies can deliver inclusive sheltered housing for the elderly. The plan also seeks to safeguard community facilities. The plan would however have little/no impact on food choice.</p> <p>Consultation comment on Site 142 and Site 097 St Davids:  This issue lies outside the scope of planning land use policy for generic market housing allocations. Should a specific proposal be received for housing of this nature, the appropriateness of the location would form a material planning</p>

<b>Protected Group: Age</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
			consideration.
<p>Concern for young people about limited range of job opportunities available in their local areas.</p> <p>Implication of policies for young people in certain industries e.g. young farmers</p> <p>Consultation response 3468 from CPRW: <b>“Updated Agricultural Land Classification and Division of grade 3 into 3a (BMV land) and 3b.</b> Work on this upgrading is now well advanced. The LDP should use the new and more sophisticated Predictive maps being produced to up- grade Land Classification data. Otherwise BMV land will be seriously at risk. We understand also that some LDPs in process are already taking note of this upgrading of data. The ability of the National Park to grow local food for local residents could be compromised if the Predictive maps now being produced are ignored. Keeping to the old Provisional maps which did not divide grade 3 is unsustainable.</p>	<p>A need to ensure land use policy is encouraging a range of job opportunities available to young people in local areas, taking into account accessibility and transport considerations.</p> <p>A consideration of the views of young people in farming industry or looking to go into farming industry on Policy 46 - Agricultural Diversification (Previously 43A).</p> <p>Consultation response 3468 on updated agricultural land classification</p> <p><b>Spatial Strategy</b>  <b>Major Development, the Potential for Growth</b>  <b>Visitor Economy, Employment</b>  <b>Policy 46Agricultural Diversification</b>  <b>Community Facilities, Retailing and Transport</b></p>	+	<p>Employment support: The Plan allows for small-scale provision of land for employment uses in or adjacent to the defined Centres where public transport availability is more prevalent. Taking into account the rural nature of the National Park, the Strategy also allows for the extension of businesses into the countryside. The Strategy also allows for the development of the visitor economy which is a major employer in the area and supports the town centres for retailing and commercial uses.</p> <p>Pembrokeshire Economic Development and Pembrokeshire Business Initiative have been consulted on the draft Visitor Economy and Employment Chapter.</p>

<b>Protected Group: Age</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
			<p>Policy 46 - Agricultural Diversification: The Pembrokeshire Sustainable Agricultural Network has been consulted on the relevant policies for the Plan before Christmas 2016 including the farm diversification policy. No comments have been received to date (23/1/17). Pembrokeshire Young Farmers and Wales YFC contacted March 2017 – no comments provided.</p> <p>Consultation response 3468 on updated agricultural land classification: Comment noted. The assessment of sites for development includes an appraisal of agricultural land value.</p>
<p>Transport barriers faced by older people and young people due to the rural nature of area, poor public transport links and costs associated with private transport. Negative impact on people's ability to access facilities, recreational</p>	<p>Location of developments in terms of public transport links and proximity to employment and education opportunities, community facilities and health facilities.</p> <p>Promotion of accessible public transport</p>	+/-	<p>Public Transport: The Plan Strategy directs the majority of new development to identified Centres where public transport availability is more</p>

<b>Protected Group: Age</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
<p>opportunities, health facilities, colleges, job placements and employment.</p> <p>Importance of accessible transport options in terms of public transport and access to accessible car parking and drop off places in terms of facilities.</p>	<p>infrastructure.</p> <p>Potential issues relating to need for car parking and accessible car parking spaces for residential units.</p> <p>Drop off places in terms of facilities.</p> <p>Storage considerations in terms of mobility scooters.</p> <p><b>Spatial Strategy Community Facilities, Retailing and Transport E. Affordable Housing and Housing</b></p>		<p>prevalent.</p> <p>Policies 57 and 58 provide a supportive context for this provision.</p> <p>Car Parking: The Authority has adopted Supplementary Planning Guidance on Parking which requires the appropriate levels and type of parking facilities for each development type, taking into account users of the development and availability of public transport. The Guidance will be updated for the Replacement Plan. National planning policy allows for the development of affordable housing in areas without access to public transport.</p> <p>Access and Facilities: Building Regulations require both domestic and nondomestic buildings to be built so that people,</p>

<b>Protected Group: Age</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
			<p>including disabled people, can reach the principal, or suitable alternative, entrance to a building from the point of access. For the adaptation of historic buildings however, accessibility measures are balanced against the impact upon the historical character and interest of those buildings.</p> <p>Dwellings that are built to the Lifetime Homes standards, such as those built by a Registered Social Landlord, include additional requirements to Building Regulations, for example requiring entrances to be lit and covered.</p> <p>Technical Advice Note 12: Design promotes key design principles such as ease of access for all, community safety and safe and clear movement routes that are fit for purpose.</p>

<b>Protected Group: Age</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
			<p>The authority consults with an 'Access officer' to advise on the accessibility of proposed buildings when considering planning applications for buildings and public open spaces.</p> <p>Mobility Scooter Storage: Building Regulations does not require scooter storage areas.</p>

## **Disability**

<b>Protected Group: Disability</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
<p>High % of people whose day-to-day activities are limited in some LSOA areas. Amroth and Manorbier both rural centres have the highest % of people providing some form of unpaid care.</p> <p>Implications of this in terms of accessible affordable and market housing and developing accessible neighbourhoods and facilities.</p>	<p>A need to ensure adequate provision of accessible housing in terms of affordable housing and market housing. Taking into account a need to future proof housing through Life Time Homes principles and promoting certain design features.</p> <p><b>Spatial Strategy</b></p> <p><b>Priority A Special Qualities</b></p>	-	<p>Accessible Housing Provision: See above regarding planning affordable housing provision. A life time home standard is applicable to all social housing achieving the Development Quality Requirement (DQR) funded by WG Social Housing</p>

<b>Protected Group: Disability</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
	<p><b>Priority C Climate Change, Sustainable Design, Flooding, Sustainable Energy</b>  <b>E. Affordable Housing and Housing</b>  <b>F. Community Facilities, Retailing, Transport</b></p>		<p>Grant. There is however limited provision of affordable housing under DQR in this National Park. To apply the requirement to housing development generally would require evidence of need and evidence of viability. The primary premise of the Plan is that there is no need for market housing so a justification for requiring a lifetime home standard on market housing is not feasible. A requirement for a lifetime home standard on the affordable housing element would need more information on nature of need perhaps from the local housing market assessment. Welsh Government is also relying on individual local authorities to consider what the viability implications are for adopting the lifetime homes standard. Given the experience of assessing the viability of</p>

<b>Protected Group: Disability</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
			<p>introducing sprinklers a more national than local type of assessment would be less likely to be challengeable.</p> <p>No action at this point. Part M of Building Regulations does apply the standard for 'visitable dwellings'.</p> <p>Pembrokeshire Affordable Housing Group contacted March 2017 – no comments provided.</p>
<p>A number of barriers in neighbourhood and street design impact on access to the outdoors and active travel opportunities for disabled people across a range of disabilities.</p> <p>As a result this can limit active travel opportunities and increase reliance of private car travel.</p> <p>However due to rural nature of area and limited public transport, accessible parking and drop off points at homes and facilities will be important.</p>	<p>Taking into account accessible design features at a street and neighbourhood level including distances to public transport will help overcome barriers to active travel for disabled people.</p> <p>A need to consider access to accessible parking and drop of points at homes and facilities.</p> <p><b>Spatial Strategy</b>  <b>C. Climate Change, Sustainable Design, Renewable Energy, Flooding</b>  <b>F. Community Facilities, Retailing and Transport</b></p>	+	<p>Neighbourhood access:  The Plan's Spatial strategy seeks to focus development in locations that have facilities accessible by means other than private car. Promoting pedestrian/wheelchair friendly environments and routes that link to existing services/facilities forms normal Development Management practice when considering the suitability of a proposal in terms of</p>

<b>Protected Group: Disability</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
			sustainable design.  Consulting the Highways Authority and Access Officer informs this process for specific proposals. However over engineered environments in this respect can reduce the aesthetical quality and specific character of developments, these impacts therefore need to be balanced.
Access to green spaces, active walking opportunities and allotments can have a positive effect on people's mental health and wellbeing.	Positive impact of policies that promote greenspaces, active walking opportunities and allotments. A need to ensure that access to these opportunities is available to all e.g. policies that remove barriers to accessibility.  <b>Spatial Policy</b> <b>Special Qualities</b> <b>Affordable Housing and Housing</b> <b>F. Community Facilities, Retailing, Transport</b>	+	Access to Green Space: Areas of open space, including recreational open space and allotments are protected from development in the Plan. The removal of barriers linked to existing development are generally not within the remit of land-use planning. However design and layout of new developments will need to take accessibility for all into account.
Potential access issues in terms of tourism and recreational opportunities within the Park.	A need to ensure that policies related to tourism industry take into account accessibility considerations.	+/-	Accessibility: The Plan Strategy directs visitor attractions to Centres,

