

26.4.18

Mr. Alun Davies, A.C.

Gweinidog Llywodraeth Leol,

Cynulliad Cymru,

Y Bae, Caerdydd,

POWYS

Annwyl Gyfaill,

Diolch i chi am eich cyfraniad fel Aelod a Gweinidog yn y Cynulliad tros yr iaith, diwylliant, cymunedau a phob agwedd o'n bywyd mewn adeg anodd.

Teimlaf ein bod ar hyn o bryd mewn sefyllfa os na chawn wrth ad-drefnu Llywodraeth Leol y sefyllfa yn iawn, y gallwn golli cymeriad ac arbenigedd ein Cymunedau a'n Broydd am byth.

Felly gan fy mod yn gweld eich bod yn gofyn am farn, 'rwyf wedi meddwl yn hir a dyma roi fy marn a'm syniadau sy'n saeliedig o'm profiad i'ch sylw.

Mae yn debyg fod fy nghefdir yn rhan o'r farn sydd gennyf, Fy magu yn Llanbryn-mair. Ysgol Gynrad ac Uwchradd, gadael yr ysgol yn 1954 yn 15 oed i weithio ym musnes fy nhad sef Busnes Beddfeini, 1957-59 Coleg Celf Amwythig, 1960 Partneriaeth am tad yn y busnes. 1965 cymeryd y busnes trosodd (fy nhad yn ymddeol). Ynglwm a gweithgaredd, yr Urdd a diwylliant y fro hyd fy eithaf.

1965 i 1979 datblygu y busnes yn sylweddol o safbwynt cynrych, adeilad, cyflogaeth, dalgylch ag ati.

1979 i 2005 y busnes yn dod yn Gwmni Cyfyngedig Teuluol ac yn gweithredu erbyn hyn tros Gymru gyfan. 2000 Rhys Bleddyn y mab yn ymuno yn y busnes, (deallaf fod Rhys a chi yn coleg ar yr un adeg.)

2005 fi yn ymddeol, a Rhys yn cymeryd yr awenau.

O 1967 i 2007 fy rhan mewn Llywodraeth Leol, Cyngor Plwy a Bro hyd 1979, 1979 i 1994 Cyngor Maldwyn, Cadeirydd Cynllunio a Chadeirydd Cyngor, cydweithio yn agos iawn gyda Glyn Davies A.S. sydd yn dal yn wir gyfaill, (er ddim yr un Blaid) ond yn cyd weld ynglyn a gwerth a grym ein cymunedau. Bu i ni Sefydlu Gweithdai Pentref, Polisiau Cynllunion Tai ag ati ein dau trwy gydweithio yn hollol amhleidiol.

O 1994 i 2005 Cyngor Powys, Cadeirydd Addysg, Sefydlu Ysgolion Penodol Gymraeg hyd y Gororau, Aberhonddu, Drenewydd, a hyn yn dal i fynd ymlaen yn y Trallwng a hefyd yn Wecsam yn fuan mae yn debyg.

#### DYMA FY AWGRYMIADAU I AD-DREFNU LLYWODRAETH LEOL.

1. Rhaid i'r elfen LEOL fod yn rhan bwysig yn eu bodolaeth er mwyn cynnal fudd ac ymddiriedaeth y bobol. Sut mae gwneud hyn, fy awgrym yw gwnweud i ffwrdd a'r Cynghorau Bro a Thef presennol a gwneud eu hardaloedd yn wardiau, Sefydlu CYNGHORAU CYLCH NEWYDD gyda chynrychiolaeth etholidig o bob ward yn adlweyrchu y boblogaeth yn y ward ar y Cyngor Cylch. Awgrymwf 3 aelod o'r wardiau dan 1500 o etholwyr, 5 neu 6 o'r wardiau tros 1500 o etholwyr. Yn bersonol teimlaf y byddai yn fanteisiol ar y lefel yma i'r Cynhorau fod yn amhleidiol.
2. A chymeryd Maldwyn i ystyriaeth fel esampl byddai 5 Cyngor Cylch – Cylch Bro Ddyfi, Cylch Bro Caereinion, Cylch Bro Myllin, Cylch Bro Hafren Isaf a Cylch Bro Hafren Uchaf. Os cymerwn Cyngor Cylch Bro Ddyfi fel engraifft byddai 3 aelod yr un yn cael eu ethol o Lanbryn-mair, Cadfarch a Glantwymyn a 5 o Machynlleth, cyfanswm o 20 aelod. Rhywbeth yn debyg i'r hen RURAL Distric Council cyn 1974 o ran maint a chynrychiolaeth.
3. Creu Cynghorau Undol newydd a tua 10 ohonynt yng Nghymru, yn unol a'ch awgrym chi, ac yna dod a'r Cynhorau Cylch yma yn rhan fyw ac effeithiol yn nhrafdoethau, poliaiau, gweithrediad, gyda cysylltiad Fidio ar Sir yn eu cyfarfodydd. Ac efallai gymeryd rhai penderfyniadau megis cynllunio, tai ac efallai eraill trwy fod y cysylltiad FIDIO yn eu cyfarfodydd gyda y Swyddog Priodol o'r Uned Sirol yn amlinelli yr hawliau, y Polisi a'r grym sydd ganddynt fel Cyngor. Byddent yn cael cyfle hefyd i roi eu barn

ar Bolisiau wrth eu sefydlu, ac os y byddent yn agos neu oddifewn polisiau yn eu penderfyniadau nid oes anhawster iddynt dderbyn a gwneud y penderfyniad, byddai hyn yn rhoi grym a phwrrpas i'w bodolaeth. Os byddant yn yn gweuthredu yn hollol groes i'r polisi gall y Swyddog o'r Sir trwy y Fidio gymeryd y penderfyniad yn ol i'r Sir i'w gadarnhau neu i'r Sir ei wrthod am resymau stadudol.

4. Dylid hefyd trwy reolau Stadidol sicrhau fod pob Contract, Cynllun , Project ag ati. Yn cael ei brisio gan y Cynghorau ar bob lefel fel y gwna pob Busnes o'r gwaelod i fynny, ac nid o'r top i lawr fel ag y gwneir yn awr gan Gynghorau Sirol. Hynny ydy a rhoi engraifft syml – Ail wynebu darn o ffordd, dechrau prisio y gwaith ar faint o darmac, faint o ddynion, faint o beiriannau ac yna faint i weinyddiaeth sydd yn angenrheidiol i'r gwaith. Nid yn groes fel y gwneir ar hyn o bryd – cychwyn efo'r gweinyddu a chael yn y diwedd nad oes arian yno ar ol i brynnu y tarmac.

Maddeuwch i mi am ddod a'm barn fel hyn, ac os dymunwch buaswn yn barod i brafod ymhellach gyda chi neu unrhyw un arall, mewn unrhyw fan os dymunwch.

Teimlaf fod pob ad-drefu yn y gorffennol wedi bod yn gam yn ol, a'r gair Lleol ddim mewn 'Llywodraeth Leol' bellach, a'n Cymunedau yn edwino.

A'u hwn yw y cyfle olaf i gael pethau mewn trefn, mae y cyfrifoldeb yn drwm arnom i gyd o Weinidog yn y Cynilliad i rhywun fel fi a roddod 30 mlynedd o'm bywyd i'n Cymunedau trwy Gynghorau a Busnes.

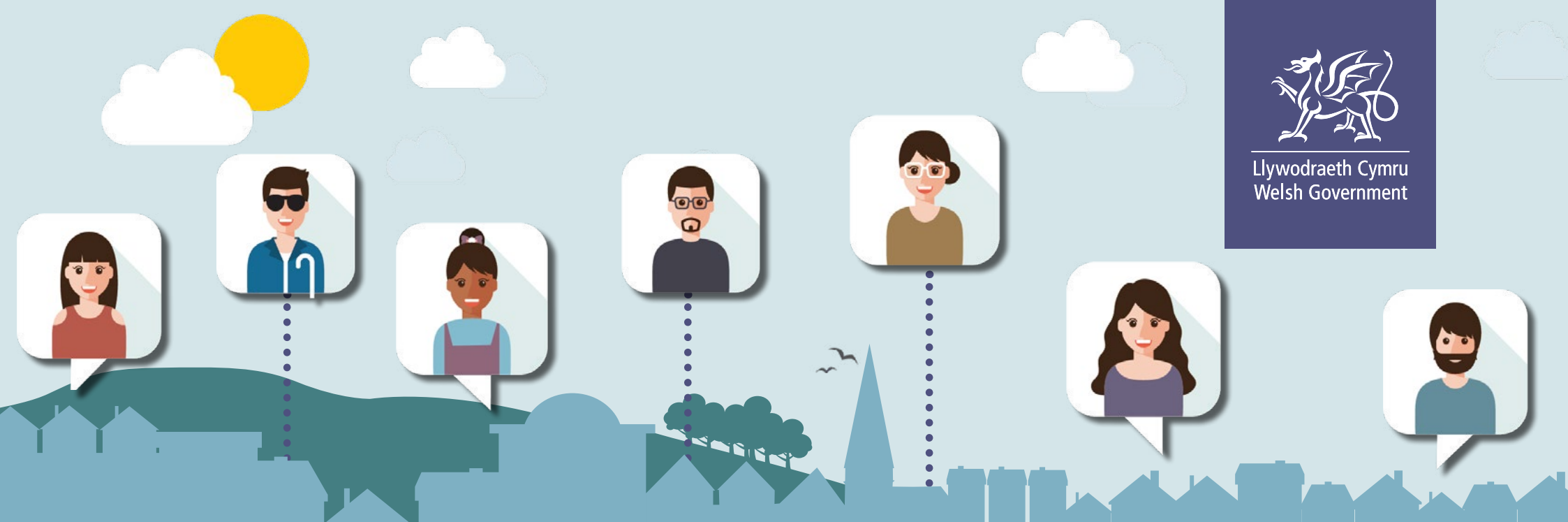
Diolch am bopeth, mae fy ymddiriedaeth yn gadarn iawn yn eich dwylo chi.

Yn Gywir,

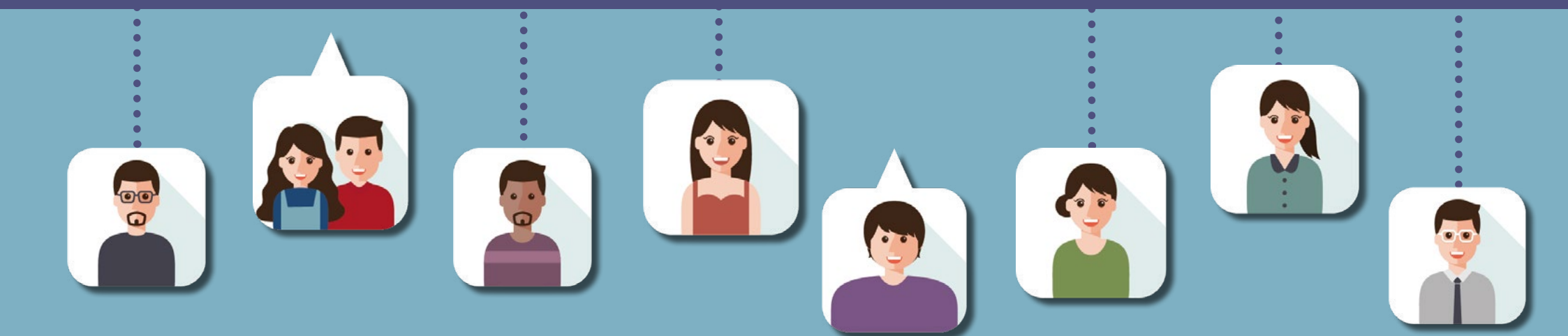
Hedd Bleddyn (Williams)



Llywodraeth Cymru  
Welsh Government



## Strengthening Local Government – Delivering for People



A consultation



# Hello

In Wales there's the **Welsh Government** and there's **Local Government**.

Sometimes people call Local Government the Local Authority or the Council.

## Welsh Government

We make decisions for Wales:

- we set budgets and give money to all Local Authorities
- we develop new policies and laws
- we support and improve the lives of everyone across Wales.

We also support Local Authorities.

## Local Authorities

A Local Authority has control over an area. They look after lots of different services which you might use:

- housing
- schools
- social services
- libraries, leisure and tourism
- planning
- environmental health, refuse and recycling
- transport.

Wales is changing. We have to plan better for the future. We've looked at Local Authorities:

- how they work
- how they listen to people
- how they meet people's needs
- how they spend money
- how they deliver services
- how they plan for the future.

### We think Local Authorities need to change.

There are 22 Local Authorities in Wales. We think some need to join together to make larger, stronger Authorities.

**This tells you about the changes – we want to know what you think.**

## Our Vision

We want bigger, stronger and more powerful Local Authorities who are able to take Wales forward.



# Why do we need change?

This is not about:

- changing lines on a map
- taking power from Local Authorities or communities
- stopping people getting involved or being heard
- making more cuts to funding
- stopping services.



## This is about democracy

Democracy is made up of two old words:

- **'demo'** – means people
- **'cracy'** – means rule.

It's a belief in freedom and that all people are equal. Our government systems are based on this.

We want all kinds of different people to get involved and have a say.

## This is about people

We want communities to be better represented by their Councillors.

Each Local Authority has councillors. Communities vote for who they want to represent them.

We want more people from different backgrounds to think about becoming Councillors.

Councillors should represent everyone in their area. No-one should be excluded because of age, race, religion, background, or any other reason.

## This is about how we use the funding available

We want to use funding and resources better.

All Local Authorities are facing challenges:

- there's less money
- more people are using services
- people expect more from services.

Funding must be used well because we need sustainable services that continue in the future.

## This is about services

It's not just about money. It's about making sure everyone gets the same high-quality service wherever they live in Wales.

We can't have **22** Local Authorities, doing things **22** different ways, to different levels with **22** different outcomes.

This isn't fair. It doesn't give people what they need.

# Timeline

What we've already done.



# The changes

We think it's time that some Local Authorities join together to make larger Authorities.

There are three different ways to do this.



## Option 1 – Local Authorities choose

Local Authorities choose if and when to join together on their own.

Then they work together and make decisions. But, this might not bring the changes that Wales needs.

We would give them support through this.

## Option 2 – Do it in stages

Some Local Authorities would become larger Authorities first then the others would follow at a later time.

The Local Authorities who choose to join together, can do it sooner. We would give them support to join in 2022.

Other Local Authorities would have to join together by 2026.

This means some areas in Wales might get better services and make savings before others.

We would give them support through this.

## Option 3 – A single action plan

All Local Authorities join and become larger Authorities at the same time.

Local Authorities become larger Authorities in 2022.

This sets out a single, clear way forward for every Authority to follow.

It may be a big change, but it deals with the challenges on services and money quicker.

We would give them support all the way through this.

## Cost of change

Change takes time and money. But, the cost of doing nothing is bigger.



Which option would you choose?

☐ 1

☒ 2

☐ 3

Why?

Because its in the middle, its set out a deadline of transition but also offers authorities or department to start the change



# What will the new larger Authorities look like?

We've listened to people and used that information to set out this plan. We think we should have fewer, larger Authorities. We've suggested how to do this.

We know this won't be easy. There will be issues that each area has to deal with.



Is having fewer, larger Authorities a good plan?



Yes



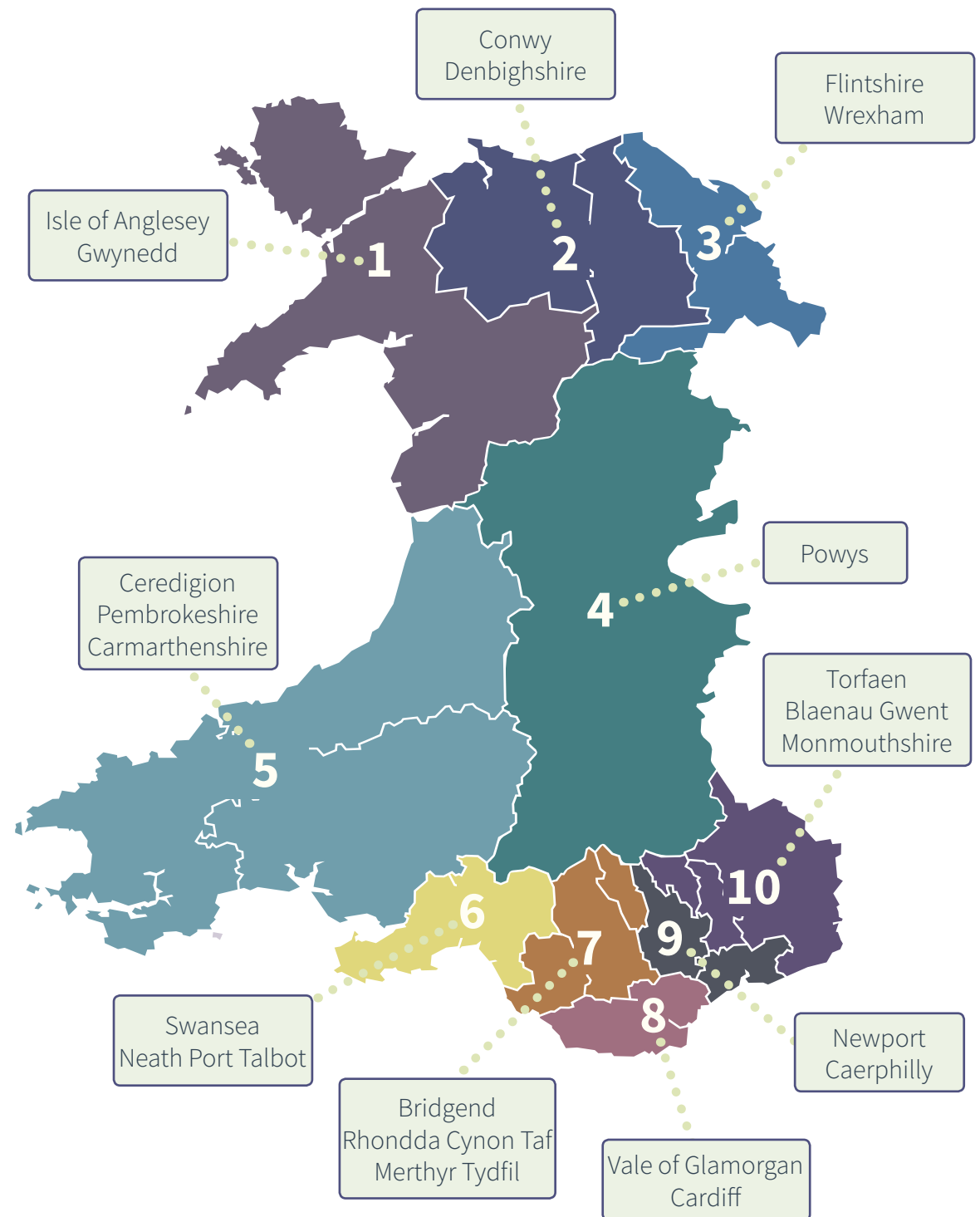
No

What do you think of our ideas for the Authority areas?

Good idea, not totally sure on the merger of Ceredigion, Pembrokeshire and Carmarthenshire, it seems from viewing the area its quite large but could potentially manage.

## Support through the changes

It's important that these changes happen in a way that is fair, open and clear. So, there'll be Transition Committees to give help and advice. Staff will also get the training and the support they need.



# What difference will it make?

The new larger Authorities will:

## Help to improve services

Larger Authorities will have:

- the ability to cope with more demand for services
- more resources and people with skills
- the opportunity to look at new ideas and develop new services
- new ways to meet people's needs, now and in the future.

## Give people the power to make decisions

Local Authority leaders said they want to be able to make decisions to improve services and do what their area needs. They want to involve people in their communities and plan better for the future.

## Support Councillors

Councillors work hard to improve life in their communities. They have to deal with cuts and difficult decisions. Often, they get criticism in the media, internet trolled and people complaining. This puts many people off becoming a councillor, even if they'd be good at it.

**Change can be difficult.** It can make people feel unsettled and worried. When these changes happen, there will be advice and support for staff and the people who deliver services.

We will make sure every area has the support they need.

? How can we get more people from different backgrounds to get involved and become councillors?

More advertising and holding community fun days



## Other issues

We have a responsibility to:

1. **Protect the Welsh Language.** It's important that people can get services in Welsh and English.

? How do you think these changes will affect the Welsh Language?  
☒ Positively    ☐ Negatively    ☐ Not much effect

2. **Treat people equally and be fair.** Everyone should be able to take part in decisions that affect their community.

? How do you think the changes will affect how people are treated?  
☒ Positively    ☐ Negatively    ☐ Not much effect

3. **Protect Children's Rights.** We must think about children's rights when we make any decisions.

? How do you think the changes will affect Children's Rights?  
☒ Positively    ☐ Negatively    ☐ Not much effect

Is there anything else you want to say about these plans?

I understand there needs to be change to local authorities as most people will agree we are paying more and receiving less, authorities need to really internally view individual departments and see what members of staff do in their roles, I understand this is a timely exercise but for managers to understand ways of saving money they need to be introducing new ideas to members of staff, I believe this is why managers are paid more and they could trial a week out of their own role and into another and see how different teams work and add suggestions to the current manager on how they could improve.

## Thanks for reading this

We want to hear what you think.

Please send your answers to:  
[StrengtheningLocalGov@gov.wales](mailto:StrengtheningLocalGov@gov.wales)

or to:

Strengthening Local Government  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

by 12th June 2018



## Annex C: Consultation Questions

Your Name	Hodge Economic Research Project: <ul style="list-style-type: none"><li>• Professor Brian Morgan</li><li>• Professor Gerry Holtham</li><li>• Dr Selyf Morgan</li></ul>
Organisation (if applicable)	Cardiff Metropolitan University
E-mail / Telephone	<a href="mailto:slmorgan@cardiffmet.ac.uk">slmorgan@cardiffmet.ac.uk</a> ; Tel: 0292041 6312
Your Address	Cardiff School of Management, Cardiff Metropolitan University, Llandaff Campus, Western Avenue, Cardiff, CF5 2YB.

