

Report of: Audit Wales

Subject: Audit Wales Report on Promoting Access to the Pembrokeshire Coast National Park

Decision Required: Yes

Recommendation

- **Members are asked to receive, note and present any views on the Audit Wales report on Promoting Access to the Pembrokeshire Coast National Park**
- **Members are asked to agree the Management Response**

1. Key messages

The report outlines the views of Audit Wales following work undertaken to assess how the Authority promotes access to the National Park.

2. Background

2.1. Audit Wales undertakes a programme of performance auditing. As part of the Auditor General's local government studies programme in 2024-25, Audit Wales undertook a review of Promoting Access to the Pembrokeshire Coast National Park. This work was originally planned for 2023-24 but due to issues with Audit Wales was deferred to 2024-25.

The audit considered the following:

- Does the Authority have a comprehensive understanding of who uses the National Park and who does not?
- Does the Authority have a clear vision of what it needs to achieve to improve access from underrepresented groups and communities?
- Is the Authority working effectively with the right people and partners to address the barriers facing groups or communities that are underrepresented visitors to the National Park?
- Has the Authority invested sufficient resources so it can deliver long-term and preventative benefits?
- Is the Authority monitoring, evaluating and reviewing progress?

The high-level conclusion was that the:

“Authority delivers a range of activity to encourage and improve access to underrepresented groups but there are weaknesses in its approach to data collection and resourcing. “

A bilingual copy of the report is provided as annex A.

3. Financial considerations

There are no specific financial issues relating to this work, however, the audit does consider how access work is funded.

4. Risk and Compliance Considerations

This work has been undertaken as part of Audit Wales’ performance auditing work. Three recommendations are provided. These are:

1. We identified weaknesses in the Authority’s arrangements to collect and analyse visitor data consistently. To maximise the use of data it gets from interactions with visitors and programme participants, the Authority should establish a more consistent arrangement to collate and analyse demographic information, activity data, and feedback.
2. The Authority does not identify the resources required to deliver its longer-term objectives in relation to improving access. To address this, the Authority should identify the resources required to deliver its actions to improve access to the Park over the short, medium and longer term. This should recognise the risk associated with reliance on grant funding and outline how these risks will be mitigated.
3. The Authority intends to conduct a stakeholder mapping exercise. To ensure that it identifies opportunities to maximise value for money, after the mapping exercise, the Authority should assure itself that it has identified all potential opportunities for collaboration in promoting access to the park.

Officers are required to provide a Management Response in relation to the recommendations. A copy of the Management Response is included as Annex B.

Members are asked to agree the Management Response.

Audit Wales and our Internal Auditors will review how the Authority delivers the actions agreed in the Management Response.

5. Impact on our Public Sector Duties

NA

6.1 Welsh language considerations

A bilingual copy of the report is provided. The Authority ensures that it meets the relevant Welsh Language Standards when undertaking its access work.

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6.2 Biodiversity Duty and Decarbonisation

NA

6.3 Well-being of Future Generations (Wales) Act

The Access work undertaken by the Authority supports is work to meet the requirement of the Well-Being of Future Generations Act.

7. Conclusion

Audit Wales report on Promoting Access to the Pembrokeshire Coast National Park and agree the Management Response.

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Promoting Access to Pembrokeshire Coast National Park

Audit year: 2023-24

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Mae'r ddogfen hon hefyd ar gael yn Gymraeg. This document is also available in Welsh

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Summary report

Why we did this audit

Our audit duties

- 1 Pembrokeshire Coast National Park Authority ('the Authority') has to put in place arrangements to get value for money for the resources it uses, and the Auditor General has to be satisfied that it has done this.
- 2 We undertook this audit to help discharge the Auditor General's duties under section 17 of the Public Audit (Wales) Act 2004. It may also inform a study for improving value for money under section 41 of the 2004 Act, and/or an examination undertaken by the Auditor General under section 15 of the Well-being of Future Generations Act (Wales) 2015.

Our objectives for this audit

- 3 To provide assurance that the Authority has proper arrangements to secure value for money in its use of resources to promote access to the National Park (the Park).
- 4 To explain the importance of people from all walks of life exploring and visiting national landscapes and outline Welsh Ministers' priorities for National Park Authorities (NPAs).
- 5 To assure people that the Authority encourages a wide range of diverse visitors, is collaborating effectively with key partners, and to determine how well it is delivering statutory responsibilities.