<b>Protected Group: Disability</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
<p>Positive identification and creation of wheelchair walks and easy access view points within National Park area.</p> <p><b>Consultation Response 2910:</b>  “Consistent with our answer in relation to Question 1, the City Council remains concerned about the lack of suitable parking and toilet facilities at St Justinians and in relation to Question 4 and the Equality Impact Assessment, how people who are protected under the Equality Act 2010 can have appropriate and necessary facilities in the St Justinians area.”</p>	<p>Policy 18 and 19 will relate to access to shoreline and beaches.</p> <p><b>Special Qualities</b>  <b>Policy 5 St Davids Local Centre (Tier 3) (Strategy Policy)</b>  <b>Policy 18 Shore Based Facilities</b>  <b>Policy 19 Porthgain, Saundersfoot, Solva and Tenby Harbours</b>  <b>Community Facilities, Retailing, Transport</b></p>		<p>unless there is specific justification for them being in the countryside. Public transport is more readily available in and between Centres. Whilst priority is given to delivery of housing, visitor accommodation is directed to Centres or through conversion of buildings in the countryside. The creation of walkways and paths is generally outside of the land use planning remit.</p> <p>Building Regulations require both domestic and non-domestic buildings to be built so that people, including disabled people, can reach the principal, or suitable alternative, entrance to a building from the point of access. For the adaptation of historic buildings however, accessibility measures are balanced against the impact upon the historical character</p>

<b>Protected Group: Disability</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
			<p>and interest of those buildings.</p> <p>Dwellings that are built to the Lifetime Homes standards, such as those built by a Registered Social Landlord, include additional requirements to Building Regulations, for example requiring entrances to be lit and covered.</p> <p>Technical Advice Note 12: Design promotes key design principles such as ease of access for all, community safety and safe and clear movement routes that are fit for purpose.</p> <p>The authority consults with an 'Access officer' to advise on the accessibility of proposed buildings when considering planning applications for buildings and public open spaces.</p> <p>St Justinians and facilities:</p>

<b>Protected Group: Disability</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
			<p>Toilets: In principle Policy 53 Community Facilities and Infrastructure Requirements supports provision of community facilities outside built up areas as long as they are suitably located.</p> <p>The provision of improved facilities in St Justinian's area is dependent on suitable proposals coming forward and Policy 53 would apply.</p> <p>Car Parking: The Authority is working with Pembrokeshire County Council and the community to find a sustainable solution for access to St Justinians and will include full consideration of accessible parking provision</p>
Residents and tourists may be targeted in terms of disability hate crime. This may impact on their use of public transport and access to opportunities and facilities	A need to promote Secure by Design principles and community safety considerations as part of Good Design and neighbourhood layouts to create a safe environment. This will be	+	Secure by Design: Secure by Design principles form part of the overall sustainable design

<b>Protected Group: Disability</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
within the Park and further afield	<p>particularly important in terms of public transport related facilities.</p> <p><b>C. Climate Change, Sustainable Design, Flooding, Sustainable Energy</b></p>		<p>considerations for development proposals, including those proposals that may exacerbate existing issues.</p> <p>The Authority consults Dyfed Powys Police who advise on individual proposals. Key principles include the promotion of natural surveillance over public areas and the prevention of dark, unused corners/routes. There is however a need to balance security design features with the overall impact upon street character and attractive, inclusive public realms.</p>
<p>Consultation methods need to be accessible and take reasonable adjustments into account.</p> <p>Documentation on LDP and its policies need to be accessible. Delivery Agreement is available in Easy read and a summary version of the preferred strategy will also be made available in Easy</p>	<p>A need to ensure views of Disabled people are captured and that Disabled people do not face barriers to participation.</p> <p>A summary version of the preferred strategy will be made available in Easy Read (following advice from Pembrokeshire People First.)</p> <p>A need to respond to reasonable adjustment</p>	+	<p>Consultation: Pembrokeshire Access Group and other disability groups consulted as part of the wider consultation. Reasonable adjustments and accessibility will be taken into account when public consultation events</p>

<b>Protected Group: Disability</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
Read (following advice from Pembrokeshire People First.)	request relating to format of LDP documentation once adopted.  <b>Consultation elements within Delivery Agreement</b>		are held.  Easy Read and Diverse Cymru Guidance: A summary of the preferred strategy will be made available in Easy Read (following advice from Pembrokeshire People First). The Authority is applying guidance from Diverse Cymru's Advice Guide: Making Documents Accessible, to the formatting of the preferred strategy. <sup>76</sup>  Reasonable Adjustments: Authority will respond to reasonable adjustment requests as they are made. Information on how to make a request in terms of reasonable adjustments and document will be outlined in the document.
<b>Consultation response 4468 from CPRW:</b>	Cumulative visual and landscape impacts could impact on residents mental health and well-being.	None	The 500m buffer zone referred to in the Toolkit relates to large scale

<sup>76</sup> Diverse Cymru, Advice Guide: Making Documents Accessible - <http://bit.ly/2kxesTc>

<b>Protected Group: Disability</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
<p><b>“Wales Government Toolkit for Planners 2015 – Planning for Renewable and Low Carbon Energy</b></p> <p>In preparing this draft of the Local Development Plan replacement it appears that the up-dated <b>Wales Government Toolkit for Planners</b> has not been used. Powys are using it to guide their LDP. We expect consistency throughout Wales especially where it gives greater protection to residents from intrusive developments.</p> <p>With regard to wind energy installations for example, <b>the Toolkit</b> identifies the following: Page 145 places a restraint on all wind clusters of 7km apart.</p> <p>Page 139 it identifies a Buffer zone of 500m between wind turbines. And any residential property.</p> <p>Unless a Buffer Zone is included in Policy 33, a necessity recognised by LPAs elsewhere in Wales, the residents of the National Park will be severely disadvantaged.</p> <p>We are asking you to amend Policy 33 to</p>	<p><b>Policy 34 Renewable Energy (Strategy Policy)</b></p>		<p>installations or a turbine with an output of 2MW. Reference No. 41 within the Toolkit states that this was the figure used for the assessment of Strategic Search Areas contained in Technical Advice Note 8. Similarly the reference to 7km distance between turbines is in relation to large scale unconstrained wind resources. There are no Strategic Search Areas identified within the National Park and this scale of turbine development would not be considered appropriate within the National Park landscape or its outliers. For small scale turbine development, defined as turbines under 25m to blade tip in the supporting table to Policy 33 within the Local Development Plan Preferred Strategy, each case will be determined on its merits, against the relevant ETSU</p>

<b>Protected Group: Disability</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
<p>add to the end of the Policy statement the word: To protect residents and tourism within the National Park a Buffer Zone will be required in lien with Wales Planning guidance.</p> <p>Leaving protection of residents' interests to the word 'amenity' is not enough, when in other areas in Wales they are protected by a Buffer zone."</p>			<p>Guidance, with regard to noise impact upon neighbouring properties. It is not considered appropriate to apply a blanket buffer zone distance in this respect as it could prohibit suitable small scale schemes being developed.</p>

## **Gender Reassignment**

<b>Protected Group: Gender Reassignment</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
<p>Trans people may feel unsafe in public spaces and be targeted in terms of hate crime. This may impact on their use of public transport and access to opportunities and facilities within the Park and further afield.</p>	<p>A need to promote Secure by Design principles and community safety considerations as part of good design and neighbourhood layouts to create a safe environment. This will be particularly important in terms of public transport related facilities.</p> <p><b>Policy 30 Sustainable Design Spatial Strategy F. Community Facilities, Retailing, Transport E. Affordable Housing and Housing</b></p>	<p>+</p>	<p>Secure by Design: Secure by Design principles form part of the overall sustainable design considerations for development proposals, including those proposals that may exacerbate existing issues.</p> <p>The Authority consults Dyfed Powys Police who advise on individual</p>

<b>Protected Group: Gender Reassignment</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
			proposals. Key principles include the promotion of natural surveillance over public areas and the prevention of dark, unused corners/routes. There is however a need to balance security design features with the overall impact upon street character and attractive, inclusive public realms.
<p>People may have to travel within Pembrokeshire and out of area to access community and support groups.</p> <p>People accessing Gender Identity Clinics will have to travel out of county and currently Wales to access them.</p>	<p>A need to promote good accessible public transport and private transport links within the Park, linked to wider Pembrokeshire and regional networks.</p> <p><b>F. Community Facilities, Retailing, Transport</b></p>	+	<p>Public Transport: The provision of public transport is outside the remit of land use planning. The Plan Strategy would allow for the consideration of proposals to improve public transport and accessibility. (Policies 52 and 53).</p>
<p>Importance of being able to access health facilities for Trans people.</p> <p>Inequalities in mental health outcomes for Trans people.</p>	<p>A need to promote access to health facilities.</p> <p>Land use policies that have positive impact on health and wellbeing outcomes may contribute to better mental health outcomes for Trans people.</p> <p><b>Spatial Policy Special Qualities</b></p>	+	<p>Access to facilities: See previously regarding the spatial strategy which promotes access to facilities through seeking to locate development in accessible locations. The Community Facilities section is supportive of protecting and</p>

<b>Protected Group: Gender Reassignment</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
	<b>Affordable Housing and Housing</b> <b>F. Community Facilities, Retailing, Transport</b>		providing community facilities; and ensuring that there are opportunities taken to promote sustainable travel choices.  Greenspaces: The Plan also includes policies for the protection of open space and the Park's special qualities which are beneficial for the health and wellbeing of people.

