

Report of Audit Wales

Subject: Audit Wales Report on Governance of National Park Authorities

Summary

To receive the report from Audit Wales on Governance of National Park Authorities.

Introduction

Audit Wales undertakes a programme of performance auditing. As part of the Auditor General's local government studies programme in 2022-23, Audit Wales reviewed the governance arrangements across the National Park Authorities (NPAs) in Wales. Their review considered five key elements:

- governance model and structures;
- key functions and responsibilities within these structures;
- governance culture;
- infrastructure to support effective governance; and
- arrangements to monitor and evaluate the effectiveness of governance.

The work was based on interviews, both internally and externally and a questionnaire.

The high-level conclusion was that:

“The governance model for National Park Authorities provides a clear framework to discharge their key functions, but weaknesses in its implementation present a risk to good governance.”

A bilingual copy of the report is included as Annex A.

Audit Wales have made the following recommendation:

Supporting members to carry out their role

R1 This report highlights weaknesses in the ongoing support and guidance provided to members appointed by the Welsh Government. To address this, we recommend that NPAs and the Welsh Government work together to:

- agree the support and guidance that will be provided to NPA members;

- agree which of this support and guidance will be provided by the Welsh Government and which will be the responsibility of NPAs; and
- clearly communicate this to Welsh Government appointed members.

Ensuring member nominations support good governance

R2 This report highlights a lack of clarity and inconsistency in how local authority members are nominated to sit on NPAs. It also highlights a lack of diversity amongst local authority NPA members. To help address this, we recommend that NPAs work with the WLGA and the Welsh Government to:

- review whether the protocol for nominations remains fit for purpose;
- raise awareness of the protocol and how it can support nominations; and
- promote its usage amongst relevant local authorities.

Improving accountability for members

R3 To provide assurance on members' contribution to the governance of NPAs, and to help inform future training and development provision, we recommend that the Welsh Government, NPAs and constituent local authorities work together to develop an accountability framework for all members of NPAs that:

- evaluates their contribution to the NPA; and
- can be used to help to target support and development to enable NPA members to be effective in their role

Reviewing whether the model is delivering what was intended

R4 This report highlights weaknesses in the implementation of the governance model and how these issues raise questions about its suitability. To ensure it remains fit for purpose and reflects the distinct and different challenges each faces we recommend that, within the timescales of designating a new national park, the Welsh Government reviews the governance model for NPAs

Organisational (Officer) Response

There is a requirement for the Authority to include an Organisational Response to the recommendations. This is prepared by officers of the Authority and is presented with the report. A draft is included as Annex B. While a number of the recommendations are for other organisations a comment is made on the four recommendations. Members are invited to comment and agree the Organisational Response.

Presentation

Officers from Audit Wales will attend the meeting to present the report and discuss this work with Members.

RECOMMENDATION:

Members are asked to receive, note and present any views on the Audit Wales report on Governance of National Park Authorities.

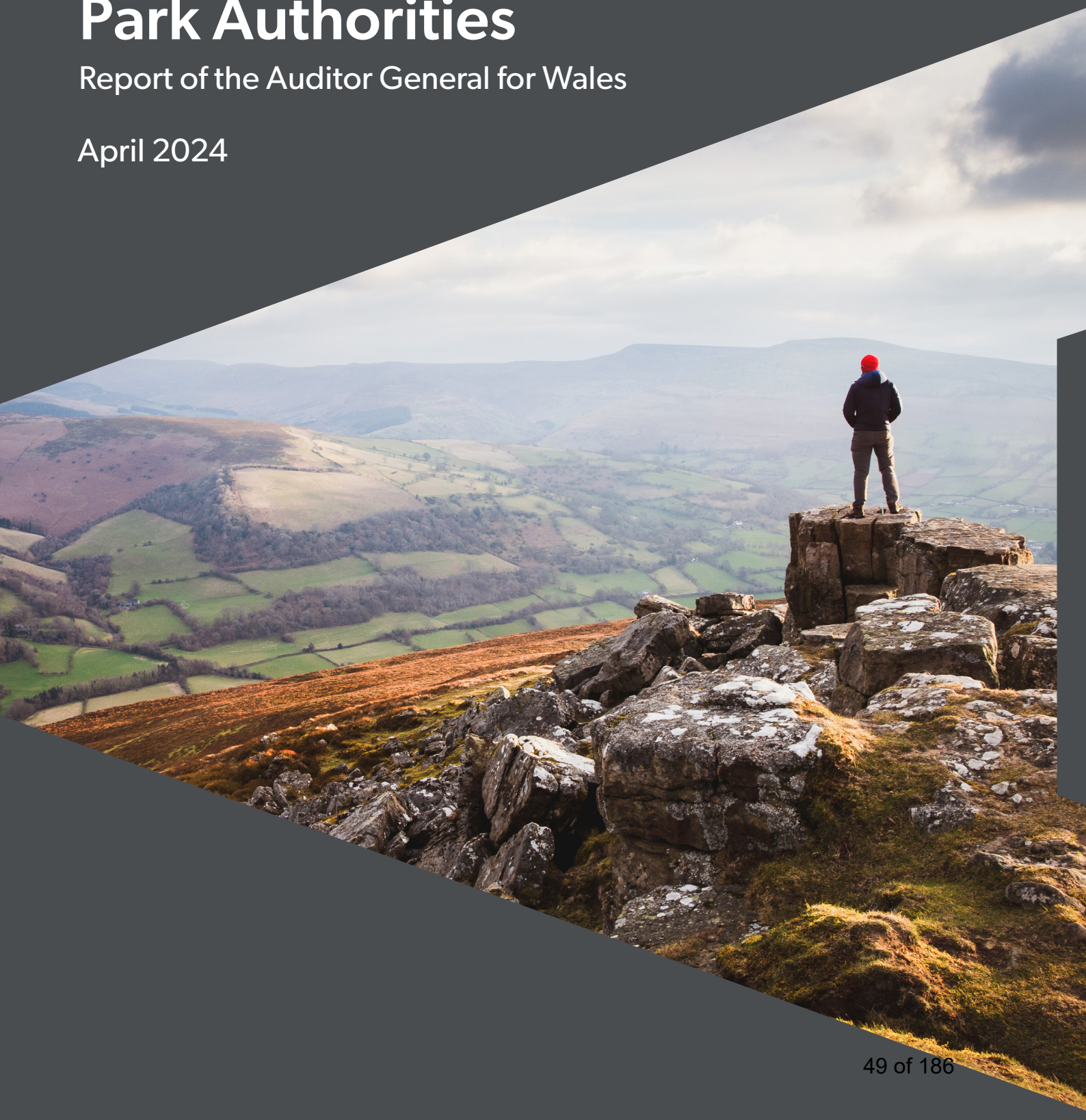
Members are asked to agree the Organisational Response