You can find out how we will use the information you provide by reading the privacy notice in the [consultation document](#).

<b>Chapter 3</b>
<p>Consultation Question 1</p> <p>In Chapter 2, 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 summarise features of the process which would be common to each option.</p>
<p>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?</p> <p><i>There are greater problems associated with regional working between a larger number than a smaller number of authorities. As such the opportunity for improving regional working in the current context of 22 LAs is limited.</i></p> <p><i>Twenty two LAs makes for a substantial number of interactions required for regional working and collaboration, and also contributes to an unequal distribution of interactions and, therefore costs, between the regions of SE, SW, Mid, NW, and NE Wales. Transaction costs, the potential for continued duplication of some activities, along with potential difficulty in securing the skills and experience required to deliver services contribute to the overall costs of 22 LAs working regionally.</i></p> <p><i>From an economic development, land use, and transport perspective, it is imperative that the issues involved are looked at on a regional basis. The Welsh Government's (WG) Economic Action Plan (EAP) seems to propose that coordination and delivery of action in these policy areas is primarily done by the Welsh Government through regional economic development teams, which will be part of the WG's structure. We would prefer to see policy developed, and action governed and coordinated with more direct linkage to local government, and there is a case for policy action and delivery to be organised at one remove from government through executive agencies.</i></p>

*As we argued in previous consultations on local government and on WG economic development policy<sup>1</sup>, such executive agencies (through their CEOs) would be answerable to both local government as well as to the WG through joint policy setting fora. The City Regions, and City and Growth Deals, have provided an opportunity to accumulate experience of regional working between LAs, with input by the WG, however, progress and delivery continues to be constrained by relatively unwieldy decision making structures and competing agendas. These models of joint working should be developed and policy delivery enhanced by the setting up of regional executive agencies. Regionally-based executive agencies could gain better momentum and delivery than currently is the case, or as the structure proposed by the EAP promises.<sup>2</sup> They could, thus, achieve long term strategic co-ordination of delivery in a joint governance structure between the fewer number of larger LAs and the WG.*

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

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

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

*The discussion about LA mergers has been ongoing for a number of years as is demonstrated in the consultation document. The issues involved, in the context of continued austerity, have been well explored and debated. It is now time to expedite the change process, and to do so in a timely manner.*

*In order to minimise disruption, and to minimise the period where there is potential for a lack of clarity as to the role and functions of LAs, we would opt for option 3, aiming for mergers in 2022. However, care should be taken that there is detailed scrutiny of proposed LA borders, so that the new local government structure is coherent and optimal both in geographical terms, and between the LA and other public service delivery bodies such as the Health Boards, Education Consortia, and Regional Skills Partnerships, whilst effective public accountability is maintained.*

*However, local government currently has responsibility for a range of functions or policy areas, and the optimal size of authority is not the same for different functions. Existing unitary authorities are a compromise and in many instances are currently too small efficiently to discharge some functions (hence the need for regional working), and unnecessarily remote from local people for others (hence the importance of community and town councils).*

*There is a case that reorganisation at the Unitary Authority level, particularly where amalgamation of existing LAs lead to geographically large new LA areas (particularly the areas currently represented by Pembrokeshire, Carmarthenshire, and Ceredigion; the proposed enlarged Gwynedd, and also in the case of Powys), cannot be done without addressing the role and place of*

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<sup>1</sup> See response from The Hodge Economic Research Project, Cardiff Metropolitan University, to the Welsh Government's White Paper entitled 'Reforming Local Government: Resilient and Renewed'; 11 April, 2017: <http://welsheconomicchallenge.com/wp-content/uploads/Local-Authority-Reform-Consultation-Responses-April-2017.pdf>

<sup>2</sup> See outline proposal on why we argue this case and how to realise such structure at the end of this document. Also see Hodge Economic Research Project, Cardiff Metropolitan University's submission to the WG's consultation on a National Infrastructure; 9<sup>th</sup> January, 2017 <http://welsheconomicchallenge.com/wp-content/uploads/Main-Consultation-response-NICFW-Jan-2017.pdf>; and the project's response to the UK Government's consultation on the Industrial Strategy: <http://welsheconomicchallenge.com/wp-content/uploads/UK-Industrial-Strategy-Response-Cardiff-Metropolitan-University.pdf>

#### *Community and Town Councils (CTC).*

*Remoteness from centres of political and executive authority is a weakness of the current proposal in many parts of Wales, and the inclusion of CTCs in the process of local government reform will provide means for maintaining local awareness of, and maximising opportunities to be active participants in local democracy.*

*There is a wide range of types and capabilities of CTCs, and the conclusions of the WG review of CTCs, which is due to report later this year, should be taken into account before the final decision on reform of the LAs is taken. As part of the reform of CTCs, the clustering of resources and services where appropriate, driven by local needs, responsibilities, and ambitions, should be a core area of consideration. The potential strengthening of CTCs should also be pursued and perhaps piloted in Powys, which is to be unaltered under the current proposals for reorganisation, and in selected other areas such as Llanelli, Y Wyddgrug, and on Ynys Mon (but not excluding other areas).*

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

#### **Chapter 4**

##### Consultation Question 2

Chapter 4 has 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 sets 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?
- b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?
- c) What are your views on the new areas suggested in this section?
- d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?
- 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?

*We agree that providing clarity on the future footprint of local government is important, and that the factors identified are relevant and useful. We have suggested above that CTCs should be included in considerations of LA reform, and provided an outline approach to establish at arms-length executive agencies to deliver economic development policy, which is focused at the regional level, and which we argue is a better alternative to the approach outlined in the EAP.*

*Not all local government functions are closely interrelated. There is no particular reason why the footprint for economic development should exactly match the footprint for social care (for example). Tests to evaluate optimal regional working may well dictate different outcomes with respect to regional working or to its footprint for different local government functions. A certain amount of complexity is an inevitable corollary of an organic approach, proceeding by consent with respect for differing local conditions and preferences. For example, some CTC's may be able to take on the responsibility for some current LA assets and services.*

*Note that similar comments were made in our submission to the WG's consultation process about the White Paper: Resilient and Renewed (submitted April, 2017 – see footnote above), and they remain relevant.*

<b>Chapter 5</b>
<p>Consultation Question 3</p> <p>Chapter 5 sets out the proposed approach to transition and implications for establishing Transition Committees and elections to Shadow Authorities under each option.</p> <p>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?</p> <p>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?</p> <p>c) Do you have any other thoughts on the proposed process?</p> <p><i>We do not have a comment to make on the arrangements for transition other than to indicate that our preference is that Option 3 is decided upon.</i></p>
<p>Consultation Question 4</p> <p>The consultation suggests holding any local government elections in June 2021.</p> <p>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.</p> <p><i>No comment.</i></p>
<p>Consultation Question 5</p> <p>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 make 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?</p> <p><i>No comment.</i></p>
<p>Consultation Question 6</p> <p>What are your views on the approach which should be taken to determining the parameters of electoral reviews?</p> <p><i>No comment</i></p>
<b>Chapter 6</b>
Consultation Question 7
<p>a) How can councils make more effective use of their elected members' knowledge of, and connections in, their communities?</p> <p><i>To ensure a basic level of competence, skills, and knowledge of relevant issues there should be comprehensive training provided for councillors to enable them all fully to engage with their roles. This requires that sufficient funding is provided to enable such training to be effective.</i></p>

*Local Authority councillors should, where possible, be closely involved in the CTCs in their area, particularly those that may have enhanced capacities as co-opted liaison members if not already by virtue having been elected members of the CTC.*

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?

*No comment*

#### Consultation Question 8

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?

*See previous comments on the establishment of executive agencies, which will report both to the LA and to the WG through a joint forum on which there will be councillor representation. Similarly see comments for an enhanced role for qualifying CTCs. Enhanced powers depend on local capacity to exercise them effectively and should be decided on as part of continuing dialogue between local government and WG.*

#### Consultation Question 9

a) Which areas offer the greatest scope for shared transactional services?  
b) How might such arrangements be best developed?

*No comment*

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

*We agree on pooling common administrative 'back office' tasks across local government to minimise costs and to build coherent systems across Wales, and where possible, to share built and other assets.*

#### Consultation Question 11.

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

*No comment*

#### Consultation Question 12

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.

*No comment*

Consultation Question 13

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

*No comment*

Consultation Question 14

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

*No comment*

Consultation Question 15

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

*We have argued in our response above in favour of a reorganisation that takes the least amount of time, and adopts the essential elements of the WG's proposal for a rationalisation of local authority structures.*

*To reiterate, our response is based on the following key elements:*

- *a reduction in the number of LAs*
- *a reorganisation of boundaries to match those of other public service providers where possible (such as Health Boards etc.)*
- *sensitivity to the need for local representation (see further below)*
- *the development of the role of CTCs following a programme of enhancement in capabilities and capacities*
- *continued dialogue between WG and new local government structures on enhancement and development of roles and responsibilities*
- *continued and strengthened regional co-operation in economic development, infrastructure, and land use policy*
- *the establishment of 'at arms-length' regional executive agencies to deliver coordinated action on policy decisions answerable to the regions' LAs and the WG (see further below)*

*Accountability and involvement in democratic structures is essential for healthy local government. Hence, we would advise caution in respect of those new LA areas that create large geographical regions such as in the case of the former Dyfed and Gwynedd areas, whilst it should be recognised*

*that there are also issues of remoteness from the centre of local government already current in Powys.*

*There is a case for strengthening a level of local government below the LA in these geographically larger regions in particular. This level could take on very local service provision in collaboration with neighbouring CTCs and the LA, something that could happen organically as capabilities and capacities develop. Currently CTCs exhibit a range of capabilities and capacities for locally delivered services, and some are already able to, and in some cases already do take on responsibilities and assets from the LAs. This should be encouraged and systemised through a standing commission of the WG to develop and oversee CTCs.*

*The case for regional working and delivery of policy, at a level above the new LAs is also made, building on the learning that has taken place already in collaborative exercises between existing LAs, between LAs and the WG, and which is being developed through the City Regions, and City and Growth Deals.*

*We propose, however, that policy delivery, specifically in economic development, infrastructure, and land use policy areas, is done through executive agencies. These agencies would be accountable to the regions' LAs in combination with the WG, while operational issues (of delivery and implementation) would be the responsibility of specialists.*

*We are aware that this consultation is not focused solely on these policy areas, so we do not develop this argument further here, but we are ready to engage in further clarification of this proposal, and to establish those principles that would make such a system flexible, dynamic, and sustainable, and where responsibilities for action and delivery are clear.*

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

Strengthening Local Government  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

Our Ref: HRCW/CH  
Your Ref:

Date: 11 June 2018

Direct: +44 (0)29 2039 1765  
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Email: huw.williams@geldards.com

Dear Sirs

## Strengthening Local Government: Delivering for People

I attach my response to the Green Paper "Strengthening Local Government: Delivering for People".

I have prepared the response drawing on my experience as Lead Partner: Public Law at Geldards LLP, a current Member of the Wales Committee of the Law Society of England and Wales and also a former member of the Planning and Environment Law Committee. I was also member of the Independent Advisory Group on Planning whose report was a major part of the evidence base for the reforms in the Planning (Wales) Act 2015. Earlier in my career, I worked as an in-house lawyer in local government in Wales for nine years.

The views expressed are my own and do not represent the corporate view of Geldards LLP.

Yours faithfully



Huw Williams  
Partner  
Geldards LLP

C: 5570814v1



## **Consultation Response**

### **Strengthening Local Government: Delivering for People**

Huw Williams, Geldards LLP

#### **Question 1(a)**

The response submitted by Geldards dated 10<sup>th</sup> April 2017 to the consultation on the White Paper "Reforming Local Government: Resilient and Renewed", identified the need for public sector-wide shared service arrangements to be able to establish a corporate body to conduct its activities: employ or agree secondments of staff, and enter into contracts for its own purposes.

While the use of companies could facilitate this, it raises unhelpful connotations of "privatisation" with many local politicians. Accordingly, there should be a general and flexible statutory power for the Ministers' to establish by order bodies to deliver public sector-wide shared services and to make provision for the nomination of their boards of management by stakeholder and for the co-option or appointment of independent members with specialist skills. This power should allow such bodies to work across the Welsh public bodies and should not be restricted to collaboration between local authorities.

The Ministers' should have powers themselves to initiate and direct such arrangements as well as to establish them in response to initiatives from the public sector.

This view is based in particular, on the experience of:

1. advising on one of the Welsh City Deals and the complexity of devising governance arrangements to comply with the Local Government Act 1972 section 101 which authorises the creation of joint committees, but without the advantages of corporate personality;
2. the advantages a corporate entity would confer in the delivery of all-Wales services under, for example, the auspices of the Welsh Local Government Association;
3. the governance and vires issues that flowed from the abolition of a former statutory education body and its replacement by a company limited by guarantee.

#### **Question 1 (b)**

I think that an important element not mentioned is that the new footprint should command broad public acceptance and should create units that engender a sense of civic pride among the population.

My professional experience of local government extends back to establishment of the local authorities created by the Local Government Act 1972. The authorities were widely unpopular with the general public and the loss of county and borough identities going back centuries was keenly felt and the community councils which replaced many of these were but pale shadows of their

predecessors. There are examples from across Wales of this but I would mention three examples from my own native county of Carmarthen; the Borough of Kidwelly had a continuous history from 1115 to 1974, the Borough of Llanelli was incorporated in 1913 in recognition of the town's status as "Tinopolis" and its reduction in 1974 to a "Town Council" adversely affected the perception of the new District and County Councils. Similarly, Carmarthen took pride in its status pre-1974 of being "the County of the Borough of Carmarthen", again with a civic history with its origins in the town's functions as a seat of royal administration in South Wales.

The introduction of unitary authorities in 1996 reversed, to an extent, the effects of the 1972 Act and the restoration of unitary status to the cities and former county boroughs (Cardiff, Swansea, Newport and Merthyr Tydfil), the return of historic county identities, such as Pembrokeshire and Monmouthshire and recognisable urban authority names such as Caerphilly and Wrexham have given the present structure a degree of public acceptance that the 1974 authorities never achieved.

While I do not disagree with the central proposition of the White Paper that a return to larger and therefore fewer, principal councils is necessary in the interests of the delivery of efficient modern services, this comes at the cost of new authorities operating at greater distance from the communities they serve compared with the current unitary structure. Without careful consideration of how to ensure the broad acceptability of such councils amongst these communities the Government risks repeating the mistakes of the 1974 reorganisation, which failed to work with the grain of Wales' character as, in the main, a nation of small communities with the local loyalties and ties of history and affection that this implies.

To my mind, the key to a structure that avoids these pitfalls is to go further in reinvigorating those community councils established in 1974 in the place of the boroughs and more significant urban districts (for example, Penarth) by giving them some real functional responsibilities (in addition to the welcome proposal to extend the general power of competence to eligible community councils) so that they can again be the focus for civic pride and be perceived as bodies fulfilling a role and functions that will attract individuals with an interest in public service and with the skills and desire to make a difference.

To achieve this, it is necessary to analyse the functions that might be devolved to eligible community councils to enable them to fulfil the renewed and enhanced role I envisage. Clearly, the major functions such as education, social services and transport, along with waste disposal, environmental health and economic development need to be undertaken at the level of the enlarged principal councils. However, there are a range of "place making" functions that would be a good fit with the enhanced civic role that I propose for eligible community councils.

Specifically, I would envisage these functions to relate to:

1. The management of parks, open spaces and the local public realm more generally.
2. Cultural services, including cultural venues and perhaps local libraries as part of a national library service.

3. Certain town and country planning functions, for instance:
  - 3.1 Planning applications of local importance but which fall outside the principal council's scheme of delegation for officer determination could be delegated to be determined by a community council or its planning committee, rather than by the principal council's planning committee.
  - 3.2 I also think that there is sufficient experience by now of neighbourhood planning in England for there to be a sufficient body of evidence to assess whether the enhanced community councils I envisage should have the power to adopt statutory place plans in conformity with the principal council's local development plans. This would also fit well with the revised Planning Policy Wales edition 10, which has recently been subject to consultation and which proposes place-making as the central policy aim of the planning system.
4. Eligible community councils could also be given a role on scrutiny committees of their principal council.

In addition, there should be provision for historic councils to apply for and assume the "civic character" (coats of arms, regalia and privileges) of historic predecessor councils, including a power to apply for re-incorporation by Royal Charter.

#### **Question 1 (c)**

I would favour a single comprehensive merger programme on the "Option 3 plus" model I suggest in response to the next question, given the continuing financial pressures on principal councils and the time already spent in the repeated rounds of reports and consultations noted in the Green Paper.

#### **Question 1 (d)**

Taking account of my comments on the previous question, I suggest a fourth option or perhaps an "Option 3 plus" with a comprehensive merger programme linked to a programme of enhancing community and especially town councils.

This need not take place simultaneously with the reorganisation of principal councils, but the reorganisation legislation should create the framework for a programme to facilitate and develop eligible community councils over time and place appropriate duties on principal councils and Ministers to facilitate this both initially and in future when a community council can demonstrate that it meets the criteria for taking on enhanced functions.

#### **Question 1 (e)**

No.

However, I would observe that my proposed "Option 3 plus" may carry with it costs for principal councils in managing relations with enhanced community councils, but I would regard these as being worthwhile as the cost of securing wider public acceptance of the larger principal councils operating at greater distance than the current unitary authorities.

**Question 2 (a)**

Yes.

**Question 2 (b)**

Yes.

**Question 2 (c)**

I think that the proposed footprint is the best that can be achieved with the only outlier being the structure of the Fire and Rescue Services. I agree that alignment with the other public service boundaries is critical to a future local authority footprint.

**Question 2 (d)**

The only area that I think would justify further consideration is whether there is a case for Ceredigion merging with Powys to create a Mid Wales authority with a larger population and developing the connections created by the "Growing Mid Wales" Growth Deal. The main obstacle to this would seem to be the need to consider a realignment of health services in the area as well if the principle of co-terminosity is to be maintained.

**Question 2 (e)**

See my response to Question 1(a).

**Question 3 (a)**

Agree.

**Question 3 (b)**

I do not support option 1.

**Question 3 (c)**

No.

**Question 4**

No comment.

**Question 5**

No comment.

**Question 6**

My views on this question are linked to my response to question 7 below.

The review should aim to bring the number of electors per councillor more into line with England and Scotland.



However, assuming the National Assembly for Wales decides to increase its number of AM's to around 90, I do not think, as a matter of principle, that there is any justification for any new principal council's councillors to exceed the number of AM's.

#### **Question 7 (a)**

With a smaller number of larger principal councils there is an opportunity, especially in relation to the role of eligible community councils for some of their members to play a greater role as a democratic link to the principal council and its scrutiny, perhaps through co-option to scrutiny committees.

#### **Question 7 (b)**

The budgets and functions of new principal councils are such that I think the time has come to acknowledge that the complexity of modern service delivery makes this a substantial, if not full-time, role that should be remunerated accordingly if a diverse cross section of capable individuals is to be persuaded to undertake elected office. Members elected on this basis, however, should be clear as to the representational and community leadership roles that are expected for them over a five-year electoral cycle.

Having regard to the effect of such a move on the costs of democracy in Wales, I would be prepared to accept that this would probably mean fewer councillors and larger wards, but I think the gains in professionalism and capacity are, on balance, worthwhile. Furthermore, if community councils are enhanced as I suggest then there will also be worthwhile roles at that level for those who are interested in serving as a councillor in local government but who do not wish, or feel able, to commit to a full-time role.

#### **Question 8 (a)**

The commitment to a general power of competence is to be welcomed. However, it is not a complete solution to the problem of local authority powers. Rather, the problem is the way that functions and duties have been given to local authorities over the years since the Local Government Act 1972.

Consequently, there is no substitute for a painstaking and detailed review of local authority powers leading to a Welsh Local Government Code, which will lay out the functions, both general and specific, of local authorities and signpost those other bodies of law that confer functions and duties.

However, recognising the scale of the task of creating a Code and the time required to complete the project, I would make the following suggestions for immediate action:

1. The Act for the reorganisation proposed by the Green Paper should restate all the general duties of local authorities alongside the power of general competence; examples are those related to the environment, biodiversity and crime reduction. There should be a further provision that any general duties not so restated shall be disappplied.
2. The Act should similarly restate all the Ministerial consent or approval provisions on the same basis, namely that controls not so restated shall be disappplied.

3. Local authority powers to dispose and develop land should be reviewed. I question the continued utility of the ministerial consent requirements in section 123 of the Local Government Act 1972 for disposals at less than market value given the scope of discretion already allowed by the General Disposal Consents and the constraints placed on such disposals by State aid rules (which seem likely to continue to not dissimilar effect, when the UK leaves the European Union).
4. Action should be taken to make clear the ability of local authorities to operate in their local housing markets with the aim of facilitating the achievement of the housing targets for affordable dwellings in their local development plans, through using or participating in structures such as joint ventures, local housing companies or limited liability partnerships and to disapply any constraints to this in the Housing Acts.

### **Question 9 (a) and (b)**

In the response I submitted with colleagues at Geldards to the White Paper "Reforming Local Government: Resilient and Renewed" we made proposals for the management of public sector property assets which I set out again here.

Legislation should ensure the maximum flexibility for collaboration in discharging back office functions across the whole public sector. For example, public sector wide asset management should include the ability to provide surveying and property legal services across all branches of public service – Welsh Government, NHS Wales and local government.

A public sector-wide shared service arrangement will require a corporate body to conduct its activities: employ or agree secondments of staff and enter into contracts for its own purposes. Our response to Question 1 sets out a proposal for a flexible model of public body that could be used for such a purpose.