### **Sex (Gender)**

<b>Protected Group: Sex (Gender)</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
Importance of safety considerations in terms of public spaces and neighbourhoods in relation to sexual harassment and assault and domestic violence.	A need to promote Secure by Design principles and community safety considerations as part of Good Design and neighbourhood layouts to create a safe environment.  <b>Spatial Strategy</b> <b>C. Climate Change, Sustainable Design, Flooding, Sustainable Design</b> <b>F. Community Facilities, Retailing, Transport</b> <b>E. Affordable Housing and Housing</b>	+	Secure by Design: Secure by Design principles form part of the overall sustainable design considerations for development proposals, including those proposals that may exacerbate existing issues.

<b>Protected Group: Sex (Gender)</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
			The Authority consults Dyfed Powys Police who advise on individual proposals. Key principles include the promotion of natural surveillance over public areas and the prevention of dark, unused corners/routes. There is however a need to balance security design features with the overall impact upon street character and attractive, inclusive public realms.
<p>Importance of location and access to child care and other facilities, commuting times between employment and also schools.</p> <p>Promotion of employment opportunities.</p>	<p>Location of developments in terms of public transport links and proximity to child care facilities and employment opportunities.</p> <p><b>Spatial Strategy</b>  <b>B. Major Development, the Potential for Growth</b>  <b>E. Affordable Housing and Housing</b>  <b>F. Community Facilities, Retailing, Transport</b></p>	+	<p><b>Facilities:</b>  The Plan Strategy allows for new and extended community facilities where they are well-located to meet the community's needs and are convenient to public transport.</p> <p><b>Employment:</b>  The Plan allows for small-scale provision of land for employment uses in or adjacent to the defined Centres where public</p>

<b>Protected Group: Sex (Gender)</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
			<p>transport availability is more prevalent. Taking into account the rural nature of the National Park, the Strategy also allows for the extension of businesses into the countryside. The Strategy also allows for the development of the visitor economy which is a major employer in the area and supports the town centres for retailing and commercial uses.</p> <p>Pembrokeshire Economic Development and Pembrokeshire Business Initiative have been consulted on the draft Visitor Economy and Employment Chapter.</p>
<p>Access to green spaces, active walking opportunities and allotments can have a positive effect on people's mental health and wellbeing.</p>	<p>Positive impact of policies that promote greenspaces, active walking opportunities and allotments. A need to ensure that access to these opportunities is available to all e.g. policies that remove barriers to accessibility.</p> <p><b>Spatial Policy</b> <b>Special Qualities</b></p>	+	<p><b>Green Space:</b> Areas of open space, including recreational open space and allotments are protected from development in the Plan. The removal of barriers linked to existing development are generally</p>

<b>Protected Group: Sex (Gender)</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
	<b>Affordable Housing and Housing F. Community Facilities, Retailing, Transport</b>		not within the remit of land-use planning. However design and layout of new developments will need to take accessibility for all into account.

### **Pregnancy and Maternity**

<b>Protected Group: Pregnancy and Maternity</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
<p>Importance of location and access to health facilities, community facilities, greenspace and shops in terms of healthy food options.</p> <p>Access to transport links important in terms of ensuring pregnant women and new mums don't miss health care appointments.</p>	<p>Location of developments in terms of public transport links and proximity to health and community facilities and shops.</p> <p>Promotion of accessible public transport infrastructure.</p> <p><b>F. Community Facilities, Retailing, Transport E. Affordable Housing and Housing</b></p>	+	<p>Facilities and Public Transport: The Plan Strategy allows for new and extended community facilities where they are well-located to meet the community's needs and are convenient to public transport.</p> <p>The Plan seeks to promote sustainable travel choices by permitting facilities to improve public transport linkages.</p>

<b>Protected Group: Pregnancy and Maternity</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
			Technical Advice Note 12: Design promotes key design principles such as ease of access for all, community safety and safe and clear movement and transport routes that are fit for purpose. The authority consults with an 'Access officer' to advise on the accessibility of proposed buildings when considering planning applications for buildings and public open spaces.

## **Race**

<b>Protected Group: Race</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative / None</b>	<b>Response/ Action</b>
Pembrokeshire National Park is not ethnically diverse as a whole. However both Tenby South 1 and Saundersfoot have a higher than Pembrokeshire average of BME residents.	A need to consider potential community infrastructure needs at a spatial level within Tenby and Saundersfoot.  <b>Spatial Policy 2 and 4</b>	+	Community Facilities: The Plan includes a supportive policy (Policy 48) for the protection and provision of community facilities. Proposals coming forward can be considered in this context. No proposals for specific allocations in the Plan when the

<b>Protected Group: Race</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative / None</b>	<b>Response/ Action</b>
			candidate site process was undertaken so no needs can be specifically reflected in Policies 2 and 4.  No further action.
Residents and tourists may be targeted in terms of racist hate crime. This may impact on their use of public transport and access to opportunities and facilities within the Park and further afield.	A need to promote Secure by Design principles and community safety considerations as part of Good Design and neighbourhood layouts to create a safe environment. This will be particularly important in terms of public transport related facilities.  <b>C. Climate Change, Sustainable Design, Flooding, Sustainable Energy</b> <b>F. Community Facilities, Retailing, Transport</b> <b>E. Affordable Housing and Housing</b>	+	<b>Secure by Design:</b> Secure by Design principles form part of the overall sustainable design considerations for development proposals, including those proposals that may exacerbate existing issues. The Authority consults Dyfed Powys Police who advise on individual proposals. Key principles include the promotion of natural surveillance over public areas and the prevention of dark, unused corners/routes. There is however a need to balance security design features with the overall impact upon street character and attractive, inclusive public realms.
Should title for Policy 46 (now policy 51) be reworded to Gypsy and Traveller Sites	Rewording of title to Policy 46 (now policy 51)  <b>Policy 51 Gypsy Traveller and Showpeople Sites</b>	+	Title amended as requested.  <b>Consultation response 2708 query:</b> Regarding the re-wording of the title to Policy 46, should reference also be made to Travelling

<b>Protected Group: Race</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative / None</b>	<b>Response/ Action</b>
			Show-people?  Title amended as requested.  Title in list of policies also needs amending. Amendment done.
Lower number of private sites granted permission in National Park area than in Pembrokeshire Council Planning area. Many of the local authority and private sites are located close to National Park boundaries.	A need to ensure that Gypsies and Travellers seeking permission for private sites are treated fairly under Policy 46 (now Policy 51). A consideration of differences between approach within Authority and Council in terms of their policies on private sites  <b>Policy 51 Gypsy Traveller and Showpeople Sites Monitoring Section</b>	+	Comparison of approaches: The approaches have been checked and the same considerations are included between the policy wording and the reasoned justification.  Monitoring indicator: Agree to including a monitoring indicator to consider issues arising where 1 or more applications are approved contrary to recommendation. In addition the Monitoring framework for the Local Development Plan ensures that the effectiveness of policies at appeal are also analysed.  Consultation: Pembrokeshire Affordable Housing Group contacted March 2017 – no comments provided. Pembrokeshire Gypsy Traveller Accommodation Needs Assessment Group and Affordable Housing Group contacted March 2017 – no comments provided. Both groups had further opportunity to comment during consultation on preferred strategy.

<b>Protected Group: Race</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative / None</b>	<b>Response/ Action</b>
No reference to indicators around Gypsy Traveller sites and Policy 46 (now Policy 51) are currently contained within the Monitoring section.	A need to include an indicator for Policy 46  <b>Policy 51 Gypsy Traveller and Showpeople Sites Monitoring Section</b>	<b>+</b>	See above.
Although no change is proposed to Policy 46 (now Policy 51) changes are proposed for Policy 38A Caravan, Camping and Chalet Development (now Policy 42) will this have any implications for Policy 46 (now Policy 51).	A consideration of how Policy 38A (now Policy 42) interrelates and impacts on Policy 46 (now Policy 51) and enforcement related to unauthorised Gypsy and Traveller Sites.  <b>Policy 42 Caravan, Camping and Chalet Development Policy 51 Gypsy Traveller and Showpeople Sites</b>	<b>None</b>	Assimilation into landscape: Occupancy controls for holiday accommodation are different than those for Gypsy Traveller sites.  An issue arising for the 2 unauthorised sites referred to in the Assessment would most likely be equally problematic for a new caravan and camping sites. The issue related to the effect on the character and appearance of the area. Criterion a) of Policy 38A (now Policy 42) requires caravan and camping proposals to be assimilated into the landscape.  Consultation: Pembrokeshire Gypsy Traveller Accommodation Needs Assessment Group contacted March 2017 – no comments provided. Further opportunity for Group and Gypsy and Traveller Communities to comment during consultation on preferred strategy.
Gypsies and Traveller experience worse	Importance of meeting need	<b>+</b>	Policy Framework:

