

Report of: Director of Place and Engagement

Subject: Pembrokeshire County Council Request regarding two years additional funding for public conveniences

Decision Required: Yes

Recommendation:

The Authority is recommended to agree a voluntary contribution to financially support public conveniences located around the Pembrokeshire Coast National Park for a further two years.

1. Key Messages

- a) This report follows an informal discussion with the NPA Income Diversification Working Group in September of this year on the subject of funding public conveniences.
- b) The report sets out a request from Pembrokeshire County Council to the National Park Authority regarding the funding of public conveniences at locations across the Pembrokeshire Coast National Park (see Annex A: letter of request). It outlines the issues identified by a Member Working Group which previously considered this matter in 2023, the activities undertaken between 2023 and 2025 and makes recommendations regarding a response to be returned to Pembrokeshire County Council.

2. Background

- a) In February 2023 the National Park Authority received a letter from the Chief Executive of Pembrokeshire County Council (PCC) regarding toilet facilities in Pembrokeshire. This letter set out the results of a PCC Cabinet decision in February and identified that if the National Park Authority was unable to financially contribute towards the provision of a number of toilet facilities around the coast, that PCC would close those facilities from the 5th November 2023.
- b) Following this letter, the National Park Authority agreed to establish a Members' Working Group to consider the issues raised for the National Park and the Authority.
- c) The Members working group assessed a range of options. These included: 1. paying for all toilets included in the request; 2. paying for some locations; 3. paying a percentage for some toilets; and 4. not making any financial

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

- d) The Members' Working Group therefore considered a range of data as part of its work. This included consideration of geographical data looking at the proximity of facilities to important environmental designations (for example Sites of Scientific Interest or Special Areas of Conservation). It also included consideration of the contribution facilities play in relation to key areas of work for the National Park Authority such as use by its Education team for outdoor engagement and whether or not there were connections to emerging projects such as the National Park Authority's beach wheelchair schemes. Other factors such as impact on Blue Flag status were also detailed. Such criteria, as well as an understanding of levels of current public use and other information supplied by PCC's officers were used to generate a scoring system which identified which individual facilities contributed most significantly in terms of National Park purposes. The scoring system is set out in Appendix 1 of the National Park Authority 2023 report for information.
- e) The final recommendations from the Members' Working Group were that the National Park Authority agreed to fund toilet facilities at the following locations for two years (2023-2025)
- *West Angle*
 - *Freshwater East*
 - *Manorbier*
 - *Newport Sands / Traeth Mawr*
 - *Poppit Sands*
 - *Saundersfoot*
 - *Broad Haven North*
 - *Solva*
- f) Officers also recommended that Little Haven and St Brides be funded, to avoid a cluster of closures in St Brides Bay and in recognition of the work of the Authority's accessibility and education programme at the walled garden at St Brides.
- g) Of the above sites it is important to note that only 3 are in the National Parks ownership – Poppit Sands, Newport Sands/Traeth Mawr and Manorbier. The National Park Authority has no statutory duty to fund toilet provision.
- h) The decision taken in September 2023 was to make a contribution of £111k for the above facilities for a period of two years. This offer was subject to a request that PCC establish a working group consisting of representatives of the National Park along with other relevant partners to develop a strategy to seek grant funding to improve general standards at locations around the coast

and to develop an Accessible Coast project, submitting grant funded applications over this two year period.

Actions taken over previous 2-year period

- a) National Park officers have met regularly with Pembrokeshire County Council officers over the last two years to consider issues relating to public conveniences in the National Park and will be inputting into an updated Pembrokeshire County Council toilet strategy for consideration by their Cabinet in 2026.
- b) The National Park has gained grant funding for the redevelopment of Newport Sands/Traeth Mawr car park, toilet block and ramps with the revised scheme aiming to be an exemplar of disabled access providing bespoke wheelchair storage, changing places facilities and improved ramp access. Planning permission was granted in Autumn 2024 and contractors are due to start work Autumn 2026. PCC has not supported this project financially but has provided officer input into the design of the toilet block as well as support from its Access Officer. Project funding has been drawn from Sustainable Landscapes and Sustainable Places as well as the Welsh Government Brilliant Basics programme, both of which were applied for by PCNPA officers.
- c) PCNPA has commissioned and finished a Car Parking Study of the 14 charged car parks within the National Park. This study has assessed all elements of the car parks and identifies options for projects to improve biodiversity, accessibility and responsiveness to climate change (for example by mitigating flood risk). This study has been used to identify priorities for future work. This study was funded by Sustainable Landscapes and Sustainable Places funding.
- d) A drainage study is underway at Poppit Sands in relation to the toilet block and options for alternative systems, also funded by grant funding sought by the National Park Authority and a Masterplan for the wider site is ready to be commissioned in Autumn 2026.
- e) Plans have been commissioned to redesign the ramps at West Angle Bay to improve accessibility. The intention is to seek planning permission for this element to improve wheelchair access with a separate phase to seek grant funding over the next two years.
- f) In their letter of the 5th September 2025 PCC identify that they have undertaken work at the toilets funded by PCNPA in the form of Annual Safety inspections, new pipe work at St Brides, replacement of velux windows at Freshwater East and that external rendering is scheduled for Solva in the Autumn.