Using the model outlined in the response to Question 1, we suggest the creation of "Regional Asset Management Boards". The Boards would have the mission to become centres of property management expertise. To enable surplus assets to be managed effectively, there should be statutory powers to vest surplus assets in such Boards by agreement. This would be more efficient than having to undertake formal transfers of title. To facilitate such transfers and avoid valuation disputes holding up vesting, we propose a statutory scheme for the net proceeds of disposal to pass to the originating body.

A National Asset Management Board could exercise oversight of the Regional Boards. It could also contribute a national perspective and provide input into other national planning activities such as the work of the Welsh National Infrastructure Commission and the National Development Framework.

### **Questions 10 – 14**

No comment.

### **Question 15**

Further comments:

1. Indicative LA Area 5 should be named "Deheubarth" the historically accurate name for the counties of Carmarthen, Cardigan and Pembroke, rather than Dyfed.
2. The future of the "preserved counties" should be considered. They now represent arrangements that existed for barely twenty years and their only function appears to be to determine the distribution of Lord Lieutenants and High Sheriffs. I suggest there is a case for aligning these offices with the four police areas.

11<sup>th</sup> June 2018



Annex C: Consultation Questions

Your Name	Sarah Jennings
Organisation (if applicable)	Hywel Dda University Health Board
E-mail / Telephone	<a href="mailto:Sarah.jennings@wales.nhs.uk">Sarah.jennings@wales.nhs.uk</a>
Your Address	[REDACTED]

You can find out how we will use the information you provide by reading the privacy notice in the [consultation document](#).

<b>Chapter 3</b>
<p><u>Consultation Question 1</u></p> <p>In Chapter 2, 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 summarise features of the process which would be common to each option.</p>
<p>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?</p>
<p><b>The new regional boundaries would help to simplify Public Services Board arrangements. At present, Hywel Dda UHB is a partner in three Public Services Boards and have been involved in the development of three different Well-being Plans. There are similar themes emerging but the three Plans will all be taken forward slightly differently and with three different sets of reporting requirements. Streamlining PSBs will also streamline governance and reporting arrangements.</b></p> <p><b>Also to continue to use RPB Health &amp; Social Care arrangements as the main governance for all integration of health and social care.</b></p>
<p>b) What are your views on the common elements to the process of mergers we outline in this section?</p>
<p><b>No comments</b></p>
<p>c) What are your views on the options for creating fewer, larger authorities which we have set out?</p>
<p><b>No comments</b></p>
<p>d) Are there other options for creating fewer, larger authorities we should consider?</p>
<p><b>No comments</b></p>
<p>e) Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.</p>

**No comments**

## **Chapter 4**

### Consultation Question 2

Chapter 4 has 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 sets 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?

**From a Health Board perspective we would agree that providing clarity on the future footprint of local government is vital to supporting the integration of health and social care. The ability to make progress at pace is likely to be impacted by local authority changes, therefore the quicker this can take place the better.**

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

**Aligning local government footprints to current Local Health Board boundaries will support more effective joint working.**

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

**We agree with the proposed new area covering the Hywel Dda Local Health Board footprint.**

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

**No comments.**

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?

**The new regional boundaries would help to simplify Public Services Board arrangements. At present, Hywel Dda UHB is a partner in three Public Services Boards and have been involved in the development of three different Well-being Plans. There are similar themes emerging but the three Plans will all be taken forward slightly differently and with three different sets of reporting requirements. Streamlining PSBs will also streamline governance and reporting arrangements.**

<b>Chapter 5</b>
<p><u>Consultation Question 3</u></p> <p>Chapter 5 sets out the proposed approach to transition and implications for establishing Transition Committees and elections to Shadow Authorities under each option.</p>
<p>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?</p>
<p><b>Transitional arrangements would have benefits to the existing and new organisations and help to facilitate a smooth handover of business.</b></p>
<p>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?</p>
<p><b>Yes. Clarity about voluntary merger dates will be essential but difficult to manage if different areas decide to proceed at different paces. This could have a significant impact on other public sector partners.</b></p>
<p>c) Do you have any other thoughts on the proposed process?</p>
<p><b>Comprehensive mergers by 2022 whilst radical and challenging for some areas would have the benefit of limiting the period of organisational change and the impact that this has on joint working with other partners. These processes distract people from the important strategic objectives we have to deliver so a short period would be our preference.</b></p>
<p><u>Consultation Question 4</u></p> <p>The consultation suggests holding any local government elections in June 2021.</p> <p>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.</p>
<p><b>No comment</b></p>
<p><u>Consultation Question 5</u></p> <p>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 make 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?</p>
<p><b>Can't think of any others at this point.</b></p>
<p><u>Consultation Question 6</u></p> <p>What are your views on the approach which should be taken to determining the parameters of electoral reviews?</p>
<p><b>No comment</b></p>

<b>Chapter 6</b>
<b>Consultation Question 7</b>
a) How can councils make more effective use of their elected members knowledge of, and connections in, their communities?
<b>Local elected members should be asked to undertake training on community engagement and co-production techniques in order to harness the contribution that they can make more effectively.</b>
a) 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?
<b>No comment</b>
<b>Consultation Question 8</b>
a) Are there other powers which local government should have? If so, what are they?
<b>No comment</b>
b) Are there other freedoms or flexibilities which local government should have? If so, what are they?
<b>No comment</b>
<b>Consultation Question 9</b>
a) Which areas offer the greatest scope for shared transactional services?
<b>No comment</b>
b) How might such arrangements be best developed?
<b>No comment</b>
<b>Consultation Question 10</b>
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?
<b>No comment</b>
c) 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?



<b>No comment</b>
d) Which of the issues identified above or in your response should be prioritised for early resolution?
<b>No comment</b>
<u>Consultation Question 11.</u> 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?
<b>All public bodies are subject to the Welsh Language (Wales) Measure 2011 therefore there should be no adverse impact.</b>
b) How could positive effects be increased, or negative effects be mitigated?
<b>No comment</b>
<u>Consultation Question 12</u> 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.
<b>No comment</b>
<u>Consultation Question 13</u> 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?
<b>No comments</b>
b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?
<b>No comments</b>
<u>Consultation Question 14</u> 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?
<b>No comments</b>
b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?
<b>No comments</b>
<u>Consultation Question 15</u> Please provide any other comments you wish to make on the content of this consultation.
<b>No comments</b>

## Annex C: Consultation Questions

Your Name	<b>The Independent Remuneration Panel for Wales</b>
Organisation (if applicable)	
E-mail / Telephone	<b>IRPMailbox@gov.wales</b>
Your Address	

You can find out how we will use the information you provide by reading the privacy notice in the [consultation document](#).

<b>Chapter 3</b>
<p><u>Consultation Question 1</u></p> <p>In Chapter 2, 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 summarise features of the process which would be common to each option.</p>
<p>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?</p>
<p><b>Regional working would be made easier and more effective if the Welsh Government made clear resourcing and accountability mechanisms underpin the working of the defined regions.</b></p> <p><b>There has been minimal take up of the remuneration available for joint working.</b></p>
<p>b) What are your views on the common elements to the process of mergers we outline in this section?</p>
<p>c) What are your views on the options for creating fewer, larger authorities which we have set out?</p>
<p><b>There would be an impact on the work of the Panel on the process of putting in place a remuneration framework. Options one and two in particular could require two frameworks in place at the same time.</b></p> <p><b>If, in future models, Powys retains its current size, the opportunity for the creation of a balanced all Wales remuneration framework with fewer, better remunerated councillors is adversely affected.</b></p>
<p>d) Are there other options for creating fewer, larger authorities we should consider?</p>

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

<b>Chapter 4</b>
<u>Consultation Question 2</u> Chapter 4 has 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 sets 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?
<b>Yes, this is clearly desirable.</b>
b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?
c) What are your views on the new areas suggested in this section?
<b>If, in future models, Powys retains its current size, the opportunity for the creation of a balanced all Wales remuneration framework with fewer, better remunerated councillors is adversely affected.</b>
d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?
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?

<b>Chapter 5</b>
<u>Consultation Question 3</u> Chapter 5 sets out the proposed approach to transition and implications for establishing Transition Committees and elections to Shadow Authorities under each option.
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?

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?
<b>Yes, for planning purposes.</b>
c) Do you have any other thoughts on the proposed process?
<b>What ever transition processes are undertaken, where shadow authorities are elected; there will be a need to address remuneration matters for shadow members.</b>
<u>Consultation Question 4</u> 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.
<u>Consultation Question 5</u> 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 make 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?
<u>Consultation Question 6</u> What are your views on the approach which should be taken to determining the parameters of electoral reviews?

<b>Chapter 6</b>
<u>Consultation Question 7</u>
a) How can councils make more effective use of their elected members knowledge of, and connections in, their communities?
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?

**In relation to remuneration:**

**Establishing an appropriate remuneration framework, attractive to a wide diversity of potential candidates and publishing it widely in advance of elections. The obligation to publish this information for rest with national and local government.**

**On going support for elected members in relation to the full range of duties: representative, executive, regulatory and scrutiny. This support should be sufficient and comparable to that of other elected members such as AMs and MPs receive. Recognition of the career, financial and personal implications holding elected office may need to be recognised by provision such as “parachute” payments for members who are not retuned following an election.**

Consultation Question 8

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?

Consultation Question 9

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

b) How might such arrangements be best developed?

Consultation Question 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?

c) 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?

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

Consultation Question 11.

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?
b) How could positive effects be increased, or negative effects be mitigated?
<u>Consultation Question 12</u> 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.
<u>Consultation Question 13</u> 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?
b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?
<u>Consultation Question 14</u> 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?
b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?
<u>Consultation Question 15</u> Please provide any other comments you wish to make on the content of this consultation.

## The Isle of Anglesey's response to the Green Paper

<b>Your Name</b>	J. Huw Jones
<b>Organisation (if applicable)</b>	Isle of Anglesey County Council
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### General

The County Council's position in response to the reorganisation is shaped on following principles based on local government being accountable for delivering services:

- 1) The need to provide effective and efficient services for the residents of Anglesey. It is acknowledged that this could involve regional and sub-regional collaboration in order to ensure that the required specialism and resilience is in place and that an arrangement needs to be established to ensure direct local accountability for the quality of services. In this context, an understanding is required of the services which will be provided regionally, sub-regionally and locally, broadly aligned to the findings of the Williams Commission but also suggesting that local government needs to make decisions on collaboration structures.
- 2) Any collaboration arrangement should be based on the likely benefits to the residents of Anglesey or on the presumption that services of the same quality can be provided at a lower cost.
- 3) The Council is of the opinion that leadership based on local knowledge is more important than size. The Council is of the opinion that WG's expectations could be met through a combination of collaboration and local provision, i.e. a natural extension of the current position. In addition, it is acknowledged that detailed consideration needs to be given to any possibilities to provide services in a more cost-effective manner, e.g. reducing the costs of management or support services.

These key matters should be central to any discussion on reforming local government rather than lines on maps.

The Green Paper – Overview sets out the Welsh Governments' intent 'for a stronger, more empowered local government in Wales'.

However, it fails to demonstrate sufficiently how these aspirations will be met - at what cost and what cost to local democracy in particular? It focuses on structures and a more centralist model where bigger is better. There is evidence to suggest that models based on large geographical areas are costly and that sustainability is a major challenge e.g. in Health.



The Council has previously highlighted the importance of maintaining the status quo in terms of structures to safeguard local accountability and that service delivery should focus on meeting the needs of local communities. (Response to 2017 White paper). The Council has also highlighted and acknowledged the benefits of delivering some services regionally as in the case of North Wales, and that these collaborative models provide a basis for greater resilience, subject to refinement and better use of cross sector resources and local accountability. Service delivery needs to be a right balance between the benefits of what is delivered locally and regionally, shaped by democratic representation on a local level by those elected to serve their communities.

Models should be given the freedom to grow organically and not imposed from the centre. Larger organisations do not always serve communities well due to the nature and distinctiveness of communities and competing demands. Where is the evidence to support the notion that larger authorities will ‘empower communities’? How will an equal partnership be secured through forced amalgamation? What about the impact of increasing Council tax levels and impact on citizens at a time of prolonged austerity? What about priorities on spending on an equal footing prior to 1996 in the former Gwynedd County Council in areas such as the smallholdings estate?

The Green Paper is preoccupied with structures, lines on map and more powers but largely silent on how best to safeguard local accountability. Yet, proposals in the document are intended to shape ‘more resilient and sustainable public services with democratic accountability at its core.’ Where is the evidence that the Green Paper addresses these key aspects? In 2006, Cardiff University was commissioned by the Office of the Deputy Prime Minister to analyse the relationship between size and performance in local government. The results demonstrated that size did affect a Councils performance. Subsequent research by Cardiff University on behalf of the Department of Communities and Local Government in 2008 found that reorganisations to produce larger councils have significant disruptive effects on organisational performance.

There is no reference, for example, to the effectiveness of democratic arrangements in this Council and how this may be replicated elsewhere. It is doubtful if improving democratic arrangements will be achieved by decreasing the number of Councillors. LGR will cause disruption to residents when budgets are under pressure. This Council has demonstrated that service performance has improved as is evident from key data sets published by the Data Unit for 2016/17. It does not want to see reorganisation blurring work and a distraction to progress on major infrastructure projects led by the Council and service transformation. It is also seen as a major distraction at a time when strategic plans are in place to transform key areas and meet efficiency targets. Where is the evidence of public support for this?

The Green Paper is also silent on major challenges facing the public purse not least finance and other uncertainties e.g. Brexit. Welsh Government should focus on maximising the benefits of Brexit to Wales rather than concentrating on local government boundaries. How for example, will these proposals impact on Welsh Government strategic programmes and the pace of major transformation programmes e.g. in Education?

Local Authorities have had to make year on year cuts due to a reduction in central Government grants. The Leader of the WLGA has stated that the situation is unsustainable due to the scale of cuts. Public finances should be the priority of Welsh Government rather than reorganisation which is at best costly.

How will reorganisation address the fundamental issue of funding but also spending on health? Unless this is addressed, the financial resilience of the public sector will continue to be a major challenge. How do these proposals shape up to other proposed changes across Wales – and particularly increasing democratic representation in the Assembly and additional central costs at the expense of local government? The Green Paper does not provide details on how savings will be achieved by local authorities. Local government should be given the freedom to innovate and less intervention from the centre.

Reference is made to the need for larger Council delivering ‘bold new solutions’ (page 8). However, these solutions are not outlined and need clarification. Where is the evidence to support the notion that the current structure is missing opportunities to transform service delivery and the case to revisit structures? The Green Paper refers to options to create stronger and more powerful local authorities, although in essence only one option is presented on structures and various timescales.

## **Specific**

Para 2.4 makes reference to comments from the Leader of the WLGA on funding issues. How will reorganisation address this fundamental point- this is central to any discussion on public services including any reorganisation. The Green Paper draws heavily from the findings of the Williams Commission and that reform was necessary to ensure financial resilience. Since the Williams report, local authorities have made significant efficiencies at a time of reduced budgets whilst also transforming organisations. Where is the evidence to state that this is not been addressed? In Ynys Môn savings of £8.4 million have been made between 2016/17 and 2018/19.

Para 2.8 –makes reference to the challenges faced by smaller authorities, due to size etc. – is this view shared by regulators?

Para 2.9 - financial resilience will continue to be a challenge due to increase in demand, increase in cost and until there is a proper debate on the funding of health in Wales. The Green Paper refers to services at a point of collapse although Welsh Government has protected funding for local authorities. CIPFA and Deloitte have questioned the costs of past proposals for LGR which far exceed Welsh Government costings.

Para 2.12 – local authorities have made the case that regional collaboration should not be mandated from then centre but rather should be allowed to evolve locally and cooperation developed organically. Para 2.16 refers to lack of progress on pooled budgets as an example and also joint local development plans .Pooled budgets is a poor example and an ill thought out idea imposed by Welsh Government rather than a concept that should be given flexibility to be addressed more locally. More emphasis should be placed on joint working delivering better outcomes for citizens

and tangible benefits. This authority has already developed a joint LDP with Gwynedd – this is contrary to the assertion made in this section.

Para 2.21 – this refers to new stronger structures supported by regional delivery. The Green Paper fails to demonstrate how this will be achieved, although acknowledging that regional working will have a crucial role in the future. Accountability is fundamental in any model of regional delivery. Position on benefits of regional delivery here...

Para 2.22 and the 3 options for creating fewer but larger authorities. What is presented here is basically one option with different possibilities driven by timescales. This does not address the question whether this is the right solution nor whether the timing is right. No alternative options are presented. Why is there no debate on the footprint between local authorities and health for example given the size, and complexity of budgets? It is unclear whether reorganisation will address the challenges faced by local authorities. Will the cost of mergers outweigh the real cost to citizens, communities and employee and blur local accountability. Structures based simply around achieving economies of scale and large footprints can become too unwieldy, costly and less efficient overall.

Para 2.24 recognises that there will be a cost to mergers, although there is limited reference to new powers and flexibilities and it does not address fully fair and sustainable funding for local government

<b>Chapter 3</b>
<b>Consultation Question 1</b> <b>In Chapter 2, 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 summarise features of the process which would be common to each option.</b>
<b>a) What practical steps could the Welsh Government take to make current regional working easier and more effective, for example in relation to the education consortia, social services and the City Regions and City and Growth Deals?</b>
Please refer to Council's response to 2017 White Paper. LGR could have a negative impact on the momentum for regional collaboration. Potential impact on key areas – e.g. North Wales Economic Growth Bid would need to be considered.
<b>b) What are your views on the common elements to the process of mergers we outline in this section?</b>
Please see introductory comments. The Council has previously declared its opposition to any merger. However, it has welcomed the stance taken by Welsh Government in the past on regional footprints for major services provided that local accountability is safeguarded through appropriate governance arrangements.
<b>c) What are your views on the options for creating fewer, larger authorities which we have set out?</b>

This is not supported by the Council. The Green paper fails to provide adequate evidence and assurance that larger authorities are better at improving outcomes for citizens and are more efficient.

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

There is insufficient detail in the Green Paper on the case for creating fewer, larger authorities and associated costs. How will local government be safeguarded-there is a risk that this would be at the expense of a centralist model spanning a larger geographic area with competing needs.

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

The fundamental point here is one of insufficient detail on costings overall which is central. Information on costs should have been determined before deciding whether the options are viable or not.

**Chapter 4**

**Consultation Question 2**

**Chapter 4 has 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 sets 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?**

The Council does not support current proposals.  
Although clarity is important, the fundamental point here is around the need to address local accountability and delivery of better outcomes. No changes are planned here for Health although alignment with regional footprints are proposed at a time when costs are escalating.

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

The case for change needs to be compelling, supported by an objective and robust cost – benefit analysis. Any reform needs to be able to demonstrate whether larger councils are capable of being well governed and democratically accountable and can perform better than existing Councils. Of equal importance is the ability to demonstrate financial resilience.

Clarity is required on new powers and flexibility. Greater collaboration and integration with Health to reduce costs and bureaucracy is important. It is disappointing that no review of spending on health is mentioned.

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

This is not supported by the Council

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

Please refer to the Council's response referred to under question 1

**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?**

It would be helpful if Welsh Government provide specific examples where this has been achieved successfully.

## **Chapter 5**

### **Consultation Question 3**

**This section sets out the proposed approach to transition and implications for establishing Transition Committees and elections to Shadow Authorities under each option.**

**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?**

These proposals mirror structures in place prior to the 1996 reorganisation. LGR is a major distraction for staff and Member and service users – particularly now when services are under pressure to deliver efficiencies. Continuity in planning for the future is important. Reform is costly and complex requiring additional change management capacity. Timescales for structural reform are ill planned at a time of austerity and national uncertainty.

The period of transition is not just about the Shadow Authorities but what happens to the service delivery in the final two years of the old Councils. As more time is spent on the shadow authorities there is less staff time devoted to running existing services and they suffer – this is what happened to some extent in 1996.

**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?**

Voluntary mergers have not progressed in the past and, generally, there has been minimal interest in taking this forward.

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

No further comments

### **Consultation Question 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.**

See comments above on timing to implement LDBCW recommendations and any subsequent statutory enactment. Any change of this scale needs to be planned properly and not rushed. 2021 will be the time when the Brexit transitional arrangements end. Do we need another issue to deal with at this time?

**Consultation Question 5**

**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 make 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?**

This is largely dictated by statute already.

**Consultation Question 6**

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

There is no mention of reviewing the multi member model in Ynys Mon and the benefits /disbenefits in terms of democratic representation and whether this type of model will be replicated in proposed local authority areas. An evaluation is important and should be part of a review Also; reference is made to LDBCW submitting recommendations by August 2020. Clarity is required on how this timetable fits for voluntary mergers.

**Chapter 6**

**Consultation question 7**

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

Elected Members play a pivotal role in a healthy democracy and place shaping. The Council has previously stressed the importance of good governance and local accountability. Clear guidance is required on expectations on Members to undertake duties and responsibilities including objective setting and annual personal development reviews.

**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?**

The IRP is tasked to look at this. The challenge is to attract a cross section of people to stand for election. Demands are particularly heavy and increasing given the roles undertaken and this has been acknowledged by the IRP. It is increasingly challenging to balance full time employment with being a Councillor. Substantial changes would be necessary to allowances to attract greater interest.

#### **Consultation Question 8**

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

The granting of additional powers does not require a re-organisation of Local Government. It is not thought that this should be part of this process. Incentives around the level of business rates levied would allow for the better support of local businesses and the local economy. Powers to set local levels of Council tax should be retained and the planning process retained on a local level. The ability of Council operated functions to make a profit for re-investment in Council services. Revenues raised through the Apprenticeship levy should be invested in training resources by local authorities.

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

At present local authorities only have power to enter into joint committees with each other and not with other bodies whether public or corporate –this should be reviewed.

#### **Consultation Question 9**

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

The Councils comments on the 2017 White Paper are relevant:

“A common definition of “back office” and “transactional services” would be a useful start point to establish clarity. This should apply to Transactional services, or transactional aspects of some back office functions, which lend themselves to a common blueprint. To adhere to common practice, technology and standards these should be national rather than regional. To maximise any savings they should (ultimately) apply across the public sector, not just to local government.