(For further information, please contact Tegryn Jones at Tegrynj@pembrokeshirecoast.org.uk)

Governance of National Park Authorities

Report of the Auditor General for Wales

April 2024



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Mae'r ddogfen hon hefyd ar gael yn Gymraeg.

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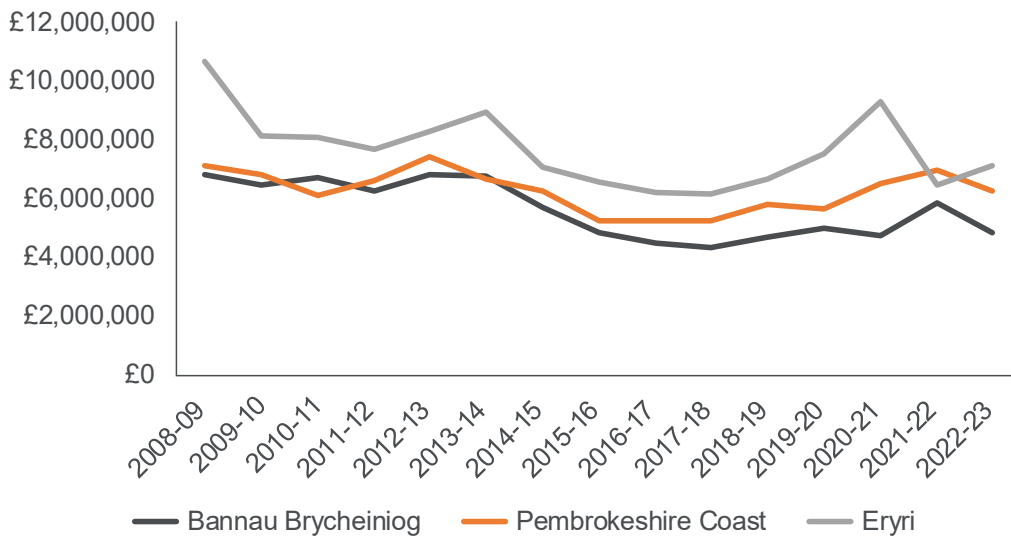
Summary report

What we reviewed and why

- 1 As part of the Auditor General's local government studies programme in 2022-23, we reviewed the governance arrangements across the National Park Authorities (NPAs) in Wales. Our review considered five key elements:
 - governance model and structures;
 - key functions and responsibilities within these structures;
 - governance culture;
 - infrastructure to support effective governance; and
 - arrangements to monitor and evaluate the effectiveness of governance.
- 2 This report concludes the first part of a two-stage review considering the governance arrangements across Special Purpose Authorities in Wales. There are two cohorts of Special Purpose Authorities within the Welsh local government sector. They are the three NPAs, and the three Fire and Rescue Authorities (FRAs). The second stage of this review – which looks at the governance arrangements across the three FRAs – is included as part of our [work programme](#) for 2023-24.
- 3 We examined the governance of NPAs for a number of reasons. Firstly, key themes identified through our reviews in NPAs in recent years include opportunities to strengthen governance arrangements. For example, in recent reviews we have highlighted:
 - stretched officer capacity;
 - tension between key priorities when discharging their functions;
 - reliance on short-term grant funding;
 - challenging financial positions and use of reserves; and
 - difficulties in performance management of partnerships.

4 Secondly, all NPAs in Wales have been operating with reducing budgets over the last 15 years. This is best illustrated in the changes to their revenue outturn expenditure between 2008-09 and 2022-23. For example, in real terms, the total revenue outturn expenditure¹ for the three NPAs combined in 2022-23 was 26% lower than it was in 2008-09. **Exhibit 1** shows the difference across the three NPAs. This challenging operating environment makes good governance even more important to manage the reductions in funding in a way that secures value for money.

Exhibit 1: National Park Authorities’ real terms revenue outturn expenditure between 2008-09 and 2022-23



Source: Audit Wales analysis of [Revenue outturn expenditure, by authority \(gov.wales\)](#), adjusted in line with [HM Treasury GDP Deflators](#) published in September 2023

1 Revenue expenditure is the costs of running local authority services such as staffing, heating, lighting and cleaning, together with the expenditure on goods and services consumed within the year.

- 5 Thirdly, we have highlighted significant governance issues within Bannau Brycheiniog NPA in recent years.² These issues are potentially in part related to the wider governance model.
- 6 In a broader context, weaknesses in governance arrangements have also been highlighted in English national parks. For example, the Landscapes Review³ found challenges relating to the size, make-up, and purpose of NPAs' membership, as well as in legislation and funding. The review made a series of recommendations to the UK Government, which were accepted in part.⁴

What we found

- 7 Our review sought to answer the question: Do special purpose local authorities in Wales have effective governance arrangements that support good outcomes for citizens?
- 8 Overall, we found that: the governance model for National Park Authorities provides a clear framework to discharge their key functions, but weaknesses in its implementation present a risk to good governance.