<b>Protected Group: Race</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative / None</b>	<b>Response/ Action</b>
<p>health and education outcomes than the settled community.</p> <p>Access to safe and appropriate sites and facilities can assist in helping to improve outcomes in these areas.</p>	<p>for sites to prevent unauthorised encampments in unsafe areas or without adequate facilities.</p> <p>Policy 46 (now policy 51) notes: the site is well located to serve the needs of Gypsy and Travellers including the need to access local services;</p> <p><b>Policy 51 Gypsy Traveller and Showpeople Sites F. Community Facilities, Retailing, Transport</b></p>		<p>The policy sets out a framework for such considering proposals.</p> <p>Consultation: Pembrokeshire Gypsy Traveller Accommodation Needs Assessment Group contacted March 2017 – no comments provided. Further opportunity for Group and Gypsy and Traveller Communities to comment during consultation on preferred strategy.</p>
<p>A need to tailor engagement methods for Gypsy and Traveller Communities, ensuring it is culturally sensitive and takes into account preferences for face to face contact and low literacy levels.</p> <p>Delivery Agreement is available in Easy read and a summary version of the preferred strategy will also be made available in Easy Read.</p>	<p>A need to ensure views of Gypsies and Traveller communities are captured in terms of the preferred strategy – in particular around Policy 46 (now Policy 51) and 38A (now Policy 42).</p> <p>A summary version of the preferred strategy will be made available in Easy Read.</p> <p><b>Consultation elements within Delivery Agreement</b></p>	+	<p>Consultation: Pembrokeshire Gypsy Traveller Accommodation Needs Assessment Group contacted March 2017 – no comments provided. Further opportunity for Group and Gypsy and Traveller Communities to comment during consultation on preferred strategy.</p> <p>Easy Read: A summary of the preferred strategy has been prepared and an Easy Read version of the summary will also be made available.</p>

<b>Protected Group: Race</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative / None</b>	<b>Response/ Action</b>
	<b>Policy 42 Caravan, Camping and Chalet Development Policy 51 Gypsy Traveller and Showpeople Sites</b>		
<p><b>Consultation response 4468 from CPRW:</b></p> <p>“CPRW is dismayed by the decline in Welsh speakers within much of the National Park. South Pembrokeshire is noted as an English Speaking area but residents should be encouraged to view Welsh positively as it is a part of a bi-lingual country. Of great concern is the decline in the north of the National Park.</p> <p>Policy 12 [14] attempts to prevent further decline in some areas but what is needed is positive promotion of Welsh culture first within the English speaking area of south Pembrokeshire, and then the language in those areas where less than 30% speak Welsh.</p> <p>In a bi-lingual nation, those speaking only one of the languages are culturally and economically disadvantaged. This decline needs to be reversed</p>	<p>Welsh Language decline and policy 14 on the Welsh Language.</p> <p><b>Policy 14 Welsh Language</b></p>	<b>+/-</b>	<p>Welsh Language: Policy 14 is in accordance with scope of what a Local Planning Authority can do under National Planning Policy as set out in Planning Policy Wales and TAN 20: Planning and the Welsh Language.</p>

<b>Protected Group: Race</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative / None</b>	<b>Response/ Action</b>
The South Pembrokeshire Culture with its own often unique words is also being lost.”			
<p><b>Consultation response 4468 from Welsh Government, Plans branch on Criteria A under Policy 51 (previously Policy 46):</b></p> <p>“Policy 46 Gypsy and Travellers – As worded, Criterion A could be considered not to promote the same rights in the planning system as other citizens (Bullet 1, Annex B). The requirement to ‘evidence need’ would not be a restriction placed on non-Gypsy and Travellers, so would this requirement be fair and reasonable in the plan? By their very nature, Gypsy and Travellers are nomadic and will not always have local connections. On this basis, Authorities should determine all applications from anyone who submits them (Bullet 6, Annex B).”</p>	Risk of Criteria A discriminating against Gypsy, Travellers and Show People in the planning process.	-	<p>Criterion A: The justification for deleting criterion a) in the email clarification above actually refers to the Welsh Assembly Government not approving of a criterion that advises 'Applications from Gypsies and Travellers with no local connection will not normally be allowed.' The supporting text quite rightly refers to the fact that Gypsies and Travellers are nomadic and do not necessarily have local connections. Given this context it is still argued by this Authority that the criterion is appropriate as it does not apply this restriction. The purpose of the criterion is to ensure that proposals for Gypsies and Travellers are planned for in a co-ordinated fashion and if there is a suitable plot already available in the area then it would be better to utilise this than create a new site on an ad hoc basis where there was no justification for it. This would not prevent Gypsies and Travellers providing a justification for why they needed to be in that particular location, for example the need to have a transitory site for potato picking on the St David's peninsula.</p> <p><b>Further Clarification asked for from officer</b></p>

<b>Protected Group: Race</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative / None</b>	<b>Response/ Action</b>
			<p><b>and provided below</b></p> <p>These types of proposals come forward in a countryside location which in planning terms requires justification of need. Housing in countryside locations similarly requires evidence of need. Welsh Government has advised that it needed to seek legal advice on the issue.</p> <p>These types of proposals come forward in a countryside location which in planning terms requires justification of need. Housing in countryside locations similarly requires evidence of need. Welsh Government has advised that it needed to seek legal advice on the issue .</p> <p><b>Response from Welsh Government on 4/12/2017 noted</b></p> <p>“The requirement to ‘evidence need’ for new gypsy and traveller sites is an issue being considered as part of the updated circular. To my understanding, this is due to be published in the New Year.</p> <p>Whilst the findings of the updated circular should be incorporated in your Deposit plan,</p>

Protected Group: Race			
Evidence/ Areas to Address	How might it impact?	Positive/ Negative / None	Response/ Action
			<p>this may not be feasible due to the timing of its release. In this case, the LDP process and examination itself will allow for any amendments to be made.”</p> <p><b><u>See updated response below:</u></b></p>
<p><b><u>September 2018 Update: Consultation response Replacement Deposit Local Development Plan, 1569 – Welsh Government: Chapter 4E Housing Delivery: Gypsy and Traveller Accommodation Assessment (GTAA) / Policy 51 Gypsy and Travellers - Replacement Deposit Local Development Plan Consultation:</u></b>  <u>“Criterion a) is contrary to national policy. It implies Gypsies and Travellers have restricted freedom of movement to develop sites in other local authorities. This could be deemed as indirect discrimination under the Equality Act 2010 as Gypsies and Travellers are nomadic in nature and less likely to have a local connection to any particular local authority.”</u></p>	<p><u>Risk of Criteria A indirectly discriminating against Gypsy, Travellers and Show People in the planning process.</u></p>	<p>=</p>	<p><b><u>September 2018 Update:</u></b></p> <p><u>Development Plan is to ensure that proposals for Gypsies and Travellers are planned for in a co-ordinated fashion and if there is a suitable plot already available in the area then it would be better to utilise this than create a new site on an ad hoc basis where there was no justification for it. This would not prevent Gypsies and Travellers providing a justification for why they needed to be in that particular location, for example the need to have a transitory site for potato picking on the St David's peninsula.</u></p> <p><u>Our current criterion which is causing difficulties advises:</u></p> <p><u>'a) evidence of need to locate or provide transitory arrangements in the area has been identified; and'</u></p> <p><u>Appeal decisions looked at refer to (in terms of establishing need):</u></p>

Protected Group: Race			
Evidence/ Areas to Address	How might it impact?	Positive/ Negative / None	Response/ Action
			<p><u>- Establishing a general need in the most recent Gypsy Traveller Accommodation Assessment to justify a site that can't be provided for by the LDP provision – for us this would be within a Pembrokeshire context. The criterion used in Policy 51 is flexible enough to consider other needs identified as well.</u></p> <p><u>- Establishing an individual need – only applying to those who meet the planning definition of a Gypsy. What alternative accommodation might be available in a reasonable time frame (enforcement appeal)? Are the applicants listed on the Gypsy Traveller Waiting list?</u></p> <p><u>-Considering personal circumstances.</u></p> <p><u>-Considering granting temporary permission where alternative provision is likely in the future</u></p> <p><u>That approach reflects paragraph 36 onwards of Circular 30/2007(now superseded) and paragraph 58 onwards of the new Circular 005/2018.</u></p> <p><u>'58. Section 38 of the Planning and Compulsory Purchase Act 2004 provide that determinations of applications for planning permission shall be made in accordance with the development plan unless material considerations indicate otherwise. Other considerations for Gypsy and</u></p>

Protected Group: Race			
Evidence/ Areas to Address	How might it impact?	Positive/ Negative / None	Response/ Action
			<p><u>Traveller site applications will usually include the impact on the surrounding area, the existing level of provision and need for sites which is evidenced as part of the Gypsy and Traveller Accommodation Assessment for the area.'</u></p> <p><u>One option to address the objection is to suggest, that to ensure explicit consistency with the advice in 005/2018 Appendix B, that the Authority prefixes the criterion with 'where the proposal is in a location where housing development would not normally be permitted' This would address the specific issue highlighted by Welsh Government regarding placing restrictions on proposals that would not be placed on non-Gypsies and Travellers in Appendix B page 29 last reference to examples unacceptable criteria. It wouldn't however reconcile the obligations upon the planning authority and any Inspector to consider the matters set out in paragraph 58 onwards in the Circular.</u></p> <p><u>Note Paragraph 61 of the Circular also refers to needing to explore if there are alternative sites available before allowing proposals outside settlement boundaries.</u></p> <p><u>Policy 7 Countryside (TIER 5) (Strategy Policy)</u></p>

Protected Group: Race			
Evidence/ Areas to Address	How might it impact?	Positive/ Negative / None	Response/ Action
			<p><u>advises in criterion 'm) There is a need for a Gypsy and Traveller site in a countryside location (see Policy 51). ' which would be consistent with the suggested amendment above.</u></p> <p><u>Another option would be to delete the criterion and instead to cross refer in the reasoned justification to the need to comply in particular with requirements for submitting a planning application as set out in Circular 005/2018 which would cover requirements set out in paragraphs 58 to 69 of the Circular. Other cross referencing to national planning policy and guidance can be found in the Plan.</u></p> <p><u>A discussion at Examination to clarify what the expectations are from the Circular/WG would be helpful.</u></p> <p><u>Also to note in Criterion d) there is a typographical error 'and on site services and facilities' needs addressing.</u></p> <p><u>The site sustainability criteria in paragraph 37 of the new Circular against the Deposit Plan policy text and the wording is considered to be adequate.</u></p>

