



Older People's Commissioner for Wales Comisiynydd Pobl Hŷn Cymru

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Alun Davies AM
Cabinet Secretary for Local Government and Public Services
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

25 May 2018

Dear Cabinet Secretary,

Green Paper Consultation Document – Strengthening Local Government – Delivering for People

Thank you for the opportunity to comment on the 'Strengthening Local Government – Delivering for People - Green Paper Consultation Document. In previous responses to Welsh Government consultations on local government reform, I referred to three areas of particular importance for older people:

- a commitment that the quality of service provided to older people would not be diminished with any restructuring of local government;
- enabling the voices of older people to be heard by their Local Authorities, through effective consultation and strong community councils; and
- ensuring that the make-up of local representatives better reflects their constituents by encouraging older women and older people with protected characteristics to engage with Local Authorities and run for elected office.

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

www.olderpeoplewales.com

Fewer, larger Local Authorities with the powers and flexibility to make a real difference in their communities

Whilst the case for change is widely accepted and is clearly supported by the report of the Commission on Public Service Governance and Delivery (the Williams Commission), there remains a concern amongst older people that their voices will be lost as the size of their Local Authority is increased. The proposal identifies the need for local government to connect with communities, and effective consultation with older people and other groups is foundational to allay these concerns.

It is imperative that effective and meaningful engagement and consultation is undertaken with older people and others so that they feel heard and included in the process of change. Older people tell me that consultations often feel tokenistic, a tick box exercise, with the conclusion already pre-determined.

“In 2014, I published best practice guidance for engagement and consultation with older people,¹ which sets out how to make these processes more meaningful and how to ensure that older people can be fully involved in decision-making that affects their lives.”

It is crucial that the future local government landscape addresses the key findings in the Wales Audit Office report on ‘Supporting the Independence of Older People: Are Councils Doing Enough?’² and aligns with key legislative drivers, such as the Well-being of Future Generations (Wales) Act 2015, to develop a preventative and outcomes-focussed approach and recognise older people as economic and societal assets.

Furthermore, I expect Local Authorities’ commitment to the Dublin Declaration to continue; their support to develop Age Friendly Communities, a key feature in the Ageing Well in Wales programme, is crucial.

¹ <http://www.olderpeoplewales.com/en/Publications/pub-story/14-07-01>

² <http://www.audit.wales/system/files/publications/Independence-Older-People-2015-English.pdf>

Local Authorities must also ensure that the realigned Public Services Boards are positioned at the centre of service delivery to ensure that services are fully integrated and working together for the best results for local people with minimal disruption.

I expect Local Authority infrastructure to support older people to be reinforced and made sustainable in the reform agenda, i.e. in line with the Welsh Government Strategy for Older People 2013-23. This means a re-investment in the Strategy for Older People coordinators posts, alongside recognising the role of Older People's Champions and the value of 50+ Forums.

Strengthening local government and support through the process of change: Valuing councillors & diversity

I welcome the call for council membership to be fully representative of the local community and have a membership which is relevant to everyone. It is important that local government in Wales is reflective of, and responsive to, the diverse populations that they represent. There is a need for more diversity amongst council members: there is currently a lack of women and ethnic minority councillors in local government in Wales.

A large proportion of constituents are older people, nearly one third of the Welsh population, and it is vital that their views are represented. Older people have a key role to play in the decision-making process of Local Authorities, whether through elected office, local consultations or having their voices represented through 50+ Forums.

Older people must be viewed as an asset to their communities. They have a wealth of knowledge, skills and experience that should be utilised to ensure that the delivery of public services is the best it can be. Older people can help to drive change in our society and improve the wellbeing of people in Wales. Through the reform agenda for local government, we have an opportunity to ensure that the voices of older people are properly embedded into the decision-making processes of Local Authorities in Wales.

The Local Government (Wales) Bill should include measures to place a duty on Council Leaders, Group Leaders and Chief Executives to ensure that diversity is respected. Older women and older people with protected characteristics should be encouraged to put themselves forward as candidates for local elections and should form a greater role in the leadership of Local Authorities.

Community and Town Councils

I welcome the value placed on Community and Town Councils and councillors within the proposal and the recognition of the crucial role they play. They are quite rightly identified as the level of government considered to be closest to the community, and quite often the most approachable by older people.

I also welcome the independent cross-party review³ to identify “how community councils can be strengthened so they are best able to support their communities and care for their areas, shaping everyday lives”.

Transforming services and involving people

Community services will remain a key issue and for many will be the litmus test for how smoothly the transition arrangements are being managed. Ultimately, older people will be focused on how these services are improved (or not) under any new regime. Many older people tell me that they are concerned about how decisions are reached about these community services. As regular users of public services – and often ‘experts by experience’ – older people are well-placed to gauge the effectiveness of public services and therefore need to play a proper and meaningful part in the debate over local services. It is essential that any move towards having fewer, larger Local Authorities does not dilute older people’s opportunities to contribute to local decision-making on the services that matter to them.

³ <https://gov.wales/topics/localgovernment/communitytowncouncils/review-of-community-town-council-sector/?lang=en>

Whilst expanding the use of digital technology across all public services is to be welcomed, it is crucial that offline services continue to be available. In 2016/17, over a third of people aged 50+ in Wales were digitally excluded and did not use online services⁴ and older people must therefore be able to engage through both digital and non-digital means.

Population

Whilst I support the attempt to achieve demographic clarity for the proposed new areas, I would wish to re-iterate the need to recognise that older people are not a homogenous group that can be captured under the simple classification of 'people aged 65+'.

For example, many older people will continue to be active within the workforce much later in life, others will find themselves in the role of unpaid carers. It is also important to recognise that we have a significant number of 'older' older people (those over the age of 85), whose needs could be very different from those in their 60s, and that this demographic is projected to continue to grow significantly in the years ahead.

It is essential that the narrative that older people are a burden on public services and the cause of the many challenges that public services currently face is challenged in the strongest possible terms. We therefore need a far more granular approach to data collection under the proposed footprint.

It is also important to remember that older people are the fastest growing group of unpaid carers⁵. Local Authorities will therefore need to work with partners to ensure that services will help to sustain the wellbeing of carers and support positive, caring relationships.

Equality and Impact Assessment

⁴ <http://gov.wales/docs/dsjlg/publications/comm/160316-digital-inclusion-strategic-framework-en.pdf>

⁵ https://www.carersuk.org/images/Facts_about_Carers_2015.pdf

There is a duty placed upon Local Authorities, under the Equality Act 2010, to consult with those people who have protected characteristics as defined in the Act.

Whilst I agree with the comments made in the Equalities and Impact Assessment which accompanies the Green Paper that 'The proposed reforms *could* have a positive impact on people of all ages', I expected to have seen reference to the **UN Principles for Older Persons** in the assessment in a similar way to the separate Children's Rights Impact Assessment, which refers to 'due regard' under the **UNCRC**.

For example, a positive use of the Principles could have been referenced under Principle 7 in the evidence column. It says that 'Older persons should remain integrated in society, participate actively in the formulation and implementation of policies that directly affect their well-being and share their knowledge and skills with younger generations'. This would have reinforced and added rigour to the conclusion that the proposal could 'have a positive impact on older people'.

I published formal Guidance, under Section 12 of the Commissioner for Older People (Wales) Act 2006, on Equality and Human Rights Impact Assessments⁶, which public bodies must have regard to in discharging their duties under the Equality Act in 2016. This would be a useful reference for the Welsh Government to utilise in strengthening the delivery of Local Government services for older people.

My successor will work with the Welsh Government and local government in order to ensure that the reform agenda fully considers the needs and circumstances of older people, supports the development of age-friendly communities and that Local Authorities play a significant role in ensuring that Wales is a good place to grow older - not just for some but for everyone.

Yours sincerely,

⁶ http://www.olderpeoplewales.com/en/news/news/16-02-16/Section_12_Guidance_Equality_and_Human_Rights_Impact_Assessments_Scrutiny.aspx#.WvLoAuSG_xM

A handwritten signature in black ink, reading "Sarah Rochira". The script is cursive and fluid, with a long, sweeping underline that extends to the right.

Sarah Rochira

Older People's Commissioner for Wales

CC: Equalities, Local Government and Communities Committee,
National Assembly for Wales

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?

commissioning processes aligned throughout Wales

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

merger seems inevitable - we must retain the skills and experience of senior managers without cutting the fundamental workforce that drive services and make the taxes paid by the citizen work for them without comprising quality

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

Yes I agree we need fewer authorities, fewer elected Councillors, fewer top management, more service providers, pooled resources

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

ten authorities seems like a reasonable figure, taking geographical and cultural differences into account

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

Take into account the pooled budgets of existing mergers, such as social services workforce development, safeguarding teams, domestic violence teams, supporting people teams

Page 3: Chapter 4

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

very important - with rationale behind the decision clearly explained to the public

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

this footprint plan is preferable to previous thinking - 10 authorities seems reasonable and manageable

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

Bridgend seems to be a bit disjointed, but overall the new areas make sense as they collorate nicely with other public authorities such as health, police, fire service.....

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?

Senior management and middle management cuts - more services on the ground to serve the public with the public purse

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?

Yes - forward planning is good

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?

yes

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

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?

scrutiny should be carried out by both citizens and other stakeholders

Page 5: Chapter 6

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

Job descriptions, role specifications with minimum criteria for standing - not on the basis of belonging to a political party - this will attract suitable candidates based on their credibility and experience

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?

If the remuneration were increased, then they should also be scrutinised and if their role is not being fulfilled, there should be powers brought in to remove them from office

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

As above

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?

Social services, Health, community care, education

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

Regionally and in some cases between two regions - eg Gwent region to shadow health authority

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?

Set up a watchdog committee at Welsh Government level, with citizen membership

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?

Deciding the regions

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.

