



**Cyfoeth
Naturiol**
Cymru
**Natural
Resources**
Wales

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Social Justice Statistics Team
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

27th February 2014

Dear Sir,

**Welsh Government Consultation:
Proposed indicators for the Welsh Index of Multiple Deprivation 2014**

Natural Resources Wales (NRW) brings together the work of the Countryside Council for Wales, Environment Agency Wales and Forestry Commission Wales, as well as some functions of Welsh Government. Our purpose is to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future.

The Natural Resources Body for Wales (Functions) Order 2012 gives NRW duties relating to access and recreation, historic sites and well-being – specifically the health and social well-being of individuals and communities, and the economic well-being of individuals, businesses and communities. Our response to the WIMD 2014 proposed indicators consultation is made in relation to these specific duties.

NRW welcomes the opportunity to respond to this clear and well presented consultation. Our comments are summarised below.

Income and Employment

It would be useful to investigate how data might be gathered about people not currently eligible for benefit owing to participating in a 'back to work' training scheme or newly unemployed. People in this situation are omitted from any Government statistical analysis as they are not yet on a claimants list.

Health

We would support the inclusion of:

- an indicator on diagnosed chronic diseases, subject to adequate data developments and quality;
- child obesity indicators – and obesity indicators for adults if an appropriate data source is available.

Access to Services

In the light of the Active Travel (Wales) Act 2013, we would recommend inclusion of travel by bicycle, with the measure being the ability to access services by travel on a cycle path, using proximity to cycle path of both residence and service.

We agree with the proposals to combine public and private transport.

Community Safety

It is welcomed that racially or religiously motivated crime and harassment is included in the indicator list. If not included in the crime codes cited, we recommend the inclusion of recorded hate crimes in relation to disability, gender-identity and sexual orientation.

In the longer term, it would be very useful to include fly tipping as an indicator, but understand that data records are not sufficiently robust. We will work with partner organisations to identify ways in which recording can be improved.

We would strongly support the preferred option for including an anti-social behaviour indicator.

Physical Environment: 5.7.2 – Proximity to a Natural Green Space

It's recommended that reference to this issue should be in the Access to Services theme, in line with the Ecosystem Services approach.

We understand why proximity to natural green-space cannot yet be included as an indicator. It is essential, however, that we work to ensure that suitable data is available for subsequent WIMDs. NRW will collaborate with partner organisations on this important measure, looking at how we can develop data sources such as the Green-space Toolkit and the Woodland Trust's 'Space for People' surveys. The positive health and wellbeing benefits of access to green-space are well researched and documented.

Current access to natural green-space analyses tend to include *potential* and indicative physical access rather than verified *actual*, accessible space. Future methodologies must address this issue.

Rural Deprivation

We understand the limitations of the WIMD in relation to rural deprivation, but very much welcome the proposal to address the issue through analysis of underlying WIMD indicators.

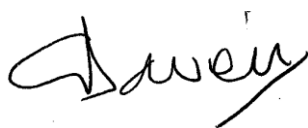
Annex G - Air Quality

- Air pollution concentrations vary significantly from year to year. Therefore, the most recent data is required to estimate the impact on deprivation. Utilizing data that is up to three years old (as the WIMD seems to do) may not be representative. The Wales Air Quality Forum publishes near real time measured air quality data.

- Air pollution is very seasonal. Although annual average limit values may not be breached, there may well be prolonged periods of significant pollution elevations followed by lower levels. During these elevated periods the level of deprivation may be substantial.
- NAEI data (as used by the WIMD) often highlights breaches of limit or target values based on modelling, whereas the corresponding measured data does not indicate a similar issue. The WIMD would therefore give a false impression of deprivation.

Thank you for the opportunity to comment on these proposals.

Yours faithfully,



Ceri Davies
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