Transactional Services have 3 main cost components – the staffing costs to process the transaction, I.T. costs (hardware and software) and management costs. Regional delivery does nothing to reduce the volume of transactions and as a result, savings in the staff dealing with transactions are not usually significant. It is agreed that savings can be made from software costs and some management costs; however, there are additional costs and practical issues which cannot be ignored. Firstly, 6 Councils use different systems and the cost of terminating existing contracts and moving to one software supplier for each transactional service may be high. Secondly, transactional services tend to be financial in nature (payroll, creditor payments, council tax, housing benefit etc.) and as a result,

details of the transactions have to be recorded in each Council's financial accounting system. All the systems are different and interfacing from a central system to 6 separate accounting systems can be costly to set up and maintain. This must be taken into consideration when assessing the overall savings of any regional working.

It should be noted that specialist services are better delivered locally and regionally, owing to the need for tailoring and direct client contact. Many of these services have already had significant financial cuts over the past six years and it is unlikely that there will be savings in the short or medium term. Resilience and nurturing/developing a single pool of public sector professionals should be the overriding objective.

Whilst the principle of utilising the "NHS Shared Service Partnership" appears a logical and sensible consideration, experience of utilising the NHS e-learning shared platform has proven to be resource intensive.

HR and ICT services are proven to be more cost effective per staff head than operating at a regional base. Attention is also drawn to the fact that back office services need to offer and deliver bilingual services".

The Council also emphasised that a strategic paper outlining options to inform regional and local approaches would be an useful starting point

The Green Paper refers in section 6.18 to new authorities with additional powers and flexibility to reconfigure and redesign services. It would be helpful to have clarification on what is proposed here, supported by specific examples. Also shared services would need to be able to deliver against The Welsh Language standards

Statutory barriers on shared services between different parts of the public sector in Wales should be removed to enable cross boundary pooling of work.

Comments in para 6.21 are divisive - rewarding those authorities willing to work together to shape regional solutions and others left to adopt models shaped by others

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

No further comments.

**Consultation Question 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?**

This section refers to the workforce, supporting change, transforming services, systems and maximising assets etc.



Any loss of local government jobs would have a significant effect on the economy of Ynys Môn and especially the economy of Llangefni. Para 6.27 refers to protecting jobs in deprived areas. How will this be addressed and jobs safeguarded? How will the cost of change be funded? LGR would have implications on staff retention and recruitment and unnecessary disruption.
<b>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?</b>
No further comments.
<b>c) Which of the issues identified above or in your response should be prioritised for early resolution?</b>
No further comments.
<b>Consultation Question 11</b> <b>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.</b>
<b>a) What effects do you think there would be?</b>
Compliance with Welsh Language statutory obligations is essential. Any reorganisation of this scale will need to be managed and supported to ensure the prosperity and vibrancy of the Welsh language and needs of citizens are met. Any mergers must ensure that service provision is available at all times in the chosen language of service users, and this should be an integral part of service re-design arrangements.
<b>b) How could positive effects be increased, or negative effects be mitigated?</b>
Proactive steps should be taken to ensure that the workforce has the appropriate levels of bilingual skills (this process can be informed by a baseline review).
<b>Consultation Question 12</b> <b>Please also explain how you believe the proposals 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.</b>

Practical issues such as the adequate availability of Welsh speaking staff is potentially challenges in some areas and within some disciplines.

**Consultation Question 13**

**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?**

It is important to highlight the interests and wellbeing of children as a primary concern

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

**Consultation Question 14**

**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?**

Detailed information will be required to explain to service users how access to services will be gained and language of choice e.g. elderly service users with no transport and those disabled

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

More detailed information required

**Consultation Question 15**

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

## Ymateb Cyngor Ynys Môn i'r Papur Gwyrdd

<b>Eich enw:</b>	J. Huw Jones
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### Cyffredinol

Mae sefyllfa'r Cyngor Sir mewn ymateb i'r ad-drefnu wedi'i lunio ar yr egwyddorion canlynol yn seiliedig ar lywodraeth leol yn bod yn atebol ar gyfer darparu gwasanaethau:

1) Yr angen i ddarparu trigolion Ynys Môn â gwasanaethau effeithiol ac effeithlon. Cydnabyddir y gallai hyn gynnwys cydweithio rhanbarthol ac is-ranbarthol er mwyn sicrhau bod yr arbenigedd ac gwytnwch angenrheidiol yn ei le a bod angen sefydlu trefniant er mwyn sicrhau atebolrwydd uniongyrchol yn lleol ar gyfer ansawdd y gwasanaethau. Yn y cyd-destun hwn, mae angen dealltwriaeth o'r math o wasanaethau a fydd yn cael eu darparu'n rhanbarthol, yn is-ranbarthol ac yn lleol, wedi'i alinio'n fras â chanfyddiadau Comisiwn Williams ond hefyd yn awgrymu bod angen i lywodraeth leol wneud penderfyniadau ar strwythurau cydweithio.

2) Fe ddylai unrhyw drefniadau cydweithio fod yn seiliedig ar y buddion tebygol i drigolion Ynys Môn neu ar y rhagdybiaeth y gellir darparu gwasanaethau o'r un safon yn rhatach.

3) Mae'r Cyngor o'r farn bod arweinyddiaeth yn seiliedig ar wybodaeth leol yn bwysicach na maint. Mae'r Cyngor o'r farn y gellid bodloni disgwyliadau Llywodraeth Cymru drwy gyfuniad o gydweithio a darpariaeth leol, h.y. estyniad naturiol o'r sefyllfa bresennol. Yn ychwanegol, at hynny, cydnabyddir bod angen rhoi ystyriaeth fanwl i unrhyw bosibilrwydd o ddarparu gwasanaethau mewn modd mwy cost-effeithiol, e.e. lleihau costau rheoli neu wasanaethau cefnogi.

Fe ddylai'r materion allweddol hyn fod yn ganolog i unrhyw benderfyniad ar ad-drefnu llywodraeth leol, yn hytrach na llinellau ar fap.

Mae'r Ddogfen Ymgynghorol ar y Papur Gwyrdd yn nodi bwriad Llywodraeth Cymru ar gyfer 'llywodraeth leol gryf, sydd wedi'i grymuso yng Nghymru', Fodd bynnag, mae'n methu ag arddangos sut yn union y bydd y dyheadau hyn yn cael eu cyflawni – ar ba gost ac ar ba gost i ddemocratiaeth leol yn benodol? Mae'n canolbwyntio ar strwythurau a model mwy canolog lle mae sefydliad mwy yn well. Mae tystiolaeth i awgrymu bod modelau sy'n seiliedig ar ardaloedd daearyddol mawr yn gostus a bod cynaliadwyedd yn her sylweddol e.e. iechyd.

Mae'r Cyngor eisoes wedi amlygu pwysigrwydd cynnal y status quo o ran strwythurau er mwyn diogelu atebolrwydd lleol ac y dylai darpariaeth gwasanaeth ganolbwyntio ar fodloni anghenion cymunedau lleol (Ymateb i'r Papur Gwyn, 2017). Mae'r Cyngor hefyd wedi amlygu a chydabod manteision darparu rhai gwasanaethau'n rhanbarthol fel yn achos Gogledd Cymru a bod y modelau hyn o gydweithio yn darparu gwell defnydd o adnoddau traws-sector ac atebolrwydd yn lleol. Mae angen cael y cydbwysedd cywir rhwng y manteision o'r hyn a ddarperir yn lleol ac yn rhanbarthol, wedi'i siapio gan gynrychiolaeth ddemocrataidd ar lefel leol gan y rhai hynny a gaiff eu hethol i wasanaethu eu cymunedau.

Fe ddylai modelau gael y rhyddid i dyfu mewn modd organig ac nid eu gorfodi o'r canol. Nid yw sefydliadau mwy bob amser yn gwasanaethu cymunedau'n dda oherwydd natur a hynodrwydd cymunedau a gofynion sy'n cystadlu â'i gilydd. Lle mae'r dystiolaeth i gefnogi'r syniad y bydd awdurdodau mwy yn 'grymuso cymunedau'? Sut bydd partneriaeth gyfartal yn cael ei sicrhau drwy uno gorfodol? Beth am effeithiau cynyddu lefelau'r Dreth Gyngor a'r effaith ar drigolion lleol mewn cyfnod o gynni ariannol estynedig? Beth am y blaenoriaethau ar wario ar sail gyfartal cyn 1996 yn yr hen Gyngor Sir Gwynedd mewn meysydd megis y stad mân-ddaliadau?

Mae'r Papur Gwyrdd yn canolbwyntio'n ormodol ar strwythurau, llinellau ar fap a mwy o bwerau ond yn gymharol ddistaw ar sut orau i sicrhau atebolrwydd yn lleol. Ond eto, mae'r hyn a gynigir yn y ddogfen i lunio 'gwasanaethau cyhoeddus mwy gwydn a chynaliadwy sydd ag atebolrwydd democrataidd wrth wraidd hynny.' Lle mae'r dystiolaeth bod y Papur Gwyrdd yn mynd i'r afael â'r materion allweddol hyn? Yn 2006, comisiynwyd Prifysgol Caerdydd gan Swyddfa'r Dirprwy Brif Weinidog i ddadansoddi'r berthynas rhwng maint a pherfformiad o fewn llywodraeth leol. Roedd y canlyniadau'n dangos bod maint yn effeithio ar berfformiad Cyngor. Dangosodd ymchwil dilynol gan Brifysgol Caerdydd ar ran yr Adran Cymunedau a Llywodraeth Leol yn 2008 bod ad-drefnu er mwyn creu cynghorau mwy yn amharu'n sylweddol ar berfformiad sefydliadol.

Does dim cyfeiriad er enghraifft at effeithiolrwydd y trefniadau democrataidd yn y Cyngor hwn ar hyn o bryd a sut y gellid gweithredu'r un patrwm yn rhywle arall. Mae'n annhebygol y gellir gwella trefniadau democrataidd drwy leihau nifer y Cynghorwyr. Bydd Ad-drefnu Llywodraeth leol yn achosi aflonyddwch ymysg trigolion ar amser lle mae cyllidebau o dan bwysau. Mae'r Cyngor hwn wedi dangos bod perfformiad y gwasanaethau wedi gwella fel sy'n amlwg o'r setiau data allweddol a gyhoeddwyd gan yr Uned Ddata yn 2016/17. Nid yw'n dymuno gweld ad-drefnu yn effeithio ar y gwaith hwnnw ac yn tynnu sylw oddi wrth y cynnydd a wneir ar brosiectau isadeiledd mawr a arweinir gan y Cyngor a'r gwaith o drawsnewid gwasanaethau. Gwelir hyn hefyd fel rhywbeth sy'n tynnu sylw sylweddol ar adeg lle mae cynlluniau strategol yn eu lle er mwyn trawsnewid meysydd allweddol a bodloni targedau effeithlonrwydd. Lle mae'r dystiolaeth o gefnogaeth gyhoeddus i hyn?

Mae'r Papur Gwyrdd yn dawel iawn hefyd ynghylch yr heriau sylweddol sy'n wynebu'r pwrs cyhoeddus nid yn unig yn ariannol ond mathau eraill o ansicrwydd hefyd e.e. Brexit. Fe ddylai Llywodraeth Cymru ganolbwyntio ar sicrhau buddion Brexit i Gymru yn hytrach na chanolbwyntio ar ffiniau llywodraeth leol. Sut er enghraifft fydd y cynigion hyn yn effeithio ar raglenni strategol Llywodraeth Cymru a chyflymder rhaglenni trawsnewid mawr e.e. o fewn Addysg.

Mae Awdurdodau Lleol wedi gorfod gwneud toriadau flwyddyn ar flwyddyn o ganlyniad i ostyngiad mewn grantiau gan y Llywodraeth ganolog. Mae Arweinydd Cymdeithas Llywodraeth Leol Cymru wedi nodi nad yw'r sefyllfa yn gynaliadwy o ganlyniad i raddfa'r toriadau. Fe ddylai cyllid cyhoeddus fod yn flaenoriaeth i Lywodraeth Cymru yn hytrach nag ad-drefnu sy'n gostus ar y gorau.

Sut bydd ad-drefnu yn mynd i'r afael â'r mater sylfaenol o gyllid ond hefyd gwariant ar iechyd? Oni bai y bydd hyn yn cael sylw, bydd gwytnwch ariannol y sector cyhoeddus yn parhau i fod yn her sylweddol. Sut mae'r cynigion yn cymharu â newidiadau arfaethedig eraill ledled Cymru – ac yn enwedig cynrychiolaeth ddemocrataidd gynyddol yn y Cynulliad a chostau canolog ychwanegol ar draul llywodraeth leol? Nid yw'r Papur Gwyrdd yn darparu manylion ar sut y bydd awdurdodau lleol yn sicrhau arbedion. Dylid rhoi mwy o ryddid i lywodraeth leol fod yn arloesol a llai o ymyrraeth o'r canol.

Cyfeirir ar yr angen i Gyngorau mwy ddarparu 'atebion newydd wedi'u grymuso' (tudalen 8). Fodd bynnag, nid yw'r atebion hyn wedi'u hamlinellu ac mae angen cadarnhad. Lle mae'r dystiolaeth i gefnogi'r syniad bod y strwythur presennol yn methu cyfleoedd i drawsnewid y ddarpariaeth o wasanaethau a'r achos i ail-ymweld â strwythurau? Mae'r Papur Gwyrdd yn cyfeirio at opsiynau i greu awdurdodau lleol cryfach a mwy pwerus er mewn gwirionedd dim ond un opsiwn a gyflwynir ar strwythurau ac amserlenni amrywiol.

## **Penodol**

Mae paragraff 2.4 yn cyfeirio at sylwadau gan Arweinydd Cymdeithas Llywodraeth Leol Cymru ar faterion ariannu. Sut bydd ad-drefnu yn mynd i'r afael â'r pwynt sylfaenol hwn – mae hyn yn ganolog i unrhyw drafodaeth ar wasanaethau cyhoeddus, gan gynnwys unrhyw ad-drefnu. Mae'r Papur gwyrdd yn cyfeirio'n helaeth at ganfyddiadau'r Comisiwn Williams a bod angen ad-drefnu er mwyn sicrhau gwytnwch ariannol. Ers adroddiad Williams, mae awdurdodau lleol wedi gwneud arbedion sylweddol ar adeg o gyllidebau llai a hynny tra'n trawsnewid sefydliadau. Lle mae'r dystiolaeth sy'n dangos nad yw hyn wedi cael sylw? Yn Ynys Môn, mae arbedion o £8.4 miliwn wedi eu gwneud rhwng 2016/17 a 2018/19.

Mae paragraff 2.8 yn cyfeirio at yr heriau a wynebwr gan awdurdodau llai o ganlyniad i'w maint ac ati – a yw'r rheoleiddwyr yn rhannu'r farn hon?

Paragraff 2.9 – bydd gwytnwch ariannol yn parhau i fod yn her o ganlyniad i'r cynnydd mewn galw, cynnydd mewn costau a tan y cynhelir trafodaeth go iawn am ariannu iechyd yng Nghymru. Mae'r Papur Gwyrdd yn cyfeirio at wasanaethau sydd bron â methu er bod Llywodraeth Cymru wedi diogelu cyllid ar gyfer awdurdodau lleol. Mae CIPFA a Deloitte wedi cwestiynu costau cynigion y gorffennol ar gyfer Ad-drefnu Llywodraeth leol, sy'n llawer uwch na'r costau a ragwelir gan Lywodraeth Cymru.

Paragraff 2.12 – mae awdurdodau lleol wedi dadlau na ddylai cydweithio'n rhanbarthol gael ei orfodi o'r canol ond yn hytrach y dylid gadael iddo ddatblygu yn lleol ac y dylid datblygu cydweithio mewn modd organig. Mae paragraff 2.16 yn cyfeirio at ddiffyg cynnydd o ran cyfuno cyllidebau a chynlluniau datblygu lleol ar y cyd fel enghreifftiau. Mae cyfuno cyllidebau yn enghraifft wael ac yn syniad a orfodwyd gan Lywodraeth Cymru heb roi unrhyw feddwl iddo yn hytrach na chysyniad y dylid rhoi hyblygrwydd

i'w ddelio ag ef yn fwy lleol. Dylid rhoi mwy o bwyslais ar gydweithio er mwyn darparu gwell canlyniadau ar gyfer dinasyddion a sicrhau buddion sylweddol. Mae'r awdurdod hwn eisoes wedi datblygu Cynllun Datblygu Lleol ar y Cyd â Gwynedd – mae'n groes i'r datganiad a wneir yn yr adran hon.

Paragraff 2.21 – mae hyn yn cyfeirio at strwythurau newydd, cryfach a gefnogir gan ddarpariaeth rhanbarthol. Nid yw'r Papur Gwyrdd yn dangos sut bydd hyn yn cael ei gyflawni, er y cydnabyddir y bydd gwaith rhanbarthol yn chwarae rôl hanfodol yn y dyfodol. Mae atebolrwydd yn hanfodol i unrhyw fodel o ddarpariaeth rhanbarthol. Y sefyllfa o ran buddion darpariaeth rhanbarthol yma....

Paragraff 2.22 a'r 3 opsiwn ar gyfer creu llai o awdurdodau sy'n fwy o faint. Yr hyn a gyflwynir yma mewn gwirionedd yw un opsiwn â gwahanol bosibiliadau o ran amserlen. Nid yw hyn yn ateb y cwestiwn ai hwn yw'r datrysiad cywir ac a yw'r amseriad yn gywir. Does dim opsiynau gwahanol yn cael eu cyflwyno. Pam nad oes trafodaeth ar yr ôl troed rhwng awdurdodau lleol ac iechyd er enghraifft o gofio cymhlethdod a maint y cyllidebau? Nid yw'n glir a fydd ad-drefnu yn datrys yr heriau a wynebier gan awdurdodau lleol. A fydd y costau uno yn gorbwyso'r gwir gostau i ddinasyddion, cymunedau a gweithwyr ac yn amharu ar atebolrwydd lleol. Gall strwythurau sy'n seiliedig ar gyflawni arbedion maint ac olion troed mawr fod yn aneffeithiol, yn gostus ac yn llai effeithlon yn y pen draw.

Mae paragraff 2.24 yn cydnabod y bydd uno'n costio er mai ychydig iawn o gyfeiriad sydd i bwerau newydd a hyblygrwydd ac nid yw'n mynd i'r afael yn llawn â'r mater o gyllid teg a chynaliadwy ar gyfer llywodraeth leol.

<b>Pennod 3</b>	
<b><u>Cwestiwn Ymgynghori 1</u></b>	
<b>Yn bennod 2, dywedom unwaith eto ein bod wedi ymrwymo i weithio'n rhanbarthol mewn meysydd allweddol, gan gydnabod hefyd fod angen gwneud newidiadau pellach i gefnogi hyn. Yn bennod 3, rydym yn cyflwyno'r opsiynau cyffredinol ar gyfer symud tuag at lai o awdurdodau, a'r rheini'n rhai mwy o faint, ac rydym yn crynhoi nodweddion y broses a fyddai'n gyffredin i bob opsiwn.</b>	
<b>a) Pa gamau ymarferol allai Llywodraeth Cymru eu cymryd i wneud y trefniadau gweithio'n rhanbarthol presennol yn haws ac yn fwy effeithiol, er enghraifft mewn perthynas â'r consortia addysg, gwasanaethau cymdeithasol a'r Dinas-ranbarthau a'r Bargeinion Dinas a Thwf?</b>	Cyfeiriwch os gwelwch yn dda at ymateb y Cyngor i'r Papur Gwyn yn 2017. Gallai Ad-drefnu Llywodraeth Leol gael effaith negyddol ar y momentwm ar gyfer cydweithio rhanbarthol. Effaith bosibl ar feysydd allweddol – e.e. byddai angen ystyried Bid Twf Economaidd Gogledd Cymru.
<b>b) Beth yw eich barn chi am yr elfennau cyffredin i'r prosesau uno yr ydym yn eu cyflwyno yn yr adran hon?</b>	Gweler y sylwadau rhagarweiniol. Mae'r Cyngor wedi mynegi ei wrthwynebiad i unrhyw uno yn y gorffennol. Fodd bynnag, mae wedi croesawu safbwynt Llywodraeth Cymru yn y gorffennol ar olion troed rhanbarthol ar gyfer

gwasanaethau mawr ar yr amod y gellir sicrhau atebolrwydd lleol drwy drefniadau llywodraethu priodol.
<b>c) Beth yw eich barn chi am yr opsiynau a gyflwynwyd gennym ar gyfer creu llai o awdurdodau, a'r rheini'n rhai mwy o faint?</b>
Nid yw'r Cyngor yn cefnogi hyn. Mae'r Papur Gwyrdd yn methu â darparu tystiolaeth a sicrwydd digonol bod awdurdodau sy'n fwy o faint yn well o ran darparu canlyniadau ar gyfer dinasyddion a'u bod yn fwy effeithlon.
<b>d) A oes unrhyw opsiynau eraill y dylem eu hystyried ar gyfer creu llai o awdurdodau, sy'n fwy o faint?</b>
Does dim digon o fanylion yn y Papur Gwyrdd am yr achos dros greu llai o awdurdodau, sy'n fwy o faint a'r costau cysylltiedig â hynny. Sut bydd llywodraeth leol yn cael ei ddiogelu – mae risg y byddai hyn ar draul model wedi'i ganoli dros ardal ddaearyddol fwy â gofynion sy'n cystadlu yn erbyn ei gilydd.
<b>e) A oes gennych dystiolaeth ynglŷn â chost, manteision ac arbedion pob opsiwn a allai helpu i lywio'r penderfyniad? Os oes, rhowch fanylion.</b>
Y pwynt sylfaenol yma yw nad oes manylion digonol am gostau yn gyffredinol sy'n ganolog i'r holl gynllun. Fe ddylai gwybodaeth ar gostau fod wedi cael ei phennu cyn penderfynu a yw'r opsiynau yn hyfyw ai peidio.