Other languages should have equal importance, given the diversity of the population

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 Pat Powell

Organisation (if applicable) -

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

Green Paper – Strengthening Local Government: Delivering for People
Annex C: Consultation Questions

Annex C: Consultation Questions

Your Name	
Organisation (if applicable)	Pembrokeshire County Council
E-mail / Telephone	
Your Address	

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
<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>There are a range of constraints and 'building blocks' or 'practical steps' that could support more effective regional working.</p> <p>In terms of constraints these include:</p> <ul style="list-style-type: none"> • Effective collaboration is difficult to achieve because it cuts across deeply embedded organisational and service silos and funding regimes. • There is little, if any, standardisation of funding, process or service delivery models across local authorities; each has developed its own local approach over the last two decades. • Developing regional working is perhaps more difficult in a period of austerity. • As management capacity has reduced in the last five years there is much less scope to operate at a regional <u>and</u> local level. • There are significant variations in local workforce pay and conditions. • Dual accountability (local and regional), scrutiny and engagement has significant resource implications for Elected Members and Officers. • There are significant cultural differences between organisations (local authorities). • Incompatible IT systems and data sharing issues limit the potential for 'smarter' working unless additional funding for new IT infrastructure is made available. • Co-location (of regional functions) may lead to a loss of local employment. • There is a potential loss of direct control over significant elements of the Council's budget. <p>Practical steps to address these constraints would facilitate more efficient and effective regional working.</p> <p>In terms of the 'building blocks' these include:</p>

<ul style="list-style-type: none"> • The need for clear outcomes – focussed regional goals so local authorities can match resources to priorities. • Co-location may help overcome cultural differences and data sharing challenges. • The buy-in and commitment of leaders – both Members and Officers. • The need for additional up-stream and continuous investment in systems integration, co-location (where appropriate) and workforce harmonisation. • Utilisation of digital technology to address the drop in productivity caused by regional travelling.
<p>Practical steps could include:</p> <ul style="list-style-type: none"> • Simplifying the financial and tax frameworks between different organisations in the public sector, for example, local government and the NHS. • Reduction in the number of grants/standardised funding regimes. • Harmonisation of workforce pay and conditions. • Less is more: less micro-managing of regional structures could release capacity for innovation and improved outcomes.
<p>b) What are your views on the common elements to the process of mergers we outline in this section?</p>
<p><u>'Clear future footprint'</u> – Whilst Annex B Table 1 indicates a more simplified regional map, the reality is that there will still be multiple footprints which will make effective collaboration across the public sector complex and challenging.</p> <p><u>'Democratically-led change process'</u> without a mandate from the electorate for 'larger, stronger authorities' it is difficult to see how any decision on mergers could be truly democratically-led.</p> <p><u>'Support and assistance'</u> – whilst further support for councillors and options for more powers and greater flexibility are generally welcomed, the Green Paper is silent on financial support for mergers, the cost of which could be in the region of £0.5 billion when the updated Regulatory Impact Assessment is completed (para. 3.19). It is not clear why the Welsh Government can fund the costs of integration between health and social care (£100 m+ for pilot projects) and yet assumes that the costs of mergers can be met from existing local government budgets.</p>
<p><u>'Emergency powers'</u> – Pembrokeshire County Council acknowledges that this power already exists.</p>
<p>c) What are your views on the options for creating fewer, larger authorities which we have set out?</p>
<p>The evidence base to support the optimum size of a local government unit is inconclusive. Across the UK there are examples of high and low performing local authorities of all sizes, providing a strong indication that size is not the key determinant. International comparisons are of limited value as the UK has a far more centralised local government structure with Councils having a much lower</p>

<p>degree of fiscal autonomy than most other Western democracies.</p> <p>As such, and in line with the view taken by the Welsh Local Government Association (WLGA Council meeting, 23 March 2018), Pembrokeshire County Council does not believe there is a business case to support legislation to create 'fewer, larger local authorities'. In arriving at this position, Pembrokeshire County Council has reflected on the views of other local authorities in West Wales.</p> <p>Fewer and larger health boards do not appear to have generated significant budget reductions or improved outcomes if media reports are accurate.</p>	
<p>d) Are there other options for creating fewer, larger authorities we should consider?</p> <p>Pembrokeshire County Council considers that the issue of the number of local authorities ('fewer, larger') is a false prospectus. What matters is better outcomes or, to repeat the comments in the Green Paper Overview (p2) "Stronger, more resilient and sustainable public services with democratic accountability at its core".</p> <p>Pembrokeshire County Council notes the reference to 'public services' and considers that the wider integration of public services with more effective democratic accountability would, all other things being equal, be more likely to deliver better outcomes and create administrative efficiencies, particularly in peripheral areas.</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> <p>As already indicated, the evidence base – insofar as it is available – would suggest there is no one-size-fits all solution. The key issue is that there is a limited understanding about what works in local government reform generally. To date, reforms in Wales – either as a result of poor design, implementation and/or wider contextual issues, for example, the c30% cut in local government budgets – have not delivered improvements in the relative performance of many services.</p> <p>Pembrokeshire County Council has consistently provided its services at well below (c£15m p.a.) the Standard Spending Assessment level. According to the Data Unit Pembrokeshire's performance has been in the top quartile for two of the last three years, indicating that there is further scope across local government to reduce its cost base without the need for additional costs and impact on productivity from a pan Wales merger programme.</p>	

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>As a principle and driver of both good governance and robust forward planning, clarity on the future footprint of local government is very important.</p> <p>In the last five years local government has been subject to a number of Welsh Government led reviews. Most proposals start with bold ambitions and a mix of support and cynicism. They are followed by delays and division as the challenges of geo-political decision making and the reality of implementing change in complex organisations beings to impact.</p> <p>Pembrokeshire County Council considers that both clarity and stability are critical success factors for local government in Wales.</p> <p>However, local government is generally accepted to be one – if not the – most efficient part of the public sector. As such, it seems paradoxical that the Welsh Government continues to focus on local government reorganisation as a panacea for the wider austerity agenda.</p>
b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?
<p>If the Green Paper proposals are to be “game changing” (Cabinet Secretary Foreword p7) then a wider range of factors need to be considered.</p> <p>In addition to partnership working (and Public Service Boards) population data and area characteristics (such as household number, budgets, Council Tax levels, staffing levels, Welsh speakers and Councillor to elector ratio), Pembrokeshire County Council considers that the following factors should also be considered:</p> <ul style="list-style-type: none"> • Geography (peripherality and rurality) • history and heritage • landscape and natural environment • sense of place/identity • travel to services/travel to work areas.
c) What are your views on the new areas suggested in this section?
<p>As set out in response to Question 1c) Pembrokeshire County Council does not support proposals for mergers in line with the view of the WLGA.</p>
d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?
<p>As set out in response to Question 1d) Pembrokeshire County Council considers there is merit in adopting a wider public services approach to this exercise. By international comparisons, the functions of local government are limited and constrained by the concept of ‘ultra vires’ in the UK. The common core of municipal competencies across Europe includes functions as wide as health (hospitals, primary care), utilities, water/drainage/sewage and policing (Local</p>

<p>Authority competencies in Europe – Council of Europe 2007: Study of the European Committee on local and regional democracy).</p> <p>In the context of the Well-being of Future Generations Act and the establishment of Public Service Boards on a statutory footing, there is an opportunity to consider the potential benefits (and costs) that an integrated public services model might provide: a “bolder and more innovative” solution to the challenges of collaboration, resilience, democracy and funding that underpin the Green Paper.</p> <p>Given recent reports on NHS deficits it would seem axiomatic to include health as part of a wider public services approach.</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>See answer to 2d above.</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?

As set out in response to Question 1c) Pembrokeshire County Council does not support proposals for mergers in line with the view of the WLGA.

- 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?

As set out in response to Question 1c) Pembrokeshire County Council does not support proposals for mergers in line with the WLGA.

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

Pembrokeshire County Council would support proposals to use a Staff Commission or Social Partnership arrangement (para. 6.41) to facilitate workforce reform.

The ‘restraints on financial transactions regime’ could force local authorities to scale back current transformation and service reconfiguration programmes prior to any local government reorganisation, as planning and preparation costs may prove abortive.

It would also be important to ensure that Transition Committees have equal representation of Executive Members from each of the local authorities involved in a specific merger proposal.

<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>The general understanding for candidates elected in May 2017 was that they would be elected for a 5 year term through to 2022. In addition if the UK government goes to full term then it is likely there would be a General Election in May/June 2021.</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>There are a range of plans that are informed or shaped by the political priorities of the relevant Council administration. The most significant will be each authorities Corporate Well-being.</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>In seeking to merge local authorities, or not as the case may be, the minimum parameters that need to be used would be Council size, number of Councillors and a proposed ratio of electors to Councillors taking into account the diverse urbanisation and rurality of the Principality.</p>

<p>Chapter 6</p>
<p>Consultation Question 7</p>
<p>a) How can councils make more effective use of their elected Members knowledge of, and connections in, their communities?</p> <ul style="list-style-type: none"> • By ensuring there are effective relationships with Town and Community Councils. • Consideration of devolved local budgets to support member-led community well-being projects. • Effective Overview and Scrutiny arrangements that enable Members to hold the Executive to account and to contribute to policy development and improvement. • Ensuring there are regular ward surgeries and a mechanism for escalating and resolving local issues.
<p>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</p>

would enable a wider range of people to become involved in local democratic representation?
<p>Whilst an increase in levels of remuneration may help attract more potential Councillors, there is a risk that a significant increase could create tension and the possibility of role confusion with senior officers.</p> <p>The current regime provides Councillors with allowances irrespective of their input or contribution. Consideration could be given to additional remuneration based on a performance management framework.</p>
Consultation Question 8
a) Are there other powers which local government should have? If so, what are they?
<p>Pembrokeshire County Council notes and supports in principle the Welsh Government proposals for additional tax raising options as a mechanism for dealing with specific pressures, for example, tourism and social care.</p> <p>In many parts of rural Wales there has been a significant reduction in the number of high street banks in the last 5 years. Accordingly, there may be a case for local government to have powers to operate a retail banking function.</p> <p>In a similar vein, and in the context of the powers and competence of local government across Europe (see answer to Question 1c) there are a wider range of functions that local government could undertake.</p> <p>Pembrokeshire County Council supports the proposal (para. 6.14) to legislate for the general power of competence but does not agree that this should be limited to 'principal Councils which merge'.</p>
b) Are there other freedoms or flexibilities which local government should have? If so, what are they?
See above.
Consultation Question 9
a) Which areas offer the greatest scope for shared transactional services?
<p>Processing services such as Payroll, Creditors, Debtors, housing benefit, Council Tax, etc.</p> <p>Back office functions such as human resources, legal and procurement.</p> <p>Streamlining IT systems.</p>
b) How might such arrangements be best developed?
Initially through IT 'solutions' such as TASCOMI for Public Protection services.
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?
<p>Whilst the County Council recognises the existing and proposed support mechanisms in place there is limited capacity to support a pan-Wales merger programme in the timescales indicated. One consequence of this is that the costs of mergers (direct and indirect) are likely to increase, and any potential efficiency gains eroded in the short and medium term.</p> <p>Moreover, there may be good reasons (see response to Question 2b)) why a 'Once for Wales' solution may not always work.</p>
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?
Additional powers or repatriation of powers to local authorities to deal with poor performing schools.
d) Which of the issues identified above or in your response should be prioritised for early resolution?
Workforce matters.
<p><u>Consultation Question 11.</u></p> <p>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.</p>
a) What effects do you think there would be?
Pembrokeshire County Council is committed to meeting the Welsh Language standards and agrees that it is likely that if mergers proceed it will present an opportunity to strengthen the use of the Welsh Language in the delivery of Services and as the language of internal administration.
b) How could positive effects be increased, or negative effects be mitigated?
No further comment.
<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>
No further comment.
<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</p>

that assessment.
a) Are there any positive or adverse effects not identified in the assessment?
No comment.
b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?
No comment.
<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?
No comment.
b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?
No comment.
<u>Consultation Question 15</u> Please provide any other comments you wish to make on the content of this consultation.
In line with the comments in 1d) and 2a), Pembrokeshire County Council considers that the Green Paper misses an opportunity to consider a public services solution including, for example, Health Boards, National Parks, Natural Resources Wales that <u>may</u> be better aligned with the outcomes set out by the Cabinet Secretary.

