

Number: WG34071



Llywodraeth Cymru  
Welsh Government

Welsh Government  
Green Paper Consultation – summary of response

# Strengthening Local Government: Delivering for People

July 2018

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

## Contents

1. Introduction .....	3
2. Methodology.....	4
3. Overview of responses.....	6
4. Summary of Responses to Specific Consultation Questions.....	12
5. Next Steps.....	48
6. List of Respondents.....	49

## **1. Introduction**

1.1 The Welsh Government consulted on the Green Paper 'Strengthening Local Government: Delivering for People' (the Green Paper) for a 12 weeks period from 20 March 2018 to 12 June 2018.

1.2 The Green Paper set out proposals for stronger and more empowered local government with the powers, capacity and capability to provide bold, determined and focused leadership for the future of communities in Wales. The Green Paper sought views on the future structure of local government and a practical approach to achieving it; a proposed footprint and common factors which would underpin the footprint; the proposed transition process and electoral arrangements; councillor numbers and remuneration; increased powers and flexibilities to local government; opportunities for shared services and an appropriate change support package.

1.3 This document sets out a summary of the response to the Green Paper.

1.4 Responses to the Green Paper consultation will be published later this summer.

## **2. Methodology**

### **Consultation documentation**

2.1 The principal consultation document posed 15 key questions (33 questions in all, including sub questions) on strengthening local government.

2.2 In addition to the principal consultation document, the Welsh Government also produced Youth Friendly and Easy Read versions of the consultation paper. They were made available on the Welsh Government's website. The Youth Friendly and Easy Read documents were abridged to suit the target audience for these accessible versions.

2.3 In total, 177 responses were received to the principal consultation. One response was received to the youth-friendly questions, which has been incorporated into the analysis of the responses to the principal consultation paper.

### **Cabinet Secretary for Local Government and Public Services - consultation meetings and events**

2.4 Consultation is not just about formal documents and responses. It is an on-going process of engagement.

2.5 The Cabinet Secretary for Local Government and Public Services undertook a series of engagement meetings and events throughout the consultation period. The majority of those organisations that the Cabinet Secretary met with also submitted a formal consultation response.

#### **Local authority events:**

- Half-day symposium - Attended by majority of local authorities, typically Leaders, Chief Executives and Cabinet Members.
- Individual local authority meetings - immediately prior to consultation launch and during consultation period.

#### **Meetings with Other public services, third sector and private sector:**

- Local Health Boards & NHS Trust Chairs & Chief Executives.
- Police and Police and Crime Commissioners.
- North Wales Regional Leadership Board.
- Third Sector - Wales Council for Voluntary Action, Electoral Reform Society Cymru, Building Communities Trust and Third Sector Support Wales.
- Federation of Small Businesses & Confederation of British Industry.

#### **#StrongLocalGov**

2.6 The Welsh Government also ran the #StrongLocalGov campaign in parallel to the formal consultation. This involved using a simpler (one side of A4) narrative picking out the key points of the consultation that would be relevant to the general public. This was accompanied by a 'Smart Survey' (online survey) as the primary

mechanism for gathering feedback. The full formal consultation was signposted to those wanting more information. The Smart Survey is useful in identifying broad opinions but percentage data is unreliable and so has not been used to draw firm conclusions within this summary. The majority of respondents to the Smart Survey were opposed to mergers. It is worth noting that two thirds of the respondents to the Smart Survey were from two local authority areas Caerphilly and Rhondda Cynon Taff.

### 3. Overview of responses

3.1 In total 178 responses to the Green Paper were received from organisation and individuals.

<b>Respondent Type</b>	<b>Number</b>	<b>%</b>
Local Authority	22	12
Other Public Sector Body	9	5
Member of the Public	74	41
Town and Community Council	16	9
Regulatory Bodies / Commissioners	4	2
Trade Unions or Social Partners	5	3
Third or Voluntary sector	8	5
Other	33	19
Not Known / Not disclosed	7	4
<b>Total</b>	<b>178</b>	<b>100</b>

3.2 A list of respondents is included at Section 6.

3.3 The consultation asked for views under the following main chapters of the Green Paper:

- Options for Strengthening Local Government.
- Finding agreement for a future footprint for local government.
- A clear and democratically led process.
- Strengthening local government and support through the process of change.

3.4 The consultation also asked questions in relation to the specific impact assessments which were published alongside the Green Paper.

3.5 An overview of the responses to the principles of creating fewer, larger authorities is provided below. A summary of responses to each of the questions asked under each of the main chapters of the Green Paper is provided in Section 4.

#### **Fewer, larger authorities**

3.6 Overall 138 respondents provided a view on the principle of merging authorities. Of those who expressed a view on the principle of creating fewer, larger authorities, 54 per cent were in favour of the proposals within the Green Paper with 46 per cent opposed.

3.7 Those who were in favour of the proposals in the Green Paper to reduce the number of local authorities believed this would deliver simplified and more effective collaborative working, significant economies of scale and be a more efficient use of limited public resources. By far the greater positive response was from members of the public. In addition, the third sector and social partners were more in favour than opposed. There was no single consensus on which of the three options proposed in the Green Paper would be preferable with some respondents preferring a quick and comprehensive transition process and others preferring a more considered voluntary

process. Others agreed there should be mergers but wanted a more comprehensive boundary review to decide the new areas.

3.8 Those who were not in favour of the proposals within the Green Paper believed larger local authorities would potentially reduce democratic accountability and move decision-making further away from local communities. Many did not believe the case for change had been made within the Green Paper and had concerns over the costs and benefits of the proposals, particularly at a time of austerity. Many believed the benefits that were being sought could be achieved through greater regional collaboration on a voluntary basis particularly around specific services such as education and health and social care.

3.9 It is worth noting that a number who disagreed with the proposals in the Green Paper did accept that voluntary mergers might be appropriate for some authorities, particularly smaller ones. The local authority responses showed as being mostly opposed to mergers, this was the largest sector response. In the other sectors where a preference was expressed, excluding members of the public, the responses were fairly even between those in favour and those opposed.

### **Local authority responses**

3.10 In total there were 22 responses from the local authority sector: 21 from local authorities themselves and one from the WLGA. Two responses were received from the local authority leaders of the Cardiff City Regional Deal and the North Wales Growth Deal. These responses are considered in the 'other' category.

3.11 The response from local government is clear that, in their view, the answer to the challenges they face is more money and continued voluntary joint or regional working. 19 of the respondents, including the WLGA, were not in favour of mergers, three local authorities were open to the idea of mergers, although this was qualified. In general, the local authorities which were not in favour stated that the business or financial case for mergers had not been made and the overall cost and benefit was not clear. They also suggested that creating larger authorities would create a democratic deficit and move decisions further away from communities and citizens and limit their ability to respond to local issue in creative ways.

3.12 It was clear from the responses that local government was strongly opposed to option 3, with their reservations focused either on the case for change not being made and / or that the timescales were not realistic.

“... the timetables are incredibly tight especially those relating to the determination of electoral arrangements for the new authorities” (Denbighshire County Council)

3.13 There was also opposition from local government to option 2 although it was less pronounced than the opposition to option 3, comments focused on the complexity and potential for drift.

“The proposal around a phased approach to mergers leading up to 2026 will effectively kick the matter into the long grass...” (Swansea County Council)

3.14 Local government is open to option 1, provided there is no map.

“...there may be opportunities for other smaller authorities to merge and this should be done on a voluntary basis.” (Newport City Council)

3.15 Swansea, Cardiff and Neath Port Talbot were all open to the idea of mergers. Neath Port Talbot saw some merit in Option 2 and merging with Swansea by 2026. They were doubtful that mergers could be achieved by 2022. Swansea, on the other hand, was in favour of a rapid merger: “if there is a will to do this then it needs to be done rapidly that is by 2022”. Cardiff were open to the idea of structural reform but consider a full boundary review as the best way to approach this.

### **Other public sector respondents**

3.16 Nine responses were received from other public sector bodies in Wales; this included three Health Boards, one Port Health Authority, a Police and Crime Commissioner, the Local Democracy and Boundary Commission for Wales (LDBCW), the Electoral Commission, Natural Resources Wales and the Welsh NHS Confederation.

3.17 In terms of the principles of mergers themselves few commented, although the Port Health Authority disagreed with the principle of mergers.

### **Responses from members of the public**

3.18 There were a total of 74 responses received from members of the public a further seven were received where no contact information was provided. For the purpose of this overview, these have been considered as responses from members of the public.

3.19 Of those who responded on the principle of mergers, 71 per cent were in favour of mergers with 29 per cent against. The public response was by far the largest in favour of local authority mergers. Those in favour were in general agreement with the proposition and rationale within the Green Paper. Respondents felt there was a need for change, they were unhappy with the current local authorities and felt change would bring greater efficiencies and effectiveness to local authorities.

“The proposal will strengthen local government and will alleviate the need to cut front line services, but at the same time deliver financial sustainability.” (Anon)

3.20 Many were keen for the Welsh Government to “get on with it” and some wanted the proposals to go further with a small number in favour of returning to the pre-1996 county council areas. Some did, however, want a more voluntary approach to mergers.

“I believe that the current arrangements are inefficient and that a reduced number of authorities will allow efficiency from scale and the opportunity to take advantage of new technology and employ staff with greater expertise” (Anon)



3.21 Of those not in favour of mergers, a number of reasons provided. The most prevalent reason was they believed the current structure was working well, alongside regional approaches where appropriate. Some were concerned that creating larger authorities would be expensive and affect democratic accountability and localism - with decisions becoming more remote from communities.

“... there will be a lack of democratic oversight and representation...” (Anon)

3.22 A number of responses rejected the principle of mergers based on the proposed ‘merger partner/s’ and local issues associated with this. A small number of responses considered the need for a full boundary review or a full review of the purpose of the local government and Public Sector as a whole.

“There needs to be further consideration of the purpose and capacity of local government and relationships of local authorities with the populations they represent and with other public services that serve that population...” (Anon)

### **Responses from Town and Community Councils**

3.23 There were a total of 16 responses received from Town and Community Councils (TCC) across Wales. (There are over 730 Town and Community Councils throughout Wales.)

3.24 Seven of the TCC responses were in favour of mergers with eight against, two did not express a view. Those who agreed with the principle of mergers wanted to see greater alignment with regional structure to facilitate and improve collaborative working although they wanted to ensure that localised delivery and decision making was maintained.

“The new authorities need alignment with other authorities across the board, there are too many misalignments which will lead to difficulties on cross board process and procedure.” (Mold Town Council)

3.25 Of those who were not in favour there was concern that further centralisation would remove power, accountability and accessibility from local communities and remove the linkages with TCCs. They also believed that the case for merger in terms of costs had not been made.

“There still seems to be lack of clarity re the entirety of the vision, cost and savings, capacity and capability of LAs to effectively bring forward changes.” (Pontypool Community Council)

### **Responses from Regulatory Bodies / Commissioners**

3.26 Four responses were received. These were from the Older People’s Commissioner, the Welsh Language Commissioner, the Independent Remuneration Panel for Wales and the Auditor General for Wales. None commented specifically on the merits of local government mergers as a policy proposal. The majority of responses focussed on providing constructive feedback on the potential impact or opportunities in their areas of responsibility.