<b>Pennod 4</b>
<b><u>Cwestiwn Ymgynghori 2</u></b>
Mae pennod 4 wedi egluro'r angen am eglurder ar y patrwm ar gyfer llywodraeth leol yn y dyfodol a'r ystod o ffactorau y dylid ei hystyried wrth benderfynu ar ffurf newydd. Mae'n cynnig patrwm posibl ar gyfer llywodraeth leol yn y dyfodol, y gellid ei gyflawni drwy bob un o'r opsiynau a drafodwyd yn y bennod flaenorol.
<b>a) Ydych chi'n cytuno ei bod hi'n bwysig rhoi eglurder ynghylch y patrwm ar gyfer llywodraeth leol y dyfodol?</b>
Nid yw'r Cyngor yn cefnogi'r cynigion presennol. Er bod eglurder yn bwysig, mae'r pwynt sylfaenol yma yn ymwneud â'r angen i fynd i'r afael ag atebolrwydd lleol a darparu gwell canlyniadau. Does dim newidiadau wedi'u cynllunio yma ar gyfer lechyd er fe argymhellir aliniad ag olion troed rhanbarthol ar adeg lle mae costau'n cynyddu.
<b>b) Ydych chi'n cytuno â'r ffactorau a nodwyd gennym i lywio ein syniadau? A fydddech chi'n ychwanegu ffactorau eraill neu'n newid unrhyw ffactor?</b>
Mae angen i'r achos dros newid fod yn un grymus, wedi'i gefnogi gan ddadansoddiad cost gwrthrychol a chadarn. Mae angen i unrhyw newid allu dangos a yw cynghorau sy'n fwy o faint yn gallu cael eu llywodraethu'n dda ac yn

<p>atebol yn ddemocrataidd a bod modd iddynt berfformio'n well na Chynghorau presennol. Mae'r gallu i arddangos gwytnwch ariannol yr un mor bwysig.</p> <p>Mae angen eglurder ar bwerau newydd ac hyblygrwydd. Mae mwy o gydweithio ac integreiddio ag iechyd er mwyn lleihau costau a biwrocratiaeth yn bwysig. Mae'n siomedig nad yw adolygiad o'r gwariant ar iechyd yn cael ei grybwyll.</p>
<p><b>c) Beth yw eich barn chi am yr ardaloedd newydd a awgrymir yn yr adran hon</b></p> <p>Ni chefnogir hyn gan y Cyngor</p>
<p><b>d) A oes gennych unrhyw awgrymiadau eraill ac, os felly, pa wybodaeth sydd gennych i gefnogi'r rhain fel dewis arall?</b></p> <p>Cyfeiriwch at ymateb y Cyngor o dan gwestiwn 1</p>
<p><b>e) Oes yna unrhyw ddulliau eraill y dylem eu defnyddio i symleiddio trefniadau cydweithio ar lefel ranbarthol a rhwng cyrff cyhoeddus â'i gilydd yn yr ardaloedd awdurdod newydd? Os oes, beth ydyn nhw?</b></p> <p>Byddai'n ddefnyddiol pe gallai Llywodraeth Cymru ddarparu enghreifftiau penodol o ble mae hyn wedi'i gyflawni'n llwyddiannus.</p>

<p><b>Pennod 5</b></p>
<p><b><u>Cwestiwn Ymgynghori 3</u></b></p> <p><b>Mae'r pennod hon yn trafod y dull arfaethedig ar gyfer trawsnewid a'r goblygiadau ar gyfer sefydlu Pwyllgorau Pontio ac etholiadau i'r Awdurdodau Cysgodol o dan bob opsiwn.</b></p>
<p><b>a) Ydych chi'n cytuno â'r broses bontio arfaethedig: sef sefydlu Pwyllgorau Pontio a sicrhau bod etholiadau i Awdurdodau Cysgodol yn gallu cael eu cynnal cyn y diwrnod breinio ar gyfer yr awdurdodau newydd?</b></p> <p>Mae'r cynigion hyn yn adlewyrchu'r strwythurau a oedd yn eu lle cyn ad-drefnu 1996. Mae Ad-drefnu Llywodraeth leol yn tynnu sylw staff, Aelodau a defnyddwyr gwasanaeth yn sylweddol oddi ar bethau eraill - yn enwedig rŵan pan mae gwasanaethu o dan bwysau i sicrhau arbedion. Mae dilyniant o ran darparu ar gyfer y dyfodol yn bwysig. Mae diwygio yn gostus ac yn gymhleth ac mae angen capasiti rheoli newid ychwanegol.</p> <p>Nid yw'r amserlen ar gyfer diwygio'r strwythur wedi'i chynllunio'n dda, mae'n gyfnod o gynni ariannol ac ansicrwydd cenedlaethol.</p> <p>Mae'r cyfnod o drawsnewid yn ymwneud nid yn unig ag Awdurdodau Cysgodol ond hefyd beth sy'n digwydd i'r ddarpariaeth gwasanaeth yn nwy flynedd olaf yr hen Gynghorau. Wrth i fwy o amser gael ei dreulio ar yr awdurdodau cysgodol bydd llai o amser staff yn cael ei dreulio yn rhedeg y gwasanaethau cyfredol, gyda'r rheini yn – dyma ddigwyddodd i raddau ym 1996.</p>



<b>b) Ydych chi'n cytuno, pe byddai opsiwn 1 yn cael ei ddilyn, y dylem bennu dyddiad terfynol ar gyfer cyflwyno cynigion ar gyfer uno gwirfoddol ym mhob cylch etholiadol?</b>
Nid yw uno gwirfoddol wedi llwyddo yn y gorffennol ac yn gyffredinol, ychydig iawn o ddiddordeb a ddangoswyd mewn datblygu hyn.
<b>c) A oes gennych unrhyw sylwadau eraill ar y map arfaethedig?</b>
Dim sylwadau pellach
<b><u>Cwestiwn Ymgynghori 4</u></b> <b>Mae'r ymgynghoriad yn awgrymu cynnal unrhyw etholiadau llywodraeth leol ym mis Mehefin 2021.</b>  <b>A oes unrhyw reswm pam na fyddai mis Mehefin 2021 yn ddyddiad addas? Os felly, awgrymwch ddyddiad arall gan nodi'r rhesymau pam y byddai'r dyddiad hwnnw yn fwy addas.</b>
Gweler y sylwadau uchod ar yr amseriad i weithredu argymhellion LDBCW ac unrhyw weithrediad statudol dilynol. Mae angen i unrhyw newid ar y raddfa hon gael ei gynllunio'n gywir ac ni ddylid ei wneud ar frys. 2021 fydd yr adeg y bydd trefniadau trawsnewidiol Brexit yn dod i ben. Yda ni angen gorfod delio gyda mater arall ar yr un pryd?
<b><u>Cwestiwn Ymgynghori 5</u></b> <b>Mae Llywodraeth Cymru yn cydnabod bod rhai cynlluniau neu asesiadau sy'n gysylltiedig â chylchoedd etholiadol, er enghraifft asesiadau llesiant a baratoir gan Fyrddau Gwasanaethau Cyhoeddus. Byddwn yn gwneud darpariaeth i sicrhau bod y rhain yn cyd-fynd ag unrhyw gylchoedd etholiadol newydd yn y dyfodol. A oes unrhyw gynlluniau neu faterion eraill a allai fod ynghlwm wrth y cylch etholiadol y mae angen inni eu hystyried?</b>
Mae hyn yn eisoes yn cael ei bennu gan statud i raddau helaeth
<b><u>Cwestiwn Ymgynghori 6</u></b> <b>Beth yw eich barn am y dull y dylid ei ddilyn i benderfynu ar derfynau'r adolygiadau etholiadol?</b>
Does dim sôn am adolygu'r model aml-aelod yn Ynys Môn a'r buddion / anfanteision o ran cynrychiolaeth ddemocrataidd ac a fydd y math hwn o fodel yn cael ei ailadrodd yn yr ardaloedd awdurdod lleol arfaethedig. Mae gwerthusiad yn bwysig ac fe ddylai fod yn rhan o adolygiad. Hefyd, cyfeirir at LDBCW yn cyflwyno argymhellion erbyn Awst 2020. Mae angen eglurder ar sut mae'r amserlen hon yn addas ar gyfer uno gwirfoddol.

<b>Pennod 6</b>
<b>Cwestiwn Ymgynghori 7</b>
<p><b>a) Sut gall cynghorau ddefnyddio gwybodaeth eu haelodau etholedig am eu cymunedau, a'u cysylltiadau ynddynt, yn fwy effeithiol?</b></p> <p>Mae Aelodau Etholedig yn chwarae rhan hanfodol mewn democratiaeth iach a siapio lle. Yn y gorffennol, mae'r Cyngor wedi pwysleisio pwysigrwydd llywodraethiant da ac atebolrwydd lleol. Mae angen arweiniad clir ar y disgwyliadau ar Aelodau i ymgymryd â dyletswyddau a chyfrifoldebau gan gynnwys gosod amcanion ac adolygiadau datblygiad personol blynyddol.</p>
<p><b>b) Sut y gallwn gydnabod yn well lefel y cyfrifoldeb o fod yn gynghorydd lleol? Pa newidiadau i'r gydnabyddiaeth ariannol a'r gefnogaeth mae cynghorwyr yn eu cael fyddai'n galluogi ystod ehangach o bobl i fod yn rhan o'r gynrychiolaeth ddemocrataidd leol?</b></p> <p>Mae'r IRP wedi cael y dasg o edrych ar hyn. Yr her yw ceisio denu trawstoriad o bobl i sefyll ar gyfer etholiad. Mae'r gofynion yn drwm ac yn cynyddu o ystyried y rolau yr ymgymerydd â nhw ac mae hyn wedi'i gydnabod gan yr IRP. Mae'n gynyddol heriol cydbwyso swydd amser llawn gyda bod yn Gynghorydd. Byddai angen newidiadau sylweddol i lwfansau er mwyn denu mwy o ddiddordeb.</p>
<b>Cwestiwn Ymgynghori 8</b>
<p><b>a) A oes unrhyw bwerau eraill y dylid eu rhoi i lywodraeth leol? Os oes, beth ydyn nhw?</b></p> <p>Nid yw dyfarnu pwerau ychwanegol yn golygu bod angen ad-drefnu Llywodraeth Leol. Ni ystyrir y dylai hyn fod yn rhan o'r broses hon. Byddai'r gallu i ddarparu cymhelliannau o ran lefel y trethi busnes a godir o well budd i fusnesau lleol a'r economi leol.</p> <p>Dylid cadw'r gallu i osod lefelau'r Dreth Gyngor a fe ddylai'r broses gynllunio gael ei phenderfynu ar lefel leol.</p> <p>Gallu swyddogaethau a reolir gan y Cyngor i wneud elw ar gyfer ei ail- fuddsoddi yng ngwasanaethau'r Cyngor.</p> <p>Fe ddylai'r arian a godir gan yr ardoll prentisiaethau gael ei fuddsoddi gan awdurdodau lleol mewn adnoddau hyfforddiant.</p>
<p><b>b) A oes rhyddid neu hyblygrwydd eraill y dylid eu rhoi i lywodraeth leol? Os oes, beth ydyn nhw?</b></p> <p>Ar hyn o bryd, nid oes gan Awdurdodau Lleol ond y grym i gynnal cydbwyllgorau â'i gilydd ac nid â chyrff eraill boed y rheini yn gyhoeddus neu'n gorfforaethol – dylid adolygu hyn.</p>
<b>Cwestiwn Ymgynghori 9</b>
<p><b>a) Pa feysydd sy'n cynnig y cwmpas mwyaf i rannu gwasanaethau trafodiadol?</b></p> <p>Mae Sylwadau'r Cyngor ar y Papur Gwyn 2017 yn berthnasol:</p> <p>“Byddai diffiniad cyffredin o “swyddfa gefn” a “gwasanaethau trafodiadol” yn bwynt cychwyn defnyddiol i sefydlu eglurder. Dylai hyn fod yn berthnasol i wasanaethau Trafodiadol, neu agweddau trafodiadol ar rai swyddogaethau swyddfa gefn, sy'n</p>

addas ar gyfer glasbrint cyffredin. Er mwyn glynu wrth arfer, technoleg a safonau cyffredin dylai'r rhain fod yn genedlaethol yn hytrach na rhanbarthol. I sicrhau'r arbedion mwyaf posib dylent (yn y pen draw) fod yn weithredol ar draws y sector cyhoeddus, nid dim ond mewn llywodraeth leol.

Mae tair prif elfen o ran costau Gwasanaethau Trafodiadol - costau staffio i brosesu'r trafodiad, costau T.G. (caledwedd a meddalwedd) a chostau rheoli. Nid yw'r trefniant rhanbarthol yn gwneud dim i leihau nifer y trafodion, ac o ganlyniad nid yw'r arbedion o ran nifer y staff sy'n ymdrin â thrafodion yn sylweddol fel arfer. Cytunir y gellir gwneud arbedion ar gostau meddalwedd a rhai costau rheoli, ond mae costau ychwanegol a materion ymarferol na ellir eu hanwybyddu. Yn gyntaf, mae'r 6 Chyngor yn defnyddio systemau gwahanol a gallai'r gost o derfynu'r contractau presennol a symud i un cyflenwr meddalwedd ar gyfer pob gwasanaeth trafodiadol fod yn uchel. Yn ail, mae gwasanaethau trafodiadol yn tueddu i fod yn ariannol o ran eu natur (cyflogres, taliadau credydwy, treth gyngor, budd-dal tai ac ati) ac, o ganlyniad, rhaid cofnodi manylion y trafodion yn system gyfrifyddu ariannol pob Cyngor. Mae'r holl systemau yn wahanol a gallai rhyngwynebu o system ganolog i 6 systemau gyfrifyddu ar wahân fod yn gostus i sefydlu a'i gynnal. Rhaid cymryd hyn i ystyriaeth wrth asesu arbedion cyffredinol yn sgîl unrhyw waith rhanbarthol.

Dylid nodi bod gwasanaethau arbenigol yn cael eu darparu'n well yn lleol ac yn rhanbarthol, a hynny oherwydd yr angen i'w teilwra ac i gysylltu'n uniongyrchol â chleientiaid. Mae llawer o'r gwasanaethau hyn eisoes wedi cael toriadau ariannol sylweddol dros y chwe blynedd diwethaf ac mae'n annhebygol y bydd arbedion yn y tymor byr neu ganolog. Gwydnwch a meithrin / datblygu cronfa o weithwyr proffesiynol yn y sector cyhoeddus ddylai fod yr amcan sydd â'r flaenoriaeth fwyaf.

Er bod yr egwyddor o ddefnyddio'r "Partneriaeth Cyd-wasanaethau GIG" yn ymddangos yn ystyriaeth resymegol a synhwyrrol, mae'r profiad o ddefnyddio llwyfan e-ddysgu GIG wedi bod yn drwm ar adnoddau.

Profwyd eisoes bod gwasanaethau Adnoddau Dynol a TGCh yn fwy cost-effeithiol y pen na gweithredu ar sail ranbarthol. Dygir sylw at y ffaith hefyd bod angen i wasanaethau swyddfa gefn gynnig a darparu gwasanaethau dwyieithog."

Pwysleisiodd y Cyngor hefyd y byddai papur strategol yn amlinellu'r opsiynau ar gyfer hysbysu agweddau rhanbarthol a lleol yn fan cychwyn defnyddiol.

Mae'r Papur Gwyrdd yn cyfeirio yn 6.18 at awdurdodau newydd â phwerau ychwanegol ac hyblygrwydd er mwyn gallu ail ddiffinio ac ail ddylunio gwasanaethau. Byddai'n ddefnyddiol cael cadarnhad o'r hyn sy'n cael ei argymhell yma, wedi'i gefnogi gan enghreifftiau penodol. Hefyd, byddai angen gallu darparu unrhyw wasanaethau yn unol â'r Safonau Iaith Gymraeg.

Fe ddylai rhwystrau statudol i wasanaethau a rennir rhwng gwahanol rannau o'r sector cyhoeddus yng Nghymru gael eu diddymu er mwyn galluogi rhannu gwaith yn draws ffiniol.

Mae'r sylwadau ym mharagraff 6.21 yn gynhennus – gwobrwyo'r awdurdodau hynny sy'n fodlon cydweithio er mwyn llunio datrysiadau lleol a gadael eraill i fabwysiadu modelau sy'n cael eu llunio gan eraill.

**b) Beth yw'r ffordd orau o ddatblygu trefniadau o'r fath?**

Dim sylwadau pellach

**Cwestiwn Ymgynghori 10**

**a) Er mwyn sicrhau ein bod yn datblygu dull cyson ar draws Cymru, lle bo cysondeb yn bwysig, sut ydych chi'n meddwl fyddai orau i ddarparu'r cyngor a'r cymorth ar y materion hyn?**

Mae'r adran hon yn cyfeirio at y gweithlu, cefnogi newid, trawsnewid gwasanaethau, systemau a gwneud y mwyaf o asedau ac ati.

Byddai colli unrhyw swyddi llywodraeth leol yn cael effaith sylweddol ar yr economi yn Ynys Môn ac yn enwedig economi Llangefni. Mae paragraff 6.27 yn cyfeirio at ddiogelu swyddi mewn ardaloedd difreintiedig. Sut bydd hyn yn cael ei ddatrys a swyddi'n cael eu diogelu? Sut bydd y gost o newid yn cael ei ariannu?

Byddai Ad-drefnu Llywodraeth Leol yn cael effaith ar y gallu i gadw staff a recriwtio ac yn achosi aflonyddwch di-angen.

**b) Oes unrhyw heriau neu gyfleoedd eraill yn deillio o newid strwythurol neu ddarparu pwerau a hyblygrwydd eraill nad ydynt wedi eu nodi uchod? Os oes angen cymorth ar y meysydd hyn, ym mha ffordd y dylid rhoi'r cymorth hwnnw?**

Dim sylwadau pellach

**c) Pa un o'r materion a nodwyd uchod neu yn eich ymateb ddylai gael blaenoriaeth i'w ddatrys yn gynnar?**

Dim sylwadau pellach

**Cwestiwn Ymgynghori 11.**

**Hoffem wybod eich barn am ba effeithiau y byddai'r cynigion yn yr ymgynghoriad hwn yn eu cael ar y Gymraeg, yn enwedig ar y cyfleoedd i bobl ddefnyddio'r iaith ac o ran peidio â'i thrin yn llai ffafriol na'r Saesneg.**

**a) Beth fyddai'r effeithiau yn eich barn chi?**

Mae cydymffurfiaeth â goblygiadau statudol o ran yr iaith Gymraeg yn hanfodol. Bydd angen i unrhyw ad-drefnu ar y raddfa hon gael ei reoli a'i gefnogi er mwyn sicrhau ffyniant y Gymraeg a bod anghenion dinasyddion yn cael eu bodloni. Rhaid i unrhyw uno sicrhau bod darpariaeth gwasanaeth ar gael yn newis iaith y defnyddiwr gwasanaeth bob amser ac fe ddylai hyn fod yn rhan annatod o unrhyw drefniadau ar gyfer ail ddylunio gwasanaeth.

<p><b>b) Sut y byddai modd cynyddu'r effeithiau cadarnhaol, neu liniaru'r effeithiau negyddol?</b></p>
<p>Dylid cymryd camau rhagweithiol er mwyn sicrhau bod gan y gweithlu'r lefelau angenrheidiol o sgiliau dwyieithog (gall y broses hon gael ei hysbysu drwy gyfrwng adolygiad sylfaenol).</p>
<p><b><u>Cwestiwn Ymgynghori 12</u></b>  <b>Eglurwch hefyd sut y credwch y byddai modd ffurfio neu newid (os bydd angen) y cynigion yn yr ymgynghoriad hwn er mwyn arwain at effeithiau cadarnhaol, neu fwy o effeithiau cadarnhaol, ar gyfleoedd i bobl ddefnyddio'r Gymraeg a pheidio â thrin y Gymraeg yn llai ffafrïol na'r Saesneg, ac er mwyn peidio â chael effaith andwyol ar gyfleoedd i bobl ddefnyddio'r Gymraeg nac o ran trin y Gymraeg yn llai ffafrïol na'r Saesneg.</b></p>
<p>Mae materion ymarferol megis argaeledd digonol o staff sy'n siarad Cymraeg yn heriol mewn rhai meysydd ac o fewn rhai gwasanaethau.</p>
<p><b><u>Cwestiwn Ymgynghori 13</u></b>  <b>Mae'r Asesiad o'r Effaith ar Hawliau Plant a gyhoeddir ochr yn ochr â'r ymgynghoriad yn amlinellu barn Llywodraeth Cymru am effaith y cynigion sydd wedi'u cynnwys yn yr ymgynghoriad ar blant a phobl ifanc. Mae Llywodraeth Cymru yn ceisio barn ar yr asesiad hwnnw.</b></p>
<p><b>a) A oes unrhyw effeithiau cadarnhaol neu andwyol sydd heb eu nodi yn yr asesiad?</b></p>
<p>Mae'n bwysig amlygu buddiannau a llesiant plant fel un o'r prif bryderon.</p>
<p><b>b) A ellid ail-lunio'r cynigion er mwyn cynyddu'r effeithiau cadarnhaol neu leihau unrhyw effeithiau andwyol posibl?</b></p>
<p><b><u>Cwestiwn Ymgynghori 14</u></b>  <b>Mae'r Asesiad o'r Effaith ar Gydraddoldeb a gyhoeddwyd ochr yn ochr â'r ymgynghoriad yn rhoi braslun o farn Llywodraeth Cymru ar effaith y cynigion sydd wedi'u cynnwys yn yr ymgynghoriad ar grwpiau sy'n cael eu diogelu o dan Ddeddf Cydraddoldeb 2010. Mae Llywodraeth Cymru yn ceisio barn ar yr asesiad hwnnw.</b></p>
<p><b>a) A oes unrhyw effeithiau cadarnhaol neu andwyol eraill sydd heb eu nodi yn yr asesiad?</b></p>
<p>Bydd angen gwybodaeth fanwl er mwyn egluro i ddefnyddwyr gwasanaeth sut y byddant yn cael mynediad i wasanaethau a dewis iaith e.e. defnyddwyr gwasanaeth hŷn nad oes ganddynt gludiant a'r anabl</p>

b) A ellid ail-lunio'r cynigion er mwyn cynyddu'r effeithiau cadarnhaol neu leihau unrhyw effeithiau andwyol posibl?