Cymorth Cynllunio Cymru

Ymgysylltiad y gymuned a chynllunio

Planning Aid Wales

Community engagement in planning



Response to 'Strengthening Local Government: Delivering for people' consultation

To: StrengtheningLocalGov@gov.wales

Date: 12th June 2018

1. About Planning Aid Wales

1.1 Planning Aid Wales (PAW) is the charity supporting communities and planning authorities to work better together in shaping places. We are core funded by Welsh Government but retain a high degree of freedom to act independently on behalf of communities.

1.2 Planning aid is about giving people the information and support they need to understand and engage positively with planning. We work to help local communities in Wales to understand and engage more effectively with planning. We do this by explaining the planning process from a community perspective and building capacity for constructive community engagement through our information, advice and training services.

1.3 We also work with the planning profession, planning authorities and Welsh Government to encourage more effective community involvement in the planning process. Through the delivery of planning training courses and workshops, we have worked extensively with Community and Town Councils in Wales to help raise their capacity to engage with planning matters.

1.4 When responding to consultations such as this, our aim is to identify potential barriers which might prevent effective or manageable community involvement in planning.

1.5 We are happy for our response to this consultation to be made public.

2. General comments

2.1 Planning Aid Wales has focused its comments on the general principles on the options for achieving larger Local Authorities and the potential impacts on communities in respect to engagement in land use planning. The effects of the three options outlined, whilst raising different issues in relation to finance and local government management, are likely to raise similar issues with respect to the ability of local communities to understand and engage with planning matters.

2.2 Broadly, the merging of existing Local Authorities is likely to create uncertainty for local communities. Our experience of working with communities within existing local planning authority boundaries is that they already feel distanced from decision making in planning matters. Any of the regional models outlined will likely increase this distance, creating greater uncertainty over who decision makers are and whether local matters and concerns will have any impact on decision making.

2.3 It is likely that pursuing either option 1 or 2 will exacerbate uncertainty whilst arrangements are being negotiated and implemented, even if these options have greater potential for local input into decisions on such arrangements. At the least, pursuit of any of the options should include strong mechanisms to ensure transparency and community participation at every opportunity possible.

2.4 It is noted that there is no reference to the three existing National Park Authorities in Wales in the paper. The particular demands of land use planning and the role of National Park Authorities as well as Strategic Development Plans should be specifically taken into account to provide a sustainable structure across all local services.

2.5 Community and Town Councils are referenced in chapter 7. Whilst recognising that a review of the sector is due to report during 2018, it is essential that any changes to the role of Community and Town Councils is clarified in future proposals, particularly given both their existing and potentially extended role to advocate for local issues in land use planning matters. It should also be noted that there are approximately 130 community areas in Wales that are not represented by a community or town council – appropriate mechanisms for ensuring local representation in planning matters in these areas should be considered.

3. Responses to consultation questions

3.1 Our responses to specific consultation questions are given in italics below:

Consultation Question 1

- 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?**

No comment.

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

Greater regionalisation / enlargement of Local Authorities has the potential to increase the distance of local communities from the centres of decision making. This is likely to exacerbate the uncertainty of who is making the decisions and who needs to be contacted. Ultimately, it may act as a deterrent to involvement and a lack of ownership / acceptance of any decisions that are made.

The respective roles of Local Authority members and Community and Town Councillors is not yet clear in the proposals, in terms of who represents local community interests in planning, and how. Local government reform does provide an opportunity to clarify the nature of and distinction between these two different roles within a new Local Authority arrangement.

Voluntary and phased mergers do appear to identify some positive benefits in relation to Local Authorities having the ability to make decisions on the new arrangements, but such approaches may lead to further confusion on the part of communities. One example would be where a new area is identified comprising 3 current authorities and only two agree a voluntary arrangement, the arrangements for the third area would be unclear. This could lead to planning policy and strategic development being judged on a sub-regional area with implications for communities in the third authority who may not be able to fully engage in the process.

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

The larger authorities as set out would in some cases encompass significant land areas which may encompass significant variations in socio-economic and land use priorities. For example, an authority comprising Carmarthenshire, Pembrokeshire and Ceredigion would cover such a large area that it may require sub-regional development plans (not dissimilar to existing LDPs) in order to ensure the regional variations are adequately considered and to allow the communities in the respective regions to have a say on their area.

A mechanism would also be needed to recognise the regional variations e.g. to ensure an appropriate spread of development and to avoid too great an emphasis on 'key settlement' approaches to land use planning. Without an appropriate mechanism to ensure all communities can engage effectively, it is feasible that future planning policy and development may be at risk of being dominated by the larger towns and cities to the detriment of the smaller towns and rural communities within a new Local Authority area.

In relation to planning documents (policy and planning applications) it is important that all information is readily available and easily accessible on websites and there is access to this at the local community level e.g. local library or other community facility. Similarly, there is a need for access to authority officers at a local level. If

someone has to travel significant distance to a regional council head office this will likely act as a deterrent to engagement.

Consultation Question 7

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

A comprehensive programme of planning training is essential for all elected members to effectively advocate for the communities they represent within the planning process.

The document mentions the importance of town and community councils in providing a voice from the local level. In considering the widespread local government review there may be a need to enhance the powers of the town and community councils in relation to planning matters. For example, some of the larger town and community councils might be willing/able to take on additional planning responsibilities as part of a phased programme, subject to ensuring there is commitment, capability and appropriate resources for to them to do so. There is likely to be a need to provide greater resources to community and town councils in order to meet any increased responsibilities.

Building capacity across the community council sector will enable constructive contributions to plan-making and development management decisions. For example, encouraging and supporting community councils to work with the relevant planning authority to develop Place Plans for their area would help to develop their understanding of planning and their expertise in influencing the planning process to benefit local communities. Place Plans could have greater importance within a larger Local Authority, especially if there is greater emphasis on their status within the development plan framework as adopted SPG. Such an approach would provide a clear local input to the planning process and provide a sense of ownership and consent to new development at a local level.

There is no community and town council representation in 130 community areas in Wales. These areas include the urban centres of Cardiff, Newport and Swansea, Rhos-on-Sea and Old Colwyn in Conwy as well numerous areas along the Heads of the Valleys corridor encompassing Neath Port Talbot, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly, Blaenau Gwent and Torfaen. Many of these areas are comprised of some of the most deprived areas in Wales. Any new arrangements that strengthen the role of community and town councils as representatives of local issues should consider suitable mechanisms / alternative arrangements for communities within those areas that do not benefit from community and town council representation.

Response from the Plaid Cymru Group of Caerffili County Borough Council to the Strengthening Local Government Consultation Paper

Could I state that the Plaid group fully supports the response that you will have received from Caerffili CBC (attached for ease of reference). The response was considered by full council on 5.6.18 and overwhelmingly supported by the elected members present. In fact only one (Independent) councillor voted against the proposal

This latest proposal is the latest in a series from the Welsh Government looking at various re-organisation proposals. In fact, proposals seem to be made with monotonous regularity. Why not have real consultation and actually ask the people who are being proposed for re-organisation rather than trying to impose solutions from above?

I would contend that there is very little prospect of any financial benefit from these proposals. Where is the evidence that the financial cost, together with the disruption, that re-organisation would cause would be recouped in any reasonable time, if at all? What is the point of wasting money on pointless re-organisation in this age of austerity when everyone is struggling for adequate resources?

I should not need to remind you that councils that have offered to merge as a response to previous proposals had their offers rejected.

With reference to the latest proposal could I say that there is no real community of interest between Caerffili CBC and Newport. To give just one example Newport is largely an urban authority, with ambitions as an emerging new city. Newport also has a substantial ethnic minority, different to CCBC. Caerffili is largely a rural authority made up of around 50 mainly small settlements, including many former mining communities. These communities have – and still are – struggling to cope with all the challenges of a post-industrial situation. The culture and background of the two areas does not look potentially like a good mix.

Caerffili is one of the largest councils in Wales and certainly is of a size to provide the majority of services from its own resources. Where this is not the

case the council is willing to cooperate with other authorities as appropriate. This has already happened in many instances.

How much faith can we have in Welsh Government proposals? The Welsh Government has not exactly covered itself in glory with the National Procurement Service. Much of the good work and cooperation previously done by local government, e.g the Welsh Purchasing Consortium, has been totally disrupted by this proposal. We now find that the national service which was established at great cost to the Welsh taxpayer is just not delivering the goods!

I have not responded directly to your questionnaire as there are many assumptions in it that take the respondent down a route that I do not wish to take.

In conclusion, could I say that I and many colleagues that I have spoken to very much resent the time taken to respond to these proposals, proposals that many regard as nonsensical.

Maybe it would be best for the Welsh Government to concentrate on improving itself and allow Local Government to deliver the services needed by the people of Wales, albeit with ever-diminishing resources.