## **Responses from Trades Unions and Social Partners**

3.27 In total five responses were received from trades unions or social partners, this included; the Association of Local Authority Chief Executives (ALACE); Unison Cymru; The National Association of Schoolmasters Union of Women Teachers (NASUWT); Undeb Cenedlaethol Athrawon Cymru (UCAC) and the Wales Trades Union Congress (TUC). Most of the responses acknowledged the need for change and the importance of the alignment of boundaries across public services. The majority highlighted the need for any change to be appropriately funded and sought assurance that the workforce would be supported and protected during any change process. They also welcomed early engagement in any change process.

## **Responses from Third or Voluntary Sector**

3.28 There were eight responses from third sector organisations including one from the WCVA; the remainder covered a range of organisations from local community groups to county-wide associations.

3.29 Only five of the respondents commented directly on the principle of creating fewer, larger local authorities, three agreed and two disagreed with mergers. The respondents in favour did not expand on their reasoning save to agree with the proposals as outlined in the Green Paper. Those who disagreed did not think the case had been made or that mergers would weaken local accountability and connectivity with communities.

## **Responses from Other respondents**

3.30 This was the second largest consultation group with 33 responses in total. Nine of these were from local or national political parties or groupings and 11 from advice networks, associations or representative organisations. (National Advice Network Wales, Country Land and Business Association Wales, Cymdeithas Cyfieithwyr Cymru (the association of welsh translators and interpreters), The Association of School and College Leaders (ASCL) Cymru, Association of Electoral Administrators in Wales, Royal College of Nursing Wales, Federation of Museums and Art Galleries of Wales, Royal Town Planning Institute, Chartered Institute of Housing Cymru, Society of Local Authority Chief Executives (SOLACE) Wales, Chartered Institute of Public Finance and Accountancy (CIPFA), Association of Directors of Social Services (ADSS) and Chartered Institute of Housing Cymru). There were additional responses from children's interest groups (Pupils 2 Parliament (the sample grouping of young people were from Powys only) and Children in Wales), religious groups (Cytun – Churches in Wales, Catholic Education Service and the Church of England Education Office), City / Growth deal areas (Cardiff Capital Region City Deal and North Wales Regional Leadership Board) and one each from Geldards, Tai Ceredigion Monitoring and the Hodge Economic Research Project.

3.31 Of those who responded nine agreed with the need to create fewer, larger local authorities with 11 disagreeing. 13 did not express an opinion either way. Of those in favour, two were from political parties or groupings, three were from

associations or representative organisations (National Advice Network Wales, Royal College of Nursing Wales, ASCL Cymru), and one each from Geldards, Hodge Economic research group, Tai Ceredigion Monitoring Group and Children in Wales. Respondents agreed that mergers would provide economies of scale and strengthen regional working and collaboration and mergers would ensure that all local authorities had the resources and capability to provide sustainable and effective local public services.

“We would support the development of fewer / larger authorities which we would see as being beneficial in being able to deliver many services on a bigger scale than is currently the case, especially for more costly and specialist services for example, for disabled children.” (Children in Wales)

3.32 Of those who were not in favour of mergers six were from political parties or groupings, two from the City / Growth deal areas, two representative organisations (SOLACE, ADSS) and one children’s group (Pupils 2 Parliament. The reasons for opposing mergers were predominantly around a view that there was no clear case for structural reform and that regional approaches were preferred. Additionally some respondents felt the cost could be considerable during a time of ongoing austerity and could cause too much disruption.

“It was the unanimous view of the Forum that the proposal to make significant changes such as those proposed in the Green Paper is unwise in the present age of austerity since there are significant costs allied to making such changes.” (Torfaen Labour Local Campaign Forum)

## **4. Summary of Responses to Specific Consultation Questions**

**Q1. In Chapter 2 of the Green Paper, we restated our commitment to regional working in key areas but recognised the need for this to be supported by further change. In chapter 3, we set out the broad options for moving toward fewer, larger local authorities and summarised features of the process which would be common to each option**

**a) What practical steps could the Welsh Government take to make current regional working easier and more effective, for example in relation to education consortia, social services and the City Regions and City and Growth Deals?**

4.1.1 In all, 70 percent of respondents commented under this question. A number of respondents took the opportunity to comment on the merits, or otherwise, of regional working itself as opposed to the practical steps which Welsh Government could take to make current regional working easier. Of those who responded in this way, it was fairly balanced between those who agreed with regional or collaborative working and those who did not.

4.1.2 The majority of local authority respondents believed regional working or collaborative approaches were preferable to wholesale reform. A small number of respondents expressed a view that the local government reform proposals could have a negative impact on current regional working approaches.

4.1.3 Of those who responded to the question directly, there were a number of suggestions of practical steps which could be taken to make current regional working easier, these included:

- Greater alignment of boundaries / ensuring common boundaries at a regional level for all public services, including Public Service Boards and other sub regional arrangements (e.g. port authority functions).
- A simplification of arrangements including funding, governance, decision making processes, a reduction in monitoring and reporting requirements and a reduction in duplication.
- To provide greater clarity on the roles and powers / functions of individual regional structures; the structures themselves and how they are accountable and encourage greater scrutiny by principal authorities of regional arrangements and those who lead such arrangements.
- The development of more appropriate governance models to better enable agreements between and across public service providers, private and third sectors.
- For the Welsh Government to set clear outcomes for regional working which local authorities and stakeholders could deliver to, with some believing that Welsh Government should also mandate regional working / collaborative approaches.
- Better funding, or more direct funding of regional / collaborative arrangements, particularly at the formative stages and also with reference to regional education consortia.

- Focus on a more service based approach to collaboration, ‘form following function’, which allows for more natural and appropriate boundaries or collaborative arrangements and delivers more integrated services, particularly in specialist areas and in health and social services.
- That the Welsh Government should avoid micromanagement of regional / collaborative approaches and work with local government and others to provide the platform for a more integrated Welsh Public Service policy.
- That the Welsh Government should support local government and the wider public sector to harmonise processes and terms and conditions where possible, to undertake public service wide workforce planning, facilitate the sharing of best practice and consider sharing / seconding staff across government.

4.1.4 The local government response broadly supported a more service based, local authority led approach to collaboration at the appropriate scale to the service. They were in favour of a more simplified approach generally (including funding) with significant de-layering where possible. They also welcomed the opportunity for the development of more appropriate governance models to help facilitate regional working.

4.1.5 A number of respondents, including the local authority sector, stressed the need for more collaboration between Welsh Government and local government in the overall approach to regional working. It was suggested this collaboration should look to develop a joint vision and priorities for regional working and to agree what services or functions should be undertaken at a national, regional or local level.

**b) What are your views on the common elements to the process of mergers we outline in this section?**

4.1.6 Approximately 70 percent of respondents answered this question. Just under half of these broadly agreed with the common elements to the process of mergers, and 40 per cent disagreed. The remaining responses did not agree or disagree on the common elements of the process of mergers but provided a number of related comments.

4.1.7 Of those who agreed with the common elements it should be noted that there was no direct link in all cases with agreeing with mergers themselves or the proposed footprint. Many respondents agreed with the common elements without providing additional comment and a number expressed the need to ‘get on with it’ or expressed frustration that the process of reform had been going on for so long. A number of further observations were made by respondents, including:

- The need to provide clarity throughout the process to ensure citizens and stakeholders are fully informed, that it was important to ensure that change was democratically led and to ensure that larger authorities did not reduce democratic accountability and representation.
- That reform proposals must be supported by a funding framework which ensures an appropriate level of funding going forward.
- It was important to ensure the retention of the skilled and experience of senior managers and public sector workers, that there were no compulsory

redundancies and to avoid compromising quality of service delivery during transition.

- There needed to be a greater focus on the interaction between all levels of government, national and local, and with Town and Community Councils and stressed the support a stronger Town and Community Council sector could bring to the process.

4.1.8 Of those who disagreed with the common elements, over two thirds were on the basis of not agreeing with the principle of mergers, believing that the case for mergers had not been made, that the costs and benefits had not been set out and that the wider financial implications were not fully understood. A number of further observations were made by respondents, including:

- That any change should be based on a shared vision for local government, a mutual understanding of the role of Government at all levels and clarity on the outcomes that were being sought and how these outcomes could be achieved.
- A preference for a more democratically accountable, locally led approach to change with collaboration and regional working focused on individual services and natural boundaries.
- That Welsh Government should re-consider the timing of such changes, delaying until austerity is lifted and the full impact of Brexit is understood.

4.1.9 Those who didn't express a view on the common elements themselves but did comment more generally made similar comments to those above including seeking clarity on the role of local government, democratic accountability, further consultation, simplified funding arrangements and a delay until after Brexit.

### **c) What are your views on the options for creating fewer, larger authorities which we have set out?**

4.1.10 Approximately 85 per cent of respondents provided comment on the options as set out in the Green Paper almost half of which were from members of the public with local authorities and the 'other' group providing approximately a sixth of responses each. It should be noted that there was not always a link between those who responded in favour or against the options proposed in this question and those respondents who expressed a view on mergers as a policy approach or to the proposed 'footprint'. A small number of those who responded didn't provide a view on the options themselves preferring to make wider comments on mergers including expressing a preference over the 'footprint' or approach to setting boundaries, the need to protect the workforce during any change and wanting a wider debate over the role and function of local government.

4.1.11 Of those who provided a view, just over half agreed with the options presented, although only a third of these who agreed expressed a view on a preferred option. Half of those who did express a preference preferred Option 3 (comprehensive mergers), a quarter preferred Option 2 (phased mergers), and a quarter preferred Option 1 (voluntary mergers). The majority of those who expressed a preference for Option 1 did so on the basis of no mandated 'footprint'. One

respondent preferred Option 3 alongside a reinvigorated Town and Community Council sector.

4.1.12 Just under half of those who provided a view disagreed with the options presented. 60 per cent of those did so on the basis of disagreeing with the principle of mergers, believing that the case had not been made and that larger authorities would reduce democratic accountability or disagreeing with the 'future footprint' proposed. A small number disagreed with mergers but did express a view on the options proposed with one preferring Option 1, another preferring Option 1 without a mandated footprint and the third preferring Option 3.

4.1.13 It was clear from the responses that local government was strongly opposed to option 3, with their reservations focused either on the case for change not being made and / or that the timescales were not realistic. There was also opposition from local government to option 2 although it was less pronounced, comments focused on the complexity and potential for drift. Local government is open to option 1, provided there is no map.

4.1.14 A number of additional comments were made by both respondents in favour and against the options as presented, these included:

- An ongoing concern over the potential cost of mergers.
- That more thought on the 'footprint' was needed, reflecting that a number agreed with the options but not the 'footprint' to which the options would apply, with various responses preferring alternative configurations.
- A need to review all levels of government as a whole as part of any re-organisation to ensure that roles and functions are clear and at the appropriate level and receiving the appropriate levels of support.

4.1.15 The Local Democracy and Boundary Commission for Wales (LDBCW) highlighted in their response that all options would have a significant impact on the current programme of work for the LDBCW and a review of their work would be required subject to the final option selected. The Independent Remuneration Panel for Wales (IRPW) suggested that subject to the option selected there would be an impact on the work of the IRPW and the process of putting in place a remuneration framework. They highlighted that option 1 and option 2 in particular could require two remuneration frameworks to be in place at the same time.

#### **d) Are there other options for creating fewer, larger authorities we should consider?**

4.1.16 Just over half of respondents provided responses to this question, a number of these however took the opportunity to reaffirm their position for or against mergers as opposed to proposing additional options.

