

Eryri National Park Authority



Proposal: Sale of Authority Asset – Plas Tan y Bwlch and Gardens including Llyn Mair and Woodlands

Equality Impact Assessment

(live document subject to continued updating)

IMPACT ASSESSMENT: Key Questions

1. What is being assessed and what is its main purpose?
Please note the name of the strategy, policy, plan, procedure, practice or proposal to be assessed and a brief narrative of its main purpose or aim.

Potential Sale of Plas Tan y Bwlch and Gardens including Llyn Mair and Woodlands.

Background

As an Environmental Study Centre, Plas Tan y Bwlch has from the outset always relied heavily on grant funding to subsidise the professional environmental courses, with the Authority's core funding subsidising residential educational courses for children and young people. In addition, a programme of public recreational courses was run from the Centre, some of which were based around nature and biodiversity and Eryri's special qualities (thus aligning with the Authority's statutory purposes), as well as general interest courses such as drawing, painting, photography, sewing, arts and crafts etc., which were also indirectly subsidised by core funding, and which mainly attracted a core group of older adults who returned annually.

In 2012 the Authority (as with rest of the public sector) commenced a long period of austerity, which has meant that difficult decisions had to be made over financial cuts to services over a number of years.

For Plas Tan y Bwlch Environmental Study Centre, a new business model was established with an emphasis on increasing commercial activities that would subsidise the educational side of the business. Over the years all subsidies and grants available for education and professional courses have ceased. Coupled with this, the Environmental Centre has seen a decline in both demand for professional courses due to the changing market which saw a demand for new more cost efficient training (day courses and online / remote learning), and very little new business for recreational courses.

Efforts by the staff to develop new income streams through being a wedding and party venue, opening the tea room and gardens as a visitor attraction, and conferences and bed and breakfast accommodation had seen various degrees of success. As a Grade II listed building, the Centre's high running and maintenance cost has meant that despite generating a reasonable turnover, its annual target to be cost neutral, has been consistently missed by many thousands of pounds over a number of years.

In 2019, plans were put forward for upgrading some of the bedrooms and relocating the reception and bar area to improve facilities as part of a new revised business plan. However, before such plans were implemented the Centre had to shut its doors in March 2020 as the Covid-19 pandemic took hold in the UK.

On the 1st of July 2020, the PTYB Board considered various options for the future, ranging from continuing the current business model, operating at a reduced level, mothballing the site for the duration of the pandemic to a full closure. It was clear to the Board that the current business model was untenable and exposed the Authority to an unacceptable financial and reputational risk. Consultation began with the affected staff and Unions, and viable business models were considered.

After full consideration was given to consultation responses and all potential business models, on the 23rd of October 2020 the Authority resolved to continue to operate Plas Tan y Bwlch as a B&B type business in the short to medium term and to proceed with staff restructuring whilst navigating UK Covid restrictions.

Since this time, attempts to develop the business have largely been unsuccessful, due to a combination of factors. The recruitment problems which started in 2021, the standard and availability of facilities at Plas Tan y Bwlch for paying guests along with inflationary pressures on costs have all had a detrimental effect. Although the recruitment crisis was a nationwide problem in various sectors, the hospitality industry was particularly effected. The Centre's business depended on staff being flexible with the hours worked to match demand, which saw consistent vacancies and remaining staff working excessive consecutive days without breaks at peak times, to no work at quiet times.

In addition, at quiet times a few rooms booked on a bed and breakfast basis would require all facilities open and staffed and the large public spaces fully heated, which was financially unviable. Not offering meals and bar service etc. to cut costs, was met by complaints from paying guests. Reports to the Plas Tan y Bwlch Board at this time demonstrates despite valiant efforts by staff, the impact that staffing issues, inflationary pressures and facilities offered was having on the sustainability of the business.

In 2022, expert external consultants were commissioned to do a full structural condition survey of the building, which outlined the immediate remedial works required, as well as the investment of an estimated £3 million required over the next decade to repair and maintain the fabric of the Grade II listed building.

By April 2023, Members officially reviewed and considered the position of the Centre and requested the Plas Board to re-evaluate the business model. Additionally, in July 2023 Audit Wales presented its findings on income diversification within the Authority, and made the following specific recommendation on Plas Tan y Bwlch:

“Within 12 months, the Authority review its operating model at Plas Tan y Bwlch and to undertake a cost benefit appraisal of the facility to determine its future strategy for the site. Additionally, Audit Wales commented that Plas should be seen to deliver National Park purposes.”