Colin Mann

Arweinydd/Leader – Grwp Plaid Cymru, Caerffili CBC

Annex C: Consultation Questions

Your Name	Jeff Cuthbert
Organisation (if applicable)	Police and Crime Commissioner for Gwent
E-mail / Telephone	jeff.cuthbert@gwent.pnn.police.uk
Your Address	Gwent police Headquarters, Croesyceiliog, Cwmbran, NP44 2XJ

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

Chapter 3
<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) 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>d) Are there other options for creating fewer, larger authorities we should consider?</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>

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Chapter 4
<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) 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?
Although I don't think that the boundaries of local government in Wales is a matter for me, as a PCC, to comment on I do have strong views about the partnership arrangements required for effective public service delivery. In particular I consider

the importance of regional delivery of public services through fewer but larger Public Service Boards (PSBs) to be fundamental to joined-up and well co-ordinated service delivery.

The Police in Wales are not devolved but we act as if we were. That's recognised by the Welsh Government in that we are Statutory Invitees to all PSBs. Consequently, in the case of Gwent Police, we attend all five PSBs as active participants. We play a full role in the determination of each of the five Well-being Plans and engage positively with the other (but devolved) PSB partners.

Given that there will be a drive to regionalise public service delivery, regardless of whether local government boundaries change, then it seems sensible to re-organise PSBs so that they reflect the regional delivery of public services. This would be of great assistance to pan Gwent organisations such as the Health Board, Fire and Rescue, Coleg Gwent and many Third Sector groups as well as Gwent Police.

In Gwent we have established the "G9 Group". This group consists of the five local authorities, ABUHB, South Wales Fire and Rescue, Gwent Police and the Office of the Police and Crime Commissioner for Gwent. We will consider issues that affect all parts of Gwent and strive to agree a united approach. I hope that this will lead to a common acceptance that one, or possibly two, PSB/s for Gwent is sensible and more likely to produce that shared vision of effective public service delivery than the current system of five separate PSBs.

I understand, with the possible exception of Newport City Council, that that is a generally accepted view now.

On a separate, but related, matter, it is worth noting that if Policing were devolved to the Welsh Government then there would be no need for the four Welsh Police Services to have their distinct Police and Crime Plans. Currently, of course, each PCC must prepare and issue such a Plan by Statute.

If devolved then rather than have a distinct Police and Crime Plan, which could conflict with the local Well-being Plans, policing would be seen as a thread running through the well-being Plans just like any other public service.

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

Chapter 6
<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?
<u>Consultation Question 8</u>
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?
<u>Consultation Question 9</u>
a) Which areas offer the greatest scope for shared transactional services?

b) How might such arrangements be best developed?
<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?
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?
<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) How could positive effects be increased, or negative effects be mitigated?

<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>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>

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?

Consultation Question 15

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

Your Name	
Organisation (if applicable)	Pontypool Community Council
E-mail / Telephone	%. RTucker@pontypoolcc.gov.uk
Your Address	Clerc i'r Cyngor/Clerk to the Council
	Torfaen

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?

Regional working is deemed to be progressing and working well in its current format. There is evidence of joint working between Local Authorities to achieve the necessary services, quality of service and economies when challenges arise re resources and funding. WLGA deem the regional approach to be quicker, safer and more effective than the amalgamation approach.

The WLGA proposal made during consultation in the White Paper on Local Government Reforms strikes a balance between the White Paper's Option 2 and Option 4 for regional working: 'Mandating a framework', so the Welsh Government articulates services where it expects to see greater regionalisation, but how they are delivered would be 'Deliberatively Regional', the regions themselves would put forward their own detailed proposals and timescales outlining how this would be delivered. This is the preferred appropriate, as it might be more beneficial to regionalise certain services in one part of Wales rather than another, for example, the nature of housing challenges in rural areas are far different to those in urban. Economic development will vary between regions. Key localised projects will still be required. Small town centre improvement proposals or starter units on industrial estates for example make little sense being determined at regional level.'

Underpinning tests already exist to test the appropriate use of regional deals. Sound business models strengthen this approach.

How will WG address the concerns and alternative suggestions made by WLGA and other organisations re the preference and need for some areas of provision being on a more local level?

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

There is little detail of how a structured, democratically led change process is achieved when the changes suggested are mandatory, with some LAs giving reasoned arguments to their case of objection.

There is little detail re strengthening local democracy, equipping new local Authorities with powers or flexibility or reference to where this information can be found. The supporting Regulatory Impact Assessment associated with the Local Government (Wales) Bill made mention of the requirements for Councillors in undertaking their roles being made statutory to ensure liaison with electorate and Community Councils being more accountable and to take on wider responsibilities with clearer liaison with LAs.

To date it does not appear clear how any of these issues would be tackled.

Can we make considered and constructive comment on which option offered is the best for residents and services without such detail being more clear?

What are the effects on Community Councils of the changes?

Political consensus may be difficult to achieve.

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

‘Mandation’ has not been necessary to date for authorities to come together on the current regional footprints around city regions and sub regional working. This grew organically from councils. This has seen the development of 4 regional footprints based on the Cardiff Capital Region, Swansea Bay City Region, North Wales Economic Ambition board and Growing Mid Wales.’ - WLGA

It is widely recognised that effective change is best facilitated via negotiation but the Green Paper suggests that economic savings will be better served by more rapid mandated change. What is the priority? Where is the balance? Strengthening Local Government by increasing flexibility, powers and improving local democracy has a very different methodology to those of reducing costs by economy of scale. Collaboration and economy of scale is already being achieved between LAs via Regional and joint working in areas of services delivery using business models.

It can be appreciated that the change in culture to joint and regional working was slow but has made much progress over more recent years and joint working is now becoming more ingrained in LA thinking, culture and service provision.

The costs of reorganisation on this scale are of grave concern with LA struggling under Austerity. There is already much joint working between LAs and other organisations, implemented to address the challenges of reduced funding which demonstrates that regional and collaborative working is proving an effective mode of change.

For example - Torfaen already undertake joint working in the following areas;.....

Education Achievement Service (EAS) - with Caerphilly, Blaenau Gwent, Newport and Monmouthshire

Health and Social Services - with other Gwent authorities and AB Health Board sharing executive functions

Information Technology - Shared service with Monmouthshire and Gwent Police

Community Safety - with Gwent Police sharing staff and facilities

Revenues and Benefits – with Monmouthshire

Waste Management – procurement with several boroughs in SE Wales

Trading Standards - with Citizens Advice

Play Services - with Monmouthshire, and Cwmbran and Pontypool Community Councils delivering to children all year round

It is a concern that the proposals in this Green Paper could add to the problems already experienced by LAs in the short to medium term, that the risks are as yet not clearly identified and cost benefits and risks are as yet unproven.

The concept of a two tiered structure for local government seems to have been rejected but offered significant cost savings and resilience without the need to change the structure of current LAs when muted in the Reorganisation Impact Assessment associated with the white paper re reforming local government. Could this not be expanded to more service areas outside of administration to bring forward extra cost benefits and improve efficiency on a Regional agreement basis?

The concern is that some LAs are resistant to the suggestions of voluntary or mandatory mergers and give sound reasons as to why they have reservations.

How will public access to Councils suffer as a result of centralisation of services and loss of local access points through the reductions in buildings and offices?

How can it be assured that Council decision making will remain relevant to the specific requirements of smaller areas where greater levels of deprivation exist, greater variances in social needs or demographics occur? The issues relevant to rural areas and market towns are very different to those of isolated villages in the South Wales Valleys. Torfaen can be used as an example within a current LA area in that the South of the Borough has very different transport links, access to social hubs, retail outlets and work opportunities to those in the North of the Borough. Residents identify this with a North South divide, despite the efforts of the LA to address this. The loss of services such as libraries, local offices, youth centres, leisure centres and job opportunities with the added problems of travel and lack of recreational opportunities within the North of the Borough are keenly felt and perceived as unequal. How would this be amplified across larger areas?

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

There needs to be much further discussion between LAs and WG via the WLGA to determine this - the supporting Regulatory Impact Assessment associated with the Local Government (Wales) Bill has already identified some of the issues involved and the White Paper re Local Government reforms generally agreed. A platform exists to build on but this Green Paper may create confusion re structure and forward planning so soon after the introduction of the Local Government Wales Bill.

WG should provide mandated areas for joint/regional working with associated time scales but recognise that other services are best left on a locality basis. This would not require the reorganisations proposed in the Green Paper but could be achieved via revisiting the two tier system with a widening of areas where regional services can be applied effectively.

WLGA in their recent statement raised the points that the proposals are yet to be fully costed and most academic analysis concludes that such reform programmes rarely deliver the savings or changes in performance that were hoped. How is this to be tested and addressed?

The role of Community Councils as the grass roots of the democratic process is not clear at this time so the vision does not seem complete.

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?

Clarity is desirable to lessen uncertainty re any process of change. The White Paper published by WG re LA reorganisation was generally accepted as providing a forward plan.

Much work and many reports have been published to date re LG reform and the need for change is widely agreed but consensus is still lacking on delivery..

The 3 options for merger still appears on the surface to be divisive. There still seems to be lack of clarity re the entirety of the vision, cost and savings, capacity and capability of LAs to effectively bring forward changes. The issues of staffing, pensions and workplace representation and agreements still need to be addressed.

The benefits, challenges and risks need to be identified in more detail to truly achieve informed and democratically led change

How will these issues be addressed in the time scales proposed to ensure democratically led change?

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

Revisit the two tier system with a widening of areas where regional and national services can be applied with some agreed element of mandatory requirement from WG re delivery by LAs.

Keeping others areas of services on a more locality based structure as agreed by WLGA. The savings may not be as great but quality of services may be better served and resilience can be assured in the medium term.

Costs of implementing such changes would be significantly lower, stresses on staff far less, uncertainty addressed, consensus easier to reach and there is scope for ongoing evaluation and further change if and when austerity is finally lifted by either a change in Policy at Central Government or a change of Central Government.

To make such fundamental changes under the pressures of Austerity may risk bringing forward change that is not in the best interests of the whole of Wales in the longer term and may put extra financial burdens on smaller LAs that adversely affect current service provision. Regional working and joint working within neighbouring LAs is already coming forward and could be incentivised to ensure early uptake and voluntarily mergers still come forward if deemed beneficial by groups of LAs.

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

Joint working and collaboration fits in well with some aspects of service delivery as shown by current collaborative working arrangements. Other areas need a more detailed local knowledge and closer consultation with residents who will be directly affected. Some aspects of Planning are very much across boundaries such as forward Planning and infrastructure. Others more relevant to a locality and these need to be addressed on a very local level to achieve satisfactory consultation with the residents who are most affected. How is it proposed that these variances will be addressed and managed without negative impact, local accountability maintained and local democracy strengthen?