4.1.17 A fifth of respondents believed changes to the proposed footprint, including in some cases a preference for a return to the pre 1996 counties, or a full boundary review would be the preferred option. A fifth believed that further regional or sub regional collaboration was preferable to the merger options or that change should be focused on reviewing individual services, allowing for a more natural collaboration on

boundaries appropriate to each service. Many of these believe that sustainable funding was also a pre-requisite.

4.1.18 A fifth of those who responded did not provide alternative options for creating fewer, larger authorities but did include additional comments including suggesting that the Welsh Government should freeze all appointments to Local Government senior posts. One respondent proposed further tests which should be met prior to mergers proceeding including; greater clarity on financial issues (Council tax Harmonisation, funding formula, staff etc); greater realism on the capacity of Local Government to undertake complex transformation programmes simultaneously; and, the need for absolute, unequivocal political commitment from all parties.

4.1.19 A number of respondents suggested that change should be driven by a fundamental review of the role and functions of all levels of governance and public services in Wales but particularly on the role, powers, purpose and practices of local government and that 'form should follow function'.

4.1.20 The remaining respondents suggested a number of alternative options. These included:

- a review or strengthening of Town and Community Councils.
- fostering a cultural or community based approach to change.
- a return to two tier local government with an area committee approach.
- nationally set priorities and objectives with local delivery focussed on improving outcomes.
- agreed common standards and sharing of best practice.
- a full public vote on the future of local authorities.

4.1.21 A small number, primarily local authorities, suggested a voluntary merger approach with no mandated 'footprint'.

**e) Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.**

4.1.22 Just over a third of respondents answered this question, although limited additional evidence was provided. A number elected to reiterate their position on the principle of mergers and a third of those who did respond stated that they had no further evidence to provide. A small number suggested previous experience of local government re-organisation, previous estimates associated with applications for voluntary mergers or previous estimates of costs linked to the 'Reforming Local Government: Resilient and Renewed' White Paper should be used to help inform costs.

4.1.23 A third of those who responded commented specifically on the financial case for mergers. They suggested that the financial case had not been made or the costs in the Green Paper were not complete, that they believed the costs of merger would be more than predicted or that the predicted savings had already been made by local government as a result of austerity. Some provided further evidence that mergers would not work and others went on to cite the Health Boards as cases where they believed increased scale had not necessarily led to improved financial performance.



A number agreed that savings could be achieved in areas of management, support infrastructure or administration and democratic functions as a result of mergers.

4.1.24 The remaining respondents made a number of related comments. These included; that the costs of change should be met centrally by the Welsh Government; expressing concerns on the potential impact on council tax and the loss of democratic accountability; expressing caution on the potential economic benefits of outsourcing services; and, the need to balance short term efficiencies against sustainability and gaining competitive advantage in a global market place.

4.1.25 The Local Democracy and Boundary Commission for Wales and Natural Resources Wales both expressed willingness to provide further support to the development of any Regulatory Impact Assessment as final options became clearer.

**Q2. Chapter 4 of the Green Paper explained the need for clarity on the future footprint for local government and the range of factors which should be taken into account to determine a new configuration. It set out a suggested future footprint for local government, which could be reached via each of the options set out in the previous chapter.**

**a) Do you agree that providing clarity on the future footprint of local government is important?**

4.2.1 Just under 75 per cent of all respondents answered this question three quarters of which agreed that clarity was important. Just under a fifth did not think that providing clarity was important and the remainder did not express a direct view either way. Half of the responses to this question were from members of the public with local government and 'other' category contributing about a fifth each.

4.2.2 Of those that agreed that clarity was important it should be noted that there was not always a direct link with agreeing with mergers or the footprint. Approximately 15 per cent of those that agreed stated that the Green Paper did not provide any clarity or disagreed with the principle of mergers.

4.2.3 Some of those respondents who agreed that clarity was important made additional related comments, which included:

- That the proposed footprint was overly simplistic and did not recognise the complexity and interconnections between councils and wider public service and that any future footprint needed to be coterminous with other major public service boundaries.
- A need to focus on both structures and new ways of working - adopting a systematic approach to agree where strategic or regional approaches are required.
- A need to understand the role and function of local government and ensure that local democratic accountability is maintained.
- A need for good communication so that communities understand where and how their services are delivered and to help drive behavioural change within local authorities.

- The importance of developing a localist vision for the future of local government and that place-based solutions are best developed by local partnerships around community needs.

4.2.4 Of those that disagreed with the need to provide clarity on the future footprint, a number did so on the basis of not agreeing with the footprint itself or the need for a footprint, or being against the principle of mergers. Others thought that stability was more important than clarity and that there was a need for a national conversation on the roles, responsibilities and accountabilities of all levels of government in Wales before discussions on structure and footprints.

4.2.5 Those that did not express a particular view did provide further comment however with some reiterating their opposition to mergers or to a mandated footprint, preferring local determination on any merger proposals. Others believed that there should be a full boundary review or wider consultation, a focus on democratic participation before reform, or a pause until the financial climate to support change was more favourable and the proposals were more fully developed.

**b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?**

4.2.6 Approximately 60 per cent of all respondents answered this question. Just under 40 per cent of those who responded agreed with the factors identified and just over half disagreed. The remaining responses did not state agreement or otherwise. Of those that agreed, a quarter provided additional comment. A number agreed with the factors and welcomed the alignment with health board boundaries but cautioned on a fixation on scale believing that maintaining democratic accountability could be a challenge. Some believed that the factors should include consideration of local authority performance and resources, transport connectivity and accessibility and further detail on overall costs of mergers. Others thought that the proposals would benefit from consideration of a stronger Town and Community Council sector and an additional focus on services, particularly those which might benefit from working at a larger scale than the proposed local authority areas.

4.2.7 Of those that disagreed just under a third did so on the basis that they did not agree with mergers or that the case for mergers had not been made, they did not agree with the proposed map or a preference for more regional working as opposed to reform. Just over a fifth believed that further consideration was needed of local accountability and how local authorities relate to and take account of their communities, community diversity, natural boundaries, landscape, identity, culture, history and heritage, transport links and travel to work areas and a greater consideration of economic indicators. The remaining comments focussed on a need to engage more with the private sector, to factor in cross border arrangements (outside Wales) or to take a service led approach to determining future structures, one which is more flexible and adaptable to service needs.

4.2.8 A number of respondents did not indicate any agreement with the factors identified in the Green Paper but did provide additional related comments, these included:

- To include a wider consideration of the purpose, role and capacity of local government and its relationships with its population and other public services.
- A radical de-layering of responsibilities and accountabilities in local government and to review service delivery and associated administrative boundaries, which could also include consideration of community well-being assessments.
- The inclusion of a wider set of demographic, inequality and deprivation data and economic data such as GVA, income and economic performance, and a consideration of how communities naturally work.
- Expressing caution on searching for a 'one size fits all' approach and seeking a broader debate on all the options which would focus on the required cultures, ensuring that local authorities are supported and all issues are considered, including the position of schools in any new authorities.

### **c) What are your views on the new areas suggested in this section?**

4.2.9 Just under 70 per cent of respondents answered this question and half of these were from members of the public. Twenty per cent of those who responded agreed with the areas as proposed in the footprint and 70 percent disagreed, the remainder did not express a clear opinion on the areas.

4.2.10 Of those that agreed with the areas, few provided additional comment under this question. A small number highlighted the importance of maintaining partnership arrangements within the new areas. Some also questioned the potential impact of not considering Powys, although this was primarily questioning its sustainability as a stand-alone authority.

4.2.11 Of those that disagreed with the areas proposed it is important to note that there was no direct link between disagreeing with the areas and disagreeing with the principle of mergers, although some clearly did disagree with the new areas on this basis preferring more regional, service led or locally led approaches to collaboration.

4.2.12 A fifth of those who disagreed with the areas did so without further comment. Slightly less than a fifth of those who disagreed with the new areas disagreed with the number of areas proposed - with half wanting fewer new authority areas and the remaining respondents wanting more new authority areas within the footprint or a voluntary approach to mergers. Local authority respondents preferred the voluntary approach, or 'no map' approach.

4.2.13 Just over a fifth of those who disagreed with the new areas focussed on local issues and individual merger proposals. Over half of these were centred on the South East (or Gwent) areas and a quarter in North Wales, particularly Flintshire and Wrexham. Others covered very local issues in Pembrokeshire, Swansea, Merthyr Tydfil and Blaenau Gwent.

4.2.14 The remaining comments from those who disagreed with the new areas reflected comments under previous sections seeking a wider consideration of factors such as economic, demographic, social, cultural, natural boundaries and local authority performance when considering new areas. A few wanted to see a more

comprehensive boundary review and others took the opportunity to reiterate their concerns that mergers would reduce localism, accountability and representation.

4.2.15 A small number of additional comments were received from respondents who didn't express a direct view on the areas themselves, these included:

- The need to consider rural areas within the proposed new areas to ensure that these didn't become subsidiaries of the larger urban areas.
- To consider developing new areas to reflect or be coterminous with National Assembly electoral constituencies.
- The need to strengthen the role of Town and Community Councils to support the new larger areas and strengthen and protect linkages between Town and Community Councils and the new local authorities.

4.2.16 The Independent Remuneration Panel for Wales also raised specific concerns on Powys, highlighting that in their view if Powys remained unchanged the opportunity for the creation of a balanced all Wales remuneration framework with fewer, better remunerated Councillors could be adversely affected.

**d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?**

4.2.17 Just under 60 per cent of respondents answered this question. Approximately 15 per cent of these suggested that there were no alternatives or had none to propose. The remaining responses covered a broad range of proposals although few provided evidence to support these alternative positions. Those that did based them on population statistics or comparisons with larger local authorities in England.

4.2.18 Just under 30 percent of respondents proposed alternative 'footprints', under half of which commented on specific local issues and the remainder provided a suggested alternative 'footprint' for part, or all, of Wales. Those responding to specific local issues included:

- wanting either Bridgend, Caerphilly or Wrexham to remain as stand alone authorities.
- four relating specifically to the 5 counties in the South East – one wanting the 5 principal authorities to merge to form a single area and three asking for the footprint in the South East to be reconsidered, in particular to consider North / South travel patterns and connectivity.
- one response suggesting Powys should merge with Ceredigion and another suggesting that Powys' position as a stand alone authority should be reviewed.
- two expressed a preference for two new local authority areas in North Wales as opposed to the three proposed (Conwy, Gwynedd and Anglesey and Denbighshire, Flintshire and Wrexham).

4.2.19 Of those that suggested alternative footprints two respondents suggested different configurations to deliver 10 new areas, four proposed fewer - with two proposing a 4 authority (regional) approach and one each proposing either seven or eight new areas - and two proposed more with 11 or 16 new areas outlined. There

were a small number of similarities in some of the responses e.g. preferring two areas in North Wales, Ceredigion to merge with Carmarthen and Pembrokeshire to stand alone. Most proposed 'footprints' however had no clear areas of similarity. There were significant variations in approach when considering the local authorities in mid Wales, the south and in particular the south east.

4.2.20 This variation is further reflected by a number of responses mapping (or partially mapping) the mid and southern counties only. These included for example a preference for a greater Cardiff city region approach; or a Heads of the Valleys authority with Cardiff, Swansea and Rhondda Cynon Taff by themselves; a north Gwent and South Gwent approach; or Ceredigion merging with Powys. One respondent agreed with the proposals for North Wales and suggested that the remaining areas of Wales should be created to reflect the scale of those new areas proposed for North Wales.