In February 2024, the Chief Executive reported the Plas Tan y Bwlch Management Board findings to the Authority:

- The Board could not develop a vision for Plas that delivered strongly against National Park purposes whilst delivering commercial gain;
- The Board could not support the current business model in terms of delivering against National Park purposes and becoming commercially effective;
- The Board would wish to consider partnership models but accepted that such a window should be time limited;
- If no partnership is to mature then Plas should be offered on the open market, preferably as a going concern but subject to agent advice; and
- Considering the time constraints involved the Board recommends progressing a twin track approach in terms of gaining a partnership arrangement and open market disposal.

Following this, discussions (which had commenced in the later part of 2020) were immediately stepped up with potential partners.

In July 2024, the whole site including Llyn Mair and the Woodlands were put up for sale on the open market.

2. Who is affected by this proposal? Who is it intended to benefit and how?

Sale of the House and Gardens

Currently there are 5 permanent members of staff employed by the Authority at Plas Tan y Bwlch. The contracted hours are the equivalent to 3.4 full-time equivalent posts. In addition, there are an additional 5 individuals who have casual work contracts with the Authority. This proposal has a direct effect on their future employment.

At the time of writing, the only ongoing business at the Centre are sporadic group residential bookings or group day events/meetings. There are alternative venues and hotels nearby who are able to accommodate these events. It is therefore not anticipated that this will have a major impact on these service users.

There has been very little use of the Centre in the past few years by local community groups to hold meetings and events, despite a promotion and marketing campaign, which included reduced rates. It is therefore anticipated that there will be very little impact on such groups, as again there are other venues nearby which can accommodate them.

The decision also affects the Authority as a whole, and by extension the staff that it employs. Any decision on the Centre or any other element of the Authority's business must be made in full knowledge of the Authority's general finances. It was reported to the Performance & Resource Committee in November 2023 that the predicted shortfall for the 2024/25 is in the region of £870K. Welsh Government Officers have confirmed that in relation to future financial predictions, any improvements in finances will not be likely achievable until at least 2027. The decision therefore to sell or keep hold of the asset will directly impact funding and service capabilities (which will include staff numbers) in other areas of the Authority's work.

For chalets which are privately owned and located within the grounds of Plas Tan y Bwlch, the Authority owns the freehold title of the land, which if sold will be transferred to the new owner. However, as leaseholders their rights are clearly indicated within their lease agreements. Although historically part of the estate, the other dwellings within the grounds have long since been transferred to private ownership with freehold rights. The extent to which they will be affected is subject to the access rights stipulated in their property deeds. Therefore, to various extents the chalet and dwelling owners are directly affected by this proposal.

Sale of Llyn Mair and Surrounding Woodlands and Paths

There is a network of paths that runs through this area which is used primarily by the surrounding local communities as well as visitors to the area. These are not however designated public rights of way and are permissive paths. The sale of this land has the potential to directly impact local users as a new landowner can temporarily or permanently close permissive routes at any time, without needing to give the public notice. This is likely to have a direct effect on the local community mostly, as regular users of the paths.

3. Have those people who will be affected by this proposal been consulted and given an opportunity to respond? If not, has it been promoted and explained to those people who will be affected?

At the time of writing (August 2024) no consultation has taken place as this is the start of the process. Potential partnership discussions are ongoing with one group who have shown an interest. The asset itself has only recently been put on the open market.

It is understood that the asset has attracted a huge number of initial enquiries from potential purchasers, but following receipt of further information regarding the costs of the structural and building fabric restoration required, internal improvement works and upgrading, grounds and woodland management and access routes maintenance costs from the Agents, no offers have been forthcoming. It is understood that there is one potential interested party, who may soon be in a position to make an offer.

News of the sale has gathered a lot of interest from in particular the local community, and the story has been picked up nationally by the press. Accordingly, the public consultation should commence as soon as practically possible to enable the public to be fully informed of the proposal, as well as the background information which explains how the Authority has reached this point. The Authority will then be able to gather the views of the public and identify and address any areas of concern.

4. Are there opportunities within the proposal to promote equality and is there an opportunity to promote positive attitudes towards people who share protected characteristics and promote good relations between different groups and communities?

Due to the nature of the proposal, none have currently been identified.

5. Could this proposal affect negatively and disproportionately on any groups of people based upon the following statutory protected characteristics?

Age

Staff

Of the 10 members of staff (both permanent and casual) directly affected, they are in the following age groups:

18 – 25 years old = 2

40 – 50 years old = 1

50 – 60 years old = 3

60 – 70 years old = 4

Of the staff members directly affected, 70% are over 50 years old.