Strengthening local Democracy, ensuring local accountability, scrutiny and shaping service areas to fit local needs may be more difficult to achieve effectively across a larger authority base. To use Community Councils as an example, smaller Community Councils have more scope to provide improvements that are desirable to their smaller communities. Larger Community Councils with a wider demographic find more difficulty in providing improvements across the full scope of their Communities. The larger the area and more diverse the population, the greater the difference in the views and wishes expressed and the more difficulty is experienced with consultation and reaching all sections of the Community. Evidence of this is demonstrated in the following WG document.

<https://gov.wales/docs/caecd/research/2014/141218-community-town-councils-wales-en.pdf>

6.6 The research was able to test whether the size of council is related to satisfaction and feelings of representation of the whole community. The suppositions were that smaller councils may be limited in their resource to serve the needs of the community adequately and robustly, but that conversely larger councils may lose that connection to the community and the very niche local issues.

6.7 By and large the data support both hypotheses – mid-sized councils were most highly rated in almost all measures in the survey. Engagement was higher, as was perceived value for money, and overall satisfaction. Those living in areas covered by smaller community and town councils were most likely to say the council represented the interests of everyone in their communities.

It is widely recognised that to meet very local needs flexibility is necessary and a one size fits all approach may not address the best interests of all residents or future generations across all areas.

How these issues be addressed in a larger LA structure?

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

Health and Social Care being more closely integrated and funding allocated in accordance and more effectively is widely agreed as the best service model.

<http://www.nhsconfed.org/-/media/Employers/Publications/WNHSC-Briefing-Integration-Briefing.pdf>

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?

Best practice and clear guidance from WG across agreed areas of service provision / delivery has potential benefits but they must be carefully identified to ensure that locality needs can be addressed and not impacted negatively. This has already been roughly agreed by WLGA. Taking some areas that lend themselves to regional working into an agreed structure for joint working but leaving other areas that are better suited and require local democratic inputs as they are. Again the two tiered approach may fit.

An all Wales approach would be useful in limited areas of provision and potential bring forward improvements in customer satisfaction, environmental impacts and cost savings.

For example - Standardisation of collection methods and working practices re refuse. Change could be driven by the evidence of current experience across Wales via identifying cost effectiveness, customer satisfaction, environmental benefits. Some areas experience litter from spillages due to overfull, open topped receptacles, some residents complain that receptacles are bulky and difficult to handle, some areas complain of the unsightly nature of receptacles that have to be stored at the fronts of terraced properties and obstruct pavements, some areas residents don't complain and are satisfied with the service. What can be learnt from the past 10 years re recycling? Common practices could provide the potential for joint working between authorities in times of high stress ie adverse weather conditions, equipment failures.

Currently we have LAs implementing WG requirements re kerbside recycling using different approaches. LAs have invested heavily in setting up current service provision using differing arrangements as per WG's policy re allowing LAs to set up services as they see fit for their locality and through local consultation. This approach does not translate well into the merging of LAs and may be better driven by examining LA experiences across Wales re efficiency, best practice, customer satisfaction and WG being more prescriptive of the method of service delivery. Currently TCBC, BGCC and MCC all use different methods of kerbside recycling. However risks exist, costs of rectifying this may be prohibitive and present a risk to any benefits gained through spiralling costs.

Regionalisation of administration and ICT seem an obvious areas where more regional working could be achieved without affecting local democracy or service provision adversely and would achieve economy of scale and standardisation of practices which would have benefits to all users as already recognised by LAs through joint working. There are however the costs in lost jobs in a locality, especially relevant in areas of high unemployment. How could this be balanced?

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?

No comment

- 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?

A link in the process of change to the electoral cycle would seem appropriate, cost effective and provide a relevant time frame if the other concerns re voluntary mergers were satisfactorily addressed by the LAs involved.

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

Clarity and detail to be provided and evidence based information brought together to inform the process re risks and costs. There have been many reports to date with information that feeds into the process of change, many conflicting. They should be brought together, updated and clearly presented prior to further consultation. There is concern that The Williams Report is already out of date and much has changed since it was published through voluntary joint working arrangements which should be acknowledged.

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.

No comment

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?

No comment

Consultation Question 6

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

Chapter 6

Consultation Question 7

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

The supporting Regulatory Impact Assessment associated with the Local Government (Wales) Bill made mention of the requirements for the roles of Councillors being made statutory to ensure liaison with electorate and for Community Councils being more accountable and to take on wider responsibilities with clearer liaison with LAs. To date it is not clear how any of these issues would be tackled.

Surgeries, as suggested in the Regulatory Impact Assessment, are shown to be ineffective re engaging a broad range of residents in some areas. Some Councillors now invest in walk about surgeries, organise local events to ensure they will be accessible or use social media but would need support and training on using these effectively and safely.

To ensure local knowledge and connections are used effectively they need to be sought at the front end of any decision making process to shape the outcomes. How could local Councillors and Community Councils be more involved at the early stages ?

The use of working groups with representation from Officers, Borough and Community Councillors, statutory consultees, interested parties and Peoples Panel representatives could be explored as a model for improving local democracy?

Consultation in its current form is often criticised for offering narrow choices, using leading questions and often being at the end of a process of change. People often complain that they only hear of change once it is visible and happening. Community Councils and Borough Councillors could be better utilised in gathering local views.

Improving local democracy via consultation and resident participation has cost implications. How will these be assessed and met?

What are the effects on Community Councils re the proposed changes? This is as yet unclear and as CCs provide the bottom rung of democracy there role should be outlined more clearly at this stage.

- 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?

Support via peer supervision, mentorship, reflective practice and appraisal could provide a template for Councillors to grow and develop their skills, aid personal and professional development, increase personal satisfaction and help identify more effective ways of engaging with residents through such reflective practices.

Joint training across Borough and Community Council for all Councillors. When important changes are taking place joint training with Officers and Councillors would facilitate uniformity of information, improve understanding, build working relationships and strengthen liaison.

Clarity re roles and responsibilities undertaken by Councillors would provide for more consistency across Wards. A more structured and accountable role could increase public confidence and improve perceptions, provide justification for remuneration or any increases in the same, could aid in attracting a wider candidate base. Those who do stand would have a clearer template on which to facilitate the role and serve their communities. The principles of transparency, scrutiny and accountability should apply across all areas of public service.

As Community Councillors take on their responsibilities without remuneration, such structure could also be provided as a guide but it may not be appropriate to make this statutory as this could have the potential to put off prospective candidates. Supervision, mentorship and constructive appraisal would however still be of benefit to aid personal and professional development. More discussion would be needed with Community Councils to find acceptable ways to take this forward and achieve affective change.

More structured publicity re the roles and responsibilities of Councillors, Information available at open days, Community events, use of social media and via newsletters that LAs produced to inform residents of the role, responsibilities and what support can be provided to residents would both strengthen understanding of the role, break down common misconceptions, potentially increase contact with Councillors and allow more to consider taking up the role.

Currently anyone who has an interest in the role has to search and research to find quality information re the role of the Councillor.

Consultation Question 8

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

No comment

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

They should retain the freedom and flexibility to decide how service provision best serves localities, the ability to prioritise by need or consultation. .

Consultation Question 9

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

Back room services are an obvious area for shared resource working but would have the knock on effect of less job opportunities in a locality with obvious negative effects on areas with already high levels of unemployment and few working opportunities locally. Outsourcing to private companies should not be seen as a solution. ICT, administration, refuse, highways maintenance are areas that could potentially lend themselves to a more transactional approach. Children's Services could benefit from wider management or a regional approach to ensure access to necessary expertise within teams and facilitate a wider skill mix to deal with complex cases. Any areas of regional working should be tested thoroughly for soundness.

It is easier to look at possible benefits of shared services but what of the risks? It would seem prudent to acknowledge them more widely in deliberations.

Elston and MacCarthaigh (2016) identify five risks that shared services do not live up to expectations. First, costs might escalate by replacing existing practices that are deeply embedded into an organisation. Second, transaction costs might be increased as time and resources are required to document existing costs and best means of replacement. Third, service quality can be reduced and decisions can take longer across collaborating organisations, which can lead to greater costs over time. Fourth, collaboration can lead to some functions being duplicated, and costs multiplied. Finally, the time and resources spent on sharing services can mean that other ways of reducing costs can be lost or ignored. The potential to save might also be less in different parts of Wales. Dollery et al. (2016) find that shared services were less successful in more remote areas, as the costs of establishing and running shared service entities were higher, and high to the extent of swamping any savings that sharing services made.

How are these and other risks to be clearly identified and met?

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?

No comment

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?

Another area of concern are LDPs, where depth of local knowledge is deemed essential and local consultation necessary. Joint LDPs have been rejected across Wales, LAs preferring local review. Citizen consultations have also shown that a more local approach is desirable to ensure citizen involvement, local democracy and scrutiny is best achieved. How would these elements be assured in a larger merged Authority?

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

Support and assistance is key but there is little discussion about the details of this aspect. There is little information to address the additional costs incurred in Officer hours and other necessary resources. Such large scale reorganisation would be an extra burden on cash strapped LAs. Officers are already under pressure to deliver day to day services efficiently and the spare capacity required to manage change effectively will need to be found by already pressed staff.

Where are the details of support and assistance, which it would seem necessary to feed into any consultation on mergers?

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?

No comment

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?

No comment

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?

No comment

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

Consultation Question 15

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

The costs of reorganisation on this scale are of grave concern with LA struggling under Austerity. There is already much joint working between LAs and other organisations, implemented to address the challenges of reduced funding which demonstrates that regional and collaborative working is proving an effective mode of change.

For example - Torfaen already undertake joint working in the following areas;.....
Education Achievement Service (EAS) - with Caerphilly, Blaenau Gwent, Newport and Monmouthshire

Health and Social Services - with other Gwent authorities and AB Health Board sharing executive functions

Information Technology - Shared service with Monmouthshire and Gwent Police

Community Safety - with Gwent Police sharing staff and facilities

Revenues and Benefits – with Monmouthshire

Waste Management – procurement with several boroughs in SE Wales

Trading Standards - with Citizens Advice

Play Services - with Monmouthshire, and Cwmbran and Pontypool Community Councils delivering to children all year round

It is a concern that the proposals in this Green Paper could add to the problems already experienced by LAs in the short to medium term, that the risks are as yet not clearly identified and suggested balance of cost benefits are as yet unproven.