Why promoting access is important

- 6 A range of organisations across the public, third, and charity sectors have publicised the benefits of accessing nature. The Office for National Statistics calculates that the health benefits from outdoor recreation in 2021 had a value of £22.7 billion in Wales¹. This is through improving both physical and mental health from activity. Promoting access can benefit public health and wellbeing and in turn deliver economic benefits through a healthier population.
- 7 Promoting access also helps the Authority to act within its legal framework. One of the Authority's two statutory purposes² is to promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public. To achieve this, the Authority needs to ensure activity is aimed at the whole population to maximise participation.

¹ ONS, [Health benefits from recreation, natural capital, UK: 2022](#)

² Environment Act 1995

- 8 Promoting access also helps the Authority meet national policy and priorities. In 2022, the Welsh Government asked Welsh NPAs to ‘increase engagement in opportunities for people in vulnerable or disadvantaged groups and under-represented communities to benefit from the landscapes you manage’³. The Welsh Government supported this by funding and included the provision of a national lead officer for promoting Inclusion, Diversity and Governance Excellence ‘to drive up diversity and equality’ within National Parks. The lead officer also aimed to and support National Parks to them meet the socio-economic duty, introduced in March 2021.
- 9 UK Government research⁴ found that most visits to English National Parks are repeat visits made by people who were relatively better off and not representative of society. It also found that other communities visited the parks less often. These include older and younger people, people from the Black, Asian and Minority Ethnic community, and people from more deprived communities.



What we looked at and what does good look like⁵

- 10 We have taken a broad definition of access, including both physical access constraints and broader barriers to enjoying the Park, such as cultural or socio-economic barriers.
- 11 We have not considered other matters within the remit of the Authority nor wider matters relating to the socio-economic profile of the Authority, such as the delivery of housing through its planning function.
- 12 We have limited our review to reflect the Auditor General's duty to satisfy himself of the arrangements the Authority has in place to secure economy, efficiency, and effectiveness (commonly known as value for money). As a result, we have not evaluated the projects delivered by the Authority to promote access. Therefore, we make no judgement on the sufficiency or nature of the actions to promote access within the Park. Our focus was on the arrangements the Authority has put in place to meet its objectives, including how it planned, resourced and monitors them. We recognise, however, the considerable work that the Authority has undertaken to promote access to the Park.
- 13 The audit sought to answer the overall question – **Is the Authority doing all it can to encourage and improve access to the National Park from**

³ Welsh Government, [Term of Government Remit Letter](#), May 2022

⁴ DEFRA, [Landscapes Review](#), September 2019

⁵ Defined as ‘what should be’ according to laws or regulations, ‘what is expected’ according to best practice, or ‘what could be’, given better conditions.

underrepresented groups? To do this we looked to answer the following questions:

- Does the Authority have a comprehensive understanding of who uses the National Park and who does not?
- Does the Authority have a clear vision of what it needs to achieve to improve access from underrepresented groups and communities?
- Is the Authority working effectively with the right people and partners to address the barriers facing groups or communities that are underrepresented visitors to the National Park?
- Has the Authority invested sufficient resources so it can deliver long-term and preventative benefits?
- Is the Authority monitoring, evaluating and reviewing progress?

- 14 Our audit criteria are set out in **Appendix 1**. They were developed using our cumulative knowledge and the National Parks Wales 2021 policy statement 'Landscapes for Everyone'.



Our audit methods and when we undertook the audit

- 15 Our findings are based on document reviews and interviews with officers and representatives of groups involved in projects within the National Park. We also visited the National Park. Our findings are limited to these sources. We undertook this work during August and September 2024.



What we found

- 16 Overall, we found that **the Authority delivers a range of activity to encourage and improve access to underrepresented groups but there are weaknesses in its approach to data collection and resourcing**. We set out below why we reached this conclusion.

Does the Authority have a comprehensive understanding of users?