Local Community including Chalet / Dwelling Owners

No data is available on the numbers of people who use the permissive footpaths and where they are from. For the purpose of this assessment, the parish data for Maentwrog has been used (as a general guide), as the section of the public most likely to be affected by this proposal.

Maentwrog Parish Population = 540 (2021 Census), of which:

Under 19 = 15.2%

20 – 29 years old = 11.7%

30 – 39 years old = 8.9%

40 – 49 years old = 9%

50 – 59 years old = 21.3%

60 – 69 years old = 15.2%

70 + years old = 18.9%

In terms of the staff numbers effected, over 50s seem to be disproportionately affected.

From the data available, the proposal will not appear to have a disproportionate negative impact on any particular age group in the community.

Disability

Staff

The number of staff who have declared a disability means that this protected group is not unduly affected by this decision.

Due to the small numbers effected, no data noted to protect the identification of individuals.

Local Community including Chalet / Dwelling Owners

No data is available on the numbers of people who use the permissive footpaths and where they are from. For the purpose of this assessment, the parish data for Maentwrog has been used (as a general guide), as the section of the public most likely to be affected by this proposal.

Maentwrog Parish Population = 540 (2021 Census), of which:

18.1% of Maentwrog residents are registered disabled.

Neutral impact

Race

Staff

This protected group is not unduly affected by this decision.

Due to the small numbers effected, no data noted to protect the identification of individuals.

Local Community including Chalet / Dwelling Owners

No data is available on the numbers of people who use the permissive footpaths and where they are from. For the purpose of this assessment, the parish data for Maentwrog has been used (as a general guide), as the section of the public most likely to be affected by this proposal.

Maentwrog Parish Population = 540 (2021 Census), of which:

Asian, Asia British or Asian Welsh = 0.4%

Black, Black British, Black Welsh, Caribbean or African = 0%

Mixed or multiple ethnic groups = 0.4%

White = 97.6%

Other ethnic groups = 1.7%

From the data available, the proposal is likely to impact people who are mostly white, as the majority ethnic group of the area and as such is not considered to have a disproportionate negative impact for the purpose of an equality assessment.

Sex

Staff

Of the staff directly affected, 9 are females and 1 is male. It seems that females are therefore disproportionately affected compared to males.

Local Community including Chalet / Dwelling Owners

No data is available on the numbers of people who use the permissive footpaths and where they are from. For the purpose of this assessment, the parish data for Maentwrog has been used (as a general guide), as the section of the public most likely to be affected by this proposal.

Maentwrog Parish Population = 540 (2021 Census), of which:

Female = 48.3%

Male = 51.7%

In terms of the staff numbers effected, females are disproportionately affected compared to males.

Religion & Belief

Staff

The Authority does not hold this data on its staff, and is therefore not in a position to assess the impact on this protected group.

Local Community including Chalet / Dwelling Owners

No data is available on the numbers of people who use the permissive footpaths and where they are from. For the purpose of this assessment, the parish data for Maentwrog has been used (as a general guide), as the section of the public most likely to be affected by this proposal.

Maentwrog Parish Population = 540 (2021 Census), of which:

No religion = 44.8%

Christian = 47.4%

Buddhist = 0.2%

Muslim = 0.4%

Other religion = 0.2%

Not answered = 7.1%

Neutral impact

Sexual Orientation

Staff

The number of staff who have declared their sexuality means that this protected group is not unduly affected by this decision.

Due to the small numbers effected, no data noted to protect the identification of individuals.

Local Community including Chalet / Dwelling Owners

No data

Neutral impact

Gender reassignment

Staff

This protected group is not unduly affected by this decision.

Local Community including Chalet / Dwelling Owners

No data

Neutral impact

Pregnancy & Maternity

Staff

No affected staff have disclosed that they are currently pregnant, and no staff are currently on a period of maternity absence.

Local Community including Chalet / Dwelling Owners

No data

Neutral impact

Marriage & Civil Partnership

Staff

No data supplied by the HR service on the marital or civil partnership status of the staff affected, therefore impact cannot be identified.

Local Community including Chalet / Dwelling Owners

Maentwrog Parish Population = 540 (2021 Census), of which:

Never married or registered a civil partnership = 40.5%

Married or registered a civil partnership = 41.5%

Separated but still legally married or in civil partnership = 1.7%

Divorced or civil partnership dissolved = 9.6%

Widowed or surviving civil partnership partner = 6.7%

Neutral impact

6. What data, information, research or evidence have you used to answer the above questions?

Staff Data

2023 Equality in North Wales Data and Evidence report

Data from UK Census 2021

ONS Data

UK Hospitality Data

7. Is the negative impact intended or legal?

Staff

The impact is not intended and it is legal, as all staff that currently work at Plas Tan y Bwlch are affected by this decision, as opposed to a situation whereby only certain staff are under threat of being selected for possible redundancy out of the total number of staff who work there, which would unfairly and disproportionately affects females and older staff over others.