Angen mwy o wybodaeth fanwl

**Cwestiwn Ymgynghori 15**

**Rhowch unrhyw sylwadau eraill sydd gennych ar gynnwys yr ymgynghoriad hwn.**

# Strengthening Local Government: Delivering for People

## Page 2: Chapter 3

Q1. 1a. 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?

Leave the councils at on with it as they know it better than WG

Q2. 1b. What are your views on the common elements to the process of mergers we outline in this section?

Bigger councils isn't better and it's daft that WG keep pressing this against the wishes of residents

Q3. 1c. What are your views on the options for creating fewer, larger authorities which we have set out?

If they want to merge allow them to but don't force councils to merge

WG needs to fund councils properly

Q4. 1d. Are there other options for creating fewer, larger authorities we should consider?

Leave councils work together and share services

Q5. 1e. Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.

*No Response*

## Page 3: Chapter 4

Q6. 2a. Do you agree that providing clarity on the future footprint of local government is important?

Yes provide clarity and leave them alone

Q7. 2b. Do you agree with the factors we have identified to inform our thinking? Would you change or add any?

You are obsessed on maps instead of services

Q8. 2c. What are your views on the new areas suggested in this section?

Don't support the new footprints

Q9. 2d. Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?

Leave councils as they are

Q10. 2e. 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?

*No Response*

## Page 4: Chapter 5

Q11. 3a. 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?

No this is just more nonsense

Q12. 3b. 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?

No allow councils to decide for their selves

Q13. 3c. Do you have any other thoughts on the proposed process?

No

Q14. 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.

*No Response*

Q15. 5. 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 make 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?

*No Response*

Q16. 6. What are your views on the approach which should be taken to determining the parameters of electoral reviews?

*No Response*

## Page 5: Chapter 6



Q17. 7a. How can councils make more effective use of their elected members knowledge of, and connections in, their communities?

*No Response*

Q18. 7b. 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?

*No Response*

Q19. 8a. Are there other powers which local government should have? If so, what are they?

They should be allowed to get on with things with out WG constantly interfering

Q20. 8b. Are there other freedoms or flexibilities which local government should have? If so, what are they?

*No Response*

Q21. 9a. Which areas offer the greatest scope for shared transactional services?

Back office functions

Q22. 9b. How might such arrangements be best developed?

Allow councils to come up with the best plans

Q23. 10a. 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?

*No Response*

Q24. 10b. 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?

*No Response*

Q25. 10c. Which of the issues identified above or in your response should be prioritised for early resolution?

*No Response*

Q26. 11a. What effects do you think there would be?

*No Response*

Q27. 11b. How could positive effects be increased, or negative effects be mitigated?

Stop these stupid plans to reduce councils

Q28. 12. 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.

*No Response*

Q29. 13a. Are there any positive or adverse effects not identified in the assessment?

*No Response*

Q30. 13b. Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?

*No Response*

Q31. 14a. Are there any other positive or adverse effects not identified in the assessment?

*No Response*

Q32. 14b. Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?

*No Response*

Q33. 15. Please provide any other comments you wish to make on the content of this consultation.

*No Response*

## Page 7: Submit your response

Q34. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

**Name** Jane Philips

**Organisation (if applicable)** Community group

Q35. If you want to receive a receipt of your response, please provide an email address.  
Email address

*No Response*

Q36. Telephone

*No Response*

Q37. Address

*No Response*

Q38. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

*No Response*

### **The need for 16 unitaries rather than 10 Unitary Authorities**

\_\_\_\_\_

- D = The groupings of the 16 unitaries for the provision of shared Education and Social Services.

A		B		C	
22 Existing Unitaries	Population	Action - 6 mergers	16 Unitary Authorities by size	Population	
1 City of Cardiff	361,468		1 City of Cardiff	361,468	
2 City of Swansea	244,513		2 Rhondda Cynon Taf Merthyr	298,116	
3 Rhondda Cynon Taf	238,306		3 Caerphilly and Blaenau Gwent	250,090	
4 Carmarthenshire	185,610		4 City of Swansea	244,513	
5 Caerphilly	180,462		5 Conwy and Denbighshire	211,343	
6 Flintshire	154,419		6 Powys and Ceredigion	206,306	
7 City of Newport	149,148		7 Gwynedd and Anglesey	193,350	
8 Bridgend	143,177		8 Carmarthenshire	185,610	
9 Neath Port Talbot	141,588		9 Monmouthshire and Torfaen	184,895	
10 Wrexham	136,710		10 Flintshire	154,419	
11 Powys	132,160		11 City of Newport	149,148	
12 Vale of Glamorgan	128,463		12 Bridgend	143,177	
13 Pembrokeshire	123,954		13 Neath Port Talbot	141,588	
14 Gwynedd	123,627		14 Wrexham	136,710	
15 Conwy	116,538		15 Vale of Glamorgan	128,463	
			16 Pembrokeshire	123,954	
Untiaries Under 100,000 population		merge with -			
16 Denbighshire	94,805	Conwy			
17 Monmouthshire	92,843	Torfaen			
18 Torfaen	92,052	Monmouthshire	Keep Wales's 3 main cities as separate 'city-focussed' urban unitary authorities and not as county conglomerates of other smaller places.		
19 Ceredigion	74,146	Powys	Cardiff should not be merged with the Vale,		
20 Isle of Anglesey	69,723	Gwynedd	nor Swansea with NPT, nor Newport with		
21 Blaenau Gwent	69,628	Caerphilly	Caerphilly. The big 3 cities must concentrate on promoting themselves and their identities as		
22 Merthyr Tydfil	59,810	RCT	as dynamic leading centres for economic growth.		
	3,113,150				

C		D			
16 Unitary Authorities by size	Population	9 Groupings for Joint Education and Social Services	2016	2024 Estm.	2039 Estm.
1 <u>City of Cardiff</u>	361,468	A City of Cardiff and the Vale	489,931	517,300	572,800
2 Rhondda Cynon Taf Merthyr	298,116	B RCT, Merthyr, Bridgend	441,293	446,100	452,900
3 Caerphilly and Blaenau Gwent	250,090	C Caerphilly and Blaenau Gwent	250,090	250,000	250,000
4 <u>City of Swansea</u>	244,513	D City of Swansea and NPT	386,101	393,200	405,600
5 Conwy and Denbighshire	211,343	E Conwy and Denbighshire	211,343	214,600	215,500
6 Powys and Ceredigion	206,306	F Gwynedd, Anglesey, Powys, Ceredigion	399,656	390,000	380,000
7 Gwynedd and Anglesey	193,350	G Carmarthenshire and Pembrokeshire	309,564	310,000	312,000
8 Carmarthenshire	185,610	H Newport, Monmouthshire, Torfaen	334,043	339,000	340,000
9 Monmouthshire and Torfaen	184,895	I Wrexham and Flintshire	291,129	299,100	305,900
10 Flintshire	154,419				
11 <u>City of Newport</u>	149,148	or 10 Groupings if Gwynedd/Anglesey and Powys/Ceredigion are in separate groupings for Education and Social Services.			
12 Bridgend	143,177				
13 Neath Port Talbot	141,588				
14 Wrexham	136,710				
15 Vale of Glamorgan	128,463				
16 Pembrokeshire	123,954				
	<b>3,113,150</b>		<b>3,113,150</b>	<b>3,159,300</b>	<b>3,234,700</b>

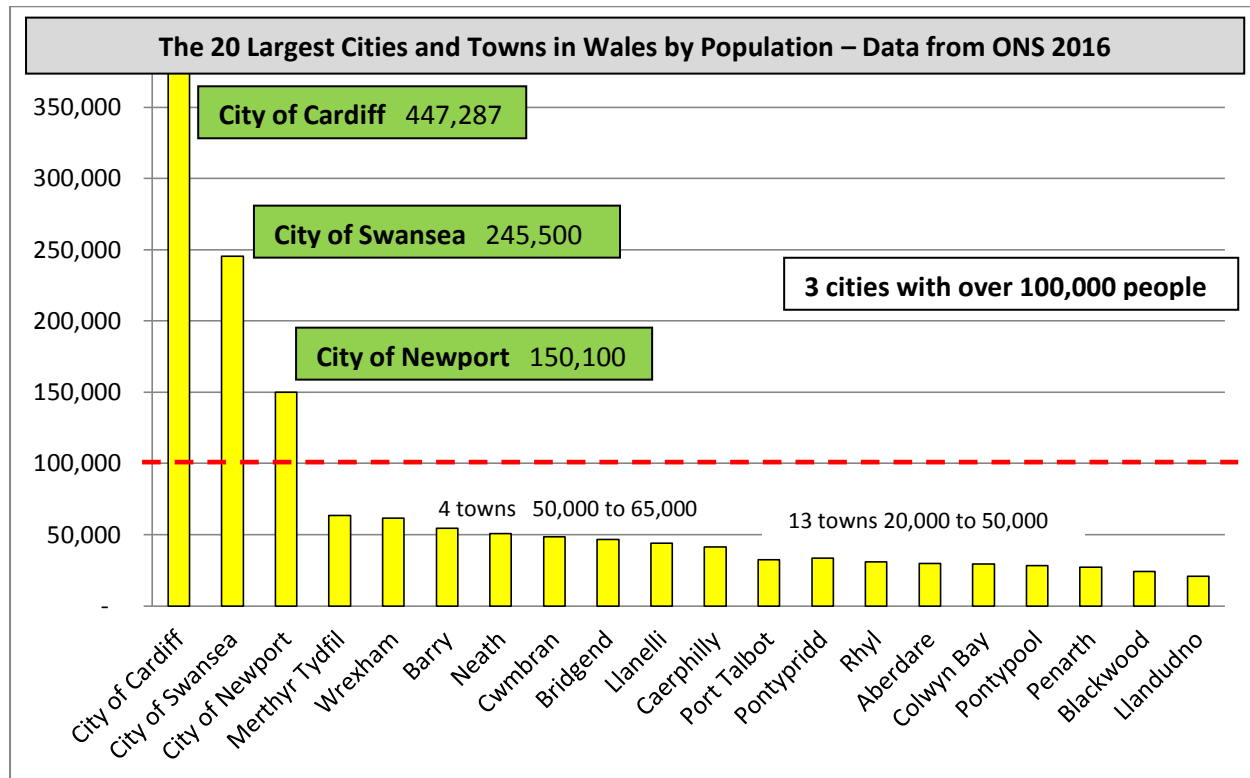
8. **Table C. Keep Wales's 3 main cities as separate 'city- focussed' urban unitary authorities** and not try to make them into county conglomerates of many places. Cardiff should not be merged with the Vale, nor Swansea with NPT, nor Newport with Caerphilly. The big 3 cities should remain as single city unitary authorities, and focus on promoting themselves and their identities as dynamic and leading urban centres for economic growth in Wales.
9. **Table D. The 9 or 10 groupings in Table D, and in the Consultation Document, are far too large to be 'single tier unitary local authorities' themselves.** They would be too large and remote and would not provide most of the roles of 'local' government effectively. They are neither 'local' nor 'county' nor 'regional' **but they could be appropriate groupings for those services which may need to be delivered on a larger scale (such as Education and Social Services)** without destroying the appropriate local structures for the rest of local government roles.
10. The groupings shown in Table D are slightly different from those shown in the Consultation Document as Powys should link with another, or several, authorities for its Education and Social Services to get the same economies of scale as all the other 15 unitaries will be getting from sharing these services in consortia. Also Newport has been grouped with Monmouthshire and Torfaen for the consortia, and Blaenau Gwent has been grouped with Caerphilly, as this makes more geographical sense for shared services. The balance of consortia by size is better.
11. **These groupings could work for sharing certain services between unitary authorities but the groupings are far too large to be the basis for new merged unitary local authorities.**
12. **Only use Table D for the groupings for some shared services between unitaries. The minimum number of unitaries should be 16 as in Table C** (and not 10) but there would be only 10 Joint Education Departments and 10 Joint Social Services Departments across Wales rather than the current 22 departments of each .
13. **One further option is to move Social Services out of the unitaries to the appropriate Health Authorities** so that the consortia arrangements in Table D would only be used for shared Education Services and any other services that the participating unitaries might wish to deliver on that scale in due course. Health Services themselves were once part of local government but were moved to Health Authorities. Perhaps Social Services should follow in view of the important relationship between the Health Service and Social Services.
14. The inter-unitary consortia must not be set up as separate organisations (or there will be no cost savings) but should be a joint committee of the participating unitaries and organised as a single education or social services department for that consortium, reporting for employment purposes to one of the participating unitary councils, and reporting to the joint committees of the participating councils.
15. The '16 unitaries' and '10 consortia' approach would help to secure the best for local government in Wales.

## **Wales's 3<sup>rd</sup> largest city should be treated as a special case and retained as a separate unitary authority**

John Burrows 10 June 2018 [johnwburrows@btinternet.com](mailto:johnwburrows@btinternet.com)

**1. Wales has 3 major cities with over 100,000 inhabitants. Newport is Wales's 3<sup>rd</sup> largest city.**

Largest settlement after Newport is 42% of Newport's size. 4<sup>th</sup> **and** 5<sup>th</sup> largest Welsh towns **combined** is 25,000 less than the City of Newport. Local authority populations disguise Newport's prominence.



**2. The City of Newport is a special case and should be retained as a single city unitary authority.**

Powys is regarded as a special 'rural' case. Newport should be regarded as a special 'urban' case.

**3. There are many economic and social advantages for Wales in treating Newport as a special case and retaining its urban position, identity, and key economic development advantages for Wales** with its 3<sup>rd</sup> largest city located at the economic gateway to South Wales. Reform risks undermining this role.

**4. Combining the City of Newport with Caerphilly (or any other authority) has many disadvantages. It undermines the strength, identity, and economic advantage and location of Wales's 3<sup>rd</sup> largest city and creates **major problems for local democracy** not just for Newport, which has run its own affairs for **over 600 years**, but for the smaller communities of neighbouring areas which would become dominated by the problems and needs of the major city, Newport, and outvoted by it on their own local issues.**

**5. A merger between Newport and Caerphilly makes no economic sense or geographical sense.**

Newport is an '*M4 Corridor*' city. Caerphilly's towns relate to Cardiff, not Newport, in the 21<sup>st</sup> century.

**6. The City of Newport is large enough by English and Scottish standards** to remain a principal unitary authority. If Wales feels that Newport at 150,000 (growing towards 200,000) is not large enough for some services then it would be better for Newport to share Education and Social Services with other authorities but still remain as a separate unitary authority as Wales as a whole benefits more that way.

**7. Newport is one of only 36 key cities in the UK** (out of 60 cities and 200 towns and 200 districts in UK) **that is a unitary authority with 'city' status.** It ranks with the UK's most prominent cities and economic hubs. Critical importance for economic development. It is a special status, not mentioned in the report, very hard to achieve, and should be maintained at all costs, but is threatened by the proposed reforms.

**8. The vitality, identity and status of Wales's 3<sup>rd</sup> largest city is critical to the Welsh economy and image.** The implications go far beyond local authority reform but these implications have not been fully considered. There will be **less problems and far more advantages for Wales** if Newport remains '**un-merged**' in view of its large and strong 'single city' urban focus and its key economic role and location.

# Strengthening Local Government: Delivering for People

## Page 2: Chapter 3

Q1. 1a. 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?

We do not support this model. There is growing frustration on reducing authorities

Q2. 1b. What are your views on the common elements to the process of mergers we outline in this section?

New alignment of areas is not consistent with single footprint for each local authority.

Q3. 1c. What are your views on the options for creating fewer, larger authorities which we have set out?

More thought needs to be considered with who and why each area is merging with.

Q4. 1d. Are there other options for creating fewer, larger authorities we should consider?

*No Response*

Q5. 1e. Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.

*No Response*

## Page 3: Chapter 4

Q6. 2a. Do you agree that providing clarity on the future footprint of local government is important?

We agree it is important and will be challenging however we do not support this model.

Q7. 2b. Do you agree with the factors we have identified to inform our thinking? Would you change or add any?

2b and 2c - Considerations to be included would be population, ages, employment and education prospects for the area and impact on needs. No mention of ethnic population.

Q8. 2c. What are your views on the new areas suggested in this section?

See above.

Q9. 2d. Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?

None - leave the current model in place.

Q10. 2e. 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?

*No Response*

## Page 4: Chapter 5

Q11. 3a. 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?

Agreed.

Q12. 3b. 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?

Agreed.

Q13. 3c. Do you have any other thoughts on the proposed process?

Consideration needs to be taken in account for County and Community and Town Councils elections on the same day as it is now.

Q14. 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.

June 2021 is too close to the Welsh Assembly elections.

Q15. 5. 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 make 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?

See Q4.

Q16. 6. What are your views on the approach which should be taken to determining the parameters of electoral reviews?

Disagree with this approach. Limit amount of Councillors in each Ward to represent population of their area. Each Area/Ward has own specific needs.



## Page 5: Chapter 6

Q17. 7a. How can councils make more effective use of their elected members knowledge of, and connections in, their communities?

Listen to them! Councillors reflect the whole area via community feedback. Less Councillors will represent a much larger area and will put strain on each Member. They would not be able to represent the whole area and engage effectively.

Q18. 7b. 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?

Councils need to increase their engagement with young people and strengthen then involvement in local democracy. Maybe an age limit on Councillors would attract young people into the roles. Promote no contributory pension and educate employers to release people to carry out their Councillor roles.

Q19. 8a. Are there other powers which local government should have? If so, what are they?

Keep them the same however if more Powers are given, additional funding should also be provided.

Q20. 8b. Are there other freedoms or flexibilities which local government should have? If so, what are they?

*No Response*

Q21. 9a. Which areas offer the greatest scope for shared transactional services?

Transport systems.

Q22. 9b. How might such arrangements be best developed?

Welsh Government and Councils to run railways!

Q23. 10a. 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?

Disagree.

Q24. 10b. 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?

Disagree.

Q25. 10c. Which of the issues identified above or in your response should be prioritised for early resolution?

True democracy will not happen if this model is implemented.

## Page 6: Impact assessments

Q26. 11a. What effects do you think there would be?

None. Additional funding should be made available to provide training for Welsh Language to be embedded into Councils maybe through a Welsh Language Strategy for staff.

Q27. 11b. How could positive effects be increased, or negative effects be mitigated?

As 11a.

Q28. 12. 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.

More clarity is needed on what this actually means.

Q29. 13a. Are there any positive or adverse effects not identified in the assessment?

*No Response*

Q30. 13b. Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?

*No Response*

Q31. 14a. Are there any other positive or adverse effects not identified in the assessment?

*No Response*

Q32. 14b. Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?

*No Response*

Q33. 15. Please provide any other comments you wish to make on the content of this consultation.

Ethnic minorities living in Wales are not included and need to be addressed

## Page 7: Submit your response

Q34. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

**Name** Kathryn Charles - Town Clerk

**Organisation (if applicable)** Neath Town Council

Q35. If you want to receive a receipt of your response, please provide an email address.  
Email address

kathryn.charles@neathtowncouncil.gov.uk

Q36. Telephone

01639 642126

Q37. Address

Administration Offices  
1st Floor  
10 -12 Orchard Street  
Neath  
SA11 1DU

Q38. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

*No Response*

# Strengthening Local Government: Delivering for People

## Page 2: Chapter 3

Q1. 1a. 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?

*No Response*

Q2. 1b. What are your views on the common elements to the process of mergers we outline in this section?

*No Response*

Q3. 1c. What are your views on the options for creating fewer, larger authorities which we have set out?

*No Response*

Q4. 1d. Are there other options for creating fewer, larger authorities we should consider?

*No Response*

Q5. 1e. Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.

*No Response*

## Page 3: Chapter 4

Q6. 2a. Do you agree that providing clarity on the future footprint of local government is important?

*No Response*

Q7. 2b. Do you agree with the factors we have identified to inform our thinking? Would you change or add any?

*No Response*

Q8. 2c. What are your views on the new areas suggested in this section?

*No Response*

Q9. 2d. Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?

*No Response*

Q10. 2e. 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?

*No Response*

## Page 4: Chapter 5

Q11. 3a. 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?

*No Response*

Q12. 3b. 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?

*No Response*

Q13. 3c. Do you have any other thoughts on the proposed process?

*No Response*

Q14. 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.

*No Response*

Q15. 5. 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 make 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?

*No Response*

Q16. 6. What are your views on the approach which should be taken to determining the parameters of electoral reviews?

*No Response*

## Page 5: Chapter 6

Q17. 7a. How can councils make more effective use of their elected members knowledge of, and connections in, their communities?

*No Response*

Q18. 7b. 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?

*No Response*

Q19. 8a. Are there other powers which local government should have? If so, what are they?

*No Response*

Q20. 8b. Are there other freedoms or flexibilities which local government should have? If so, what are they?

*No Response*

Q21. 9a. Which areas offer the greatest scope for shared transactional services?

*No Response*

Q22. 9b. How might such arrangements be best developed?

*No Response*

Q23. 10a. 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?

*No Response*

Q24. 10b. 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?

*No Response*

Q25. 10c. Which of the issues identified above or in your response should be prioritised for early resolution?