4.2.21 Additional proposals from respondents for alternatives to the proposed 'footprint' included:

- Approximately a quarter suggested not merging, continued or enhanced regional and sub-regional working and / or voluntary mergers with no map as alternatives.
- Seven responses, all members of the public, wanted to revert to the pre 1996 counties or to a 2 tier government system.
- A small number proposed a complete or partial boundary review to establish the 'footprint', while others preferred additional factors such as local culture, community linkages, socio economic issues, rurality, transport links and natural boundaries to play a bigger role in guiding decisions on new areas.
- Four responses preferred a more natural or organic service led approach to collaboration with some services delivered at a national level, with one respondent also wanting this natural approach to allow the consideration of mergers across health board boundaries and a further three preferring locally led solutions to any issues identified.

4.2.22 Additional comments by respondents regarding alternative approaches to the footprint included;

- a more fundamental review of the role and function of local authorities and the role of Town and Community Councils in the delivery of services.
- a wider review of public services as a whole to deliver better integrated and more appropriately funded services.
- complete re-design of governance arrangements and the potential for arms-length executive agencies to deliver at the regional level.
- independent management accreditation to drive good management practices.

**e) In the context of these proposals, are there other ways we should simplify and streamline joint working arrangements at regional level and among public bodies within the new authority areas? If so, what are they?**

4.2.23 Approximately 50 percent of all respondents answered this question. Around 10 percent of those who responded said there were no other ways or said they

disagreed with the merger proposals. A further seven respondents believed that regional working should be the exception and not the norm, that there should be a sound business case for doing so and that there was a danger in it becoming overly complex and bureaucratic. A small number highlighted the need for appropriate funding for any future arrangements.

4.2.24 Around 20 per cent of respondents took the opportunity to press the case for more locally led collaboration, allowing for greater local scrutiny and a more natural / organic service led approach to collaboration. This included four responses from the local authority sector seeking a shared vision, constructive engagement and a commitment to partnership, to deliver locally accountable solutions based on a clear business case leading to service improvements.

4.2.25 Over 10 per cent suggested that Welsh Government needed to be more prescriptive in regional working approaches, setting clear guidelines and frameworks for joint working whilst providing guidance, best practice examples and evidence of successful collaborative approaches and supporting innovative delivery models. Some local authorities thought the Welsh Government should legislate for appropriate governance vehicles to enable local authorities to work, and enter into legal agreement, with the wider public sector and private sector partners. A number of respondents also believed that Welsh Government should provide clarity on decision making processes and on roles, responsibilities and accountabilities within any regional arrangements, protect existing partnerships and collaborations impacted by any transition and streamlining regulations, policy and governance at a national level.

4.2.26 A number felt that there was further opportunities in streamlining regional arrangements through; establishing a single regional footprint for all regional activity - including using the same regional label or name; reducing the number of Public Service Boards to reflect the Health Board footprints with a possibility of merging with the Regional Partnership Boards; and the national implementation of certain functions such as council tax collection, road improvements and other specialist services. One respondent believed that pooled recruitment of skilled officers within certain areas of expertise would also be useful.

4.2.27 Further integration of public services was a theme of a number of responses encouraging for example more collaboration between NHS and local authorities and suggesting that primary care, community care and social care should be located in a single organisation with a common accountability framework and a single budget - with democratic accountability built in. Respondents also encouraged better working with housing professionals and further engagement with social partners in the design and delivery of regional working approaches.

4.2.28 A number of other issues raised by respondents included:

- To consider the establishment of partnership development agencies, development commissions, public sector wide shared service delivery bodies, with one respondents believing this could address those areas that have not enjoyed rising standards, are in income poverty or have low literacy and

numeracy levels or to prioritise (and fund) identified opportunities and necessary infrastructure which local authorities can't provide on their own.

- The need for independent management accreditation to achieve and demonstrate good management.
- Transform and review the Town and Community Council sector to improve effectiveness and consider devolving functions and services to Town and Community Councils to deliver.
- The need to consider wider cross border initiatives, including with England and the need to consider the implications of Brexit, population changes and the movement of people when considering regional arrangements.

### Q3

#### **a) Do you agree with the proposed process of transition: namely establishing Transition Committees and ensuring elections to Shadow Authorities can be held ahead of vesting day for the new authorities?**

4.3.1 Almost 50 per cent of respondents answered this question. Of those, just under half agreed with the proposed process of transition; these responses were mainly from Town and Community Council, members of the public and one local authority.

4.3.2 In addition to confirming their agreement, a number of respondents also took the opportunity to provide their view on the process. These are highlighted below:

- It was felt elections to Shadow Authorities need to be timely to allow sufficient preparatory time and necessary decisions and arrangements to be made. Local authorities should start work earlier where possible.
- The need to ensure continuity of services during the transition process.
- Imperative that the Local Democracy and Boundary Commission for Wales is directed in sufficient time to complete effective reviews for the elections.
- It was asserted that the dates set out in the Green Paper were too close to the Assembly elections in 2021.
- The process needs promotion and publicity in order to avoid confusion.
- The need for people involved in the process to be representative of their area.
- One respondent agreed with the transactions regime but would prefer Transition Committees to approve transactions rather than Welsh Government. There needs to be a system of exceptions and urgency provisions to make sure the process does not disrupt collaboration / service delivery.
- Avoid Shadow Authorities seeing existing authority as needless predecessor.
- The need to keep bureaucracy to a minimum and not used as platform for politicians to argue.
- A primary concern for one respondent is the scale of work that will need to be undertaken by Transition Committees. Focusing on housing, the work required to ensure mergers take account of different demographics, service and make-up of housing functions is considerable. Strongly urge any terms of reference for Transition Committees to embody commitment to working closely with professionals at all levels within housing departments.

4.3.3 However, a quarter of respondents, mainly members of the public and two local authorities, disagreed with the process. The main concerns raised by respondents are listed below:

- Transition Committees are not needed. Infringe on Shadow Authorities. Bring too much influence on current authorities rather than future ones.
- Transition Committees will be expensive and undemocratic.
- Can't spend more money on bureaucracy.
- Councillors elected in current role should be able to remain until full elections can be held.

4.3.4 Of those who responded, just over a quarter did not provide a direct 'yes' or 'no' answer to Question 3a but did offer a general view on the transition process. The range of respondents included local authorities, members of the public, Town and Community Councils, third or voluntary sector and public services.

4.3.5 The responses are highlighted below:

- Some concerns around the timing / timescales of the transition process were raised as was the need for clarity on the transition process. More detail and guidance on various aspects of process would be welcomed.
- The need to ensure Transition Committee and Shadow Authorities are fully open and publicly visible. They both should be open to scrutiny at all stages and that that scrutiny is appropriate to each stage.
- It was also suggested Transition Committees should be cross party and members of the Committees should make decisions in the interest of their area and local government generally. However, one response raised concerns about their size, feeling big committees are too slow and cumbersome – suggesting one member from each area.
- Some capacity concerns were expressed, in relation to supporting the Transition Committees and Shadow Committees.
- Transition Committee should be part of a wider social partnership model.
- One local authority felt that the transition process would detract from their regional working agenda and ambitious transformational change programme they already had in place.
- Another local authority felt that the transition process is not just about Transition Committees and Shadow Authorities, consideration needed to be given to service delivery in the old or merging council in last 2 years - prevent focus drift.
- The appropriateness of the role of Welsh Ministers in resolutions of a Transition Committee was queried as this could expose a council to legal challenge.
- One respondent highlighted the need for 'change agents' as cheerleaders for change.



**b) Do you agree that, if option 1 were pursued, we should set a date by which voluntary merger proposals should come forward in each electoral cycle?**

4.3.6 Just over 40 percent of respondents replied. Of those, just over half stated that they agreed, if option 1 was pursued, that a date should be set by which voluntary merger proposals should come forward in each electoral cycle. These responses were from a range of stakeholders. In addition to agreeing to the question, some of the respondents emphasised the need for further clarity around timescales and proposed dates would be welcomed.

4.3.7 In contrast, just under 40 percent of respondents disagreed. A small number of respondents stated that they were not in agreement to setting a date by which voluntary mergers proposals should come forward in each electoral cycle due to not supporting option 1. Others stated that the Welsh Government should work with local authorities and / or WLGA to establish mutually agreed dates. Of those who responded, a number did not provide a direct 'yes' or 'no' answer but did offer a general view in relation to setting a date for voluntary merger proposals in each electoral cycles.

4.3.8 The responses were varied and ranged from stating that: option 1 should be time limited for all; only support voluntary if not compulsory; voluntary mergers whilst democratic won't help matters; to stating that there are many considerations and while 'one size does not fit all' a voluntary approach is to be favoured within an overall context and set objectives for change. There was also a request for the Welsh Government to provide clear guidance and expectation on this matter.

**c) Do you have any other thoughts on the proposed process?**

4.3.9 A third of respondents provided a view on the proposed process. Responses were received from a good range of stakeholders: including local authorities, Town and Community Councils, public sector and members of the public.

4.3.10 In answering, a small number of respondents took the opportunity to express their support for mergers in general but felt it should be undertaken over a shorter time period. Although in contrast, a higher number of respondents expressed their objections. Some felt mergers were unnecessary and unlikely to succeed. One respondent felt that larger councils would lose sense and feel for local residents and another was worried that there would be more power being held by entirely south Wales centric assembly.

4.3.11 Some respondents queried and sought clarity around costs associated with the process, in particular Shadow Authorities. One respondent felt the proposals are a cost cutting exercise rather than making Wales a strong and proud nation.

4.3.12 A number of respondents highlighted the need for the Welsh Government to work in partnership with local authorities and also the WLGA on the proposals. It should not be seen as another attempt at a Welsh Government take over. Others felt a full boundary review would be necessary but there were also some concerns that timescales for this would be very tight. Two respondents believed Powys should be considered as part of any boundary review.

4.3.13 A small number of other respondents also highlighted:

- The need to ensure that the needs and views of older people are represented in new authorities.
- Transition Committees should be part of a wider social partnership model and recognised trade unions should have a voice on the committees. Unions need to be involved from the start and not as a consultee.
- It may be useful to think of 'developmental change'. Pioneers and early adopters could lead the reforms potentially producing working arrangements with other public and third sector social organisations. Reorganisation to ensure it is fit for purpose and capable of delivering for the population of Wales.
- Independent management accreditation needed to achieve and demonstrate good management (all levels of government).

**Q 4. The consultation suggests holding any local government elections in June 2021. Are there any reasons why June 2021 would not be a suitable date? If so, please suggest an alternative date with the reasons why that would be more suitable.**

4.4.1 Approximately a third of all respondents provided comments on this question. A quarter of these had no objections and agreed with holding the local government elections in June 2021 and just under two thirds disagreed. The remainder partially agreed with the suggested date.

4.4.2 Of those who disagreed with the suggestion for holding any local authority elections in June 2021, three main reasons were given.

- The majority of respondents who disagreed (nearly two thirds) suggested that the new date would undermine the commitment to a full 5 year term of office for elected members, and/or also felt the elections would clash with the National Assembly elections in the same year. Some felt this would cause confusion or apathy among the electorate, while others were concerned about the resources and drain on electoral staff.
- A fifth of those who disagreed suggested that 2021 was an ambitious target, which would not be enough time for to implement the changes or engage in the process.
- The remained believed that the elections should be sooner, and for the changes to be implemented more quickly.