Due to the Welsh language requirements of posts within the Authority, the Authority has a higher percentage of Welsh speaking employees compared to the general population, and it is for this reason Welsh speakers are disproportionately affected by this decision. This again is not an intended negative impact and it is legally acceptable.

It is important to note however that although this decision affects the staff who currently work at Plas Tan y Bwlch, the loss of employment if the sale of the asset proceeds is a possibility, and not a certainty.

8. Have individuals and groups with the protected characteristics been involved in the process and consulted with? If not, what steps will be taken to consult with them?

Plas Tan y Bwlch staff are fully aware of the current process and informal discussions are regularly taking place. A formal consultation will commence shortly.

9. What does the consultation / research / data indicate about the negative impact?

Due to the nature of the decision, the impact is primarily socio-economic.

Around 2,100 people aged 16 and over in Gwynedd were unemployed in the year ending December 2023. This is a rate of 3.5%. This was an increase compared with the year ending December 2022 when the unemployment rate was 2.5%. However, this is lower than the overall rate in Wales which was 3.7% in December 2023 (and 3% in December 2022).

The hospitality sector is the third biggest sector in the UK and has shown faster economic growth than any other UK sector since the pandemic. Employment in this sector is more fluid but has strong demand, with more part-time, seasonal and casual positions available. Data therefore suggest that it may be easier overall to secure alternative employment in this sector compared to others in Gwynedd, especially for the casual staff.

10. Specify measures that can be taken to remove or minimise the disproportionate or adverse affect identified.

No other measures have been identified that will further reduce the impact if the asset is sold. However, options are also being considered with regard to forming a Partnership Agreement. Potential partners are currently considering options which include assessing financial viability and feasibility of such a partnership, and to date no firm proposals are forthcoming. Should this option come to fruition, there may be opportunities for continued employment for some current staff members.

11. Are there any other impacts not relating to equality and / or socio-economic factors which require further consideration and action?

The inclusion of Llyn Mair and the surrounding woodland and paths has the potential to have the most overall impact on the local community. Although we do not have counters on the permissive paths and therefore no definitive data on the usage numbers, anecdotally we know that they are very popular. Heat maps on Strava give us an idea of their popularity.

As an Authority, the ownership of this land contributes towards 2 of the Authority's Well-being and Strategic Objectives – Resilient Environments and Resilient Communities.

Under Resilient Environments, the ownership and sustainable management of this land contributes directly to the sub-theme 'Responding to the Challenges of Climate Change' as well as to the sub-theme 'Improving Recreation Management and any Negative Effects on Recreation'. Disposal of this part of the asset will therefore not align with these objectives.

Under Resilient Communities, 'Maintaining and Increasing the Quality of Life for Residents' is another sub-theme which the sale of this part of the land would not align with. As an Authority, we are fully aware of the benefits of spending time outdoors in nature and making the most of the recreational opportunities the national park offers. The benefits are not only good for us physically but also for our mental health and well-being. As a national park authority we encourage people to make the most of these opportunities by providing and maintaining paths and routes which are suitable for a wide range of abilities, which provides a low cost way of maintaining health and spending quality time outdoors.

The ownership of Llyn Mair and the woodlands therefore directly align with not only our Well-being Objectives but also National Park purposes, and as such its disposal could be seen as incompatible with our purposes.

This proposal in its current form is therefore going to have a negative impact on the regular users of the paths around Llyn Mair, the majority of which are likely to be within the local parish community of Maentwrog.

12. Specify measures that can be taken to remove or minimise the adverse affect identified.

The Authority should give further consideration to this aspect of the sale, and consider the viability and practicality of all available options to securing permanent footpath access around Llyn Mair for future generations.

The Authority should now commence a public consultation exercise to inform the local community and to gather their views on the proposal.

13. It is important to record the mitigating actions to be taken following the initial findings of this impact assessment and after the initial public consultation.

Record here what measures or changes you will introduce to the proposal which could reduce or remove any unlawful or negative impact or disadvantage and/or introduce positive change.

Unlawful or Negative Impact Identified	Mitigation / Positive Action Taken	Date

	Date
Initial Impact assessment completed for first consultation:	12 August 2024
Assessment updated after consultation:	
Further updates:	
Final assessment:	