Key facts about National Park Authorities

- 9 National parks are areas of land that have been designated as protected landscapes due to their Special Qualities.
- 10 All of the national parks in Wales, Scotland and England have a clearly defined list of Special Qualities. They set out what makes the area special and unique. The combination of these Special Qualities is at the heart of the area's designation as a national park.
- 11 Across the UK there are fifteen national parks, of which three are in Wales – Bannau Brycheiniog, Eryri and Pembrokeshire Coast (**Exhibit 2**).
- 12 In its Programme for Government⁵, the Welsh Government sets out its intention to designate a new national park, based around the current Clwydian Range and Dee Valley Area of Outstanding Natural Beauty in north-east Wales. At the time of reporting, the Welsh Government had commissioned Natural Resources Wales to evaluate the case for the designation and a series of consultations was underway.

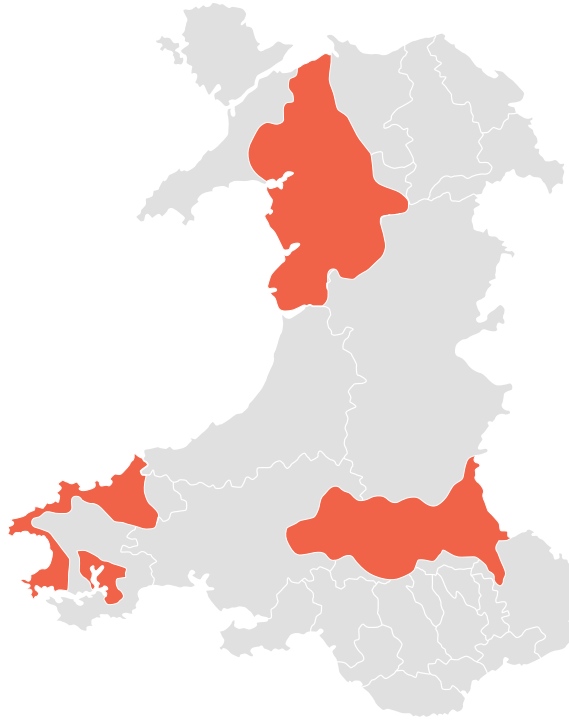
2 Audit Wales, [Delivery of the Change Programme](#), February 2021

3 Department for Environment, Food, and Rural Affairs (DEFRA), [Landscapes review: National Parks and AONBs](#), September 201

4 DEFRA, [Landscapes review: government response](#), January 2022

5 Welsh Government, [Programme for Government – Update](#), December 2021

Exhibit 2: national parks of Wales



Source: Audit Wales

- 13 The three national parks in Wales cover an area of 4,122 square kilometres. This represents approximately 20% of the land area of Wales. Eryri was designated in 1951, followed by Pembrokeshire Coast in 1952 and Bannau Brycheiniog in 1957.⁶ Most of the land within national parks is privately owned.
- 14 National Park Authorities have two purposes under the Environment Act 1995 (the Act):
- to conserve and enhance the natural beauty, wildlife, and cultural heritage of the area; and
 - to promote opportunities for the understanding and enjoyment of the Special Qualities of the national park by the public.
- 15 A concept known as the Sandford Principle dictates that, where these two purposes are in conflict and the conflict cannot be reconciled through management, the first duty takes precedence. In addition to their two statutory purposes, NPAs have a duty to co-operate with other public bodies locally to foster the economic and social well-being of local communities without incurring significant expenditure. Under Section 62 of the Act, partners such as unitary authorities must also have due regard to the NPAs' purposes in their work.

6 The National Parks of Wales: National Parks Wales

- 16 Whilst their statutory purposes and duty under the Environment Act 1995 drive much of the NPAs' work, they must also comply with their obligations under other legislative requirements, such as the socio-economic duty and the Well-being of Future Generations (Wales) Act 2015. Key responsibilities of NPAs include:
- creating a national park management plan;
 - maintaining the functions of a local planning authority within the national park; and
 - acting to fulfil the two purposes and duty – eg by promoting opportunities for people to access and enjoy the area and conserving the qualities that make the area unique and special.
- 17 Governance by an independent authority distinguishes national parks from other designated landscapes, such as Areas of Outstanding Natural Beauty (AONBs). These areas have similar environmental protections but the organisations that manage them lack comparable functions, such as planning functions, which are retained by the relevant local authorities. There are five AONBs in Wales.⁷

What is 'good governance'?

- 18 Public sector organisations need to be governed in a manner reflecting the public and environment that they serve. To support this, the Chartered Institute of Public Finance and Accountancy (CIPFA) and the International Federation of Accountants (IFAC) have defined good governance in the public sector (**Exhibit 3**).

Exhibit 3: definition of good governance

The arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved. To deliver good governance in the public sector, both governing bodies and individuals working for public sector entities must try to achieve their entity's objectives while acting in the public interest at all times. Acting in the public interest implies primary consideration of the benefits for society, which should result in positive outcomes for service users and other stakeholders.

Source: CIPFA/IFAC

- 19 To embed this definition, it has been further developed into seven principles (**Exhibit 4**).

⁷ These are the Anglesey Coast, the Gower Peninsula, the Llŷn Peninsula, the Clwydian Range and Dee Valley, and the Wye Valley. The Wye Valley covers an area in both England and Wales.

Exhibit 4: seven principles of good governance



Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.



Ensuring openness and comprehensive stakeholder engagement.



Defining outcomes in terms of sustainable economic, social, and environmental benefits.



Determining the interventions necessary to optimize the achievement of the intended outcomes.



Developing capacity, including the capability of its leadership and the individuals within it.



Managing risks and performance through robust internal control and strong public financial management.



Implementing good practices in transparency, reporting, and audit, to deliver effective accountability.

Source: CIPFA/IFAC

Recommendations

The table below sets out the recommendations that we have identified following this review. We expect NPAs and the Welsh Government to formally receive this report, consider its findings, and to monitor their respective NPA's response to our recommendations.

Exhibit 5: recommendations

Recommendations

Supporting members to carry out their role

- R1 This report highlights weaknesses in the ongoing support and guidance provided to members appointed by the Welsh Government. To address this, we recommend that NPAs and the Welsh Government work together to:
- agree the support and guidance that will be provided to NPA members;
 - agree which of this support and guidance will be provided by the Welsh Government and which will be the responsibility of NPAs; and
 - clearly communicate this to Welsh Government appointed members.