4.4.3 Of those respondents who partially agreed, a few suggested alternative days (such as the weekend) to hold the vote or to hold all elections on the same day. Others also expressed concerns that the proximity of any new elections to the National Assembly elections may be problematic.

**Q5. The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of wellbeing by Public Service Boards, which are linked to electoral cycles.**

**We will make provision to makes sure these tie into any new electoral cycles going forward.**

**Are there any other plans or matters which might be tied into the electoral cycle which we need to consider?**

4.5.1 Just over a quarter of respondents provided a response to this question. There was a range of suggestions for matters put forward that should be taken into consideration which tie into the electoral cycle. However, of those who responded the majority (35 per cent), did not think there were any plans or matters which needed to be considered. Of the suggestions that were put forward, there was little commonality between them.

4.5.2 The most common suggestion was that the local authorities' corporate plans, set out in the Well-being of Future Generations (Wales) Act 2015, be taken into consideration. Of the five stakeholders who offered this suggestion, all of them were local authorities. It was also suggested that there was scope for the timelines of area statements prepared by the Natural Resources Wales (that form part of the well-being plans) could be better aligned.

4.5.3 The Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 was also suggested on more than one occasion as something that should be taken into consideration. Other suggestions that were put forward included, Local Government improvement objectives; medium term financial plans and budgets; as well as Local Democracy and Boundary Commission for Wales (LDBCW) work. Of those who responded four of those were from Town and Community Councils, their suggestions for matters that should be taken into consideration included; National Assembly elections, town county elections and Brexit.

4.5.4 Some were of the opinion that all political or legislation matters should be aligned with electoral cycles.

4.5.5 Although many offered suggestions for certain plans or assessments to be tied into electoral cycles, some commented that although they agreed in principle with the idea, it must also be noted that this isn't always the optimal time frame. Some of the following comments were made relating to this:

- Some need to be untied from electoral cycle. Change in housing, education and health takes longer than 5 years.
- Council plans and policies should be interconnected and not exist in isolation. If planning and reporting duties are to be linked to electoral cycles, it will be important to have safeguards to ensure such work is not affected by short-term political considerations.
- Clearly moving towards convergence in all Public Service Boards and stakeholder partnerships will take time. Transitional appointments and provisions are likely to be necessary.

4.5.6 The following related comments were also made:

- Why not align with 2022 elections to save money.
- Implement on an area by area basis until any new plan is in place.
- People were elected in 2017 on a 5 year term - can't keep changing goal posts.
- Reform before 2021 elections.
- Independent management accreditation needed to achieve and demonstrate good management (at all levels of government).
- Need to inform voters (new or older) about the significance of the change.

#### **Q6. What are your views on the approach which should be taken to determining the parameters of electoral reviews?**

4.6.1 Just over a third of respondents provided a response to this question. There was no clear consensus on the approach which should be taken to determine the parameters of electoral reviews and responses have been grouped into a number of related areas below. The existing provisions in the Local Government (Democracy)(Wales) Act 2013 for conducting reviews were favourably mentioned by one respondent and suggested these should continue to be used. Several responses made the point that, however the electoral reviews are carried out; the result should be fair and equitable, support communities, promote cohesion and strengthen local democracy.

#### **Electoral ratios**

4.6.2 Several responses expressed the view that the electoral ratio of councillor/ elector was an important consideration although the views on what that ratio should be differed. Suggestions ranged from no change to a ratio of 1:4000 or 1:5000. One respondent commented that the ratios should be nearer to those in England and Scotland and there should not be more councillors in any single council than the number of Assembly Members. The importance of achieving consistency in councillor/ elector ratio across Wales was noted by some respondents, while others noted that the issues of rurality should also be considered.

#### **Electoral arrangements**

4.6.3 Several responses were in favour of multi-member wards while one response was in favour of an area committee system. Others wished to keep the existing system of one member, one ward with the First Past the Post system. One respondent was in favour of elections to councils being by the Single Transferable Vote/ Alternative Vote system or a hybrid of the two.

4.6.4 Other factors mentioned by respondents as important things to take account of in setting the parameters included;

- The number of voters, demographics and characteristics of an area including deprivation, community connectivity and the rural/ urban split.

- Parity of electoral divisions across Wales.
- The patterns of travel between the North and South and across South Wales.
- The minimum or maximum numbers of councillors in each local authority or in a multi-member ward.
- The potential workload of individual councillors if ward size increased.
- Local accountability v strategic planning.
- One size does not fit all, compare like for like areas.
- Ensure wards have a gender balance.
- Encourage those with protected characteristics are able to stand for election.

## **Boundaries**

4.6.5 Several responses linked the outcome of the electoral reviews with other boundaries: one view was there should be a broader review of all boundaries and the Local Democracy and Boundary Commission for Wales (LDBCW) should not be constrained by boundaries that currently exist. Another view was that there should be not be any conflict between Parliamentary, National Assembly and Local Government boundaries.

## **Time scales**

4.6.6 Many responses noted the current work programme of the LDBCW conflicted with the suggested timetable in the Green Paper. Some questioned if the LDBCW has the resources to review all the local authorities at the same time. There was concern expressed by some respondents that the timetable in the Green Paper was unrealistic. Others noted that local government administrators and political parties needed enough time to plan for the elections on the new boundaries. One response noted the new reviews suggested in the Green Paper were complex and there was insufficient time to consult on and determine any new policy for council size. Other responses said the reviews should start as soon as possible to resolve uncertainty for the electorate.

## **Consultation**

4.6.7 Some responses said the parameters used as well as the new boundaries should be subject to consultation with the public. Other suggestions for those that should be consulted were the LDBCW, the Wales Electoral Co-ordination Board, individual Electoral Registration Officers and the Electoral Commission.

## **Other issues**

4.6.8 One response observed that the conduct of the electoral reviews should be mindful of the services such as Housing, Education and Health which each local authority and other public bodies are responsible for. Changes to these services often took more than 5 years to implement.

4.6.9 Some responses mentioned the current Review of Town and Community Councils and the need for the ward boundaries in local government areas, to be compatible with any reforms recommended as a result of that review.

## Q7

### **a) How can councils make more effective use of their elected members' knowledge of, and connections in, their communities?**

4.7.1 Around 50 per cent of respondents replied to this question. Of these, around 13 per cent were from local authorities and around nine per cent from Town and Community Councils, but the highest number of responses was from members of the public, at around 44 per cent.

4.7.2 Of those who responded, around a tenth raised concerns that the reform proposals could damage the connections between councillors and communities because of the potential size of the merged authorities. Local authorities have asked for assurance that in any restructuring there will be no proposals to create wards that are too large and would therefore, in their view, make effective engagement with citizens harder for elected members.

4.7.3 A number of respondents highlighted the need for Members to have the capacity and time to develop knowledge and connections to communities and some indicated that this would be hindered by a more remote structure created by having fewer and larger authorities. This view was shared by local authorities, some members of the public, a Commissioner and a Town and Community Council.

4.7.4 However, the majority of responses were more positive and provided ideas around opportunities related to how councillors currently work or could work in the future with their communities. There were also areas of process which respondents felt could be improved. The main points are summarised below:

- There was wide support across respondent groups for better use of social media by elected members and development of digital tools to support elected members' use of statistical data. In terms of improved communications, they also suggested increased use of video conferencing; community hubs; local radio and weekly newspaper columns. These responses were from local authorities, members of the public and others.
- A skills audit of councillors and training of councillors were raised by a wide range of respondents, and included training on: corporate parenting regarding looked after children; community engagement and co-production techniques; independent management accreditation; and to be trained as advocates for communities. These responses were from local authorities, public sector, Town and Community Councils, voluntary sector, members of the public and others.
- Clarity of the role of, and support for, elected members featured in a number of responses. Some respondents indicated that clear guidance or tools such as job descriptions would be beneficial to provide clarity on expectations of members. Support in their full range of duties, such as representative, executive, regulatory and scrutiny roles was felt necessary. These responses were from local authorities, a Regulator and members of the public.
- Responses from Town and Community Councils and local authorities highlighted the need for input from councillors at the front end of decision making processes, including pre-scrutiny of cabinet reports; better use of

working groups and the more effective use of Town and Community Councils for gathering the views of citizens.

- Some voluntary sector respondents and members of the public felt that communities must have confidence that their elected representatives have an effective voice in the decision-making process and their vote will count. This was coupled with the suggestion that councillors should be required to report to constituents every six months or annually, and should provide evidence their position is that of their residents, e.g. by publishing their voting history. A trade union/social partner raised that the move to cabinet government might have weakened democracy in local government scrutiny as it distances other elected members from decisions making process.
- Members of the public stated views that the selection of members is critical, and a fair balance is needed in terms of geography so no area is over represented and councillors should live in the ward they represent.
- A number of other suggestions were made. These included recognition of career, financial and personal implications of holding elected office; potential "parachute" payments for members who are not returned following an election; devolved budgets to support member-led community well-being projects; members should strive to be as inclusive as possible to represent views of their constituency; vital that local councillors continue to use and share their knowledge of communities to scrutinise regionally delivered services; and identifying the advantages and disadvantages of moving to fewer multi-member wards elected using proportional representation to help strengthen minority voices; and introducing a maximum term for councillors.

4.7.5 There was also a local authority example of good practice to share:

- Newport used well-being profiles for each area within their authority to provide ward members with oversight of all data and intelligence for their ward, so they can use intelligence to inform and challenge decision making. Members' local knowledge has developed and the profiles are used by all partners including third sector and the local community.

**b) How could we better recognise the level of responsibility involved in being a local councillor? What changes to the remuneration and support councillors receive would enable a wider range of people to become involved in local democratic representation?**

4.7.6 Just over 40 per cent of respondents replied to this question. Of these, around a quarter were from local authorities and Town and Community Councils. The highest number of responses, around half, were from members of the public.

4.7.7 Of those who responded, around 11 per cent commented directly on the role of the Independent Remuneration Panel (IRP), stating the importance of the Panel's impartial role in identifying the workload and role of members and the fair remuneration for the role. These views were from local authorities and Town and Community Councils. In addition, in terms of any future reform, one trade union/social partner commented that the IRP should quantify the time commitment of the role of elected member for new larger authorities and determine the appropriate level of remuneration.

4.7.8 Around a fifth of respondents to this question agreed that remuneration for councillors needed to be better and increase, or at least be 'adequate', but only if linked with clear performance management to ensure quality in the role and value for money.

4.7.9 However, around 10 per cent of respondents to this question felt that the role of councillor should be purely about serving the community, and not about it being a paid job or career choice, and so they felt councillors should be paid expenses only. This view was stated almost entirely by members of the public or 'not known' respondents.

4.7.10 Around 10 per cent of respondents to this question stated views about the role of the councillor, and the need to clarify the role in more detail. It was stated that recent findings of the IRP were helpful in identifying that the workload and role of the councillor has changed, with increased hours and a more strategic outlook required. It was stated by one respondent that greater powers being devolved from Welsh Government would assist in the role becoming more strategic. Social media was stated as something that can make the role of the councillor more difficult. In addition to a clear job description, there was a view that councillors' skills could be further developed through peer supervision and mentoring, and through joint training across authorities and with officials.

4.7.11 The largest number of comments here were in relation to diversity in democracy, with around a quarter of those who responded to this question commenting on this issue. These responses were from local authorities, members of the public, trade unions/social partners, Town and Community Councils and a regulator.