- 17 The Authority has a general understanding of who visits the park and the potential barriers that either prevent, or make it more difficult, for some groups to visit. But its understanding is not comprehensive nor makes the best use of information it already has.
- 18 The Authority lacks a central mechanism for collecting visitor data. As a result, data collection and analysis are uncoordinated. This may mean that it does not always identify trends or gaps in data. Making better use of this data in one mechanism may enable the Authority to make interventions with broader impact.

- 19 The Authority has used its understanding of users of the Park to inform its activity. For example, it identified gaps in its engagement with some communities, including for example the LGBTQ+ community. This has led to attendance at Pride events to boost the Authority's engagement with the community.
- 20 However, currently outside of the initiatives it currently has in place, the Authority cannot assure itself that it knows which communities it may not engage with. As a result, the Authority does not know if the full diversity of the population is visiting the park due to the absence of more comprehensive data. As a result, it also lacks a comprehensive understanding of barriers to access for these communities.
- 21 Involving the full diversity of the population is also important to help meet the expectations set out by Welsh Ministers above. We acknowledge that it is not practical for the Authority to collect data for all visitors to the park, in particular visitors who do not engage directly with the Authority. But the absence of a comprehensive approach makes it difficult for the Authority to effectively target its activity and therefore achieve value for money.
- 22 The Authority has a high-level understanding of its socio-economic profile. The Authority has identified a range of barriers to access for some communities. However, the Authority does not have a thorough understanding of the long-term factors that may impact on access for underrepresented groups. We recognise that this is in part linked to the short-term nature of grant funding for many projects. The Authority has, however, delivered some projects, such as the 'First 1,000 days project' intended to deliver longer-term outcomes. This project, delivered with Pembrokeshire County Council, aims to connect families who do not regularly access open space with nature to improve their wellbeing. Understanding the long-term factors and the socio-economic profile of visitors is important to help the Authority to target its resources, including actions to help prevent barriers to access from occurring or getting worse.

Does the Authority have a clear vision for improving access?

- 23 The Authority has set out its vision for improving access and communicates this through both its operational and strategic plans. For example, the Rights of Way Improvement Plan 2018-2028⁶ seeks to address the need to improve access opportunities for disabled visitors. The Authority also considers the impact of its vision for improving access on its well-being objectives and the national well-being goals. This helps reduce the potential for duplication and can help to identify opportunities to secure multiple benefits.
- 24 The Authority has involved a range of groups in shaping its vision through projects, stakeholder surveys, and workshops. For example, we observed participants in the Authority's 'Roots to Recovery' programme being heavily involved in designing

⁶ The Rights of Way Improvement Plan 2018-2028 has been adopted by the Authority, and Pembrokeshire County Council.

project activities. This project aims to enable participants to enjoy the Park and improve their mental health. Involving communities helps the Authority to design actions that will meet their needs and reduces the risk of not achieving value for money.

- 25 The Authority does not routinely plan delivery of projects over the longer term to help deliver its strategic vision or its corporate plans. The Authority plans activity on shorter timescales than its corporate plans. We recognise that this is partially due to the short-term nature of grant funding. However, by not planning over a longer-term timescale, the Authority risks taking short-term actions that may not secure value for money over the longer term.

Is the Authority working effectively in partnerships to promote access?

- 26 The Authority is committed to involving and engaging a range of people and partners to improve access to the National Park.
- 27 The Authority has identified key groups to involve in designing and delivering work. It plans to add to this through a formal stakeholder mapping exercise. Mapping out partners and potential partners reduces the risk of the Authority not identifying opportunities to improve access and value for money through, for example, the pooling of resources and expertise.
- 28 The Authority already works with a range of partners to improve access. For example, the Authority collaborates with Mind to deliver the 'Roots to Recovery' project. This has generated positive feedback from both participants and the Authority's officers.
- 29 The Authority enables collaboration with other designated landscapes to improve access. For example, the Authority hosts the Welsh Designated Landscapes Inclusion, Diversity and Governance Excellence Strategic Lead Officer. The Officer's action plan spans all designated landscapes. This offers a potential opportunity for collaboration activity with other National Parks and Areas of Outstanding Natural Beauty (AONB) to maximise the impact of this agenda.

Has the Authority strategically resourced its activity to promote access?