Protected Group: Race			
Evidence/ Areas to Address	How might it impact?	Positive/ Negative / None	Response/ Action
			<p><u>Proposals considered by the Authority tend to be one off proposals in countryside locations. The reference to ensuring that proposals are in proportion to settled communities (Good Practice Criteria- Annex B, paragraph 5) is unlikely to arise.</u></p> <p><u>Conclusion: The Authority would welcome a discussion on these matters at Examination.</u></p>
<p><u>Update September 2018: Consultation response Replacement Deposit Local Development Plan, 1569 – Welsh Government: Chapter 4E Housing Delivery: Gypsy and Traveller Accommodation Assessment (GTAA) / Policy 51 Gypsy and Travellers - Replacement Deposit Local Development Plan Consultation: The GTAA states there is a need for 101 pitches across Pembrokeshire (2031) with an immediate need (by 2020) for 32 residential pitches and 2 Travelling Showpeople’s yards. The Deposit Plan states “no need has been identified in the PCNP” (paragraph 4.301). This statement should be supported by a Statement of Common Ground with Pembrokeshire County Council and the Welsh Government’s Equality and Prosperity Division in advance of the LDP</u></p>	<p><u>Statement of Common Ground Needed re “no need has been identified in PCNP”</u></p>	=	<p><u>Conclusion: Agree. See signed copy of the <b>Statement of Common Ground</b> – Appendix 4.</u></p>

Protected Group: Race			
Evidence/ Areas to Address	How might it impact?	Positive/ Negative / None	Response/ Action
<a href="#">examination.</a>			
<a href="#">Update September 2018: Consultation response Replacement Deposit Local Development Plan , 2708 - Pembrokeshire County Council Chapter 4E Housing Policy 51 Gypsy Traveller and Showpeople Sites: “</a>	<a href="#">PCC support the policy approach set out in relation to accommodation for Gypsy Travellers and Showpeople. There is an identified need for additional accommodation in Pembrokeshire and this policy approach will enable any applications to be considered.</a>	<a href="#">±</a>	<a href="#">N/A</a>

### Religion, Belief and Non Belief

Protected Group: Religion, Belief and Non Belief			
Evidence/ Areas to Address	How might it impact?	Positive/ Negative/ None	Response/ Action
<p>Significant percentage of people in National Park Area show religious affiliation in particular with Christian faith.</p> <p>Access to places of worship likely to be important.</p>	<p>A need to protect space for social infrastructure, including places of worship, promote Section 106 agreements and the community infrastructure levy as legitimate means for supporting places of worship provision and proactive approach to social infrastructure provision in new developments including consideration of transport links.</p> <p><b>Spatial Strategy</b>  <b>F. Community Facilities, Retailing, Transport</b>  <b>E. Affordable Housing and Housing</b></p>	<b>+</b>	<p>Community Facilities:  See Policy 48 Community Facilities &amp; Infrastructure Requirements which provides a supportive policy framework.</p> <p>No further action.</p>

<b>Protected Group: Religion, Belief and Non Belief</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
Access to good transport links (public and private) to access religious places of worship and facilities	<p>A need to promote good accessible public transport and private transport links within the Park, linked to wider Pembrokeshire and regional networks.</p> <p><b>F. Community Facilities, Retailing, Transport Policy 57 Sustainable Transport</b></p>	+	<p>Transport links: The Plan seeks to promote sustainable travel choices by permitting facilities to improve public transport linkages. The provision of public transport is outside the remit of land use planning. However, Policies 52 and 53 provide a supportive framework for considering land use related proposals to improve transport links.</p>
Protection of Religious sites of importance	<p>Protection of historic buildings and sites through land use policy.</p> <p><b>A. Special Qualities</b> <b>F. Community Facilities, Retailing, Transport</b></p>	+	<p>Protection of historic buildings: National planning policy seeks to conserve the architectural merit of buildings or sites of religious importance that are listed or are within Conservation Areas. Local Development Plan Policy 14 seeks to conserve those buildings that are not listed, but are still of local importance. Many buildings or sites of religious importance would also be protected as</p>

<b>Protected Group: Religion, Belief and Non Belief</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action</b>
			community facilities under Local Development Plan Policy 48.
Residents and tourists may be targeted in terms of hate crime due to their religion or belief. This may impact on their use of public transport and access to opportunities and facilities within the Park and further afield.	<p>A need to promote Secure by Design principles and community safety considerations as part of Good Design and neighbourhood layouts to create a safe environment. This will be particularly important in terms of public transport related facilities.</p> <p><b>C. Climate Change, Sustainable Design, Flooding, Sustainable Energy</b>  <b>F. Community Facilities, Retailing, Transport</b>  <b>E. Affordable Housing and Housing</b></p>	+	<p>Secure by Design: Secure by Design principles form part of the overall sustainable design considerations for development proposals, including those proposals that may exacerbate existing issues.</p> <p>The Authority consults Dyfed Powys Police who advise on individual proposals. Key principles include the promotion of natural surveillance over public areas and the prevention of dark, unused corners/routes. There is however a need to balance security design features with the overall impact upon street character and attractive, inclusive public realms.</p>

## Sexual Orientation

Protected Group: Sexual Orientation			
Evidence/ Areas to Address	How might it impact?	Positive/ Negative/ None	Response/ Action (Groups to directly consult?)
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.	A need to promote good accessible public transport and private transport links within the Park, linked to wider Pembrokeshire and regional networks.  <b>Policy 57 Sustainable Transport Spatial Strategy</b> <b>E. Affordable Housing and Housing</b>	+	Transport links: The Plan seeks to promote sustainable travel choices by permitting facilities to improve public transport linkages. The provision of public transport is outside the remit of land use planning. However, Policies 52 and 53 provide a supportive framework for considering land use related proposals to improve transport links.
LGB people may feel unsafe in public spaces and be targeted in terms of hate crime. This may impact on their use of public transport and access to opportunities and facilities within the Park and further afield.	A need to promote Secure by Design principles and community safety considerations as part of Good Design and neighbourhood layouts to create a safe environment. This will be particularly important in terms of public transport related facilities.  <b>C. Climate Change, Sustainable Design, Flooding, Sustainable Energy</b> <b>E. Affordable Housing and Housing</b> <b>F. Community Facilities, Retailing, Transport</b>	+	Secure by Design: Secure by Design principles form part of the overall sustainable design considerations for development proposals, including those proposals that may exacerbate existing issues.  The Authority consults Dyfed Powys Police who advise on individual proposals. Key principles include the promotion of

<b>Protected Group: Sexual Orientation</b>			
<b>Evidence/ Areas to Address</b>	<b>How might it impact?</b>	<b>Positive/ Negative/ None</b>	<b>Response/ Action (Groups to directly consult?)</b>
			natural surveillance over public areas and the prevention of dark, unused corners/routes. There is however a need to balance security design features with the overall impact upon street character and attractive, inclusive public realms.
<p>Importance of being able to access health facilities for some LGB people.</p> <p>Inequalities in mental health outcomes for LGB people.</p>	<p>A need to promote access to health facilities.</p> <p>Land use policies that have positive impact on health and wellbeing outcomes may contribute to better mental health outcomes for LGB people.</p> <p><b>F. Community Facilities, Retailing, Transport</b> <b>A. Special Qualities</b></p>	+	<p>Community Facilities: See previous commentary regarding providing for and protecting community facilities.</p>

## **Assessing Impact in relation to the General Duty**

**How could, or does, the policy help advance / promote equality of opportunity?**

### **Accessible facilities and neighbourhoods (Age, Pregnancy and Maternity)**

107. The Plan Strategy directs the majority of new development to identified Centres where public transport availability is more prevalent. The Plan's Spatial strategy seeks to focus development in locations that have facilities and are supported by a public transport network (see the Plan's Vision and Spatial Strategy).
108. Policies seek to conserve key attributes of the natural environment that promote healthy environments, promote specific sustainable design elements such as legible layouts that are pedestrian friendly, accessible buildings, natural surveillance and open spaces.
109. The Plan seeks to safeguard community facilities. Policies 53 and 54 provide a supportive context for this provision.
110. National planning policy allows for the development of affordable housing in areas without access to public transport.
111. The Authority has adopted Supplementary Planning Guidance on Parking which requires the appropriate levels and type of parking facilities for each development type, taking into account users of the development and availability of public transport. The Guidance will be updated for the Replacement Plan.

### **Addressing Public Health Considerations where possible (Age)**

112. The Plan's Spatial strategy seeks to focus development in locations that have facilities accessible by means other than private car. Policies seek to conserve key attributes of the natural environment that promote healthy environments, promote pedestrian friendly layouts and provide and protect open spaces for recreation. Anything ugly, dirty, noisy, crowded, intrusive or uncomfortable that would adversely affect public amenity would not be supported. The plan also seeks to safeguard community facilities. The plan would however have little/no impact on food choice.