4. Strategic Policy Context

- a) The information and recommendation(s) contained in this report are consistent with the Authority's statutory purposes and its approved strategic policy context. Section 65(5) of the Environment Act 1995 provides that the powers of a national park authority include power to do anything which, in the opinion of that authority, is calculated to facilitate, or is conducive or incidental to (a) the accomplishment of the purposes mentioned in subsection 65(1) (purposes of conserving and enhancing the natural beauty, wildlife and cultural heritage of national parks and of promoting opportunities for the understanding and enjoyment of the special qualities of those parks by the public); or (b) the carrying out of any functions conferred on it by virtue of any other enactment.
- b) There is no specific legal duty for either Pembrokeshire County Council or Pembrokeshire Coast National Park to provide toilet facilities. However, it is recognised by the National Park Authority that Toilets are a key enabler of access to the coast, and a lack of toilet provision can be a significant barrier in terms of access to the coast and a lack of provision can also result in environmental harm as it may lead to the public using wild spaces instead in some locations. Lack of alternative provision was therefore a key consideration when the National Park Members Working Group undertook its initial assessment and scoring in 2023.
- c) Some other groups have paid and are continuing to maintain other toilet facilities around Pembrokeshire, including Community Councils and some private businesses.

5. Financial Considerations

- a) The Authority previously agreed to provide a set payment of £111k per year for 2023-2025. This did not include any allowance for inflationary increases.
- b) PCC have written to request a contribution which this time allows for inflationary pressures to be reflected. They have also asked for a £2k per toilet contribution towards any capital works. The total amount now sought is £142,986.38 (noting that fees would be subject to a CPI uplift each year).
- c) The request was discussed with Members within the September income working group meeting. Members indicated that they considered that a £2k per year contribution for each toilet towards capital works was unreasonable given the very limited investment from PCC on facilities in the last two years. Members suggested that PCC should be working more

proactively alongside PCNPA to apply for grant funding for capital upgrades instead of this element of financial contribution.

- d) The initial conclusion from Members was to support the request for a further 2 years payment plus inflation, but without the 2k per toilet element. This would result in a payment of approximately £122,986.38 per year.
- e) It is suggested that more clarity be sought from PCC about the off-setting of any contribution against the income generated from some toilets which have a charging function. This is particularly in relation to Saundersfoot and in relation to Newport Sands/Traeth Mawr which will incorporate this from its launch in 2026. PCNPA officers also consider there would need to be a re-evaluation of the running costs of Newport Sands/Traeth Mawr after its upgrade – to take account of improvements to drainage and reduced electricity costs post solar panels installation.
- f) PCC have also suggested that Penally Community Council wish to see the toilets re-opened at Penally car park and that PCNPA may wish to consider increasing its contribution to enable this to be included.
- g) The Authority has for some time identified that the Authority's future financial outlook is challenging as the impact of cumulative reductions in core funding together with significant cost rises is felt. The budget for 25-26 forecasts a deficit of £566k for the year, which would have been significantly higher had the Authority not received a one-off contribution towards the deficit from the Welsh Government in March 2025. Deficits in excess of £1m are predicted for the next 3 financial years if other income streams are not generated or financial cuts made. Continuing to make contributions of this nature impact on the wider budget situation of the Authority.

6. Risk and Compliance Considerations

- a) As part of its options appraisal in 2023, the working group identified the risks to the National Park Authority of different options. These risks include financial risks to the Authority, environmental risks to key sites across the National Park linked to toilet closures, risks to individuals and groups (including those with protected characteristics of a loss of facilities) and risks to the status of individual locations relating to reputation through loss of Blue Flag status. Not funding any toilets was identified as a significant environmental and reputational risk for the National Park Authority.