4.7.12 Of those who responded, there was acknowledgement that there was a challenge in attracting a cross section of people to the role because of the difficulty in balancing employment and the role of the councillor. Elements such as help with costs of caring responsibilities and with family friendly policies were stated as things that could help attract a more diverse range of people. In terms of encouraging those with families to stand for the role of councillor, it was felt that this would be more likely if the role was professionalised, became full time and was paid accordingly. In terms of the role as it currently stands, meetings in more family-friendly hours, such as in the evenings, would also enable those with day jobs to undertake the role.

4.7.13 More information before elections on what the role of the councillor entails and on the democratic process more widely were also identified as being important in attracting a wider group of people to consider the role of councillor. Also, establishing and publishing an appropriate remuneration framework in advance of elections, attractive to a wider diversity of potential candidates, would also help people decide whether the role was of interest to them.

4.7.14 One trade union/social partner identified an opportunity to hold focus groups with those from varying socio-economic status and protected characteristics, to discuss why they have not sought election. The trade union/social partner also raised the issue of the importance of increasing engagement with young people, and



this was also a view raised by a member of the public. A Town and Community Council raised the importance of teaching political history in school as a way to also appeal to a younger audience. Respondents also proposed setting an age limit and capping the term to 10 years to encourage fresh talent and wider democratic representation.

4.7.15 A small number of respondents to this question commented on the need for additional technological, research and administrative support for councillors. A small number of local authorities also stated that bigger wards would mean fewer councillors, albeit they would be full time, which they stated would decrease democracy and move democracy further away from local people.

## **Q8**

**a) Are there other powers which local government should have? If so, what are they?**

**b) Are there other freedoms or flexibilities which local government should have? If so, what are they?**

4.8.1 Almost half of respondents replied to this question. Around a fifth of those responding were local authorities, around 10 per cent were Town and Community Councils, and around a third of responses to this question were from members of the public. A number of those responding were not able to separate or clearly identify if they sought additional powers or freedoms and flexibilities therefore the response to these questions have been summarised collectively.

4.8.2 Of those responding, the majority either explicitly welcomed new powers, freedoms or flexibilities for local government, or implicitly conveyed a positive response by suggesting specific powers, freedoms or flexibilities that could be given. Some respondents noted that the Green Paper lacked detail on what was envisaged.

4.8.3 Around 15 per cent of those responding explicitly stated there should be no new powers, freedoms or flexibilities for local government, or replied that they did not have any to suggest. Of those that expressed a view as to why there should be no new powers, freedoms or flexibilities for local government, respondents comments included suggesting some responsibilities should be held regionally or nationally instead of at local government level; that local government currently has too many powers; and current powers are not used to best effect.

4.8.4 A number of suggestions were made for additional powers, freedoms or flexibilities which local government should have. These ranged across a number of topic areas and varied in clarity and degree of specificity. Responses have been grouped into themes where possible, and the themes include points which were raised by only one respondent as well as those made by a number of respondents. These themes include:

- Financial matters – including local taxation (retaining current powers and additional tax raising options); retail banking functions; business rates; relaxing grants regimes; charging; flexibility over use of funds and specific

grants; the revenue support grant; borrowing and ability to set deficit budgets for specific projects where there would be long term benefit; and power to generate profits from council operated functions for re-investment.

- Health and social care – including public health; community-based healthcare; closer integration and scrutiny.
- Education and skills – including additional powers for managing poor performing schools; control over use of school assets for community benefit; staff appointments; and further and higher education.
- Planning – increased powers and flexibilities over the process and decision making; and reviewing powers to dispose and develop land.
- Housing – including borrowing for house building; integration with health and social care; and local authority role in social housing.
- Governance and collaboration – including ability to set up joint committees with other public services; greater integration between public bodies; freedom to choose who to collaborate with rather than mandated approach; simplification of reporting and governance arrangements for various statutory requirements and policy frameworks; greater local discretion; and flexibilities over models of delivery; and the repeal of Local Government (Wales) Measure 2009 to allow resources to be refocused and more proportionate arrangements for audit and assessment.
- Transport, economic development, infrastructure and encouraging business growth.
- Electoral arrangements – including ability to set own dates, dissolve councils early and propose motions of no confidence (although one respondent stated that there must be consistency across Wales).
- Environmental matters - including waste recycling.
- Immigration – specifically powers to intervene on decisions.
- Power to repeal sections of the Welsh Language Act in areas of low usage.
- Requirement to co-produce social welfare law advice plans to inform commissioning and grant decisions.

4.8.5 A small number of respondents suggested devolving more powers to Town and Community Councils or that powers should follow the principle of subsidiarity and be available at the appropriate level for the decision being made.

4.8.6 Some of the local authority respondents to the Green Paper referred to earlier submissions of suggestions for new powers and flexibilities from local government leaders, following the Cabinet Secretary for Local Government and Public Services' invitation for them to set out additional powers and freedoms they need. These responses had covered a broad range of areas including financial matters, public health and transport.

4.8.7 In terms of timing of transfer of new powers, flexibilities or freedoms, some respondents stated that the new powers are needed now, while a small number of respondents suggested this should happen in time.

4.8.9 Around 15 percent of those responding to the question specifically referred to the intention set out in the Green Paper to legislate for the general power of competence for principal councils which merge and community councils which meet

eligibility criteria. All of these were supportive of the general power, although many of the responses which referred to this noted that this, and further powers in general, should not be limited only to those authorities which merge.

4.8.10 General principles to be taken into account when giving greater powers, freedoms or flexibilities to local government were also highlighted by some respondents. For example, a small number of respondents suggested that there should be flexibility and local discretion in how powers are exercised, and that this is 'not one size fits all', although in contrast a small number of respondents called for consistency over how current and future powers are used by local government. A small number of respondents noted that local capacity to exercise new powers should be considered, and communities should be listened to.

4.8.11 Other general points raised in response to this question included a need for clarity on all powers and duties of local government; the need to understand how any changes would impact on other public service organisations; that any additional powers should not disadvantage poorer areas; that fair funding should accompany new powers; and workers' rights should be safeguarded.

## **Q9**

### **a) Which areas offer the greatest scope for shared transactional services?**

4.9.1 Almost two fifths of respondents responded to this question. Of those who responded the majority were from the general public (two fifths) and local authorities (one fifth).

4.9.2 Most stakeholders recognised the potential of shared services but many were in agreement that before any shared arrangements went ahead, a robust business case should be made and there should be clear distinction as to what constitutes 'transactional services'. It was also noted that there must be caution that the increase in costs and complexity does not negate the financial benefit.

4.9.3 Concern was expressed by some stakeholders about the loss of employment that shared services could lead to and if shared arrangements were to go ahead services should not be outsourced.

4.9.4 A number of respondents were of the opinion that before any arrangements for shared services were made, there should be clear democratic accountability in place. Some respondents were particularly concerned about the current dissatisfaction with the health service and this should be considered when making arrangements for these services.

4.9.5 Although the majority of respondents could see scope for additional shared services, some were of the opinion that if the mergers were done correctly, there would be no need for additional shared arrangements.

4.9.6 Respondents suggested a wide range of services as being potentially suitable for shared arrangements. All services identified as offering scope for shared transactional services have been listed below (in alphabetical order).

- Asset management, Property / Estates
- Blue badge processing
- Childcare for the workforce
- Children in employment licensing
- Contact centres
- Council tax and Non domestic rates collection
- Creditor and Debtor control
- Disclosure Barring Service (DBS) processing
- Education
- Energy
- Environmental planning
- Finance and Legal services
- Health and safety
- Health care and Social care
- Highway design and construction
- Housing benefits
- Human resources, Payroll, Pension administration, Recruitment, Learning and development / Training
- ICT and ICT Support
- Industrial development
- Internal audits
- Language translation
- Passenger transport and Transport services
- Performance management
- Planning and Building control
- Procurement and Order processing
- Waste services

**b) How might such arrangements be best developed?**

4.9.7 A third of respondents provided a view on this question. Opinion was divided on the best arrangement for how shared services could be developed. The majority of those local authorities who responded thought that any shared arrangement should be developed regionally between the authorities themselves. Many local authorities were of the opinion that they had the relevant knowledge and expertise to best determine which services had the potential for collaboration, and thought that a one size fits all approach should be avoided. Some thought that shared services should not be undertaken.

4.9.8 There were also a large proportion of respondents who were of the opinion that any decisions regarding shared services should come directly from the Welsh Government, with clear policy, guidance, financial backing and access to specialist skills and resources.

4.9.9 It was noted that legislation should ensure the maximum flexibility for collaboration in discharging back office functions across the whole public sector e.g.

ability to provide surveying and property legal services across all branches of public sector.

4.9.10 It was suggested that the development of shared services could help to develop further expertise in Wales' workforce providing there was adequate training and progression opportunities. Respondents proposed that new shared services operations should be located in relatively deprived parts of Wales - especially those with above average levels of economic inactivity, unemployment or under-employment.

4.9.11 It was also suggested that there would need to be a public body to conduct shared service activities and there should be a general and flexible statutory power for ministers to establish bodies to deliver public sector-wide shared services, working across Welsh public bodies. Regulation should make provision for the nomination of their boards of management by stakeholders, and for the co-option or appointment of independent members with specialist skills.

4.9.12 It was also suggested that Public Service Boards (PSBs) could be used to drive forward sharing services early on if integrated correctly with any future arrangements.

4.9.13 The following related comments were also made when asked how such arrangements could be made:

- Start with the regional model and expand, look at current borders / boundaries.
- Re-purpose local authorities as delivery agencies or deliver through a single organisation with a common accountability framework and a single budget.
- Initially deliver shared services through IT solutions such as TASCMI for public protection services.
- Utilise a single Local Authority host with clear, binding arrangements between authorities so as to provide maximum clarity as to responsibilities, financial contributions, democratic oversight and accountabilities.
- Think of Wales as one whole area or region for service delivery for example social services could be run by the Cabinet Secretary for Health and Social Care. Opportunity to deliver education on a regional consortia basis.
- Some thought more could be done through community partnerships and outsourcing.
- Others thought that financial support should be put in place to enable shared service delivery.

## **Q 10**

**a) In ensuring we deliver a consistent approach across Wales, where consistency is important, how do you think the advice and support on each of these matters could be best provided?**

4.10.1 Around a third of respondents replied to this question. Of those, around a tenth were not supportive of the need for consistency; these responses were largely from local authorities and members of the public. These responses emphasised the

importance of local determination and flexibility over consistency. A few local authority responses highlighted the costs and disruption of mergers. Other responses highlighted the need to agree where to collaborate locally, to have more consideration of small local authorities and to address the implications across the public service.

4.10.2 The vast majority of the responses to this question identified practical things which could be done to provide advice and support, responses came from all sectors. There were a number of broad themes in the areas identified and in each case, the total number of responses picking up any individual theme was small. The broad themes from respondents are summarised below:

- The importance of consistency in general was highlighted in a few responses from members of the public and other organisations as was the need to treat people equally and fairly. This included a response which highlighted differences in approach as being a barrier to investment.
- The importance of clear direction and this coming either from Welsh Government or jointly between Welsh Government and the WLGA which reflected in a number responses from members of the public, social partners, Town and Community Councils and other organisations.
- A number of responses either highlighted the need for a Welsh Government funded package of general support or for Welsh Government to provide clear guidance. These responses came from all sectors, including local authorities, social partners and the voluntary sector. One response also specifically highlighted the need for funding for voluntary redundancies. As well as references to guidance, responses also highlighted things like benchmarking and practice forums as being useful.
- The need for clear communication was highlighted in a few responses from Town and Community Councils, the public and other organisations. They highlighted a range of channels which could be employed. One respondent drew out the importance of direct engagement with the staff affected by any changes.
- The scope to develop shared services or to merge IT platforms, in some cases, as a separate matter to mergers, was highlighted in a number of responses. These responses were from local authorities, Town and Community Councils, members of the public and other organisations.
- The need to involve the public in the process was highlighted by some respondents, mostly from members of the public or the voluntary sector. A number of approaches were suggested including a citizen panel at Welsh Government level and public meetings. A response also highlighted the need for education about being an effective citizen.