The Green Paper itself provides little detail on how added powers and flexibility will be achieved nor provides references to where this information can be reviewed. The options are largely re timing and boundaries but do not address the complexities of how local democracy would be strengthened, flexibility and powers increased. With fewer Councillors also proposed it could be perceived that local democracy is decreasing. Centralisation into a larger LAs has the potential to reduced access to local democracy for residents.

How larger LAs can satisfactorily address the specific needs of localities across greater areas with very differing demographics is a concern.

How could democratically led change fit in with mandated change?

Are there assurances that residents will not lose access to walk in services as currently provided?

As a Community Council we are keen to hear proposals for any actual reorganisation at our level but the Green Paper on this aspect is not available until after the close of consultation.

Consultation in a timely manner is key to democracy at a local level. How would these proposals ensure that residents and local Community Councillors are involved at the front end of any decision making process within Local Authorities and WG and not merely consulted at the end? How can consultation be improved to address the criticisms raised by residents re leading questions, poor delivery of information relevant to the subject being consulted, lack of input at early stages when choices are being formulated and lack of public engagement and publicity to ensure a wider involvement?

The sharing of information clearly but with enough detail to ensure full understanding of all of the issues involved is key to encouraging participation in consultation. WG and LAs have work to do to improve on these elements of consultation.

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?

The Green Paper sets out 16 possible criteria for choosing between three options for reform; voluntary mergers, phased mergers with 'early adopters', and a single date for change.

We asked pupils each to identify which of the 13 criteria in the Green Paper they considered to be particularly important as the basis for the decision. Five criteria were each rated as particularly important by over half the pupils. These were (with the number of pupils rating each as particularly important given in brackets):

1. Spreading the costs of change over a longer period (19 pupils)
2. The risk of some Councils fighting the change (18 pupils)
3. Councils only changing when there is enough support ready for the change (18 pupils)
4. The length of time there is uncertainty for Council workers and citizens (16 pupils)
5. The risk of some Councils blocking change for others under a voluntary merger option (14 pupils).

One criterion (being able to have 'once for Wales' solutions to problems and issues) came next, with just under half (9 pupils) rating it as particularly important. The other criteria were all rated as particularly important by fewer than half the pupils. These were: avoiding having different local authority structures in different parts of Wales, advantages of making changes in one go, problems in keeping services going in authorities that don't change under a voluntary arrangement, getting extra savings and benefits for citizens as soon as possible, getting extra Council powers as soon as possible, Councils being able to decide for themselves when they want to merge, and problems keeping services going in Councils that opt to merge later than others.

In discussion, pupils were concerned that if Councils were not allowed sufficient time for change, things might not get done properly or on time. How long it would take an existing Council to change to becoming part of a new bigger one "all depends". There was also a concern that the changeover could take more than 4 years from start to completion, and could lead to, and be slowed down by, arguments. The issue was also raised that a single compulsory merger date could lead to some "annoyed Councils".

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

The case for creating fewer, larger local authorities

We explained that the Welsh Government says our 22 local Councils are too small, and need replacing with fewer, bigger, Councils. We set out 14 reasons for this, given by the Welsh Government in the Green Paper.

The 14 arguments we extracted from the Green Paper were: small Councils can't keep providing the whole range of services; already services are getting cut as money is limited; "some services are wearing down to the point of collapse"; merging Councils saves money on administration and overheads; getting value by councils working together (eg sharing 'back office functions'); bigger Councils can cope with crises and new challenges better (resilience); bigger Councils can afford to employ enough experts and specialist workers; bigger Councils can run a wider range of services, and more specialist services (capability & capacity); having fewer people trying to negotiate agreements together is more efficient; the country can't sustain the duplication and cost of 22 Councils doing the same thing 22 ways; builds on growing regional arrangements between Councils ; the 'status quo' isn't an option; Councils themselves agree but want to develop things jointly rather than be merged; but voluntary development was slow and patchy and pooling budgets didn't work.

We asked if pupils thought these Government arguments adequately made the case for reorganisation into fewer and bigger Councils. The 19 pupils, in two separate groups, agreed unanimously that the Government has indeed in their view made the case fewer and bigger Councils.

We also asked whether pupils themselves tended to prefer larger sustainable Councils with wider capacity and greater economy, or smaller very local Councils without those advantages but able to reflect democratically what more local communities want. By 14 to 5, pupils' 'gut preference' was for smaller, more locally democratic Councils as opposed to larger more economic sustainable Councils with larger capacity.

Reasons for preferring smaller, more locally accountable Councils, were that individual people's views would have a greater impact, and that there was more chance of a local issue or idea getting adopted by the Council.

It is important for the Welsh Government to know that the young people in this Pupils 2 Parliament consultation, even though their majority personal political preference was towards smaller more locally accountable Councils, nevertheless considered the Government's case for restructuring into fewer and larger Councils to be convincing.

The choice of option for merging authorities

Having considered the criteria for choosing which of the three options for carrying out mergers of authorities, we asked the pupils to choose which of the three options they would choose.

Overall, the pupils favoured the option of a phased changeover, with 'early adopter' Councils making the change first and the others following on a set date. Nine pupils (just under half) opted for this process for change.

Six pupils favoured a single date for all mergers to take place. Four favoured a fully voluntary merger process.

Pupils were concerned that there should be a balance between long uncertainty and getting the benefits of bigger authorities as soon as reasonable, while avoiding what could be a difficult "big bang". There would therefore be tensions and disagreements whichever option the Government finally chooses to implement. However, the phased approach and degree of choice of timing for Councils in the option the pupils voted for was seen as a good compromise between factors.

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?

From the Green Paper, the 'footprint' is the aim for what a new bigger Council should be like – its land area, size of population, age range of population, budget, households. It avoids lots of different sizes and types of Council developing. But not all will exactly fit a standard footprint.

The Government consultation document asks whether it is important to be clear about the future footprint for a bigger Council.

The majority of pupils agreed with the Welsh Government setting out a 'footprint' for future Councils. 16 agreed with this, as against 3 who disagreed.

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?

The problem of Powys

From the Green Paper, it is clear that one current Council will not change under the Welsh Government's proposals. Powys. The problem is that although Powys is a quarter of the area of Wales, it only has 132,160 people in it, compared with the average of 311,000 people in the 'footprint' for a new, bigger, Council. It is also very rural with no very big towns. There are 26 people living in each square kilometre of Powys, compared the average of 150 people per square kilometre for Wales as a whole.

Changing boundaries to get a bigger population for the area would create a huge rural Council, with even more of the problems of being very rural and geographically big. The pupils in our groups were residents of Powys, and both school campuses were in Powys.

Pupils expressed strong views about the future position of Powys. They said that staying so small in population size, and therefore income too, meant that Powys would miss out on the benefits the Green Paper sets out for the whole idea of having fewer and bigger Councils, and would always suffer from all the disadvantages and problems the Government says smaller Councils suffer from. One view was that "Powys is in financial crisis already".

The view was also expressed that leaving Powys as it is could even result in other Councils, all of which had to merge in one way or another, to disagree with the arguments in the Green Paper for them to have to merge. They would see the Green Paper as not being fair between different parts of Wales.

A number of proposals were made for the future of Powys. Many proposed measures to encourage population growth in Powys, by increasing industry, developing more events and attractions for adults and children, with more hotels, to boost the tourist industry, encouraging the growth of towns like Newtown, and increasing leisure activities like bowling and cinema, and child-friendly activities. Some were concerned though that it was hard to attract more population until there were more facilities like hotel accommodation, but in turn it was hard to support building such facilities until there had been some population growth. Some felt that the present balance of shops and facilities was wrong, and could be improved – for example having two specialist fast food bakeries and five barbers on the same street.

There was also a view that Powys should make more use of its geography – "use the hills", by using them as the settings for tourist attractions, but also building housing on the hills, which would be attractive to incoming population. Those parts of Powys that are nearest to the coast could also take this into account for tourism there.

Pupils were not however in support of the idea of trying to 'seed' new communities around Powys.

Some thought Powys is doing well as it is, being good farming land and producing food crops and

animals – industrialising it would threaten this. Another view was that having a small population shouldn't matter – fewer people does mean less money coming in, but it also means fewer people needing services, and expensive services like winter road clearance might have to recognise that not all major roads can be cleared; "if less people, then less people on roads, so do not have to clear them all".

A very different view was that since having such a small population and the service problems of a very large and rural area means that Powys cannot benefit from the urgent advantages the Government wants for fewer but bigger Councils with larger populations, then the Government should recognise this by granting more money itself to Powys.

Another very different view was that Powys should again be divided up into smaller Councils – like a North Powys and a South Powys, or back into the original three Council areas of Radnorshire, Montgomeryshire and Breconshire. If Powys as a whole is no longer big enough to get the benefits the Green Paper sees for fewer, bigger Councils, then there is no benefit in keeping it as big as it is, and smaller Councils may have other advantages here. It might also be possible to merge each of the smaller Powys areas with other neighbouring Councils to include Powys citizens in the benefits promised for fewer, bigger Councils.

We asked the 11 pupils in the group which had proposed breaking Powys up to vote on the options for the future, following their discussion. None voted for any mergers which would make Powys bigger. The majority (9 pupils) voted that Powys should be divided up. One voted that Powys should be divided up and the parts included in mergers with neighbouring Councils. One voted that Powys should stay as it is.

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?

Are pupils interested in standing for election as Councillors in the future?

The consultation document asks how a wider range of people can be encouraged to become involved in standing for election to local Councils in the future. We believe it would be helpful to this question to know how many in our groups of high school pupils would be interested, and to ask their reasons for thinking this is something they may wish to do, or that it is something they do not see themselves wanting to do when they are older.

Four of the 19 pupils said they thought they would want to stand for election as a Councillor in the future. Two were not sure. The majority, 13 of the 19, said this was something they would not want to do.

Reasons for not wanting to become a Councillor were largely summed up as "I'm not that kind of person". Those uncertain thought they might "kind of" become interested in doing this in the future, and, in one case, the pupil was not sure but it would depend on where they were at the time and what the Council there was like.

In one group, although the majority were not interested in becoming Councillors themselves, there was very strong support for one who was interested being given the opportunity to become involved in Council matters while still a young person, and thus representing the young persons' view. That person would be their willing representative.

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?

Increasing the involvement of children

The Welsh Government aims to make sure that the new Councils are very democratic. It also has to uphold Children's Rights – which include children (under 18) having a say and being listened to in things that matter to them.

We asked the pupil groups how they thought the future Councils should find out about the needs and views of children in their area. This was an open question, without any suggestions from us or school staff.