### **Land use policy encouraging a range of job opportunities available to young people in local areas, taking into account accessibility and transport considerations (Age, Gender)**

113. The Plan allows for small-scale provision of land for employment uses in or adjacent to the defined Centres where public transport availability is more prevalent. Taking into account the rural nature of the National Park, the Strategy also allows for the extension of businesses into the countryside. The Strategy also allows for the development of the visitor economy which is a major employer in the area and supports the town centres for retailing and commercial uses.

### **Consultation elements within delivery agreement (Disability)**

114. Pembrokeshire Access Group and other disability groups were contacted as part of the wider consultation. Reasonable adjustments and accessibility will be taken into account when public consultation events are held. A summary of the preferred strategy was made available in Easy Read (following advice from Pembrokeshire People First). The Authority is applying guidance from Diverse Cymru's Advice Guide: Making Documents Accessible, to the formatting of the Deposit Plan.<sup>77</sup> . The Authority applied the guidance to the preparation of the preferred strategy. The Authority will respond to reasonable adjustment as they are made. Details will be included in the LDP document of who to contact in the Authority to request the LDP documents in an alternative format. Requests will be considered on the basis of reasonability. Disabled people can experience discrimination if an organisation doesn't make a reasonable adjustment. This is known as a 'failure to make reasonable adjustments'. What is reasonable depends on a number of factors, including the resources available to the organisation making the adjustment.

### **Land use policies that have positive impact on health and well-being outcomes (Disability, Gender Reassignment, Gender, Sexual Orientation)**

115. The Plan includes policies for the protection of open space, including recreational open space and allotments and the Park's special qualities which are beneficial for the health and wellbeing of people.

116. The Community Facilities section is supportive of protecting and providing community facilities; and ensuring that there are opportunities taken to promote sustainable travel choices.

### **Access considerations to greenspaces, active walking opportunities and allotments (Disability, Gender)**

117. The removal of barriers linked to existing development are generally not within the remit of land-use planning. However design and layout of new developments will need to take accessibility for all into account.

---

<sup>77</sup> Diverse Cymru, Advice Guide: Making Documents Accessible - <http://bit.ly/2kxesTc>

### **Promotion of Accessible design features at a street and neighbourhood level to remove active travel barriers for disabled people (Disability)**

118. The Plan's Spatial strategy seeks to focus development in locations that have facilities accessible by means other than private car.
119. Promoting pedestrian/wheelchair friendly environments and routes that link to existing services/facilities forms normal Development Management practice when considering the suitability of a proposal in terms of sustainable design. Consulting the Highways Authority and Access Officer informs this process for specific proposals. However over engineered environments in this respect can reduce the aesthetical quality and specific character of developments, these impacts therefore need to be balanced.

### **Public and Private Transport Links within the Park linked to wider Pembrokeshire and Regional networks (Gender Reassignment, Religion, Sexual Orientation)**

120. The Plan seeks to promote sustainable travel choices by permitting facilities to improve public transport linkages. The provision of public transport is outside the remit of land use planning. However, Policies 57 and 58 provide a supportive framework for considering land use related proposals to improve transport links and accessibility.

### **Location of developments in terms of public transport links, proximity to child care facilities and employment, health and community facilities and shops (Gender, Gender Reassignment, Pregnancy and Maternity, Sexual Orientation)**

121. The Plan Strategy allows for new and extended community facilities where they are well-located to meet the community's needs and are convenient to public transport.
122. The Plan seeks to promote sustainable travel choices by permitting facilities to improve public transport linkages.
123. Spatial strategy promotes access to facilities through seeking to locate development in accessible locations.

### **A need to consider potential community infrastructure needs at a spatial level within Tenby and Saundersfoot (Race)**

124. The Plan includes a supportive policy (Policy 48) for the protection and provision of community facilities. Proposals coming forward can be considered in this context.

There were no proposals for specific allocations in the Plan when the candidate site process was undertaken so no needs can be specifically reflected in Policies 2 and 4.

### **Protection of historic buildings and sites through land use policy (Religion)**

125. National planning policy seeks to conserve the architectural merit of buildings or sites of religious importance that are listed or are within Conservation Areas. Local Development Plan Policy 14 seeks to conserve those buildings that are not listed, but are still of local importance. Many buildings or sites of religious importance would also be protected as community facilities under Local Development Plan Policy 48

<b>How could / does the policy / decision help to eliminate unlawful discrimination, harassment or victimisation?</b>
---

### **A need to ensure that Gypsies and Travellers seeking permission for private sites are treated fairly under Policy 51 (Race)**

126. The approaches between Pembrokeshire County Council's Local Development Plan and the National Park Local Development Plan have been checked and the same considerations are included between the policy wording and the reasoned justification.

127. It has been agreed to include a monitoring indicator to consider issues arising where 1 or more applications are approved contrary to recommendation.

128. In addition the Monitoring framework for the Local Development Plan ensures that the effectiveness of policies at appeal are also analysed.

### **Policy 42 (Race)**

129. Consideration has been made of how Policy 42 interrelates and impacts on Policy 51 and enforcement related to unauthorised Gypsy and Traveller Sites. Occupancy controls for holiday accommodation are different than those for Gypsy Traveller sites. An issue arising for the 2 unauthorised sites would most likely be equally problematic for a new caravan and camping sites. The issue related to the effect on the character and appearance of the area. Criterion a) of Policy 42 requires caravan and camping proposals to be assimilated into the landscape.

130. Pembrokeshire Gypsy Traveller Accommodation Needs Assessment Group was contacted but no feedback was provided. The Group and Gypsies and Traveller communities had an opportunity to provide comment as part of the wider consultation on the Preferred Strategy.

**How could/does the policy impact on advancing / promoting good relations and wider community cohesion?**

**Secure by Design (Disability, Gender Reassignment, Gender, Race, Religion or Belief, Sexual Orientation)**

131. Secure by Design principles form part of the overall sustainable design considerations for development proposals, including those proposals that may exacerbate existing issues. The Authority consults Dyfed Powys Police who advise on individual proposals. Key principles include the promotion of natural surveillance over public areas and the prevention of dark, unused corners/routes. There is however a need to balance security design features with the overall impact upon street character and attractive, inclusive public realms.

**A need to protect space for social infrastructure, including places of worship (Religion)**

132. Policy 53 Community Facilities & Infrastructure Requirements which provides a supportive policy framework.

**Addressing any adverse impact**

**What practical changes/actions could help reduce or remove any negative impacts identified in Part 1?  
If no action is to be taken, this needs to be justified**

**Meeting the needs of an ageing population in terms of suitable accommodation (Age)**

133. The housing market assessment only takes into account bedroom numbers. There are limitations on the ability to influence the mix of housing. This issue was highlighted in consultation responses to question 1 of the preferred strategy with reference made to the 'All party Parliament group report on housing for older people' and its recommendations for Planning Authority's in relation to older people housing. One consultation highlighted this in the context of Newport.

134. Officers noted in their response the relevant recommendations for Authority's :

- Councils need to ensure their Local Plan gives the necessary priority to older people's housing needs – not least as a core component of any new settlements and that new developments of retirement housing embrace HAPPI design principles.
- Exemption of retirement housing from the requirement to build Starter Homes – or to pay a commuted sum in lieu – would provide the opportunity to prioritise this

age group.

135. The current housing market assessment only takes into account bedroom numbers. It would include any older persons needs but is not separately identified.
136. There are limitations on the ability to influence the mix of housing. Beyond providing a suitable layout where a mix of dwellings normally provides for a better layout the planning authority can only seek to achieve an element of affordable housing to meet the need as shown in the Local Housing Market Assessment. The Housing Market Assessment provides numbers for overall affordable housing need. The mix (i.e., providing suitable properties for older people) comes when need is addressed for an individual project by the housing authority.
137. Building Regulations require both domestic and nondomestic buildings to be built so that people, including disabled people, can reach the principal, or suitable alternative, entrance to a building from the point of access. For the adaptation of historic buildings however, accessibility measures are balanced against the impact upon the historical character and interest of those buildings.
138. Dwellings that are built to the Lifetime Homes standards, such as those built by a Registered Social Landlord where a Development Quality Requirements standard is required, include additional requirements to Building Regulations, for example requiring entrances to be lit and covered. This is not a national requirement at present.
139. The Authority consults with an 'Access officer' to advise on the accessibility of proposed buildings when considering planning applications for buildings and public open spaces.
140. Any amendments to Planning Policy Wales or other national planning policy in response to The Expert Group on Housing an Aging Population will need to be considered by the Authority when published.
141. The Authority would be willing to consider being part of any wider pilot initiatives.

### **Access to affordable housing young people and facilitation of self-build (Age)**

142. The Housing Market Assessment provides overall figures for affordable housing need. At an individual planning application stage the mix of units in terms of number of bedrooms that each affordable house has can be negotiated.

143. Nominations come from the housing waiting list rather than the Plan specifying who occupies in terms of social housing.
144. Private affordable housing will have occupants nominated from the housing waiting list. Local occupancy criteria are normally applied as per Technical Advice Note 2.
145. As planning authority a requirement to include self-build proposals is not possible although these can be pursued by landowners/developers. It is difficult to obtain mortgages for such proposals.
146. A consultation response query was received about the above response 'Is the basis for the first statement that there is uncertainty over deliverability because of the potential difficulty in securing finance?' Officer provided the following answer: "It is advising that the planning system cannot require a proposal for housing to be a self-build proposal. Mortgages are an additional issue."