- 30 The Authority has not identified how it will resource its plans to improve access over the longer term, and largely relies on short-term grant funding.
- 31 We recognise the challenging financial context that the public sector operates within and the consequences on individual bodies, like the Authority. However, the Authority has not identified how it will resource its plans to improve access over the longer term. For example, it has not yet identified the resources required to deliver its draft Partnership Plan 2024-29. The draft Plan recognises that 'inclusion related activities are normally reliant on time bound project funding'.

- 32 The Authority allocates some core funding to activities that promote access but generally funds this activity with grants. The Authority recognises the potential risks of relying on grant funding, such as the funding ending and not being replaced. It has taken steps to reduce these risks, including setting up a charitable trust and employing fundraising officers to access additional funding. The Authority has been successful in obtaining external revenue to support projects that would not otherwise have been possible.
- 33 However, by not setting out the resources needed to deliver its objectives in the longer term, the Authority increases the risk of them not being deliverable. The Authority's current approach also risks delivering actions that are shaped by grant funding cycles rather than identified needs. Whilst we recognise that this is a difficult issue to tackle, particularly in the current challenging financial context, it may be a limit on the impact that the Authority could achieve.

Is the Authority monitoring, evaluating, and reviewing progress?

- 34 Measuring the impact of some initiatives is clearly extremely challenging. Not all interventions lead to easily collected and reported performance measures, which we accept and note. The Authority has demonstrated to external funders that its initiatives, such as Roots to Recovery, deliver positive outcomes to participants through boosting their wellbeing. Measuring and understanding outcomes is critical to understanding what makes initiatives effective and, therefore, demonstrate their value for money.
- 35 The Authority draws on qualitative and quantitative information to measure the impact of its work to increase access. For example, the Health, Well-being and Access Delivery Plan specifies the metrics the Authority will use to measure the impact of its work. Authority members are also provided with reports on the progress of individual projects. This provides Authority members with the opportunity to oversee and scrutinise performance.
- 36 The Authority does not have a systematic approach to learning lessons from project delivery, or from feedback from service users. Feedback is collected on individual projects but is not collated to provide an overall view of the visitor experience. This increases the risk that the Authority will not identify opportunities to improve the value for money of its approach.



Our recommendations for the Authority

Exhibit 1: our recommendations for the Authority

Recommendations

Improving the Authority's evidence base to inform its planning

R1 We identified weaknesses in the Authority's arrangements to collect and analyse visitor data consistently. To maximise the use of data it gets from interactions with visitors and programme participants, the Authority should establish a more consistent arrangement to collate and analyse demographic information, activity data, and feedback.

R2 The Authority does not identify the resources required to deliver its longer-term objectives in relation to improving access. To address this, the Authority should identify the resources required to deliver its actions to improve access to the Park over the short, medium and longer term. This should recognise the risk associated with reliance on grant funding and outline how these risks will be mitigated.

R3 The Authority intends to conduct a stakeholder mapping exercise. To ensure that it identifies opportunities to maximise value for money, after the mapping exercise, the Authority should assure itself that it has identified all potential opportunities for collaboration in promoting access to the park.

Appendix 1

Audit questions and criteria

Overall question: Is the Authority doing all it can to encourage and improve access to the National Park from underrepresented groups?

Level 2 questions	Level 3 questions	Criteria
2.1 Does the Authority have a comprehensive understanding of who uses the National Park and who does not?	<ul style="list-style-type: none">• 2.2.1 Has the Authority recently analysed who visits the National Park?• 2.1.2 Has the Authority recently identified which groups or communities do not visit the National Park?• 2.1.3 Does the Authority have a thorough understanding of its socio-economic profile?• 2.1.4 Has the Authority identified barriers facing groups or communities that are underrepresented visitors to the National Park?• 2.1.5 Does the Authority have a thorough understanding of the long-term factors that may impact on access opportunities for underrepresented groups?	<ul style="list-style-type: none">• The Authority knows which groups and communities visit the National Park.• The Authority knows which groups and communities do not visit the National Park.• The Authority has a thorough understanding of its socio-economic profile.• The Authority understands and knows the barriers facing groups and communities that are underrepresented visitors to the National Park.• The Authority has a thorough understanding of the long-term factors that reduce access opportunities for underrepresented groups.