Ensuring member nominations support good governance

- R2 This report highlights a lack of clarity and inconsistency in how local authority members are nominated to sit on NPAs. It also highlights a lack of diversity amongst local authority NPA members. To help address this, we recommend that NPAs work with the WLGA and the Welsh Government to:
- review whether the protocol for nominations remains fit for purpose;
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Recommendations

Improving accountability for members

- R3 To provide assurance on members' contribution to the governance of NPAs, and to help inform future training and development provision, we recommend that the Welsh Government, NPAs and constituent local authorities work together to develop an accountability framework for all members of NPAs that:
- evaluates their contribution to the NPA; and
 - can be used to help to target support and development to enable NPA members to be effective in their role.

Reviewing whether the model is delivering what was intended

- R4 This report highlights weaknesses in the implementation of the governance model and how these issues raise questions about its suitability. To ensure it remains fit for purpose and reflects the distinct and different challenges each faces we recommend that, within the timescales of designating a new national park, the Welsh Government reviews the governance model for NPAs.

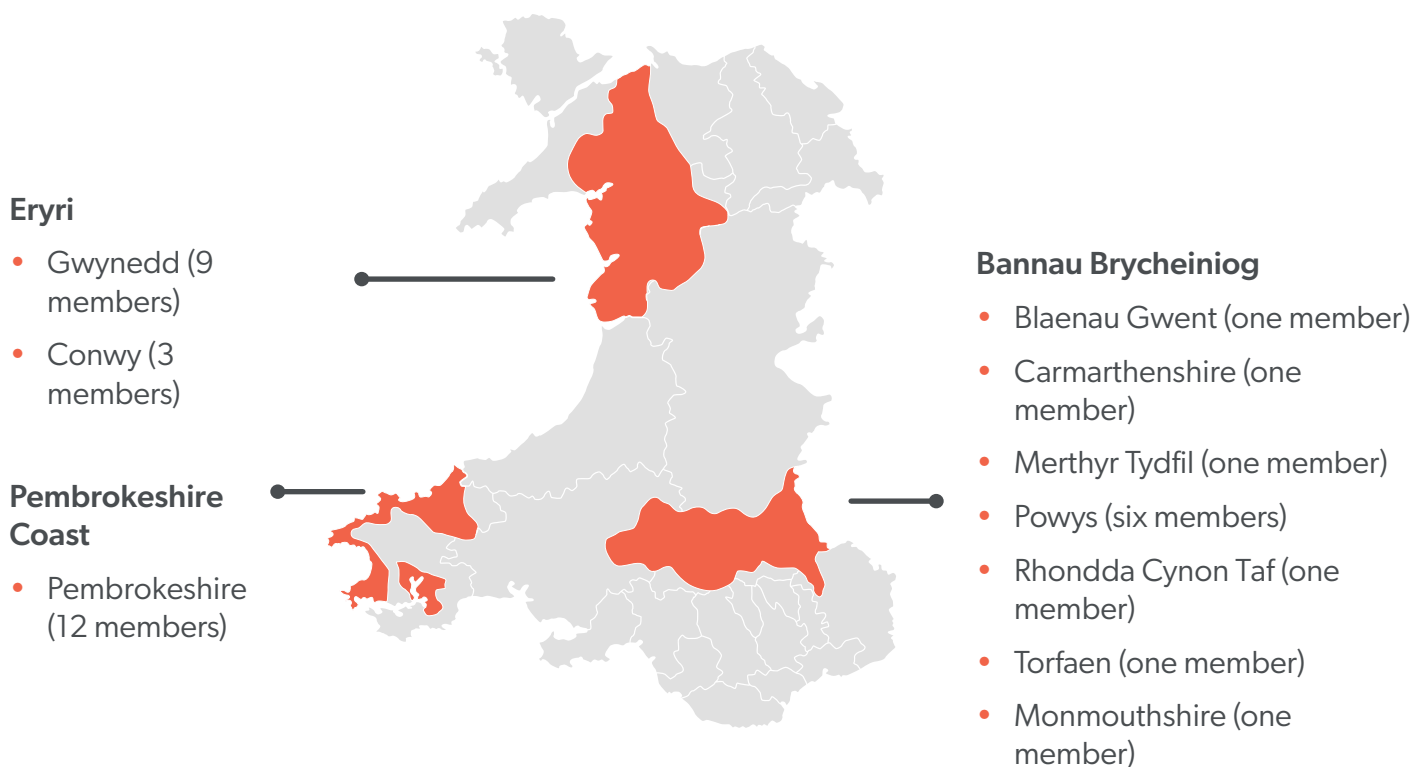
Detailed report

National Park Authorities have a clear governance model

- 20 The model of governance across the three NPAs in Wales is clearly defined. The make-up of their membership is set out in legislation⁸ underpinning the designation of national parks. Each NPA is formed by 18 members:
- two thirds (12) of members are drawn from those elected to their local authorities, where their geographical boundaries lie fully or partly within the national park. Every five years, members are nominated to sit on the NPA, reflecting the political balance of the constituent authorities. These are set out in **Exhibit 6**.
 - one third (6) of members are appointed by Welsh Ministers to provide a national focus and to ensure there is sufficient technical expertise.
- 21 This means that NPAs' governance model is designed to provide both democratic accountability through the inclusion of elected representatives from local communities, and strategic and sector expertise through members appointed by the Welsh Government.

8 [Environment Act 1995 \(legislation.gov.uk\)](https://legislation.gov.uk)

Exhibit 6: nominating principal local authorities for Welsh national parks



Source: Audit Wales

22 National Park Authorities have clear and well-established committee structures. Beyond the broad governance model set out in the Environment Act 1995, each NPA has discretion to establish a committee structure that best reflects their requirements locally. These structures are outlined in **Exhibit 7**. Each NPA also has a sub-committee structure to support its key committees, and working groups are also established, often to deal with specific issues or to oversee particular projects or assets. These provide members with opportunities to undertake more in-depth, real-time scrutiny, compared to when items are presented to a broader membership (eg at full Authority meetings). Through our interviews and document reviews we found that these structures are well-established and have clear terms of reference which reflect statutory requirements and key work streams of NPAs. This means that NPAs' committee structures help them to discharge their statutory responsibilities.