### **Accessible housing provision (Disability)**

147. A life time home standard is applicable to all social housing achieving the Development Quality Requirement (DQR) funded by WG Social Housing Grant. There is however limited provision of affordable housing under DQR in this National Park.
148. To apply the requirement to housing development generally would require evidence of need and evidence of viability. The primary premise of the Plan is that there is no need for market housing so a justification for requiring a lifetime home standard on market housing is not feasible. A requirement for a lifetime home standard on the affordable housing element would need more information on nature of need perhaps from the local housing market assessment. Welsh Government is also relying on individual local authorities to consider what the viability implications are for adopting the lifetime homes standard.
149. Given the experience of assessing the viability of introducing sprinklers a more national than local type of assessment would be less likely to be challengeable.
150. Part M of Building Regulations does apply the standard for 'visitable dwellings'.
151. The Affordable Housing Group was consulted as part of the above, no additional comments were received. They were also able to comment as part of the wider consultation.

### **Creation of Accessible Walkways and Paths (Disability and Age)**

150. The creation of walkways and paths is generally outside of the land use planning remit. Technical Advice Note 12: Design promotes key design principles such as

ease of access for all, community safety and safe and clear movement routes that are fit for purpose. The authority consults with an 'Access officer' to advise on the accessibility of proposed buildings when considering planning applications for buildings and public open spaces.

### **Accessible facilities in St Justinian's area (Disability and Age)**

152. The consultation process highlighted concern about the lack of suitable parking and toilet facilities and how people who are protected under the Equality Act 2010 can have appropriate and necessary facilities in St Justinians.
153. Officer response in relation to toilet facilities:
154. In principle Policy 53 Community Facilities and Infrastructure Requirements supports provision of community facilities outside built up areas as long as they are suitably located.
155. The provision of improved facilities in St Justinian's area is dependent on suitable proposals coming forward and Policy 53 would apply.
156. Officer response in relation to car parking:
157. The Authority is working with Pembrokeshire County Council and the community to find a sustainable solution for access to St Justinians and will include full consideration of accessible parking provision

### **Policy 51 Gypsy Traveller and Showpeople sites – Criterion A (Race)**

152. The consultation process highlighted concern about Criterion A in Policy 51. The consultation response from the Welsh Government, Plans branch notes "Policy 46 Gypsy and Travellers – As worded, Criterion A could be considered not to promote the same rights in the planning system as other citizens (Bullet 1, Annex B). The requirement to 'evidence need' would not be a restriction placed on non-Gypsy and Travellers, so would this requirement be fair and reasonable in the plan? By their very nature, Gypsy and Travellers are nomadic and will not always have local connections. On this basis, Authorities should determine all applications from anyone who submits them (Bullet 6, Annex B)."
153. Risk of Criteria A discriminating against Gypsy, Travellers and Show People in the planning process.
154. Officer response noted that the justification for deleting criterion a) in the email clarification above actually refers to the Welsh Assembly Government not approving of a criterion that advises 'Applications from Gypsies and Travellers with no local connection will not normally be allowed.' The supporting text quite rightly refers to the fact that Gypsies and Travellers are nomadic and do not necessarily have local

connections. Given this context it is still argued by this Authority that the criterion is appropriate as it does not apply this restriction. The purpose of the criterion is to ensure that proposals for Gypsies and Travellers are planned for in a co-ordinated fashion and if there is a suitable plot already available in the area then it would be better to utilise this than create a new site on an ad hoc basis where there was no justification for it. This would not prevent Gypsies and Travellers providing a justification for why they needed to be in that particular location, for example the need to have a transitory site for potato picking on the St David's peninsula

155. Further Clarification asked for from officer and provided below:

156. These types of proposals come forward in a countryside location which in planning terms requires justification of need. Housing in countryside locations similarly requires evidence of need.

157. Welsh Government has advised that it needed to seek legal advice on the issue.

158. Response from Welsh Government on 4/12/2017 noted:

“The requirement to ‘evidence need’ for new gypsy and traveller sites is an issue being considered as part of the updated circular. To my understanding, this is due to be published in the New Year.

Whilst the findings of the updated circular should be incorporated in your Deposit plan, this may not be feasible due to the timing of its release. In this case, the LDP process and examination itself will allow for any amendments to be made.”

158. **September 2018 update:** Welsh Government in their consultation response to the replacement Deposit plan noted that ““Criterion a) is contrary to national policy. It implies Gypsies and Travellers have restricted freedom of movement to develop sites in other local authorities. This could be deemed as indirect discrimination under the Equality Act 2010 as Gypsies and Travellers are nomadic in nature and less likely to have a local connection to any particular local authority.”

159. Officers have provided an updated response taking into account the new Welsh Government Circular 005/2018. The response notes:

160. “The purpose of the criterion in the Local Development Plan is to ensure that proposals for Gypsies and Travellers are planned for in a co-ordinated fashion and if there co-ordinated fashion and if there is a suitable plot already available in the area then it would be better to utilise this than create a new site on an ad hoc basis where there was no justification for it. This would not prevent Gypsies and Travellers providing a justification for why they needed to be in that particular location, for example the need to have a transitory site for potato picking on the St David's peninsula.

Our current criterion which is causing difficulties advises:

'a) evidence of need to locate or provide transitory arrangements in the area has been identified; and'

Appeal decisions looked at refer to (in terms of establishing need):

- Establishing a general need in the most recent Gypsy Traveller Accommodation Assessment to justify a site that can't be provided for by the LDP provision – for us this would be within a Pembrokeshire context. The criterion used in Policy 51 is flexible enough to consider other needs identified as well.

- Establishing an individual need – only applying to those who meet the planning definition of a Gypsy. What alternative accommodation might be available in a reasonable time frame (enforcement appeal)? Are the applicants listed on the Gypsy Traveller Waiting list?

-Considering personal circumstances.

-Considering granting temporary permission where alternative provision is likely in the future

That approach reflects paragraph 36 onwards of Circular 30/2007(now superseded) and paragraph 58 onwards of the new Circular 005/2018.

'58. Section 38 of the Planning and Compulsory Purchase Act 2004 provide that determinations of applications for planning permission shall be made in accordance with the development plan unless material considerations indicate otherwise. Other considerations for Gypsy and Traveller site applications will usually include the impact on the surrounding area, the existing level of provision and need for sites which is evidenced as part of the Gypsy and Traveller Accommodation Assessment for the area.'

One option to address the objection is to suggest, that to ensure explicit consistency with the advice in 005/2018 Appendix B, that the Authority prefixes the criterion with 'where the proposal is in a location where housing development would not normally be permitted' This would address the specific issue highlighted by Welsh Government regarding placing restrictions on proposals that would not be placed on non-Gypsies and Travellers in Appendix B page 29 last reference to examples unacceptable criteria. It wouldn't however reconcile the obligations upon the planning authority and any Inspector to consider the matters set out in paragraph 58 onwards in the Circular.

Note Paragraph 61 of the Circular also refers to needing to explore if there are alternative sites available before allowing proposals outside settlement boundaries.

Policy 7 Countryside (TIER 5) (Strategy Policy) advises in criterion

'm) There is a need for a Gypsy and Traveller site in a countryside location (see Policy 51). ' which would be consistent with the suggested amendment above.

Another option would be to delete the criterion and instead to cross refer in the reasoned justification to the need to comply in particular with requirements for

submitting a planning application as set out in Circular 005/2018 which would cover requirements set out in paragraphs 58 to 69 of the Circular. Other cross referencing to national planning policy and guidance can be found in the Plan.

A discussion at Examination to clarify what the expectations are from the Circular/WG would be helpful.

Also to note in Criterion d) there is a typographical error 'and on site services and facilities' needs addressing.

The site sustainability criteria in paragraph 37 of the new Circular against the Deposit Plan policy text and the wording is considered to be adequate.

Proposals considered by the Authority tend to be one off proposals in countryside locations. The reference to ensuring that proposals are in proportion to settled communities (Good Practice Criteria- Annex B, paragraph 5) is unlikely to arise."

161. The Authority would welcome a discussion at examination on these matters to clarify what the expectations are from the Circular/WG to ensure indirect discrimination does not occur.

## **Actions and Implementation**

<b>Actions</b>	<b>Impleme nted By</b>	<b>Timescale</b>	<b>Outcome</b>
The Affordable Housing Group will be consulted on issues highlighted relating to age and disability and housing in the assessment. Age and Disability	PCNPA	Completed	Contacted in March for comment. No comment provided. Group had further opportunity to comment as part of the formal consultation process on preferred strategy.
Consult with Pembrokeshire Young Farmers and Wales YFC to gain views of young people in farming industry or looking to go into farming industry on Policy 43A - Agricultural Diversification (Age)	PCNPA	Completed	Contacted in March for comment. No comment provided. Group had further opportunity to comment as part of the formal consultation process on preferred strategy.
Update of Supplementary Planning Guidance on Parking as part of the Replacement Plan – look at standards for disabled parking for dwellings/ reference to certain forms of development (Age and Disability)	PCNPA	To do	Supplementary Planning Guidance will be prepared and reviewed when the Local Development Plan is adopted.