7. Impact on our Public Sector Duties

7.1 Integrated Assessment Completed: NO

7.2 Equality, Socio-Economic, Health and Human Rights Impacts

- a) The Public Equality Duty requires the Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relations between different communities. This means that, in the formative stages of our policies, procedure, practice or guidelines, the Authority needs to take into account what impact its decisions will have on people who are protected under the Equality Act 2010 (people who share a protected characteristic of age, sex, race, disability, sexual orientation, gender reassignment, pregnancy and maternity, and religion or belief).
- b) Whilst PCNPA has no legal duty to provide toilet facilities, provision of payment towards maintaining these facilities is likely to support PCC in reducing the impacts on groups with protected characteristics that would otherwise be negatively impacted by their closure, particularly those with a disability, or those who are pregnant, older or with young children.

7.3 Welsh Language Impacts

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

7.4 Section 6 Biodiversity Duty and Carbon Emission Impacts

- a) Not funding public conveniences/toilets was identified by the Members Working Group in 2023 as potentially creating an environmental risk in locations without any alternative provision, particularly for locations identified as a Special Area of Conservation or Site of Special Scientific Interest. It is recognised that due to funding constraints the National Park cannot pay for facilities in all locations, however the prioritisation exercise from 2023 is considered to still provide an appropriate framework for consideration.
- b) The work being undertaken to upgrade facilities can reduce carbon for example at Traeth Mawr/Newport Sands where new plans incorporate solar panels into the roof.

7.5 Well-being Goals for Wales and 5 Ways of Working (Sustainable Development Principles) Impacts

- a) The National Park Authority recognises the importance of public bodies working collaboratively together in the spirit of the Well Being of Future Generations Act. The previous financial offer was accompanied by a request that a joint Steering Group be established with PCC to continue to work in the ways outlined by the Well Being of Future Generations Act on this matter – looking collaboratively at long term sustainable solutions. It is suggested that the need for this approach be reiterated. Members have in informal discussions been mindful of the need to act in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive and resilient communities and have sought to maximise support for facilities whilst balancing this against financial limitations.

7. Conclusion

- a) Members are recommended to support a further 2-year contribution from 1st April 2026-31st March 2028 to ensure public conveniences are provided in the following locations:
- *West Angle*
 - *Freshwater East*
 - *Manorbier*
 - *Newport Sands / Traeth Mawr*
 - *Poppit Sands*
 - *Saundersfoot*
 - *Broad Haven North*
 - *Solva*
 - *St Brides*
 - *Little Haven*
- b) That this financial contribution should not include the 2k per toilet requested for maintenance but should allow for CPI increases.
- c) That the contribution should specify that the running costs of Traeth Mawr/Newport Sands be revisited once improvement works have been undertaken.
- d) That income generated at Saundersfoot and Traeth Mawr/Newport Sands be off-set against costs for these locations.

9. List Background Documentation:

Environment Act 1995 [Environment Act 1995](#)

Pembrokeshire Coast National Park Car Parking Study – available on request

Pembrokeshire Coast National Park Authority 2023 paper on Toilet Facilities - [Report-31-23.pdf](#)

Pembrokeshire Coast National Park Authority – Corporate and Resources Plan 2023/24-26/27, Wellbeing Objectives [Corporate and Resources Plan 2023/24 - 26/27 - Pembrokeshire Coast National Park](#)

Wellbeing of Future Generations (Wales) Act 2015 [Well-being of Future Generations \(Wales\) Act 2015](#)

Welsh Government Advice on the Well Being of Future Generations (Wales) Act 2015 [Well-being of Future Generations \(Wales\) Act 2015: the essentials \[HTML\]](#)
[| GOV.WALES](#)

(For further information please contact Sara Morris, Jess Morgan or Gary Meopham, saram@pembrokeshirecoast.org.uk, jessicam@pembrokeshirecoast.org.uk or garym@pembrokeshirecoast.org.uk)

Annex A: Letter of Request from Pembrokeshire County Council

Date • Dyddiad 05/09/2025

Your ref • Eich cyfeirnod

My ref • Fy nghyfeirnod Public Convenience Funding 2026

Telephone • Ffôn 01437 775754

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Pembrokeshire County Council Cyngor Sir Penfro

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By Email

Please ask for
Os gwelwch yn dda gofynnwch am

Sarah Edwards

Dear Sara Morris,

I am writing to you today in relation to the ongoing funding contribution from your authority for toilets as agreed in 2023, namely –

Currently Funded Toilets by PCNPA
Angle
Broad Haven North
Freshwater East
Little Haven
Manorbier (facility registered to PCNPA)
Newport Sands (facility registered to PCNPA)
Poppit Sands (facility in PCNPA ownership)
Solva
Saundersfoot (contract cost minus estimated income)
St Brides
Total (10) toilets
Agreement - 2 year contribution at £111,000.00 per year (ending 31/03/2026)

The initial agreement was only for two years, and I am now writing to request that this agreement continues for 2026 onwards, the proposed charges from 1st April 2026 are detailed in the table below. Future years CPI increase would apply.