*No Response*

## Page 6: Impact assessments

Q26. 11a. What effects do you think there would be?

*No Response*

Q27. 11b. How could positive effects be increased, or negative effects be mitigated?

*No Response*

Q28. 12. 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.

*No Response*

Q29. 13a. Are there any positive or adverse effects not identified in the assessment?

*No Response*

Q30. 13b. Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?

*No Response*

Q31. 14a. Are there any other positive or adverse effects not identified in the assessment?

*No Response*

Q32. 14b. Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?

*No Response*

Q33. 15. Please provide any other comments you wish to make on the content of this consultation.

Thank you for this opportunity to comment. As the body that represents non-statutory heritage interests across Wales, The Wales Heritage Group wishes to express the view that local authority reorganisation in Wales should in no way lead to a reduction in the provision of specialist conservation and heritage services within the Principality. We are extremely concerned that these resources are already over-stretched and that the consolidation of local authority boundaries should be used as an opportunity to ensure that adequate provision is made for the delivery of conservation services across Wales as a whole. Wales's heritage contributes £1bn GVA contribution to UK tourism economy and supports over 24,000 jobs. Ensuring Wales's heritage is adequately protected is essential to the wellbeing of its future generations.

## Page 7: Submit your response

Q34. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

**Name** Kathryn Hilsden  
**Organisation (if applicable)** Wales Heritage Group

Q35. If you want to receive a receipt of your response, please provide an email address.  
Email address

[REDACTED]

Q36. Telephone

[REDACTED]

Q37. Address

*No Response*

Q38. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

*No Response*



## Annex C: Consultation Questions

Your Name	Councillor Rosemarie Harris
Organisation (if applicable)	Powys County Council
E-mail / Telephone	<a href="mailto:cllr.rosemarie.harris@powys.gov.uk">cllr.rosemarie.harris@powys.gov.uk</a> / 01597 826906
Your Address	County Hall Spa Road East Llandrindod Wells Powys LD1 5LG

You can find out how we will use the information you provide by reading the privacy notice in the [consultation document](#).

### Chapter 3

#### Consultation Question 1

In Chapter 2, 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 summarise 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?

The regional working will need to reflect the changes set out in moving from 22 to 10 local authorities. There is great risk that these fewer authorities will be part of more than one consortia therefore creating greater uncertainty and hindering planning. Consideration must be given to reconsidering the regional arrangements for these consortia within the few larger authorities, questioning whether you'd still need consortia at all. Clarity about the types of model can usefully be provided by Welsh Government. Travelling/distances? We already travel significant distances.

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

Voluntary mergers broadly reflects the status quo; that said, we understand that this is only if the proposals fall within the 10 authorities that Welsh Government prescribe within the Green Paper.

Single comprehensive merger by 2022 appears somewhat unrealistic and altogether risky. Brexit is a 'known unknown' and surely Wales should be preparing for what this will mean in practice.

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

The authority does not believe that fewer, larger authorities will result in a strong ability to weather continued austerity. Neither does it believe that fewer, larger authorities are necessarily more sustainable this is because the arguments about the benefits of scale are not at all clear. In fact there is an argument that smaller

authorities are closer to their electorate and better able to respond quickly and in more creative ways. We specifically reject that ‘more money... would not solve the problem’. We know about geographic size- large in area – school transport, schools, social care delivery.

Creating a different footprint of boundaries will not resolve the issues currently faced around a narrowing offer of public service which appears to be focussing more and more on Social Care, demand is rapidly increasing and public expectations remain high.

The Green Paper feels like a distraction, would be extremely complex, cost the taxpayer to implement and the funding is unclear.

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

There is an opportunity to look at functional reform rather than purely local authority reform e.g. Health and Social Care/Well-being, or even a broad remit of one public service, particularly as Welsh Government have continued to invest in Health Services. However, it is also recognised that the existing larger Health Boards are in no greater position than Local Government with increasing demand and costs of care. Put all quangos under LA care? Plus NRW, Visit Wales, Forestry, Public Health Committees?

We are co-terminous with our Health Board in Powys, however there is a real risk that integration will not work until organisations are fully aligned. Welsh Government could be more explicit around how Police, Health, Local Government work together.

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

No specific evidence of costs available within the authority, however, it is our understanding that research undertaken by Cardiff Business school identifies that costs are normally greater, savings are less and performance reduces more than anticipated.

From a local perspective we fully understand the difficulties and costs in providing services to our population, especially very dispersed rural population with miles of minor rural road network

## Chapter 4

### Consultation Question 2

Chapter 4 has 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 sets 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?

<p>No. The thinking needs to go right back to what we want Local Government to deliver in the future and review the statutory and non-statutory services rather than a geographical map.</p> <p>It is more appropriate that Welsh Government sets out its vision for public services within which Local Government can operate free of the distraction of reorganisation.</p>
<p>b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?</p>
<p>The continuing austerity is a factor but it is also the ‘new reality’ and it is right that the public sector must adapt. Save public money by letting Local Government run quango organisation.</p>
<p>c) What are your views on the new areas suggested in this section?</p>
<p>Consideration should be given to socio economic flows, transport and attention to where people naturally gravitate. For example in South Powys these flows include Brecon, Merthyr, Cardiff; this is a complex picture and on a local level often informed by a sense of community.</p> <p>Any “merged” areas should be “organic” – where communities naturally work together.</p>
<p>d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?</p>
<p>As above.</p>
<p>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?</p>
<p>The danger is that this becomes too bureaucratic and too much time and effort is spent servicing the process rather than producing outcomes.</p> <p>Is it in the terminology? “Joint working” rather than full scale reorganisation of boundaries.</p>

## Chapter 5

### Consultation Question 3

Chapter 5 sets out the proposed approach to transition and implications for

establishing Transition Committees and elections to Shadow Authorities under each option.
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?
It is unrealistic to expect shadow authorities to be in place in time to execute the proposals. Consideration would need to be given to realistic timescales for setting up such arrangements. These shadow authorities will also need to be serviced which will come at a cost.
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?
The attraction of setting a date is to give clarity about timescales. This is welcomed.
c) Do you have any other thoughts on the proposed process?
None.
<b><u>Consultation Question 4</u></b> 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.
If June 2021 were to be the date then this allows suitable time for preparation.
<b><u>Consultation Question 5</u></b> 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 make 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?
None in addition to the above. Our own economic plans could possibly take longer. This process will interfere.
<b><u>Consultation Question 6</u></b> What are your views on the approach which should be taken to determining the parameters of electoral reviews?
Any approach should be informed and available from the electoral commission.

## **Chapter 6**

### **Consultation Question 7**

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

By ensuring that all elected members have a worthwhile role even if not involved in the direct administration of the Council; touching base with local members to help inform decision making. Rural/Town councillors is a very different role and it is difficult to know of some communication when so dispersed.

There is some scope to look at the role of local member given that newly elected members are often able to bring a knowledge of their local area that is lacking in some cases. The concept of community ambassador may be worth exploring. This would not be just about trying to get a better deal for their area/ward but also acting as advocate and ambassador for an area in a wider context.

- 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?

Fewer Councillors working fulltime and remunerated appropriately may enable an increased number of younger people with families to become involved. The real issue is making the role of councillor worthwhile and greater powers devolved from Welsh Government may assist this.

#### Consultation Question 8

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

The authority would welcome a power of general competence based on the approach in England.

There is an emerging argument that Public Health should also be part of local government given the regulatory and strategic nature of service provision.

One planning authority for those who have a national park. Reconnect Local Government with FE colleges as they used to be.

Scrutiny of Health Boards – as in England.

Delegated tax raising powers need to be further explored to ensure a responsive local approach can be used.

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

There is merit in allowing some increased scope to raise and vary local taxation beyond the current approach to council tax. Under current arrangements Wales has had a more mature approach to raising council tax and this has been effective. This could be extended to specific local taxes that could be delegated and consulted upon by a council seeking to raise additional funding.

This may allow a more effective response to the unclear impact that Brexit will have.

#### Consultation Question 9

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

The model adopted by the health service shows that a shared approach can work. However this may be a model best suited to this sector given lack of complexity in some areas of service.

There is undoubtedly scope for sharing costs and in Powys we already supply Disclosure Barring Service (DBS) to 8 other authorities and there is merit in having centres of excellence that can provide cost effective services.

A distinction has to be drawn between transactional and advisory services as the latter (in our view) are not always appropriate for a national or regional approach.

b) How might such arrangements be best developed?

On a regional footprint but with a clear framework from Welsh Government.

#### Consultation Question 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?

Guidance notes, practice forums.

c) 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?

None of considerable relevance at this stage.

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

#### Consultation Question 11.

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?

We do not believe there will be any issues in this area for the Powys footprint.

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

As above.

<p><u>Consultation Question 12</u></p> <p>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.</p>
<p><u>Consultation Question 13</u></p> <p>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.</p> <p>a) Are there any positive or adverse effects not identified in the assessment?</p> <p>None of considerable relevance at this stage.</p> <p>b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?</p>
<p><u>Consultation Question 14</u></p> <p>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.</p> <p>a) Are there any other positive or adverse effects not identified in the assessment?</p> <p>None of considerable relevance at this stage.</p> <p>b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?</p>
<p><u>Consultation Question 15</u></p> <p>Please provide any other comments you wish to make on the content of this consultation.</p> <p>Voting reform – Welsh Government giving authorities choice on what system is used. Mindful there could be a number of systems in place when merging authorities.</p>

**SWYDDFA'R ARWEINYDD  
OFFICE OF THE LEADER**



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Fy Nghyf / My Ref: CM39777

Dyddiad / Date: 21 June 2018

Alun Davies AM  
Cabinet Secretary for Local Government and Public Services  
Welsh Government  
5th Floor  
Tŷ Hywel  
Cardiff Bay  
CF99 1NA

Annwyl / Dear Alun,

**Re: Strengthening Local Government Green Paper**

I am grateful for you for our recent meeting to discuss your Strengthening Local Government Green Paper. Having reflected further on the matter, I trust the following helps inform your thinking on the next steps. In essence The Cardiff Labour Group and I see this as an invaluable opportunity to restate the fundamental purpose of Local Government in Wales and to set out an approach for reform and delivery that is ambitious in scale, sustainable in nature and that is focused on improving outcomes for the communities we serve.

*Reforming Local Government – What are we here to do?*

Local Government represents a crucial tier of democracy; it is close to local communities and it responds to the specific needs of place. This is significant because where and how we live shapes our life chances, the nature of the local economy, as well as our physical and mental health and well-being. Crucially, what will raise productivity or tackle deprivation in one area will fail in another. It is also widely recognised that a combination of top down Government intervention and trickle-down economics, involving the spurious claim that a rising national economic tide lifts all the boats, is misguided. The evidence shows that current policies are, in fact, widening wealth, health, social and geographical divisions. It is therefore clear that meeting our shared economic and social ambitions requires a local response. This, in turn, requires a significant devolution of power to local areas. We know that greater local flexibilities are key to success, yet UK cities currently control only 5-7% of their tax base. This is ten times less than the US city average and five times less than the OECD average. In Wales, we have an opportunity to use the flexibilities of devolution to lead that change and tackle the productivity deficit that limits the potential of our national economy.

Alongside a rebalancing of local/central power, local leadership capacity is crucial and Cardiff has proven repeatedly that ambitious place-based policy is the best way of driving forward transformative regeneration projects, joining up public services and unlocking investment, even during a sustained period of biting austerity. There is no doubt that ambition and shared delivery have characterised the approach in Cardiff, and we must build on it.

**GWEITHIO DROS GAERDYDD, GWEITHIO DROSOCH CHI**

Mae'r Cyngor yn croesawu gohebiaeth yn Gymraeg, Saesneg neu'n ddwyieithog. Byddwn yn cyfathrebu â chi yn ôl eich dewis, dim ond i chi roi gwybod i ni pa un sydd well gennych. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

**WORKING FOR CARDIFF, WORKING FOR YOU**

The Council welcomes correspondence in Welsh, English or bilingually. We will ensure that we communicate with you in the language of your choice, as long as you let us know which you prefer. Corresponding in Welsh will not lead to delay.





Cardiff has always been ambitious for the people it serves and, as a capital city, for the nation it represents. This ambition has been instrumental in the city's success, driving forward levels of population growth and job creation that are amongst the fastest in the UK. Over a period of thirty years, it is bold decisions by an ambitious City Government and its partners that have made this success possible. From St. David's Hall to St. David's 2, local leadership of place has not only helped shape the economic and cultural success of the city, but a region and a nation.

At the same time, Cardiff, like every local authority across Wales, has continued to deliver some of the services that are closest to, and most highly valued by, local communities. Without exception, Cardiff – and Local Government across Wales – has delivered on time and on budget, despite facing challenges that are no less complex or demanding than those faced by other public service partners. On matters of fiscal discipline and efforts to unlock vast operating efficiencies, Local Government has proven to be a reliable partner.

Despite this track record of delivery, and its potential for delivering further transformative change, it is impossible not to conclude that Local Government today is a diminished institution. Following a decade of austerity, which has significantly reduced our funding settlement, and the slow erosion of powers and responsibilities over the course of many more years, Local Government today has less powers and less money in real terms than at any other point in recent history. I'm certain you will agree that the future cannot be characterised by the ongoing management of decline and an endless debate about funding. As the Green Paper recognises, a lasting solution can only be achieved by optimising the scale, powers and responsibilities of Local Government.

Over the past five years, Cardiff has engaged fully in dialogue with Welsh Government about the opportunities of local government reform, and I would, again, take this opportunity to reaffirm Cardiff Council's long standing commitment to collaboration. As I outlined previously to you in my letter dated 31 January 2018, there are a range of potential new powers which would support Cardiff's continued development.

### *The Limits of Regionalism*

On the issue of regional collaboration, Cardiff is fully committed to expanding and deepening collaborative arrangements in areas such as land use planning, transport and economic development, as well as the integration of health and social care. Equally, for shared transactional services, Cardiff is not only open to further discussion about regional delivery arrangements, but is committed to accelerating the pace and scale of change. However, it should be made clear that, in all instances of regional collaboration, three principles must apply. The business case must stack up, the geographical collaborative footprint must be fit for purpose and, above all, democratically accountable local members must be central to any governance arrangements. Crucially, the weighting of voting must be factored into any emerging regional governance arrangements in order to fairly reflect population size and the levels of funding contributed by participating authorities. This principle is accepted as part of city-regional governance arrangements for other UK core cities that have a long and successful track record of delivery.

Further to this, in developing regional arrangements, no presumption should be made about the preferred service delivery model. The central determining factor is ensuring that suitable delivery arrangements are established at the appropriate geographical scale, and with the right partners. For example, a city-region approach to delivering the City Deal reflects the functioning economic geography of South Wales; however, this does not necessarily represent the most appropriate delivery model or spatial scale for all services that the Council would seek to deliver in partnership. We would have concerns about any process of reorganisation which distracted us from our delivery agenda or weakened the democratic accountability of decision-makers to the citizens of Cardiff.

More broadly, if the most appropriate size and scale of Local Government is to be explored, we should not be constrained by current Local Authority boundaries. It is clear, for instance, that Cardiff will have a great deal more in common with Penarth, but not necessarily with the Vale of Glamorgan as a whole, given that Penarth now represents a natural extension of the city's core urban area. We would therefore urge Welsh Government to consider more fundamentally the existing geographical boundaries of Local Authorities as part of the reform agenda. This would ensure that Local Government represents – as far as possible – geographical areas with common social, economic and environmental characteristics.

#### *Accountability to the People*

On the issue of democratic representation, it is equally important that there is a fair and equitable ratio of local councillors to local constituents, meaning that the cap on the number of Councillors elected to local authorities should be lifted. Furthermore, we fully recognise and support the argument for the election of additional Assembly Members so that the National Assembly of Wales can respond effectively to the devolution of additional powers to Wales. It therefore follows that any additional powers and responsibilities devolved to Local Government further strengthens the need to lift the cap on the maximum number of Councillors as part of Electoral Reviews.

On this basis, and with the additional powers and responsibilities outlined in my previous letter to you, Local Government in Wales could pursue stronger place-based policy. Longer term budget cycles, the consolidation of responsibilities in areas such as public health and education improvement, as well as business rate retention for the purpose of reinvestment in growth projects, are just a few of the levers that would help improve productivity and tackle inequality. It is the policy direction adopted by other successful areas and it is certainly gaining pace within UK core cities.

The ask of Welsh Government is bold, but so too is the offer. In return, Local Government would play a leading role in driving up growth, productivity and improving life chances in Wales. Cardiff would therefore be supportive of any reform that would strengthen Local Government and remains committed to working with Welsh Government to help shape more detailed proposals in the future.

Yn gywir  
Yours sincerely



**CYNGHORYDD / COUNCILLOR HUW THOMAS**  
**ARWEINYDD / LEADER**  
**CYNGOR CAERDYDD / CARDIFF COUNCIL**



Dear Sir/Madam,

The Community Council has considered the Green Paper and wishes to comment that the creation of larger principal councils will be detrimental to the close and respectful relationship that exists between local councils and principal councils. A key disadvantage of the proposal to create larger principal councils is to potentially damage this important relationship.

Regards,

Paul R. Egan BA, Chartered MCIPD, PSLCC, F. Inst. LM, FIPSM

Clerk to Llandough Community Council,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Website [www.llandough-cc.co.uk](http://www.llandough-cc.co.uk)

# Strengthening Local Government: Delivering for People

## Page 2: Chapter 3

Q1. 1a. 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?

The Town Council have no response to this question.

Q2. 1b. What are your views on the common elements to the process of mergers we outline in this section?

The Town Council has concerns that although mentioned later in the document (Chapter 4), you state you have listened to stakeholders about which authorities to merge, we do not feel you have considered the communities served by each authority. The 'Vale of Glamorgan' is defined by its rural areas, small towns/villages and its heritage coast line. 'Cardiff' on the other hand is a densely populated urban capital city. The Vale is a third the size of Cardiff and we feel the Vale would not receive a fair representation on any Council formed.

Q3. 1c. What are your views on the options for creating fewer, larger authorities which we have set out?

The Town Council does not agree with the proposal to create fewer larger authorities. Local authorities are continually being pressed to listen to their communities, how is this achievable to deliver services with the varying needs of the community in such diverse characteristics. The needs of residents in an urban area are vastly different to those in a rural area.

We feel that financially it is not always correct that bigger is better. The Vale are evidence that although one of the smaller authorities in Wales and receiving the second lowest level of funding per head, it has still been ranked as the top performing local authority in Wales for the past 3 years.

Q4. 1d. Are there other options for creating fewer, larger authorities we should consider?

We believe that instead of looking at all authorities as a whole in one paper, you should consider looking at each individual authority and its performance record, geographic dimension, community served and size, then possibly merging those that require or 'need' to merge to enable them to fulfil their role more efficiently.

Q5. 1e. Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.

The Town Council has no comments on this, as unable to answer.

## Page 3: Chapter 4

Q6. 2a. Do you agree that providing clarity on the future footprint of local government is important?

For a number of years you have been issuing consultation documents on the 'reorganisations' of this sector, as well as our own sector, and we feel this is unsettling for not only staff but also people looking to be involved at a local level of government.

**Q7. 2b. Do you agree with the factors we have identified to inform our thinking? Would you change or add any?**

The Town Council has no comment on this.

**Q8. 2c. What are your views on the new areas suggested in this section?**

As previously stated in questions 1b, 1c, and 1d, the Town Council does not think that 'one size fits all' when looking at merging the authorities. What could work for two, maybe three, authorities merging could not work for others, eg the demographics. We have concerns that as the Vale is a small authority, merging with a larger authority Cardiff, there would be less influence and say by those representing residents especially in the 'western rural vale'. Previously when under South Glamorgan there were 81 seats on the authority, 19 of these seats were for those representing the Vale. Unfortunately with this minority representation the Vale members were never able to have a say on decision being made.

**Q9. 2d. Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?**

As previously stated authorities should be looked at on an individual basis.

**Q10. 2e. 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?**

We believe the authorities are best placed to look at arrangements and shared services.

## **Page 4: Chapter 5**

**Q11. 3a. 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?**

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

**Q12. 3b. 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?**

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

**Q13. 3c. Do you have any other thoughts on the proposed process?**

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

Q14. 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.

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

Q15. 5. 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 make 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?

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

Q16. 6. What are your views on the approach which should be taken to determining the parameters of electoral reviews?

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

## Page 5: Chapter 6

Q17. 7a. How can councils make more effective use of their elected members knowledge of, and connections in, their communities?

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

Q18. 7b. 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?

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

Q19. 8a. Are there other powers which local government should have? If so, what are they?

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

Q20. 8b. Are there other freedoms or flexibilities which local government should have? If so, what are they?

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

**Q21. 9a. Which areas offer the greatest scope for shared transactional services?**

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

**Q22. 9b. How might such arrangements be best developed?**

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

**Q23. 10a. 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?**

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

**Q24. 10b. 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?**

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

**Q25. 10c. Which of the issues identified above or in your response should be prioritised for early resolution?**

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

## **Page 6: Impact assessments**

**Q26. 11a. What effects do you think there would be?**

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

**Q27. 11b. How could positive effects be increased, or negative effects be mitigated?**

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.



Q28. 12. 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.

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

Q29. 13a. Are there any positive or adverse effects not identified in the assessment?

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

Q30. 13b. Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

Q31. 14a. Are there any other positive or adverse effects not identified in the assessment?

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

Q32. 14b. Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?

The Town Council feels they are unable to answer any questions in these Chapters as they relate more to the workings of a County Council.

Q33. 15. Please provide any other comments you wish to make on the content of this consultation.

As a large Town Council in the western vale we have responded to some of the consultation questions but other we have been unable to answer as they have no reference to us, but we strongly object to the merger of the Vale of Glamorgan Council with Cardiff County Council.