The top proposal, from 11 pupils, was that children and young people who are interested in becoming Councillors when they are adults, should be given opportunities by the new Councils to give their views and get involved with their Councils while they are still children and young people. This would both meet the Councils' children's rights duties and help to encourage a new generation of Councillors for the future.

Nine pupils proposed that contributing to Councils should be done as part of school PSE lessons, as part of the curriculum.

Eight pupils proposed having children's voting stations in each High School for pupils to give their votes on current Council issues and consultations.

Six pupils proposed that Councils should hold consultation discussion groups with pupils in schools, as Pupils 2 Parliament does.

Four pupils proposed that each Council should have a Mini or Youth Council to consult.

Finally, three pupils proposed that schools should have people from Councils visiting schools to speak with pupils about Council matters.

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 Dr Roger Morgan OBE

Organisation (if applicable) Pupils 2 Parliament (securing school pupil views for submission to government consultations. This consultation was based on inputs from 19 secondary school pupils in two Welsh high school campuses.

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

pupils.2.parliament@btinternet.com

Q36. Telephone

01544 260533

Q37. Address

[REDACTED]
[REDACTED]
[REDACTED]
Powys
[REDACTED]

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?

Please use ISO standards

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

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.

Pretty please
Use ISO standards PLEASE

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 Mr R W Ebley

Organisation (if applicable) -

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

[REDACTED]

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

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?

In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management

Independent management accreditation is required to achieve this

Thank you

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

In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management

Independent management accreditation is required to achieve this

Thank you

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

In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management

Independent management accreditation is required to achieve this

Thank you

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

In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management

Independent management accreditation is required to achieve this

Thank you

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?

In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management

Independent management accreditation is required to achieve this

Thank you

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?

In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management

Independent management accreditation is required to achieve this

ISO 9001:2015

Thank you

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?

In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management

Independent management accreditation is required to achieve this

Consider ISO 9001

Thank you

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?

In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management

Independent management accreditation is required to achieve this

Thank you

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?

In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management

Independent management accreditation is required to achieve this

Thank you

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

In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management

Independent management accreditation is required to achieve this

Thank you

Page 5: Chapter 6

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

In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management

Independent management accreditation is required to achieve this

Thank you

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?

In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management

Independent management accreditation is required to achieve this

Thank you

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?

Freedom to adopt better management

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

Good management

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

Independent accreditation

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?

Through use of ISO 9001:2015

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?

Iso9001

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

Good management

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?

In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management

Independent management accreditation is required to achieve this

Thank you

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.

In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management

Independent management accreditation is required to achieve this

Thank you

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

1 the adverse effect of existing management policy

2 the positive effect of the demonstration of good management by independent accreditation

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

Yes

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

Yes

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

Yes

Yes

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

In order that change is effectively undertaken all levels of government and other public funded organisations need to demonstrate good management

Independent management accreditation is required to achieve this

Thank you

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 Mr R W Ebley

Organisation (if applicable) -

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

[REDACTED]

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

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?

I recognise there are positive drivers in support of more effective regional working for some significant public services, including some that are within the responsibility of Local Government, however I do not consider the creation of fewer larger LA's to be necessary or a sensible use of scarce public funds. The benefits you seek can be obtained using financial and regulatory levers in support of shared commitment to secure improved delivery. I also consider there to be substantial counter arguments to your larger LA's when the representative responsibilities of Local Government are taken into account. The long-term challenges facing public services will not be overcome without a substantial change in public attitudes including the lowering of expectations of what is possible and greater engagement of individuals and communities in shaping and delivering services. Fewer, more distant Councillors will lead, not to enhanced public discourse and the strengthening of civil society, but to greater isolation and disengagement.

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

I do not believe mergers are necessary or beneficial and therefore have no comment on your process.

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

They should not happen

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

There is no need to change the number of LA's. Whilst many regret the re-organisation in 1995/6 led to 22 not 16, the cost and disruption of taking out 6 now would be a waste of money. If strengthening is needed in some services and/or in some areas, steps should be taken in partnership between LA's and WG to share management and high skill resources.

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

I do not hold such evidence personally. I do however have the experience of having served in Local Government in both 1974 and 1996. Hindsight is a powerful tool !

Page 3: Chapter 4

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

Not at this stage, there needs to be further consideration of the purpose and capacity of Local Government and relationships of Local Authorities both with the populations they represent and with the other public services who also serve that population, with a view to a "step-change" in the current disengagement, dissatisfaction and disinformation so damaging to the delivery of services and to democratic accountability.

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

see above

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

Lines on maps are not helpful at this time. They divert attention from what should be being considered.

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

See above

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?

Joint arrangements can be made to work and proper accountability can be established.

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?

Not needed if you do not pursue your proposals.

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 comment

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

no further comment

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 comment

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?

Not within my knowledge.

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

Shifting population patterns at quite local level requires further examination of disparities in the number of constituents per elected member, with a view to more equitable representation.

Page 5: Chapter 6

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

by supporting their members representation activity: eg resource surgeries. Introduce community budgeting where not already undertaken, improve and enhance where it is.

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?

Some remuneration is appropriate for all members to ensure there are no unfair barriers to participation. More radically there is a need to allow and support overt political activity which can be shown to enhance and contribute to public discourse and civil society. Whilst this will be very difficult to justify in the current climate of civil distrust, the unpopularity of politicians and media scepticism, it will be essential to the recovery of responsible public dialogue so necessary for democratic accountability to thrive again.

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

More influence over local health and environment services, including statutory requirements to collaborate on service priorities and powers to scrutinise.

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

I'm sure there are but I do not have personal current knowledge

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

IT will be critical to all future developments whatever the shape of LA's

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

I do not know

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?

By ensuring that all spheres and agencies of government participate in preparing common standards etc and are held to account by their partners.

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?

There will be a need for contingency funding.

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

Review starting point. Not structure, but purpose and relationships of local government and other public institutions with a view to refreshing the democratic engagement of the public.

Page 6: Impact assessments

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

not clear.

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

I do not know

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.

Any proposal that increases the area/population served by an individual councillor increases the risk of individual isolation of small communities and vulnerable individuals from both the democratic discourse and probably the delivery point of essential services.

discourse and probably the delivery point of essential services.

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

See 12

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

no comment

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

I am not sure sufficient thought has been given to the possible impact on protected groups of the weakening of local representation and engagement opportunities.

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

Do not pursue before reviewing purpose etc as above at 10c

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

I am sorry to appear critical of these proposals, which I might have supported 20 years ago, but the world and I have moved on.
Although I am a firm believer in the devolution of powers to Wales and an admirer of the progress made by the National Assembly and the Welsh Government, the tide of political philosophy is ebbing away from western democracy. We are in an age of public disenchantment with our traditional institutions, of instant reaction to questionable information and the diminution of public discourse. Wales cannot change this on it's own, but the Welsh Government can continue to work with it's partners in local Government and the third sector, about how to secure re-engagement with the public sphere. Without such engagement the prospects for the future resourcing and delivery of services to meet demand looks bleak. There is more work to be done on purpose and relationships before tinkering with structure.

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	R D Sandy Blair CBE DL
Organisation (if applicable)	Former LA CEx (1984-2000) President of SOLACE '99/2000 Former Director WLGA 2001/4

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

████████████████████

Q36. Telephone

No Response

Q37. Address

Usk

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

No Response

I make the following submissions in my personal capacity as a founder-member of Gwent County Council 1973-85, school governor 1973-98, and founder-member and officer of Oakdale & Penmaen Community Partnership 2003 to date. Due to the pressure of my voluntary work and family commitments, I regret my comments are not as in-depth as I would have wished.

Firstly, I was never aware of any widespread public dissatisfaction with the 1973 re-organisation of local government in Wales which led to the establishment of eight County Councils and their subsidiary district councils. However, since 1996, I have heard nothing but criticism from local residents, former council employees (both county and district), and voluntary organisations throughout Gwent and the Valleys generally of the poor performance of the unitary authorities, their lack of accountability and transparency, and declining standards of service provision in all areas, not necessarily connected with the prevailing economic climate. I will not dwell on the reasons behind the 1996 re-organisation, but they were clearly not based on providing good local government, economies of scale or a focus on the changing needs of local communities.

I believe the best way forward is to revert to the eight former counties, for the simple reason that the major functions of local government – education, social services, highways, strategic planning and industrial development, staff payroll and pensions – are best administered at a regional level which those county areas are best placed to deliver. It is also far easier to standardise best practice (once identified) across eight authorities than twenty-two.

The many failures of the existing authorities – with whole departments put into special measures, or the appointment of temporary 'commissioners' to manage affairs – has brought local government into disrepute. Much criticism/concern has come from local government officers (both serving and retired) who have despaired at the decline of services they were once very proud of.

The Green Paper appears to have been written by those with little front-line experience of local government, as it provides insufficient detail of each service area and how best to deliver that service. The document reads more like an academic thesis full of abstract philosophical ideas rather than a serious analysis of the essential facts and figures about local government.

It should address issues such as which services are national or non-discretionary and would be better provided at a national or larger regional level, eg, Fire & Rescue, Trading Standards (especially Weights & Measures), and could be removed from local government without affecting service delivery or public accountability.

It should further address what services need to be delivered at a regional or strategic level, that is, at county level, and what services are best kept local or discretionary and could well be delivered by area committees within those counties.

As far as the local dimension is concerned, the document is not bold enough to suggest that Gwent reverts to its former boundaries, which would produce a viable

strategic authority that all residents understood and would support. Whether the former Rhymney Valley should be included or revert to part of the old Glamorgan should be for further local consultation.

Community Councils

Currently 30% of the Welsh population manages perfectly well without community or town councils. There should be a compulsory referendum in every community across Wales asking voters whether they want to keep such minor authorities or want one to be set up where none now exists. Before this is done there should be a major Local Government Boundary Review identifying what people now regard as their 'community' in order to identify the foundational 'building blocks' on which to construct new and realistic community/ward areas. Where local electors choose to have a community council, a minimum population level should be set, in order to set up councils that can benefit from economies of scale of provision.

Councillors

Members should not be allowed to be elected for more than one tier of government – at any level from community to Westminster. If someone is elected to a higher tier, then that should automatically trigger a vacancy at the lower level of government. There should be a strict residence qualification for all candidates for election, which should require that person to live in the area they seek to represent – this would strengthen the ties of every elected representative with their local area and increase their credibility with the respective electorate.