Exhibit 7: National Park Authorities' committee structures

Committees	Eryri	Bannau Brycheiniog	Pembrokeshire Coast
Full Authority	✓		✓
Planning / Development Management Committee	✓		✓
Standards Committee	✓		✓
Audit and Risk Committee			✓
Finance and Performance Committee			✓
Performance and Resources Committee	✓		
Audit and Corporate Services Review Committee			✓
Operational Review Committee			✓
Human Resources Committee			✓
Sustainable Development Fund Committee			✓
Chairs Committee			✓
Member Support and Development Committee			✓
Total number of key committees:	4	7	8

Source: Audit Wales

23 National Park Authorities' schemes of delegation provide clarity on decision making responsibilities. For example, we found that a new scheme of delegation was recently adopted in Bannau Brycheiniog NPA. This has helped to clarify roles and requirements and provide additional flexibility (e.g. around member involvement in specific working groups). Similarly, Eryri NPA reviewed its governance procedures recently to ensure they are fit for purpose in light of changes to ways of working following the Covid-19 pandemic. Clarity on key responsibilities around decision making is a fundamental aspect of good governance.

National Park Authorities recognise the value of collaboration but governing through complex partnership structures presents challenges

- 24 National Park Authorities demonstrate a strong commitment to partnership working. For example, in recent years, we have highlighted NPAs' successes in establishing local partnerships with key partners to progress their aims and objectives. These include [Visit Pembrokeshire](#)⁹ and [Fforwm Eryri](#)¹⁰. This means that partnership working is central to each NPA's way of working and is important to meet key legislative requirements and avoid duplication.
- 25 National Park Authorities rely on their influence and ability to convene partnerships to help manage the challenges facing national parks. However, they have a limited role in some statutory partnerships. For example, NPAs' role on Corporate Joint Committees (CJCs) is limited to strategic planning matters. And despite being able to involve NPAs' in other work strands, only one of the four CJCs has taken the opportunity to do this.¹¹ This risks curtailing NPAs' influence in key areas. This is an issue because, as highlighted in our recent reviews on sustainable tourism¹², the demand on NPAs is significantly impacted by matters within the wider remit of CJCs, such as travel infrastructure to support the visitor economy.
- 26 Servicing partnership structures is stretching capacity. For example, Bannau Brycheiniog NPA, due to its location, is part of three CJCs and two Public Service Boards (PSBs)¹³. Through our interviews we found that this causes a considerable draw on senior officers' capacity. In relatively small organisations such as NPAs, there is also a limited number of senior officers to delegate attendance at meetings. Coupled with NPAs' limited role and influence in some statutory partnerships, this raises questions about the value of attending in the broader context of reducing resources and capacity pressures.

9 Visit Pembrokeshire is a destination management partnership established between Pembrokeshire Coast NPA and Pembrokeshire County Council.

10 Fforwm Eryri is a partnership of key stakeholders established to develop and implement Eryri NPA's national park management plan, [Cynllun Eryri](#).

11 [Corporate Joint Committees – commentary on their progress | Audit Wales](#)

12 [Sustainable Tourism in Wales National Parks | Audit Wales](#)

13 The area covered by Bannau Brycheiniog National Park means that the NPA is an invited partner on four PSBs but is currently a member of two – Powys PSB and Carmarthenshire PSB.

Servicing governance requirements risks stretching officer capacity

- 27 There are constructive working relationships between members and officers in NPAs. Through our interviews and meeting observations we found that members mostly act collegiately and when they provide challenge to officers, it is done constructively and appropriately. This was not always the case in all NPAs. For example, member behaviour contributed to the significant governance failings highlighted in Bannau Brycheiniog NPA in recent years. However, following a significant turnover in membership, we found that Members in Bannau Brycheiniog NPA are now focused on rebuilding and maintaining good relationships with each other and with officers. Constructive working relationships are important in supporting a strong governance culture.
- 28 Despite this, members do not always display confidence in providing strategic direction and robust challenge to officers. In particular, through our interviews and observations we found that not all members are clear on their role and able to fully contribute to decision making processes.
- 29 Administering the NPA governance arrangements (for example, supporting the range of committee meetings) can be resource intensive. National Park Authorities are also subject to significant reporting requirements. For example, as Special Purpose Local Authorities, NPAs must prepare detailed financial statements in line with CIPFA guidance, despite the revenue and capital budgets of NPAs being significantly smaller than all principal councils. Capacity pressures raise risks that officers have limited time to provide members with the support they require to govern effectively.
- 30 The Welsh Government has sought to boost capacity to support governance across NPAs in recent years. It has funded a central joint post to lead on inclusion, diversity and governance matters. Hosted by Pembrokeshire Coast NPA, this role works across all three NPAs and provides a platform to increase capacity through a shared resource and to improve collective governance. Specifically, the role is designed to help coordinate member training, support governance, promote diversity, increase the diversity of visitors to designated landscapes and help NPAs to respond to key Welsh Government policy initiatives.

Weaknesses in elected member selection processes risk undermining good governance

- 31 There are inconsistencies in how councillors are selected to sit on NPAs. The Welsh Local Government Association (WLGA), along with the three NPAs, have developed a protocol¹⁴ to assist local authorities in deciding which elected members should be nominated to sit on the NPAs. This protocol notes that appointments should be made according to the political balance within the local authority and that it is desirable for those nominated to represent wards wholly or partly situated within the national park boundaries. **Exhibit 8** highlights the key considerations set out in the protocol. Through our interviews we found that the protocol is not being followed consistently. This presents a number of issues:
- local authorities control who is nominated, and often members are nominated from electoral wards that sit outside the national park boundaries and have little connection to local and strategic issues affecting the NPAs. For example, at the time of our review, almost a third of the relevant elected members did not represent council wards within the boundaries of a national park.
 - priority consideration is not always given to the skills and attributes necessary to contribute effectively to NPAs' governance.
 - the extent to which local authority members aspire to serve on a NPA varies considerably. In some, several councillors are keen to serve on a NPA and therefore the local authority has a wider pool of prospective members to select from. Elsewhere, there is less competition for the role – for example, some local authority NPA members told us they're on the NPA as “no-one else wanted to go on it” and that they're there “to make up the numbers.”