We feel it will be detrimental to the residents of the Vale and the good work being undertaken by the Vale of Glamorgan Council. The Vale Council has successfully worked with local residents in establishing 5 community lead libraries, as opposed to closing the facilities. If merged to create a larger authority, projects like this would be more difficult to achieve as the central hub would be more remote.

As previously stated the rural Vale would suffer greatly, as what services the communities in these areas require differ greatly to those services needed in a more urban environment.

It is felt that larger authorities are less connected with their communities and their needs.

## Page 7: Submit your response

Q34. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

**Name** Ruth Quinn  
**Organisation (if applicable)** Llantwit Major Town Council

Q35. If you want to receive a receipt of your response, please provide an email address.  
Email address

[REDACTED]

Q36. Telephone

[REDACTED]

Q37. Address

Town Hall  
Llantwit Major  
Vale of Glamorgan  
CF61 1SB

Q38. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

*No Response*

## Annex C: Consultation Questions

Your Name	Steve Halsall
Organisation (if applicable)	Local Democracy and Boundary Commission for Wales
E-mail / Telephone	<a href="mailto:steve.halsall@gov.wales">steve.halsall@gov.wales</a> / 02920 464819
Your Address	Hastings House, Fitzalan Court, Cardiff CF24 0BL

You can find out how we will use the information you provide by reading the privacy notice in the [consultation document](#).

### Chapter 3

#### Consultation Question 1

In Chapter 2, 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 summarise 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?

It is not within the Commission's remit to take a view on the effectiveness or otherwise of regional working.

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

In terms of the first of the common elements, the Commission would welcome the clarity of an agreed future framework for local government. This is essential for planning the future work of the Commission. The second element of a structured, democratically-led change process is also to be welcomed and the Commission would wish to play its part in ensuring that appropriate electoral arrangements are in place. In terms of support and assistance to bring authorities together the Commission will continue to provide appropriate support and advice to local authorities on issues within the Commission's remit. Consideration of failing authorities is not within the Commission's remit.

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

It is not appropriate for the Commission to express a view on the merits or otherwise of the three options as such. Whichever option is chosen the Commission considers that it is appropriate for it to undertake an electoral review of any proposed new authority before the election to the Shadow Authority takes place. In order to undertake and complete effective reviews it is important that the Commission is provided with sufficient time and resources.

The Commission is currently undertaking a programme of electoral reviews of the current 22 principal authorities to be completed in time for local government elections in May 2022 as requested by Welsh Government. This current programme is running to a tight and intensive timetable, a ten year programme condensed into less than 5 years, and the indicative timetables for the three options would mean that any

programme of electoral reviews for the new authorities would require reviews to be carried out in a significantly shorter timescale.

All of the options presented will have a significant impact on this programme and may require the cessation of the process either as a whole, if Options 2 or 3 are chosen, or in part, if Option 1 is chosen. The timescales involved, number of voluntary mergers and the decision the Government makes on issues such as the appropriate number of members for the new authorities will determine if the current programme is to be cancelled under Option 1. The Commission is required by the Local Government (Democracy) (Wales) Act 2013 (the 2013 Act) to complete a review of all 22 authorities by September 2023. This can only be achieved by completing its existing programme. To stop the Commission's programme will therefore require a Direction from Welsh Ministers (under Section 48 of the 2013 Act), allowing the Commission to focus on the reviews for the proposed merged authorities. Given the short timescale for potential merger reviews as set out in the Green Paper, it will not be possible to deliver both a programme of merger reviews and the existing programme at the same time.

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

Consideration of other options is not within the Commission's remit.

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

The Commission will only be able to estimate costs with any degree of accuracy in respect of a programme of electoral reviews under each option once a set framework and timescale is agreed.

## Chapter 4

### Consultation Question 2

Chapter 4 has 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 sets 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?

Clarity, at the earliest possible opportunity, of the future footprint is extremely important for planning the work of the Commission. As indicated in the response to 1 c) above, the timetable for completing electoral reviews under any of the three options will be tight and intensive. The earlier a direction (under Section 16 of the Local Government (Wales) Act 2015) is issued to the Commission the better in this respect.

For example:

- In respect of the Options 1 and 2, to allow the Commission to conduct 1-6 reviews on voluntary mergers and report to the Welsh Government by end of July 2020 (as indicated at 5.18) the latest date that a final Direction could be issued to the Commission for it to review electoral arrangements for a new

<p>authority would be February 2019.</p> <ul style="list-style-type: none"> <li>In respect of Option 3, to allow the Commission to conduct 8 - 12 reviews and report to the Welsh Government by end of July 2020 (as indicated at 5.18) the latest date that a final Direction could be issued to the Commission for it to review electoral arrangements for a new authority would be November 2018.</li> </ul> <p>Directions later than those indicated above, assuming the end of July 2020 reporting date, would, in our view, provide insufficient time for the Commission to conduct effective reviews under the provisions of the 2015 Act.</p>
<p>b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?</p>
<p>This is outside the Commission's remit.</p>
<p>c) What are your views on the new areas suggested in this section?</p> <p>Whilst it would not be appropriate for the Commission to express a view on the makeup of the new areas, it should be noted that It is part of the Commission's remit to keep under review of boundaries between local authority areas. This is to allow changes to be made to the boundaries where anomalies have been identified. Such anomalies may arise from new developments or may be of long-standing. Such a review process would continue to apply to any new areas that arise and will therefore not preclude any future boundary changes between local authority areas.</p>
<p>d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?</p>
<p>This is outside the Commission's remit.</p>
<p>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?</p>
<p>This is outside the Commission's remit.</p>

<p><b>Chapter 5</b></p>
<p><u>Consultation Question 3</u></p> <p>Chapter 5 sets out the proposed approach to transition and implications for establishing Transition Committees and elections to Shadow Authorities under each option.</p>
<p>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?</p>
<p>The Commission agrees that it is appropriate to hold elections to Shadow Authorities ahead of the vesting day. However, as noted in our response to 2 a) above, it is imperative that the Commission is directed in sufficient time to complete effective reviews for those elections.</p>

<p>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?</p> <p>It is important that the Commission has sufficient time to carry out an effective electoral review prior to the election of a Shadow Authority. Setting a cut-off date for voluntary proposals would assist with this. As indicated at 2 a) above, the latest date that a direction could be issued to the Commission for it to review electoral arrangements for new authorities in Option 1 in this proposed electoral cycle would be February 2019.</p>
<p>c) Do you have any other thoughts on the proposed process?</p> <p>For all of the options, the time available for the Commission to undertake the requisite electoral reviews appears very tight. The earlier decisions are made and directions provided to the Commission the better.</p>
<p><u>Consultation Question 4</u></p> <p>The consultation suggests holding any local government elections in June 2021.</p> <p>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.</p> <p>The difficulties with the suggestion of holding local government elections in June 2021, with respect to the Commission's reviews, varies depending on what decisions are taken:</p> <p>No change - The Commission's current programme of electoral reviews is not due to be completed until the spring of 2021. This is too late for a June 2021 election. In addition, the provisions of the 2013 Act does not allow the Commission to report on reviews in the 9 months prior to a local government election. This would effectively reduce the existing programme deadline to the beginning of September 2019. At this point we are scheduled to have completed 17 of the 22 reviews. The Commission is already operating at peak capacity and the programme cannot be shortened any further. Therefore, in order to allow the Commission to complete its programme of reviews, an election in May or June 2022 would be more appropriate.</p> <p>Option 1 – In addition to the difficulties highlighted in the no change option above, any electoral reviews of new authorities will need to be completed by end of July 2020 which leaves very little time to undertake the reviews. As indicated in our response to 2 a) the Commission would need to be directed by February 2019. Subject to the number of reviews, work on the existing programme would also have to be stopped in order to complete the reviews of the new authorities. Alternatively, in order to allow the Commission to complete its programme of reviews and any new authority reviews, a full local government election in May or June 2022 would be more appropriate.</p> <p>Option 2 – As noted above, electoral reviews of new voluntarily merged authorities will need to be completed by end of July 2020 which leaves very little time to undertake the reviews. As indicated in our response to 2 a) the Commission would need to be directed by February 2019.</p>

In order to complete the following reviews of non-voluntary merged new authorities by an indicative date of end of July 2024 (to allow for an election in May/June 2025 as indicated at 5.8), the Commission would request that Welsh Government gives consideration to including in the February 2019 direction instructions to begin these reviews at the earliest opportunity. This will allow for effective reviews to be completed by end of July 2024.

If the Commission were not to begin these reviews at the earliest opportunity and began them after the June 2021 local government election, the timetable would still be challenging, depending on the number of reviews. In order to meet this demanding timetable consideration may need to be given to making changes to the review process that is set out in the 2015 Act.

### Option 3

As noted above, electoral reviews of new voluntarily merged authorities will need to be completed by end of July 2020 which leaves very little time to undertake the reviews. As indicated in our response to 2 a) the Commission would need to be directed by November 2018. If this cannot be achieved, in order to allow the Commission to complete its programme of reviews, an election in May or June 2022 would be more appropriate.

In either case, in order to meet this demanding timetable consideration would need to be given to making changes to the review process that is set out in the 2015 Act.

### Consultation Question 5

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 make 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?

All of the Commission's work may be considered as being tied to electoral cycles.

### Consultation Question 6

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

The Commission agrees that it will need to be directed to undertake electoral reviews of the proposed new local authority areas. The direction will need to be issued in sufficient time for the Commission to undertake reviews by the required date as discussed above at 2 a) and 4.

Furthermore any direction will need to include:

- a requirement to cease work on some or all of the current programme of reviews;
- a sequence of reviews;
- the appropriate number of members for each local authority;
- whether wards should be single-member or multi-member (or either); and
- the maximum size of a multi-member ward (in terms of the number of

members).

The inclusion of these issues bulleted above are crucial to the Commission. As indicated in the responses to earlier questions, in order to undertake what will be a very tight schedule of electoral reviews, the earlier the parameters of the reviews are set the better in terms of setting a timetable for a programme of effective electoral reviews. By way of example the Commission's existing council size policy went through three iterations and took 18 months to create, consult on and agree. There is not time for the Commission to undertake this exercise within the confines of the Options provided. In addition consideration should be given to making changes to the review process to allow for a shorter review programme.

Currently the Commission is required to consult on the policies and practices it will be applying to the reviews. If these issues are covered in the direction then this process will not be needed. In the indicative timing above we have assumed that this provision would be removed from the 2015 Act. If it is not removed we will need to be directed three months prior to the indicative dates given (December 2018 for Options 1 and 2; and August 2018 for Option 3. Alternatively the reporting date would need to be extended and/or the local government election moved to a later date.

We note that there are proposals to extend the franchise the 16 and 17 year olds. Whilst the Commission does not offer a view on this, any electorate data the Commission utilises in a review must be available at the start of a review. It is not feasible for the Commission to conduct a review, changing the electorate data part way through a review. Therefore, for the Commission to include 16 and 17 year olds in its reviews, the definitive electorate data must be supplied by the relevant council(s) under review at the outset of the review. In this respect therefore an early decision on this would be welcomed.

## **Chapter 6**

### **Consultation Question 7**

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

This issue is outside the Commission's remit.

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?

This issue is outside the Commission's remit. Consideration of these both of these issues however may have a bearing on the number of members that it is considered to be appropriate for new authorities. This will inform the guidance that Welsh Government may give to the Commission within a direction. As indicated earlier, the appropriate number of members for local authorities is an important factor in the undertaking of electoral reviews.

### **Consultation Question 8**



a) Are there other powers which local government should have? If so, what are they?
This issue is outside the Commission's remit.
b) Are there other freedoms or flexibilities which local government should have? If so, what are they?
This issue is outside the Commission's remit.
<u>Consultation Question 9</u>
a) Which areas offer the greatest scope for shared transactional services?
This issue is outside the Commission's remit.
b) How might such arrangements be best developed?
This issue is outside the Commission's remit.
<u>Consultation Question 10</u>
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?
This issue is outside the Commission's remit.
c) 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?
This issue is outside the Commission's remit.
d) Which of the issues identified above or in your response should be prioritised for early resolution?
This issue is outside the Commission's remit.
<u>Consultation Question 11.</u> 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?
The existing authorities and the proposed authorities will all be subject to the Welsh Language Standards that seek to ensure that the Welsh language is treated no less favourably than English.

b) How could positive effects be increased, or negative effects be mitigated?
By adhering to the standards.
<p><u>Consultation Question 12</u></p> <p>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.</p>
The existing authorities and the proposed authorities will all be subject to the Welsh Language Standards that seek to ensure that the Welsh language is treated no less favourably than English.
<p><u>Consultation Question 13</u></p> <p>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.</p>
a) Are there any positive or adverse effects not identified in the assessment?
The Commission has not identified any additional positive or negative effects of the proposals in respect of Children's Rights.
b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?
The Commission has no suggestions for reformulating the proposals in respect of Children's Rights.
<p><u>Consultation Question 14</u></p> <p>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.</p>
a) Are there any other positive or adverse effects not identified in the assessment?
The Commission has not identified any additional positive or negative effects of the proposals in respect of Equalities.
b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?
The Commission has no suggestions for reformulating the proposals in respect of Equalities.

**Consultation Question 15**

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

The Commission considers that it is appropriate for it to undertake electoral reviews of new authorities before the first elections to those authorities.

In order to undertake effective reviews in to a particular timetable (depending on the option) the Commission will require:

- Clarity on the agreed option and the agreed areas as soon as possible;
- A direction to the Commission at the earliest opportunity (and not later than February 2019 for Options 1 and 2, and November 2018 for Option 3) to include:
  - a requirement to cease work on some or all of the current programme of reviews (if necessary);
  - the appropriate number of members for each local authority;
  - whether wards should be single-member or multi-member (or either); and
  - the maximum size of a multi-member ward (in terms of the number of members)
- Changes to the legislation governing the conduct of reviews (to allow for a shorter review programme); and
- The appropriate staff and financial resources.

# Strengthening Local Government: Delivering for People

## Page 2: Chapter 3

Q1. 1a. 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?

Support the reduction of the number of principal authorities but do not support regions.  
Ensure that Welsh Local Authorities are provided with appropriate finances to deliver the services

Q2. 1b. What are your views on the common elements to the process of mergers we outline in this section?

Support statutory not voluntary mergers

Q3. 1c. What are your views on the options for creating fewer, larger authorities which we have set out?

Agree in principle

Q4. 1d. Are there other options for creating fewer, larger authorities we should consider?

*No Response*

Q5. 1e. Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.

Do not have evidence/experience to answer

## Page 3: Chapter 4

Q6. 2a. Do you agree that providing clarity on the future footprint of local government is important?

Absolutely agree as essential

Q7. 2b. Do you agree with the factors we have identified to inform our thinking? Would you change or add any?

Agree in principle

Q8. 2c. What are your views on the new areas suggested in this section?

The new Council areas would work financially but there would need to be localised delivery of services , accessible to the public without the need to travel great distances

Q9. 2d. Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?

No

Q10. 2e. 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?

Do not support regions. Duplication of roles is to be avoided.

## Page 4: Chapter 5

Q11. 3a. 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?

Agree in principle

Q12. 3b. 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?

Do not support option 1.

Q13. 3c. Do you have any other thoughts on the proposed process?

None that have not already been mentioned.

Q14. 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.

The current term to May 2022 should be honoured.

Q15. 5. 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 make 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?

Current plans can be implemented on an area by area basis until any new plan is in place.

Q16. 6. What are your views on the approach which should be taken to determining the parameters of electoral reviews?

The wards need to be compatible with any Town and Community Council reviews.

## Page 5: Chapter 6

**Q17. 7a. How can councils make more effective use of their elected members knowledge of, and connections in, their communities?**

The best way of using members' knowledge is to have structure as follows:  
Full Council - Precept , Budget, and overall Policy  
Cabinet has to be inclusive (i.e Councillors from Towns and Villages - not one or the other)  
Decisions need to be made by Full Council and not just the Cabinet

**Q18. 7b. 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?**

County Councillors should receive a remuneration but this should be commercially based. e.g the Local Authority Pension Scheme is not sustainable and is more than many of their constituents will have.

The remuneration should be based upon a salary with a number of hours (minimum), a basic pension scheme (commercial) and limited expenses

**Q19. 8a. Are there other powers which local government should have? If so, what are they?**

No further powers should be passed on without a clear funding stream to pay for them

Welsh Government needs to finance Social Services properly or take full responsibility for them

**Q20. 8b. Are there other freedoms or flexibilities which local government should have? If so, what are they?**

The County Councils should be left to manage their areas with little interference from Welsh Government although it is accepted that a Wales Wide Strategic Plan should be in place

**Q21. 9a. Which areas offer the greatest scope for shared transactional services?**

The delivery of services suffer the bigger departments get. They become less efficient.

The new authorities are large enough not need shared services

**Q22. 9b. How might such arrangements be best developed?**

They should not be developed

**Q23. 10a. 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?**

A set of rules and guidance should achieve greater consistency.  
Clear guidance minimises the incidence of the need for advice

Advice should be given by a single group at Welsh Government to ensure consistency in the advice given.

Q24. 10b. 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?

No

Q25. 10c. Which of the issues identified above or in your response should be prioritised for early resolution?

The first priority should be the 'structure' and the rest will follow

## Page 6: Impact assessments

Q26. 11a. What effects do you think there would be?

The welsh language is important culturally. However, there needs to be a broader scope for learning and opportunities to speak welsh outside the classroom.

Q27. 11b. How could positive effects be increased, or negative effects be mitigated?

*No Response*

Q28. 12. 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.

Champion the use of the welsh language by embracing bi-lingual policies whereby welsh speakers are offered a welsh speaking reply service and receive all printed communication in welsh. Make translation services sustainable and affordable.

Q29. 13a. Are there any positive or adverse effects not identified in the assessment?

We are not sure of the relevance of this question to the consultation. All Principal Authorities should be required to comply with the Children's Rights Impact Assessment.

Q30. 13b. Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?

*No Response*

Q31. 14a. Are there any other positive or adverse effects not identified in the assessment?

Not sure of the relevance of this question to the consultation. All Principal Authorities should comply with the Equality Act 2010 in any event

Q32. 14b. Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?

No

Q33. 15. Please provide any other comments you wish to make on the content of this consultation.

The respondent is happy for any of the content of this return to be made public

## Page 7: Submit your response

Q34. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

**Name** Lorraine Whalley, Deputy Clerk

**Organisation (if applicable)** Abergele Town Council

Q35. If you want to receive a receipt of your response, please provide an email address.  
Email address

deputyclerk@abergele-towncouncil.co.uk

Q36. Telephone

01745 833242

Q37. Address

Town Hall & Council Offices  
Llanddulas Road  
Abergele  
LL22 7BT

Q38. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

*No Response*



# Strengthening Local Government: Delivering for People

## Page 2: Chapter 3

Q1. 1a. 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?

Welsh Government must direct the Local Authorities and ensure the the New authorities consult with their Communities with a minimum of Consultation exercises per year.

Q2. 1b. What are your views on the common elements to the process of mergers we outline in this section?

All Authorities must fulfil their statutory duties regardless of monetary situations

Q3. 1c. What are your views on the options for creating fewer, larger authorities which we have set out?

Most beneficial number I beleive is 10/12

Q4. 1d. Are there other options for creating fewer, larger authorities we should consider?

*No Response*

Q5. 1e. Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.

*No Response*

## Page 3: Chapter 4

Q6. 2a. Do you agree that providing clarity on the future footprint of local government is important?

Clarity is beneficial in both verbal and written communication together with HONEST REPLIES

Q7. 2b. Do you agree with the factors we have identified to inform our thinking? Would you change or add any?

*No Response*

Q8. 2c. What are your views on the new areas suggested in this section?

*No Response*

Q9. 2d. Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?

*No Response*

Q10. 2e. 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?

*No Response*

## Page 4: Chapter 5

Q11. 3a. 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?

Transition must be as short as possible - less than 6 months, too many Councillors and employees milking the system.

Q12. 3b. 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?

No Voluntary proposal -directed approach.

Q13. 3c. Do you have any other thoughts on the proposed process?

*No Response*

Q14. 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.

As quick and as soon as possible

Q15. 5. 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 make 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?

*No Response*

Q16. 6. What are your views on the approach which should be taken to determining the parameters of electoral reviews?

*No Response*

## Page 5: Chapter 6

Q17. 7a. How can councils make more effective use of their elected members knowledge of, and connections in, their communities?

Ensure that communities are listen to and not told what is best -- for who councils.

Q18. 7b. 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?

Low basic wage with attendance / meeting payment

Q19. 8a. Are there other powers which local government should have? If so, what are they?

*No Response*

Q20. 8b. Are there other freedoms or flexibilities which local government should have? If so, what are they?

Ensure that Communities are listern to.  
All Council must have a set number of Consutation exercise every year.

Q21. 9a. Which areas offer the greatest scope for shared transactional services?

*No Response*

Q22. 9b. How might such arrangements be best developed?

*No Response*

Q23. 10a. 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?

*No Response*

Q24. 10b. 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?

*No Response*

Q25. 10c. Which of the issues identified above or in your response should be prioritised for early resolution?

*No Response*

Q26. 11a. What effects do you think there would be?

Both languages must be treated equally.

Q27. 11b. How could positive effects be increased, or negative effects be mitigated?

*No Response*

Q28. 12. 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.

*No Response*

Q29. 13a. Are there any positive or adverse effects not identified in the assessment?

*No Response*

Q30. 13b. Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?

*No Response*

Q31. 14a. Are there any other positive or adverse effects not identified in the assessment?

*No Response*

Q32. 14b. Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?

*No Response*

Q33. 15. Please provide any other comments you wish to make on the content of this consultation.

*No Response*

## Page 7: Submit your response

Q34. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

**Name** Lyndon Moore

**Organisation (if applicable)** -

Q35. If you want to receive a receipt of your response, please provide an email address.  
Email address

[REDACTED]

Q36. Telephone

[REDACTED]

Q37. Address

[REDACTED]  
[REDACTED]  
Nantyglo  
[REDACTED]

Q38. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

*No Response*