Proposed charges from 1st April 2026 to 31st March 2027 - £142,986.38 (CPI estimated at 3.7%)

Currently Funded Toilets by PCNPA	Contract cost to PCC. Aug 2022 Figures	Charges from 1st April 2026 – 31st March 2027 (all fees will be subject to CPI uplift each year)
Angle	£5,725.02	£6,583.03
Broad Haven North	£7,239.39	£8,194.26
Freshwater East	£10,064.01	£11,199.55
Little Haven	£9,360.00	£10,450.51
Manorbier (facility registered to PCNPA)	£13,894.55	£115,275.10
Newport Sands (facility registered to PCNPA)	£14,689.01	£16,120.38
Poppit Sands (facility in PCNPA ownership)	£19,028.00	£20,736.90
Solva	£12,055.06	£13,317.95
Saundersfoot (contract cost minus estimated income)	£11,515.68	£12,744.07
St Brides	£7,399.51	£8,364.62
£2000.00 per toilet for future improvements)	£20,000.00	£20,000.00
Total (10) toilets	£130,970.23	£142,986.38
Agreement - 2 year contribution at £111,000.00 per year (ending 31/03/2026)	£111,000.00 per annum agreed (deficit of £20,000 plus inflationary elements in 2025)	

The fees proposed include Danfo contract costs and additional £2000.00 per toilet for the management and maintenance costs, above the Danfo contract.

The charges do not include for any major repairs – this funding would be additional and need to be reviewed and agreed through the toilet strategy group.

I would like to highlight the following works undertaken at these toilets -

- Annual Safety inspections
- New pipe work at St Brides
- External render issue at Solva scheduled in for this autumn
- Replace Velux windows at Freshwater East

It is difficult to have an investment and forward programme in these toilets without a long-term financial commitment, which I hope you understand. The works you have scheduled at Traeth Mawr is an example of how funding can improve our assets. We want to invest in our toilets, however, without maintenance funding this limits our options.

We welcome correspondence in Welsh and English, and will respond within a maximum of 15 working days. We will respond in the language in which the correspondence is received (unless you ask us to do otherwise). / Rydym yn croesawu gohebiaeth yn Gymraeg a Saesneg a byddwn yn ymateb cyn pen 15 diwrnod gwaith fan bellaf. Byddwn yn ymateb yn yr un iaith â'r ohebiaeth a dderbyniwyd (oni bai eich bod yn gofyn i ni wneud yn wahanol).

For a copy in large print, easy-read, Braille, audio, or an alternative language, please contact Pembrokeshire County Council on the number above. / Os am gopi mewn print mawr, fformat hawdd ei ddarllen, Braille, sain neu mewn iaith arall, cysylltwch â Chyngor Sir Penfro ar y rhif uchod.

I would require in writing before 1st December 2025 of the intent to fund the running of the toilets as set above. If financial support is not agreed then these facilities, as per the Cabinet decision in February 2023, would close.

I wish to emphasise that we are not looking for closures, in fact we want to save as many facilities as possible. As such over recent years we have been working with a number of parties across Pembrokeshire to support the continuation of public conveniences as per the Toilet Strategy, to avoid closures where alternative funding or operating models have been found. However, the budgetary position continues to be challenging and as such we continue to need other organisations to support us through provision of funding, as we are no longer able to sustain the large number of public toilets across Pembrokeshire without such financial help.

As you are aware there are other toilets within the PCNP boundary that are funded by other organisations following successful negotiations to maintain these facilities, however if these funding streams were to change, we would revert back to you for discussion. One example of this is Penally, where I am aware that Penally Community Council wish to see the toilets reopened at Penally Station which is linked to the PCNP car park, I would welcome a separate discussion with you on this one.

I hope we can continue to work together to try and prevent closures which will naturally have a detrimental effect on residents and visitors to our county. If you would like to discuss any of the above in more detail, then please get in touch.

Yours sincerely



Sarah Edwards

We welcome correspondence in Welsh and English, and will respond within a maximum of 15 working days. We will respond in the language in which the correspondence is received (unless you ask us to do otherwise). / Rydym yn croesawu gohebiaeth yn Gymraeg a Saesneg a byddwn yn ymateb cyn pen 15 diwrnod gwaith fan bellaf. Byddwn yn ymateb yn yr un iaith â'r ohebiaeth a dderbyniwyd (oni bai eich bod yn gofyn i ni wneud yn wahanol).

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