4.10.3 A number of other suggestions were made. These included the need for support to assist politicians through the process; connecting with regions facing similar challenges and learning from them; drawing on Business Wales; using ISO quality management standard; ensuring Powys could access support too; pooled recruitment of skilled staff; agreeing standards and then holding local authorities to account on them and standardising the delivery of statutory services. One response also suggested there should be a single council in Wales.

**b) Are there any other challenges or opportunities from structural change or providing additional powers and flexibilities that have not been identified above? If these areas require support, what form should this support take?**

4.10.4 Just over 30 per cent of respondents replied to this question. Of these, a small proportion either disagreed with the question because they did not agree with mergers or noted there were no additional opportunities. These responses were from members of the public, Town and Community Councils and one local authority. A small number of other responses, which were not supportive of mergers, took the opportunity to express concern about whether any support could overcome the challenges posed by mergers.

4.10.5 Two local authorities also noted the real challenge was the need for additional funding. A couple of responses challenged the suggestion that additional powers should be conditional on mergers. A few responses were looking for a focus on the larger strategic questions including the vision for local government, the need for innovation and issues like demand management and service change.

4.10.6 The other responses identified a very wide range of areas where there were other challenges or opportunities and offered ideas for support which would be helpful. The main areas identified are listed below:

- The importance of communication was flagged up in a few responses.
- The need for pay harmonisation and national approaches to redeployment and redundancy was raised in a few local authority responses. The importance of social partnership and the scope to insource staff was also highlighted.
- Council tax harmonisation was raised by local authorities and a response from another organisation. Harmonisation of fees and charges was also raised.
- The need to have a longer financial planning horizon and the need for a better balance of funding across public services. Another response highlighted the need for better budget planning by local authorities and more effective scrutiny.
- The scope for shared services was highlighted and translation was an area flagged up with potential.
- The opportunity to encourage use of the Welsh Language and develop Welsh skills.
- The need to have support for staff and those affected by the proposed changes was identified. As was the need to support politicians through the changes process.
- The need for more progressive taxation which enabled greater investment in more deprived areas.
- The scope to build on integration of social care and health and link with housing.

4.10.7 A small number of responses flagged up other matters including:

- recognising the role of national parks.
- the need to focus on the environment and our natural resources.

- the case for a local focus for Local Development Plans.
- the importance of looking at the case for change in the public service as a whole at the same time.
- the need to get rid of quangos.
- addressing employment arrangements for teachers.

**c) Which of the issues identified above or in your response should be prioritised for early resolution?**

4.10.8 Around 30 per cent of respondents replied to this question and the priorities identified were varied.

4.10.9 A few responses stated the priority was stopping mergers, either in general or in relation to specific local authorities. These responses were from a mix of members of the public, Town and Community Councils and local authorities. A similar number of responses stated the priority should be mergers or 'getting on with it' as soon as possible. These responses were from members of the public, Town and Community Councils and the voluntary sector. A couple of responses highlighted the need to decide on the regions or local authority areas first and a further response proposed a phased approach. A couple of responses suggested that Welsh Government should determine the priorities.

4.10.10 The bulk of the remaining responses made suggestions of areas which should be a priority. The themes in the responses are set out below:

- Workforce matters – the priorities highlighted included matters such as a national voluntary severance scheme; a national skills audit; TUPE; developing standard pay and conditions; developing workforce planning; ensuring there were no compulsory redundancies and freezing local government appointments. These responses were from local authorities, social partners and Town and community Councils.
- Developing a meaningful estimate of the costs of mergers and providing the funding for it was raised in a number of responses. These were from local authorities, Town and Community Councils and a member of the public. A couple of local authorities also queried how capacity gaps would be filled.
- Matters related to the democratic process were highlighted with each suggested priority being raised in one response. These included the importance of addressing the democratic deficit and stimulating local political debate; effective scrutiny of the transition process; the need to reduce the number of councillors and the need for fixed terms for councillors.

4.10.11 A few responses picked out specific services areas, for example housing, as a priority or that having a debate on service delivery and powers should be the priority. Single responses focused on prioritising other matters including: communication with citizens; 'getting rid of' quangos; developing a common approach to procurement; addressing change across the public service as a whole and at the same time; focusing on the purpose of local government; putting in place a clear and supportive change framework and addressing cross-border issues.



**Q11. We would like to know your views on the effects that the proposals within this consultation would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.**

**a) What effects do you think there would be?**

4.11.1 Just over a third of respondents commented on this question. The responses gave a fairly even balance between those that thought that the effects would be positive, those that thought it would be neutral and those that thought it would be negative.

4.11.2 Summary of positive views expressed by consultees

- It would provide an opportunity for a better balance between Welsh and English languages. All local authorities to be bilingual.
- Has the potential to introduce more Welsh speakers into overall county demographics.
- Should give more opportunity for all employees to use Welsh.
- Bigger authorities should have more resources to promote Welsh, from economies of scale.
- It would provide an opportunity to strengthen bilingual services and the use of the Welsh language as the language of administration.
- There will be financial benefits from the mergers for local authorities in relation to continuing to provide a bilingual service.
- There are advantages in grouping Welsh Speaking populations together in the new electoral divisions.

4.11.3 Summary of negative views expressed by consultees

- Potentially combining counties that had different levels of Welsh language use, provision and cultural values.
- Potential to erode use of Welsh Language as the administrative language.
- Larger organisation are more disconnected from the communities they serve and in this way the Welsh Language is going to be adversely affected. Smaller communities are undermined and this will negatively impact the culture and language.
- Urge steps to be taken to ensure that the use of Welsh language is not reduced as a result of Local Government Reform.
- Potential to divert resources away from Welsh Language services and the Welsh Government target of 1 million Welsh Speakers by 2050.
- Impossible to achieve parity for the languages and cost savings at the same time.
- Welsh Language is a useful but expensive luxury; compliance cost is driving business away. Welsh should not be imposed.
- Potential to place barriers in the way of or discriminate against non-welsh speakers in gaining employment in local authorities. Difficult to get a front line job if you are not a Welsh Speaker – unless willing to learn. Difficulty in

attracting suitable talent to public sector jobs and alienation of growing non Welsh speakers.

- Likely to increase – a waste of money. LA's with low levels of Welsh Language should be allowed to repeal section of WL Act to save money.
- Region specific: cannot see how the Welsh Language will suffer any more than already is in NW and Mid & West Wales. LA and planning policies are the problem and not the solution. Merging Flintshire with Wrexham will not favour the Welsh language. Do not merge Caerphilly with Newport.

#### 4.11.4 Summary of neutral views expressed by consultees

- All local authorities are, and will be, subject to the Welsh Language (Wales) Measure 2011 and so the proposals will have no effect.
- Should be none - language is separate issue covered by separate legislation.
- Irrelevant in the context of Local Government Reform.
- Service provision needs to be available at all times in the chosen language of service users.
- Any change should be managed carefully.
- All public services should seek to maintain not only high levels of WL fluency but also encourage Welsh culture. Self empowerment through literacy and education will provide a strong effective community involvement in democracy.
- It might best to undertake some specific research in relation to this, as there may be some complex issues.
- The opportunities presented as a result of merger should not favour one group of workers over another.
- Ensure no inequity for Powys as a non merging authority.
- Additional funding for training for Welsh language to be embedded in Councils maybe through a Welsh Language strategy for staff.
- None - those that have Welsh speaking communities will continue to support use of the language and those that don't won't.
- Local authorities should be able to opt out of 'everything bilingual' to save money. Consideration of other languages?

#### **b) How could positive effects be increased, or negative effects be mitigated?**

4.11.5 Approximately a quarter of respondents provided comment here.

Respondents suggested that this could be achieved:

- through an adherence to Welsh Language Standards.
- through proactive steps to ensure the workforce has the appropriate levels of bi-lingual skills.
- by providing a broader scope of learning opportunities and opportunities to speak Welsh outside of the classroom.
- by providing additional funding for Welsh language training.
- by ensuring equal access to services and local authorities in general in both languages.
- by considering the annual assurance reports from the Welsh Language Commissioner. Giving the Commissioner a greater role.

- When considering reorganisation, be aware of the linguistic cultures in the local authority areas that are intended to merge, and ensure that they match each other from a linguistic perspective.

**Q12. Please also explain how you believe the proposed policy within this consultation could be formulated or changed (if required) so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.**

4.12.1 Just under a quarter of respondents provided a response to this question. Respondents in the main suggested examples of how use of the Welsh Language generally could be improved, for example:

- Be proactive and promote the learning of Welsh, including using Welsh place names only for signage.
- Each Local Authority should have a department dealing with compliance with the Welsh Language act and have the appropriate staff to deliver bi-lingual services.
- Consistency in Welsh Language policy was considered essential.
- New local authorities should champion the use of the Welsh language, and embrace bi-lingual policies.
- Larger authorities would create a more balanced proportion of Welsh and English speaking areas with positive impacts on the Welsh Language in current largely English speaking authorities.
- Mergers could be a distraction from focusing on the needs of communities - negative effects could be mitigated by taking a more flexible approach to collaboration and not mandate mergers.
- The opportunity to reorganize, redesign and transform the way services are provided is a golden opportunity for local authorities to share their experiences in providing Welsh language services. It also offers an opportunity to consider new and alternative methods of delivering Welsh language services and thereby promoting the use of them. Consider a means of enabling them to share information.

4.12.2 Some also believed that there was a serious lack in capacity in some parts of Wales, where English is the main language, to deliver equality in the language and warned against creating 'English' or 'Welsh' authorities.

**Q13. The Children's Rights Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on children and young people. The Welsh Government seeks views on that assessment.**

**a) Are there any positive or adverse effects not identified in the assessment?**

4.13.1 There were more limited responses in this area with just over 20 per cent of respondents providing a response. The majority of those who did respond thought that there would be no impact with a few thinking it would be positive. Where concerns were raised, these centred on the risks of creating larger organisations with some respondents feeling that larger organisations could be more disconnected from the communities they serve and that it could be easier for them to ignore marginalised, disempowered people including young people. They also believed that if there were fewer Councillors this may reduce opportunities for engagement with the democratic process and accessibility may be effected if services were concentrated in fewer locations.

4.13.2 There was a general concern to ensure that there was no service disruption during any change process and that budgets were not adversely affected. It was felt that children and young people, particularly those who were vulnerable, disabled, had learning difficulties or were from ethnic minority groups could be impacted by any disruption to services. Some stressed the need to protect social services standards.