14 [Protocol for National Park Authority Nominations](#)

Exhibit 8: key considerations for local authorities when nominating councillors to sit on National Park Authorities, as set out in the protocol



Source: [Protocol for National Park Authority Nominations](#)

32 There is a lack of diversity amongst local authority NPA members. For example, **Exhibit 9** shows that at the time of our review, 72% of local authority NPA members were male and 28% were female, although this varied considerably between NPAs (and was, in fact, equal in Eryri NPA). In addition, no local authority member sitting on NPAs at the time of our review came from a Black, Asian or Minority Ethnic background. In our interviews with NPAs officers, we heard concerns that the appointments process used by local authorities does not help with this, as little consideration is given to improving the diversity of NPAs' membership. The lack of diversity is an issue because, as highlighted in the 2014 report of the Expert Group on Diversity in Local Government, it is "vital that the people who make decisions on our behalf... are in tune with and representative of their local communities."¹⁵

15 [On Balance: Diversifying Democracy in Local Government in Wales – report of the Expert Group on Diversity \(gov.wales\)](#)

Exhibit 9: gender breakdown of the 36 local authority NPA members

National Park Authority	Number of female LA members	Number of male LA members
Bannau Brycheiniog	0	12
Eryri	6	6
Pembrokeshire Coast	4	8
Total	10	26

Source: Audit Wales analysis of NPA members in September 2023

The Welsh Government has a comparatively rigorous process for appointing members, but there is limited on-going support to appointed members

- 33 The selection process for Welsh Government members is rigorous in comparison to how local authority members are selected. Applicants go through a competitive assessment which involves the relevant NPA Chair, a Deputy Director in Welsh Government, and a Natural Resources Wales (NRW) Board member. The process is regulated and overseen by the Office of the Commissioner for Public Appointments (OCPA) and administered by the NPA Sponsorship Team in the Welsh Government, in consultation with the Public Appointments Unit. Members appointed by the Welsh Government are limited to serving eight years (two periods of four years) on NPAs, although the Minister may grant an extension to their tenure depending on performance and business need. Such extensions are agreed by exception and must be ratified by the Commissioner for Public Appointments.
- 34 Welsh Government members usually sit on NPAs for their full tenure which provides continuity and enables the Welsh Government to appoint replacements in a planned way. Welsh Government appointed members we spoke to were largely positive about the appointment process. However, despite the strengths of the Welsh Government's appointments process, given the ratio between appointed and elected members, its impact is limited to one-third of the membership.

- 35 At the time of our review, there was little on-going support for members from the Welsh Government following their appointment. We also found that some members were unclear about their role post-appointment and felt they took a substantial amount of time to 'get up to speed' with the role and contribute to decision-making processes. This means that, despite its rigorous appointment process, the Welsh Government does not know if the members it appoints are adequately supported and able to discharge their responsibilities effectively.
- 36 Consequently, there is lack of clarity around where the responsibility lies for providing information to new Welsh Government-appointed members. For example, despite some evidence of NPAs seeking to identify members' development requirements, we found that they are not always clear on what to include in their training and induction plans for Welsh Government appointed members. We also found that members can feel isolated and unsupported in their role as a result. This risks undermining the value of the strategic expertise and national perspective for which members are appointed by the Welsh Government.
- 37 Our report on Bannau Brycheiniog NPA's Change Programme in February 2021¹⁶ highlighted that 'once an appointment is made to a National Park Authority, there is little ongoing support provided by the Welsh Government. This can leave members exposed, especially when they are faced with significant challenges.' The Welsh Government has committed to addressing these weaknesses in the Minister for Climate Change's 2022 Term of Government letter.¹⁷ The Welsh Government has made some progress in supporting members during 2023-24, for example by providing training for all members on governance, landscapes for everyone and the nature and climate emergencies.
- 38 This is important because a lack of clarity and post-appointment support and guidance poses significant risks to good governance. For example, it can lead to members not understanding their role and therefore being unable to effectively take part in decision-making process.

16 Bannau Brycheiniog National Park Authority - Delivery of the Change Programme, February 2021

17 The Minister for Climate Change has responsibility for national parks and sets out her key priorities for NPAs in a Term of Government letter.

The extent to which members are being held accountable for their contribution to the governance of National Park Authorities is unclear

39 Meetings are well-attended by NPA members. They are expected to attend at least 75% of NPA meetings and members attend, on average, more than the minimum expected (**Exhibit 10**). Analysis of the attendance data shows that Members from local authorities attend approximately as often as Welsh Government-appointed members.

Exhibit 10: Member attendance at National Park Authority meetings

National Park Authority	Average meeting attendance by LA members %	Average meeting attendance by WG members %
Bannau Brycheiniog	82	82
Eryri	84	76
Pembrokeshire Coast	92	93
Overall	86	84

Source: Audit Wales analysis of meeting attendance during 2022-23

- 40 There are formal arrangements in place to oversee members' conduct and behaviour. For example, whistleblowing and complaints procedures, behaviour protocols and established standards committees to deal with complaints. This means that NPAs have established the requisite checks and balances to help discharge their statutory responsibilities and provide assurance that any wrongdoing or potential breaches of codes of conduct would be dealt with accordingly.
- 41 Beyond this, however, there are no clear arrangements in place to oversee the effectiveness of NPA members' contributions and how they perform in their role. Although the Welsh Government seeks feedback from NPAs regarding appointees' performance on an annual basis, this exercise is not always carried out in practice and its impact can be limited. For example, through our interviews, some Welsh Government appointed members expressed concerns about the Welsh Government's review of their performance, highlighting a lack of feedback on their effectiveness and how they might improve in their role. Likewise, the contribution of local authority members is not consistently evaluated. This means that, despite being a remunerated¹⁸ role, NPAs cannot demonstrate the value for money provided through members' contributions.
- 42 The lack of feedback on performance also risks NPAs not having a good understanding of the training and development needs of members. We found that, although some NPAs carry out surveys in a bid to inform member training programs, these do not always receive good response rates. Officers also highlighted poor attendance by members at training courses provided. This risks undermining good governance through members not having a clear understanding of their roles and not being equipped to effectively carry out key functions.