Level 2 questions	Level 3 questions	Criteria
2.2 Does the Authority have a clear vision of what it needs to achieve to improve access from underrepresented groups and communities?	<ul style="list-style-type: none"> • 2.2.1 Does the Authority have a comprehensive plan to address barriers facing underrepresented groups and communities? • 2.2.2 Has the Authority involved relevant groups or communities in shaping its approach? • 2.2.3 Is the Authority taking an integrated approach? • 2.2.4 Is the Authority planning over an appropriate timescale? • 2.2.5 Is the Authority's approach driven by clear and effective leadership? 	<ul style="list-style-type: none"> • The Authority has a comprehensive plan to address barriers facing underrepresented groups and communities. • The Authority fully involves relevant groups and communities in helping to shape its approach. • The Authority is taking an integrated approach and considers issues across all services and all key partners. • The Authority has a strong track record of engaging stakeholders with inclusive opportunities to access and use the National Park. • The Authority actively promotes its work and this is resulting in positive impacts on addressing social exclusion, improving health and wellbeing and alleviating the impact of poverty. • The Authority has set a range of targets for delivery over an appropriate timescale. • The Authority has good track record of delivering actions and plans and taking remedial action where necessary. • The Authority has clear and effective leadership and increasing access to the National Park is promoted consistently and clearly at the highest levels. • The Authority has good evidence to draw showing the value of National Parks for health and wellbeing and their role to help reduce social exclusion and alleviation of the barriers posed by poverty.

Level 2 questions	Level 3 questions	Criteria
2.3 Is the Authority working effectively with the right people and partners to address the barriers facing groups or communities that are underrepresented visitors to the National Park?	<ul style="list-style-type: none"> • 2.3.1 Has the Authority identified who it needs to involve in designing and delivering its work? • 2.3.2 Is the Authority effectively involving the full diversity of the population? • 2.3.3 Is the Authority working with the right partners? • 2.3.4 Is the body collaborating effectively? • 2.3.5 Is the Authority learning lessons from how it works with others? 	<ul style="list-style-type: none"> • The Authority demonstrates the value of National Parks for health and wellbeing and their role to help reduce social exclusion and alleviation of the barriers posed by poverty by contributing towards evidence-based policy and practice. • The Authority tailors opportunities for all people in Wales to benefit from the natural environment and landscape features of National Parks. • The Authority works with the right people, organisations and communities to design inclusive services that encourage access for all. • The Authority effectively involves the full diversity of the population in developing its programmes of work to ensure everyone is provided with an equal opportunity to access and use the National Park. • The Authority is open to challenge and learning to ensure its services are fit for purpose and delivering what is intended.

Level 2 questions	Level 3 questions	Criteria
2.4 Has the Authority invested sufficient resources so it can deliver long-term and preventative benefits?	<ul style="list-style-type: none"> • 2.4.1 Has the Authority set aside sufficient resources to encourage access and use of the national park by underrepresented people and communities? • 2.4.2 Does the Authority understand the long-term resource implications? • 2.4.3 Is the Authority allocating resources to deliver better outcomes over the long term? • 2.4.4 Has the Authority conducted demographic modelling to ensure resources are appropriately targeted to attract underrepresented groups in the future? 	<ul style="list-style-type: none"> • The Authority has set aside sufficient resources to improve access and encourage people to access and use the National Park. • The Authority reviews its use of resources to ensure that it is able to target future allocations on underrepresented visitor groups and communities. • The Authority has conducted demographic modelling to ensure resources are appropriately targeted to attract underrepresented groups in the future.

Level 2 questions	Level 3 questions	Criteria
2.5 Is the Authority monitoring, evaluating and reviewing progress?	<ul style="list-style-type: none"> • 2.5.1 Is the Authority drawing on qualitative and quantitative information to measure the impact of its work? • 2.5.2 Do Authority members effectively scrutinise performance? 	<ul style="list-style-type: none"> • Tailoring opportunities for all people in Wales to benefit from the natural environment and landscape features of National Parks. • The Authority has developed a suite of appropriate and relevant performance measures/metrics that enable it to judge how it is improving access and use of the national park by underrepresented groups and communities. • The data the Authority uses allows it to demonstrate the positive impact of people accessing the National Park on people's wellbeing and social outcomes; impact on poverty; and impact on health. • The Authority monitors and evaluates performance on a regular basis and takes corrective actions as a result of its review work.