**b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?**

4.13.3 Less than 20 per cent of respondents replied to this question. The following suggestions were included on how the proposals could be reformulated in order to increase the positive effects or reduce any possible adverse effects on Children and Young people:

- Public services need to redistribute the opportunities to our most disadvantaged communities and individuals.
- Setting up of youth and young people forums with access to cabinets, scrutiny committees and PSB's would allow young people to influence the decision making process.
- Use of wellbeing assessment and views of young people to inform further planning work at local level.
- Children and young people should be required to discuss / debate the implications of changes and their views should be taken seriously.
- Local Councillor's should be given compulsory training in the field of safeguarding.
- Education authorities should be aligned with local authorities to ensure all local authority areas have the same Education authority, Health board and PSB.
- Much of the CRIA focuses on the vision and intentions as set out in the Bill rather than any direct consequence for children and young people from this particular Green Paper. It is encouraging that the CRIA has considered

potential negative as well as positive impacts on service delivery. However, the context is more about how the structural changes will be more enabling and allow local authorities to take account of children's views without saying exactly how this will happen at this stage in the process.

**Q14. The Equalities Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on protected groups under the Equality Act 2010. The Welsh Government seeks views on that assessment.**

**a) Are there any other positive or adverse effects not identified in the assessment?**

4.14.1 Just under a quarter of respondents provided comment on any positive or adverse effects not identified in the assessment. Of those who responded the majority thought that there would be no impact on protected groups as a result of mergers. However, some respondents noted that local government reform offered an opportunity to make improvements in this area. Broadly, an equal number thought that the proposals would have a positive effect as negative. Of those who thought the proposals would be positive, they saw it as an opportunity to champion diversity within local authorities, pool expertise and to improve and enhance services to marginalised groups and as a positive way of addressing the changing needs of the population.

4.14.2 Those who thought that the proposals would have a negative impact were concerned over any potential disruption of services, the potential for greater remoteness from local communities and a weakening of local representation and engagement. They also raised concerns over merging authorities with potentially different demographics and approaches to marginalised and disempowered communities.

**b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?**

4.14.3 Just under 20 per cent responded to this question. The following suggestions were proposed by respondents on how the proposals could be reformulated so as to increase the positive effects or reduce any possible adverse effects on protected groups under the Equalities Act 2010:

- To place a duty on Council leaders, group leaders and Chief Executives to ensure diversity is respected.
- The Welsh Government must give a strong lead to any reconfigured Welsh public service to recognise the right of all citizens to live full and enriched lives.
- Any negative effects could be mitigated by taking a more flexible approach to collaboration and new powers.
- The need to provide ongoing security and consistency of funding to fulfil statutory duties effectively and improve services.

- Give consideration of how changes to work locations as a result of mergers could affect those with protected characteristics or no access to public transport.
- More can be done to monitor the impact of policies on persons with protected characteristics. Larger, more sustainable local authorities may have greater capacity to effect improvement in this area.
- Action needs to be taken to encourage local councillors that demonstrate a more diverse profile of all protected characteristics (including Council leaders and cabinets), possible quotas on gender, BME and disability or through all protected characteristics shortlists.
- When considering protecting people, this must also extend to workers within the Local Authorities and those who work under contracted terms for the Local Authority. Strongly advise against any use of zero-hour contracts and insecure work in both areas of employment.
- There is an opportunity to put in place a less gendered workforce and make positions more equally distributed between men and women.

4.14.4 Comments were also received on how to improve the Equalities Impact Assessments itself and these will be considered within any future Equalities Impact Assessment as the policy progresses:

- The Equalities Impact Assessment (EIA) should further consider the reality of implementation and impact on staff, communities and services and provide a better balance in considering the impacts of mergers.
- To consider including a reference to the UN principles for older persons in the impact assessment.
- The EIA fails to acknowledge that the majority of the workforce within Local Government is female and as a result any changes to Local Government could have a disproportionate impact on women. There is a lack of disaggregated data within the EIA to support the conclusions made within the EIA. The EIA identifies that none of the proposals relate only to people with disabilities and no negative impacts on people with disabilities have been identified. Yet the EIA does not consider the potential impact of reform on the service users within Local Authorities, a number of whom will have a disability.
- The assessment does not identify the effects on pupils with Additional Learning Needs in local authority schools, including those educated outside their own local authority. Given that a new system for assessing and providing for such needs is currently being introduced, would urge that such an assessment be made.
- The EIA is one sided - only considering the positive angle and has not considered the reality of implementation and impact on staff, communities and services. Needs to be more factual and provide a better balance from both aspects.

**Q15. Please provide any other comments you wish to make on the content of this consultation.**

4.15.1 The final question in the consultation offered a space for stakeholders to make any other comment about the Green Paper. In all approximately 63 per cent of respondents took the opportunity to provide additional comment on the consultation and other related matters.

4.15.2 Approximately 40 per cent of those who responded used the opportunity to restate their position for or against mergers. Just under half of these restated their support for mergers and just over half their opposition. A small number of respondents stressed that a fair and equitable funding model was the only solution while others provided constructive commentary on the timings of individual options.

4.15.3 The remaining comments varied widely and many focused on specific issues that affect stakeholders. For example, Cymdeithas Cyfieithwyr Cymru (the association of Welsh translators and interpreters) highlighted an opportunity for translation to lead the way in terms of collaboration. Similarly the Chartered Institute of Housing Cymru cautioned that the Welsh Government should ensure mergers do not have unintended consequences for local authorities contribution towards the affordable homes target and emphasised the need to consider the voice of service users in any large scale change – particularly where services are delivered differently in merging organisations.

4.15.4 In addition, trades unions respondents welcomed the commitment to social partnership which underpinned the proposals, highlighting the need to protect and enhance the workforce during any transition. Some trades unions wanted to see a commitment to social partnership, underpinned by legislation, at all levels of government.

4.15.5 A significant number of respondents used the opportunity to suggest or re-state alternative approaches to reform of local government. Responses included:

- looking again at the role, responsibilities and purpose of all levels of government, other regional arrangements and the wider public service (including National Park Authorities) as a whole.
- utilising a wider scope of factors in considering the future ‘footprint’ such as socio economic, cultural and heritage, community cohesion and natural linkages.
- a service based approach to collaboration following more natural and bespoke delivery approaches.
- clarity on how government wanted to work with local people and communities in the future and a clear understanding of what citizens wanted from government, at all levels.

4.15.6 Other comments which were made by three or more respondents included:

- Further commentary on individual merger proposals, the common elements that underpin the footprint and the opportunities around the alignment of boundaries with health board areas.

- A greater role for Town and Community Councils in working with communities to shape the future around those communities, in developing place based plans to promote collaborative actions and in delivering of services.
- The benefits of existing regional and collaborative arrangements and the need to fully understand the potential impact of reform on these arrangements and to ensure that existing regional partnerships and collaborative approaches and relationships were maintained in any new structures. Some also thought however that there was an opportunity to rationalise some regional arrangements to improve productivity, accountability and clarity around their roles.
- The need to protect and enhance democratic engagement and participation and accountability, the role of local scrutiny, and to consider electoral reform such as Single Transferable Vote for local government. The WLGA also suggested that the Welsh Government should publish a national register of public appointment to aid accessibility, transparency and clarity – particularly in decision making processes.
- The need to maintain and protect services generally and more specialist services during any transition, including offline services, and to ensure that transition processes were transparent and properly communicated to service users and citizens

4.15.7 A small number of respondents also noted that the consultation covered quite technical and complex areas which were difficult to understand and, therefore, difficult to respond to.

## **5. Next Steps**

5.1 The Welsh Government is considering the responses to the Green Paper consultation. The Cabinet Secretary for Local Government and Public Services made a statement on the way forward on 17 July 2018.



## 6. List of Respondents

Abergele Town Council  
Adam Scott  
ALACE  
Alyson King  
Amlwch Town Council  
Aneurin Bevan Health Board  
ASCL Cymru  
Association of Directors of Social Services (ADSS) Cymru  
Association of Electoral Administrators (Wales)  
B Griffiths  
Bangor City Council  
Barry Town Council  
Bay of Colwyn Town Council  
Bevan Foundation  
Blaenau Gwent County Borough Council  
Bob Chapman  
Bridgend Council  
C.Jones  
Cardiff Council  
Caerphilly County Borough Council  
Caerphilly Labour Group  
Carmarthenshire County Council  
Catholic Education Service (CES)  
Centre for Public Scrutiny  
Chartered Institute of Housing Cymru  
Chartered Institute of Public Finance and Accountancy  
Chepstow Town Council  
Children in Wales  
City & County of Swansea  
CLA Cymru  
Clayton Jones  
Cllr Lisset Burrett  
Colwinston Community Council  
Conwy County Borough Council  
Ceredigion County Council  
Cwm Taf University Health Board  
Cymdeithas Cyfieithwyr Cymru (the association of Welsh translators and interpreters)  
Cynon Valley Constituency Labour Party  
Cytûn – Churches Together in Wales  
David Cook  
David Harries  
David Rowlands  
David Shield  
Denbighshire County Council  
Dr Roger Morgan, on behalf of Pupils 2 Parliament project  
Dr Pedr Jarvis  
Federation of Museums and Art Galleries of Wales  
Fishguard and Goodwick Chamber of Trade and Tourism  
Flintshire Council  
Gareth Wardell  
Godfrey D Northam  
Graig Community Council  
Gwynedd Council  
Hedd Bleddyn  
Helen Stephenson  
Hodge Economic Research Project, CLEC, Cardiff Metropolitan University  
Huw Williams, Geldards  
Hywel Dda University Health Board  
Independent Remuneration Panel for Wales

Isle of Anglesey County Council  
Jane Philips  
Jayne Rees  
John Burrows  
Kathryn Hilsden  
Leader of Powys County Council,  
County Councillor Rosemarie Harris  
Llandough Community Council  
Llantwit Major Town Council  
Local Democracy and Boundary  
Commission for Wales  
Lyndon Moore  
Maesteg Town Council  
Mark Jones  
Martin Warren  
Merthyr Tydfil County Borough Council  
Mold Town Council  
Monmouthshire Association  
Monmouthshire County Council  
Mr R W Ebley  
NASUWT  
Nathan Tarr  
National Society (Church of England  
and Church in Wales) for the  
Promotion of Education  
Natural Resources Wales  
Neath Port Talbot Council  
Neath Port Talbot Council Voluntary  
Service  
Neath Town Council  
Neil Moore  
Nick Thomas-Symonds MP  
North Wales Regional Local  
Authorities  
Older People's Commissioner for  
Wales  
Pat Powell

Pembrokeshire County Council  
Plaid Cymru of Caerphilly Council  
Planning Aid Wales  
Police and Crime Commissioner for  
Gwent  
Pontypool Community Council  
R D Sandy Blair CBE DL  
Regional Cabinet for the CCR City  
Deal  
Rhondda Cynon Taff Welsh Liberal  
Democrats  
Rhondda Cynon Taff County Borough  
Council  
Roger Evans  
Royal College of Nursing Wales  
Royal Town Planning Institute (RTPI)  
Cymru  
S Dean  
Socialist Health Association Cymru  
Wales  
SOLACE  
Swansea Bay Port Health Authority  
Tai Ceredigion Monitoring Group  
The Electoral Commission Wales  
Torfaen County Borough Council  
Labour Group  
Torfaen Labour Local Campaign  
Forum  
Tyfu Tai Cymru Project, Chartered  
Institute of Housing  
Undeb Cenedlaethol Athrawon Cymru  
(UCAC)  
UNISON Cymru  
Vale of Glamorgan Council  
Wales Audit Office  
Wales TUC  
Welsh Conservatives  
Welsh Language Commissioner

Welsh Liberal Democrats  
Welsh NHS Confederation  
Will Godfrey

WLGA  
Wrexham County Borough Council