18 Each member is paid a basic salary of £4,738 every year for undertaking their role, reflecting an assumption of a minimum expectation of 44 days' work every year. Using this figure, members' total remuneration across the three NPAs amounts to around £250,000 every year. Some members receive additional salary – e.g. authority and committee chairs receive a senior salary on top of their basic salary. NPAs publish an annual statement of remuneration for members.

Weaknesses in how the governance model is being implemented raises questions about its suitability

- 43 The governance model for NPAs is designed to blend democratic accountability with strategic expertise and national perspectives. However, weaknesses in how it is being implemented mean that the strengths of the model 'on paper' do not always ensue in practice. This raises questions about the suitability of the model. **Exhibit 5** highlights our recommendations following this review, including our expectation that the Welsh Government reviews whether the governance model for NPAs is delivering what was intended. It would be prudent for the Welsh Government to reflect on these matters in the context and timescales of its commitment to designating a new National Park covering the Clwydian Range and Dee Valley.



Appendices

1 Audit scope, approach and methods

1 Audit scope, approach and methods

Scope

We sought to answer the question ‘Do special purpose local authorities in Wales have effective governance arrangements that support good outcomes for citizens?’

To answer this, we looked at structures of governance, the model of governance, how members and officers work within structures, and the approaches taken to review and improve governance arrangements.

We did not look at individual member or officer conduct, nor have we formed conclusions about each NPA individually. We have also not assessed governance of AONBs, principal local authorities, or other bodies, for this review.

Approach

Our approach in this audit has been to understand how governance structures are in each Authority ‘on paper’, how they are in reality, and then how they are reviewed. We aimed to provide assurance over the effectiveness of governance in Welsh NPAs overall.

We managed our fieldwork to be mindful of the pressures currently faced by officers. This includes COVID-19 recovery, the cost-of-living crisis, and the officer capacity pressures identified in our report. We ensured that our coverage was sufficient to give an overview of the whole sector but did not detract from service delivery. We worked flexibly to organise our fieldwork with officers.

Our approach was informed by the principles of good governance published by CIPFA and IFAC. These are outlined in the report above (**Exhibit 4**).

Methods

Our fieldwork was completed between January and July 2023, utilising the following methods:

- document review – we reviewed key governance documents from each NPA. This included standing orders, job descriptions of key officers, constitutions, terms of reference, and committee papers. This also included the annual remit letter issued to each NPA by the Welsh Government.
- local interviews – we interviewed both senior officers and members of each NPA.
- national interviews – we interviewed discussed our review with the Welsh Government, as well as gaining perspectives from two English NPAs.
- surveys – we conducted a survey of senior officers who regularly interact with members. We received 26 responses (65%). We also surveyed NPA members and received 28 responses (53%).
- observations – we observed five meetings in each NPA, which included a range of Full Authority, Planning, and other committees.
- website review – we reviewed each NPA website, as well as other relevant websites, such as the WLGA, Welsh Government, and UK Government.



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Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg a Saesneg.

Ffurflen ymateb sefydliadol

Organisational response form

Adroddiad/Report: [Llywodraethu Awdurdodau'r Parciau Cenedlaethol | Audit Wales](#) || [Governance of National Park Authorities | Audit Wales](#)

Dyddiad cwblhau/Completion date:

	Argymhelliad Recommendation	Ymateb y sefydliad Nodwch unrhyw sylwadau perthnasol ar y camau gweithredu mewn ymateb i'r argymhellion Organisational response Please set out here relevant commentary on the planned actions in response to the recommendations	Dyddiad cwblhau Nodwch pryd bydd y camau gweithredu wedi'u cwblhau Completion date Please set out by when the planned actions will be complete	Swyddog cyfrifol (teitl) Responsible officer (title)
R1	Supporting members to carry out their role R1 This report highlights weaknesses in the ongoing support and guidance provided to members appointed by the Welsh Government. To address this, we recommend that NPAs and the Welsh Government work together to: <ul style="list-style-type: none"> • agree the support and guidance that will be provided to NPA members; 	The Authority does not consider that Audit Wales have accurately reflected the support we provide all Members. We are surprised that the report fails to recognise that the Authority has met the standard for the Advanced Charter for Member Development awarded by the WLGA or the existence of a Training and Development Plan which seeks to meet the training and development needs of all Members and is based on a process of Personal Development	Continuous	Democratic Services Manager

<p>Argymhelliad</p> <p>Recommendation</p>	<p>Ymateb y sefydliad</p> <p>Nodwch unrhyw sylwadau perthnasol ar y camau gweithredu mewn ymateb i'r argymhellion</p> <p>Organisational response</p> <p>Please set out here relevant commentary on the planned actions in response to the recommendations</p>	<p>Dyddiad cwblhau</p> <p>Nodwch pryd bydd y camau gweithredu wedi'u cwblhau</p> <p>Completion date</p> <p>Please set out by when the planned actions will be complete</p>	<p>Swyddog cyfrifol (teitl)</p> <p>Responsible officer (title)</p>
<ul style="list-style-type: none"> • agree which of this support and guidance will be provided by the Welsh Government and which will be the responsibility of NPAs; and • clearly communicate this to Welsh Government appointed members 	<p>Reviews. The Authority has in place arrangement to support the development of all Members and we have supported the development of training for all Members across the Designated Landscapes. This training includes a variety of sessions held at local, national, UK and European level. We do not consider it appropriate for specific training and support to be provided to Welsh Government appointed Members and consider that any training needs to be provided to all Members.</p> <p>We will continue with our existing approach to training and development. However, there is always a way of improving our training and</p>		