<b>Actions</b>	<b>Implemented By</b>	<b>Timescale</b>	<b>Outcome</b>
Further information required on addressing storage issues in terms of mobility scooters (Age)	PCNPA	Completed	Building Regulations does not require scooter storage areas.
Further information required on any requirements/ guidance on visitor attractions to be accessible and self-catering accommodation. (Disability)	PCNPA	Completed	Part M of Building Regulations does apply the standard for 'visitable dwellings'.
Clarification on whether design and layout of new developments will need to take accessibility for all into account ( in terms of access requirements for new developments) (Disability)	PCNPA	Completed	Part M of Building Regulations does apply the standard for 'visitable dwellings'. Design promotes key design principles such as ease of access for all, community safety and safe and clear movement routes that are fit for purpose. The authority consults with an 'Access officer' to advise on the accessibility of proposed buildings when considering planning applications for buildings and public open spaces.
Rewording of title for Policy 46 (now policy 51) be reworded to Gypsy and Traveller Sites (Race)	PCNPA	Completed	Title has been amended and following consultation response 2708 was amended to Policy 51 Gypsy Traveller and Showpeople Sites
Inclusion of a monitoring indicator to consider issues arising where 1 or more applications are approved contrary to recommendation (Policy 46, now policy 51) (Race)	PCNPA	Completed	Monitoring indicator has been included.
Consult with Pembrokeshire Gypsy Traveller Accommodation Needs Assessment Group over Policy 46 now policy 51 and 38A now policy 42. (Race)	PCNPA	Completed	Contacted in March for comment. No comment provided. Group had further opportunity to comment as part of the formal consultation process on preferred strategy.
Consideration of feedback from wider consultation: Pembrokeshire Access Group and other disability	PCNPA	Completed	See Officers response section of the consultation table. Impacts and responses added to relevant sections of the assessment.

Actions	Implemented By	Timescale	Outcome
groups will be consulted as part of the wider consultation. Other equality organisations will also be consulted.			
Upload final version of the Gypsy Traveller Assessment as background Papers	PCNPA	When updated version available from PCC. <u>September 2018 Update: Action Completed.</u>	Officers are organising uploading on our website in advance of the Deposit Consultation. <u>September 2018: file:///C:/Users/mairt/AppData/Local/Microsoft/Windows/INetCache/IE/OP49OA17/Pembrokeshire%20Gypsy%20Traveller%20Accommodation%20Needs%20Assessment%202015%20(final).pdf</u>
Respond to updated Circular from Welsh Government in relation to Criterion A in Policy 51 - "The requirement to 'evidence need' for new gypsy and traveller sites is an issue being considered as part of the updated circular. To my understanding, this is due to be published in the New Year. Whilst the findings of the updated circular should be incorporated in your Deposit plan, this may not be feasible due to the timing of its release. In this case, the LDP process and examination itself will allow for any amendments to be made."	PCNPA	When updated Welsh Government circular made available. <u>September 2018 Update: Action Completed. Area for consideration in Examination.</u>	Not available as at 20 <sup>th</sup> February 2018. Any amendments needed will need to follow the Deposit Consultation and publication of the new Circular. <u>September 2018 update: New Welsh Government Circular 005/2018 and further response from Welsh Government to Deposit Consultation considered. Authority in consultation response notes it would welcome a discussion on these matters to clarify what the expectations are from the Circular/WG during examination process. This will enable issues relating to criteria A to be explored further to ensure indirect discrimination does not occur.</u>
<u>September 2018 Update: Statement of Common Ground with Pembrokeshire County Council and the Welsh Government's Equality and Prosperity Division in advance of the LDP examination to be included</u>	<u>PCNPA</u>	<u>Completed</u>	Signed copy of the <u>Statement of Common Ground – Appendix 4</u>

## Monitoring and Review

List details of any follow-up work that will be undertaken in relation to the policy (e.g. consultations, specific monitoring etc).

151. The content of the assessment has been reviewed following equality relevant feedback from the general consultation on the preferred strategy and feedback from the equality impact assessment specific questions in the consultation questionnaire. The consultation list for the general consultation includes equality organisations and relevant equality related feedback from other organisations, groups and individuals were considered and captured within this assessment.

152. The content of the assessment has been reviewed following equality relevant feedback from the general consultation on the Deposit plan and Officer responses.

152. Actions identified will also be monitored to ensure that they are completed within timescales required.

## Declaration

**Does the policy or decision have a significant impact upon equality issues? Yes**

(The results of all impact assessments where the impact is significant will be published on the Authority's website)

Signed By

Lead officer: Mair Thomas Date: 20/2/18

Date Reviewed: 13/9/18



Chief Executive: \_\_\_\_\_

Date:

## Appendix 1

### 339 - 4 Newport

(All emphasis is my emphasis) (All figures are 2011 Census figures unless otherwise stated)

Newport has a huge demographic imbalance.

In 2011, nearly 40% of Newport residents were already over retirement age (compared to the national figure of 23%).

*The Local Authority Population Projections for Wales (2014-based)* state for Pembrokeshire that numbers of over 75s are set to increase, and of over 85s expected to double by mid-1939. Newport already has a very high proportion of over 75s and over 85s.

Newport strives to be an Age-friendly community - promoting people's social engagement and developing support and relationships between the generations. Physically, it is far from Age-friendly at present, and we need the National Park to recognize this and help us in improvements to physical design, better access, mobility and pedestrian safety.

We do not know, but need to know the condition of existing housing stock in Newport and its suitability for older people.

9 % of houses in Newport ward have 5 bedrooms or more, compared with 4% nationally. Nearly 50% of resident households have a bedroom occupancy of 0.5 persons or less. 41% of Newport residents are in single person households. 55% of single person households are occupied by people aged over 65.

Wales adopts an "ageing in place" approach, recognising that most people want to stop in their own homes with their own possessions for as long as possible. Whilst it is true that till now, many older people have only moved late in life or at a time of crisis, for example when care needs or health problems become unmanageable, people are becoming more alert to advance care needs and, in any event, much of this reluctance to move is caused by the fact that many older people are unaware of their housing options, or in many cases – as here in Newport - have few options currently available to them.

There is growing evidence that this does not preclude moving to accommodation more suitable to later life needs, given that opportunity, especially if people are thereby enabled to stay in their own neighbourhood (See Peace et al 2011; HillcoatNallétamby & Ogg, 2013, and Our Housing Agenda: Meeting the Aspirations of Older Persons in Wales 2016). Recognition of this is also expressed in Wales' Community Cohesion Strategy (Welsh Government, 2009) and Vibrant and Viable Places (Welsh Government, 2013).

Whilst accessibility of the home itself is important, it is also important that people can get out and about around their home. Any suitable sites in Newport providing safe pedestrian access to services, shops and community facilities should be earmarked, with housing

meeting the needs of older people given priority. At the same time, appropriate parking at shops and community facilities is needed, but Newport's provision is far, far from adequate.

The Expert Group on Housing an Aging Population recommends designation of particular sites in town centres for older people's housing. There are already precious few sites left in Newport suitable for the purpose.

But demand for appropriately designed older people's housing in Newport is undoubtedly set to increase. Many older people in Newport seek to downsize

The social benefit to Newport of older people freeing up larger stock, could be significant.

Whilst the Authority does list an ageing population as an issue in the text to Policy 3, nothing is said about the implications of this in planning terms. Whilst PPW gives little encouragement to a planning authority to tackle this issue at the moment, The Welsh Government Report from the Expert Group on Housing an Ageing Population in Wales January 2017, has called for a planning system which realigns with health, social care and wellbeing of future generations policy, and which prioritises the ageing population, with key actions including a clear national policy; amendment of PPW to encourage mixed, Age-friendly, lifetime neighbourhoods and to attach greater national weight to older person's housing provision and to encourage a range of innovative solutions to meet the housing needs of an older population; strengthens practice guidance through assessment of full housing demand and need of older people and reflects this in the overall housing and five year land supply, separately identifying specific needs and setting numerical requirements for older people in the LDP; writes criteria based policies in LDPs clarifying the circumstances in which schemes will be allowed with a presumption that planning permission will be granted for properly formulated proposals; identifies and targets specific areas and particular sites suitable for such provision; and formulates of local 'exceptions policies' for housing for older people in rural areas. (Section 4 Pages 36 to 37)

The report also calls for consideration to be given to a full nationwide exemption from affordable housing obligations and perhaps from some other specific planning obligations too, and from the Community Infrastructure Levy, over a limited period of (say) five years, so-as-to kick-start the market. It suggests conferences and seminars to promote the enhanced policies, and guidance ensuring wide engagement with house builders; housing associations; and housing, social care, health and well-being professionals and comments that "*The 4 yearly reviews of Local Development Plans provide the ideal opportunity to integrate new approaches and policies*"! Very regrettably, this report has not recognised the value of community input and supported the development of neighbourhood plans in Wales.

Being ahead of others in replacing its LDP, PCNPA could also be leading the way by looking, together with local communities, justifiably using Newport as a pilot, at the connections between housing, health and well-being in the Park, and the challenges that our ageing population poses for housing needs. Quite apart from the strong link between

better health and wellbeing and better housing, there are huge benefits through making provision for appropriate housing for older people, for the local NHS and on reducing overall local government spend. We need the Authority to join in with this community, with the Health Board and County Council, in an integrated approach to thinking about the place in which we live and in developing appropriate planning policies to promote older people's well-being and engagement with their physical and social environments, and to ensure that appropriate housing is available to them in future, within a community physically improved to lifetime standards.