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

Management response form

Audit Wales use only	
Audited body	Pembrokeshire Coast National Park Authority
Audit Name	Promoting access to Pembrokeshire Coast National Park
Issue date	February 2025

Ref	Recommendation	Management Response <small>Relevant commentary on the planned actions in response to the recommendations</small>	Completion date <small>Completion date for planned actions</small>	Responsible officer (title)	Audit Wales only
R1	We identified weaknesses in the Authority's arrangements to collect and analyse visitor data consistently. To maximise the use of data it gets from interactions with visitors and programme participants, the Authority should establish a more consistent arrangement to collate and analyse demographic information, activity data, and feedback.	<p>Expectations in terms of collation of visitor data are unrealistic and would not be feasible at a level to make the data meaningful, it also risks diverting funding from more meaningful activities. However, we will</p> <ol style="list-style-type: none"> 1. Utilise data from wider Welsh Government visitor data to inform our work, and explore opportunities with relevant 	<ol style="list-style-type: none"> 1. 31/03/26 2. This work is led by our Access & PROW Manager. We are currently recruiting for a new officer. This work will be incorporated into the work 	<ol style="list-style-type: none"> 1. Director for Nature and Tourism 2. Access and PROW Manager 3. Head of Engagement and Inclusion 	

Ref	Recommendation	Management Response Relevant commentary on the planned actions in response to the recommendations	Completion date Completion date for planned actions	Responsible officer (title)	Audit Wales only
		<p>bodies for them to include wider range of demographic data in the visitor information they collect and report.</p> <p>2. Authority periodically carries out a coast path survey and this is referenced in our coast path management strategy and we will explore feasibility of wider demographic data being collected in the next iteration of this.</p> <p>3. Implement annual survey which is already in development with our project and volunteer participants and create framework to ensure</p>	<p>programme once the new officer is appointed.</p> <p>3. 31/3/2026 (although aim is that it will be implemented on an ongoing basis)</p> <p>4. 31/3/2026 (although aim is that it will be implemented on an ongoing basis)</p>	<p>4. Head of Regenerative Tourism</p>	

Ref	Recommendation	Management Response Relevant commentary on the planned actions in response to the recommendations	Completion date Completion date for planned actions	Responsible officer (title)	Audit Wales only
		<p>feedback and information gathered by the Engagement and Inclusion Team is fed through to inform wider corporate strategic planning, improvement activities and project development.</p> <p>4. Explore feasibility of gathering demographic related data as part of any feedback surveys developed for surveys for Centres and Events and Activities Programme.</p>			
R2	The Authority does not identify the resources required to deliver its longer-term objectives in relation to	This recommendation fails to reflect the challenging situation that the Authority operates under and the	31/3/2026	Performance and Compliance	

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	improving access. To address this, the Authority should identify the resources required to deliver its actions to improve access to the Park over the short, medium and longer term. This should recognise the risk associated with reliance on grant funding and outline how these risks will be mitigated.	benefits of being able to utilise grant funding to support a wide range of activities. A number of staff have fundraising as key elements of their job descriptions. However, this can be included as an area of consideration as part of wider activities in 2025/26 in terms of mid/long term financial mapping and scenario planning for Authority and departments to manage future deficits.			
R3	The Authority intends to conduct a stakeholder mapping exercise. To ensure that it identifies opportunities to maximise value for money, after the mapping exercise,	The Authority has informed Audit Wales that this exercise has been completed. Since it remains as a recommendation, we will utilise this with a further exercise looking at this	31/3/2026	Performance and Compliance Officer/ Head of Engagement and Inclusion / National	

Ref	Recommendation	Management Response Relevant commentary on the planned actions in response to the recommendations	Completion date Completion date for planned actions	Responsible officer (title)	Audit Wales only
	the Authority should assure itself that it has identified all potential opportunities for collaboration in promoting access to the park.	information against our wider partnership monitoring framework and revised partnership plan to identify priority areas for collaboration in support of promoting access to the Park.		Park Management Plan and Marine Officer	