	Argymhelliad Recommendation	Ymateb y sefydliad Nodwch unrhyw sylwadau perthnasol ar y camau gweithredu mewn ymateb i'r argymhellion Organisational response Please set out here relevant commentary on the planned actions in response to the recommendations	Dyddiad cwblhau Nodwch pryd bydd y camau gweithredu wedi'u cwblhau Completion date Please set out by when the planned actions will be complete	Swyddog cyfrifol (teitl) Responsible officer (title)
		<p>development and identifying new approaches therefore we will work with the other Designated Landscapes, Local Authority partners and Welsh Government to build on the positive work already being undertaken. We will also engage with Welsh Government to ensure there is clarity on who provides what support and training.</p>		
R2	Ensuring member nominations support good governance	There is little evidence in the report to support this recommendation however, these are not matters in the Authority's control. This is a point of action for WLGA, individual Local Authorities		The Authority has no role in appointing Members

<p>Argymhelliad</p> <p>Recommendation</p>	<p>Ymateb y sefydliad</p> <p>Nodwch unrhyw sylwadau perthnasol ar y camau gweithredu mewn ymateb i'r argymhellion</p> <p>Organisational response</p> <p>Please set out here relevant commentary on the planned actions in response to the recommendations</p>	<p>Dyddiad cwblhau</p> <p>Nodwch pryd bydd y camau gweithredu wedi'u cwblhau</p> <p>Completion date</p> <p>Please set out by when the planned actions will be complete</p>	<p>Swyddog cyfrifol (teitl)</p> <p>Responsible officer (title)</p>
<p>This report highlights a lack of clarity and inconsistency in how local authority members are nominated to sit on NPAs. It also highlights a lack of diversity amongst local authority NPA members. To help address this, we recommend that NPAs work with the WLGA and the Welsh Government to:</p> <ul style="list-style-type: none"> • review whether the protocol for nominations remains fit for purpose; • raise awareness of the protocol and how it can support nominations; and • promote its usage amongst relevant local authorities. 	<p>and the Welsh Government. The Authority will be happy to contribute to any review/scrutiny of this if invited to do so. Prior to the last Local Authority elections, the three Welsh NPAs produced a video to inform potential Members of the benefits of being a Member of a National Park Authority. We will work with partners on similar initiatives in the future.</p>		<p>therefore this is a recommendation for others to implement</p>

	Argymhelliad Recommendation	Ymateb y sefydliad Nodwch unrhyw sylwadau perthnasol ar y camau gweithredu mewn ymateb i'r argymhellion Organisational response Please set out here relevant commentary on the planned actions in response to the recommendations	Dyddiad cwblhau Nodwch pryd bydd y camau gweithredu wedi'u cwblhau Completion date Please set out by when the planned actions will be complete	Swyddog cyfrifol (teitl) Responsible officer (title)
R3	<p>Improving accountability for members</p> <p>R3 To provide assurance on members' contribution to the governance of NPAs, and to help inform future training and development provision, we recommend that the Welsh Government, NPAs and constituent local authorities work together to develop an accountability framework for all members of NPAs that:</p> <ul style="list-style-type: none"> • evaluates their contribution to the NPA; and • can be used to help to target support and development to enable NPA members to be effective in their role. 	<p>The Authority currently offers all Members an annual Personal Development Review. The information from this process feeds into a Training and Development Plan and provides an opportunity for all Members to outline issues of concern and development requirements. Therefore, the Authority will continue to implement this process for all Members.</p> <p>All Welsh Government Members undertake an Annual Performance appraisal. The Authority will continue to implement this process.</p>	<p>Continuous, unless the bodies appointing Members decide to change the current system</p>	<p>Democratic Services Manager</p>

	Argymhelliad Recommendation	Ymateb y sefydliad Nodwch unrhyw sylwadau perthnasol ar y camau gweithredu mewn ymateb i'r argymhellion Organisational response Please set out here relevant commentary on the planned actions in response to the recommendations	Dyddiad cwblhau Nodwch pryd bydd y camau gweithredu wedi'u cwblhau Completion date Please set out by when the planned actions will be complete	Swyddog cyfrifol (teitl) Responsible officer (title)
R4	<p>Reviewing whether the model is delivering what was intended R4 This report highlights weaknesses in the implementation of the governance model and how these issues raise questions about its suitability. To ensure it remains fit for purpose and reflects the distinct and different challenges each faces we recommend that, within the timescales of designating a new national park, the Welsh Government reviews the governance model for NPAs.</p>	<p>The report is narrow in its focus and fails to provide an effective overview of Governance in National Parks, with the focus being solely on how Members are appointed and supported. There is little or no evidence in the report that highlights any weaknesses in the Governance of National Parks. There is reference to common concerns shared by several public bodies such as the lack of resources for delivery. These are not deficiencies in Governance but a challenge. Several reports have concluded that the current governance process, provides the necessary balance for the management of special and vulnerable places. There is little evidence in this report to challenge that view.</p>		<p>This is a recommendation for the Welsh Government</p>

<p>Argymhelliad</p> <p>Recommendation</p>	<p>Ymateb y sefydliad</p> <p>Nodwch unrhyw sylwadau perthnasol ar y camau gweithredu mewn ymateb i'r argymhellion</p> <p>Organisational response</p> <p>Please set out here relevant commentary on the planned actions in response to the recommendations</p>	<p>Dyddiad cwblhau</p> <p>Nodwch pryd bydd y camau gweithredu wedi'u cwblhau</p> <p>Completion date</p> <p>Please set out by when the planned actions will be complete</p>	<p>Swyddog cyfrifol (teitl)</p> <p>Responsible officer (title)</p>
	<p>The report has missed an opportunity to look at strategic governance issues e.g. the effectiveness of section 62(2) of the act supports the objectives of National Parks, the ability of NPA to trade and the ability of NPA to manage Natural Resources within its boundaries.</p> <p>This is a recommendation for Welsh Government, however, any governance arrangements for a new National Park should be based on the requirements of that designation rather than perceived weaknesses in the current arrangements.</p>		