There should also be an upper age limit set for candidates, say 70 years as with lay magistrates, to encourage younger people to stand for office without having to fight possibly acrimonious selection/nomination battles with experienced councillors.

Elections and voting

Every council should be composed of single-member wards. In my experience, multi-member ward boundaries can be 'gerrymandered' to produce safe seats for the major parties at the expense of smaller areas which may wish return a politically different candidate. Also councillors in multi-member wards use the multiplicity of members to confuse voters or to pass the buck on controversial issues to other councillors in order to avoid personal responsibility.

Voting should only be on a first-past-the-post system; this is simple, easily understood and preferred by voters, as the 2011 national referendum on voting systems confirmed.

There should be four-yearly elections, which is a reasonable compromise between three years, when new councillors are just about getting familiar with their roles, and five years, which gives a permanence to the role which voters would not support.

Local Authority websites

There should be a common template or 'site map' for all new county (unitary) authorities so that it is easier for the general public to quickly find the information they want, regardless of where in Wales they live.

Roger Evans (Mr)



Blackwood
Gwent



12th May, 2018

Alan Davies AM
Cabinet Secretary for Local Government & Public Services

Dear Cabinet Secretary

**RESPONSE OF THE CARDIFF CAPITAL REGION CITY DEAL – STRENGTHENING
LOCAL GOVERNMENT GREEN PAPER**

Summary

Our response as the Regional Cabinet for the CCR City Deal to the green paper consultation is set out below, recognising that individual authorities across our region will have their own views as to the merits of specific reorganisation proposals, as well as to the green paper as a whole. Our position can be broadly summarised under the following points:

- Form should follow function. The paper is principally occupied with matters of form and footprint and re-drawing the lines of the current policy unit structure. It is difficult therefore to have confidence that the problem WG is seeking to solve, is well defined and understood
- Complex challenges like shaping the future of local government require more than simplistic and traditional responses. This is not business as usual and it is not the time for solutions and answers that have been resurrected from the past; are untested and unsupported by evidence and experts alike
- It is not how we deliver or how we look that is important. It's what we do and understanding 'why' we do it that counts – the very ethos of public service
- The consultation calls for merged and larger organisations. This undermines the structure and system of effective regional governance we have developed through our local government-enabled City Deal. Our City Deal is grappling with complex issues head-on and delivering on ambitious and world-leading projects. We are clear about the scale of the challenge; developing our appetite for financial risk and new forms of economic growth that put social justice at the heart
- The entire theme and inference of the document is that 'bigger is better' in direct contradiction to the evidence and data – some of which has previously come from WG's own studies and reports. In fact, in 40 years of academic research, quite the opposite is suggested
- Reducing resources and financial constraint require us to re-think demand management; strive for behavioural change; engage people in local social action; re-appraise risk and provide better accountability – all requiring a greater emphasis on 'local' and 'community'. This is at odds with the creation of bigger, distant, linear and rigid super-structures

- There is little if any connection to the role of LG in enabling delivery against the objectives of the Programme for Government; promoting the Wellbeing of Future Generations and the kind of regional economic growth enabled through City, Growth and Devolution Deals – including WG's own new approach to regional economic leadership. The juxtaposition of devolution of power, freedoms and flexibilities with large centralised units appears at best, counter-intuitive
- The emphasis is solely on resilience and large, linear structures are offered as the only means of achieving the new end. The document is light on new and innovative ways to renew local government. Our response contains opportunities and practice change we believe should be considered
- In short, it is our contention that the paper amounts to an approach that will see the 'local' in local government become a contradiction in terms.

Overview

In the same way the LG Green Paper considers how we best strengthen and empower communities across Wales, the Cardiff Capital Region (CCR) City Deal and our model of Regional Cabinet, is a strong demonstration of 'think local, act regional'. Our approach is less about re-drawing local boundaries and more about enabling the community, businesses and industry partners to drive and shape our purpose and function. Our clear goal in delivering a City Deal that works for the whole of the region, is to understand the problems that need to be solved and to develop powerful and enduring solutions that talk to our purpose and what matters most to the communities we are privileged to serve.

In March 2017, all ten Councils comprising the Cardiff Capital Region, along with Wales and UK Governments, signed up to and agreed a £1.2bn City Deal. City Deal is a strategic investment mechanism around which we are rapidly developing an effective model of collaboration, co-operation and regionalism. Our investment fund comprises c£700m that will directly fund the early stages of a multi-modal 'Metro' public transport system. The remaining £500m will mobilise and leverage Innovation and Digital opportunities, Infrastructure and Connectivity schemes and Skills, Employability and Regeneration programmes. Targeted outputs include a 5% uplift in GVA; creation of 25,000 new high-value jobs and mobilisation of an additional £4bn of private sector investment.

Driving this collective call to action is a clear and shared understanding of the challenge to which we must respond. Our region continues to experience stunted growth and low productivity; GVA per capita is one of the lowest in the UK; levels of benefit dependency are the highest in the UK; and, we have not always taken opportunities to leverage additional investment off the back of European funds that have historically, flowed into our region. The effect of all this, sees many of our areas within the bottom 50 of the UK Competitiveness Index – with none making the top 130 and some remaining steadfastly at the bottom. It is not good enough for the region – which comprises nearly 60% of the entire Welsh population and accounts for over half of the nation's productivity – to inch along, incrementally doing the same old things slightly better. Our ambition is to radically evolve the productivity paradigm and present a bold, enterprising and hopeful vision that enables our region to deliver fundamentally better things.

Our contention is that local government is a front door to and for citizens and any reform must have notions of empowering, enabling and convening community and social action at its core.

In a world where technological advances such as Artificial Intelligence and structural economic factors are fast changing, re-drawing boundaries and creating new larger monolithic structures presents a simplistic, inadequate and counter-intuitive answer to a complex question.

Local government has the democratic legitimacy to take an overview of the needs, priorities and aspirations of its communities – now and in the future. How we use and apply foresight to understand what is coming is an important aspect of this and the Wellbeing of Future Generations Act places a statutory requirement on public bodies to look ahead. There are wider key considerations in this regard. The decision to leave the EU was a watershed moment for the UK and as we move towards the programme of exit, the consequences will be significant for Wales and our region. The UK Industrial Strategy will be key to forging a new future for our nation and region as we begin to shape the destiny for our country post-Brexit. The change is already underway and complex challenges will be matched with unprecedented opportunities. We believe through the vision, purpose and systems established to deliver our City Deal, we are demonstrating the ability to work with the grain of change rather than against it.

Organised to Deliver

The CCR City Deal aims to understand what it takes to rediscover our place in the world and build a truly modern, resilient global economy. The aims of the Green Paper and our £1.2bn City Deal are thus, one and the same: to develop and enhance Government's interventionist role in creating sustainable and resilient communities. Our relationship with and understanding of place is fundamental to this. The whole process of building a City Deal has meant taking a long and hard look at the structural and systemic shortcomings and weaknesses in our region and how they compare to other regions across the UK. At no point, has our work highlighted that it is the ten underpinning Council's structures that impedes progress.

Our City Deal is organised to deliver. It comprises ten Councils straddling 60 miles, over 60% of the Welsh economy and must work for 1.5m people. Our strong 'sense of place' comes from our recognition that in dealing with matters of functional geography, such as the economy, planning, housing and transport, the whole is greater than the sum of its parts. Equally, local delivery and execution is an important factor when it comes to meaningful community engagement and impact. Knowing our purpose, why we are here and what we are here to do (function) must precede how we do things (form). Instead, the paper appears to suggest that 'business as usual' with some re-aligning of boundaries, will do the job. The CCR is getting on with the task and demonstrating partnership, ambition, adaptability and outcomes, without the need for imposition of top-down structural reform.

We acknowledge that our City Deal architecture is still fledgling – it is a job well begun and not yet a job well done. We are on a journey. It is with some disappointment that we see the majority of the questions comprising the consultation are focussed on form and footprint when there are more fundamental questions to pose, such as:

- How sustainable is the current model of LG finance and the formula for its allocation?
- How productive is the public sector? What are the other options to increase and enhance productivity, performance and outcomes especially in the light of reports suggesting whole-scale job displacement and replacement at the hands of AI and automation?

- What are the wider freedoms and flexibilities required for LG to be more enterprising in meeting some of the challenges posed through reducing resources?
- Against a backdrop of significant change and industrial and societal challenges – how can we reassess and address issues of continued legitimacy and viability?
- What are the cultural conditions we need to create and what kind of institutional skills and capacity do we need to invest in to create 21st Century public services?
- How do we frame the adaptive leadership challenge and ensure we have the right leadership capability to lead people and places?

We believe beginning a debate that begins to answer some of the above questions – and others – will provide the best start-point for a conversation about fit for future local government. These issues are key to delivering against the objectives set out in the Programme for Government, embedding the seven Wellbeing Goals and promoting a strong sense of collaboration and regionalism (as distinct from regionalisation).

Looking outward

Looking across structures within the existing LG system, keeps us inwardly focussed. Our work as a CCR, is providing the opportunity to re-examine the inter connects across the economy, people, place and business. We have a plan that sees this, our forerunner City Deal, as the first of many and work more extensively across Business, Government and Higher Education. Together, we can build understandings of how our region and country can position to be relevant and competitive in a fast changing global market. City Deal is not just about the economy – it sits at the inter-sect of the environment, economy, society and place and it is a key function of LG to intervene in these policy areas and market functions in a way that delivers for all. We believe that creating a vibrant economy, in which people earn more and do more and lead fulfilled lives – is the only real way of creating resilience and the conditions for generating the wealth to pay for future public services.

Consideration also needs to be given to the role of LG as an early stage investor and again - this kind of innovative thinking is largely absent from the document. Our first City Deal project off the blocks has been a symbolic one. Working with WG and indigenous Welsh business IQE Plc, we have taken forward the development of a world first state of the art 'Future Foundry' for Compound Semiconductors. Our investment of c£40m which will be returned in full, leverages £375m of private finance, anchors a key 'industry of the future' in our region; creates capability for up to 50 new company births and will generate up to 5,000 high-value high-skill jobs through supply-chain clustering. The interventionist role of the City Deal, which is the owner of the Foundry, in this example has demonstrated two important factors; i) the role of the LG-led City Deal in demonstrating innovation in the design, structure and execution of the deal and ii) the role of the LG-led City Deal in creating the outward conditions for innovation-led economic growth.

Big is better?

There is no evidence to suggest that big is better – if anything the available body of evidence, which is not quoted in the paper – contradicts this assertion. In fact, in 40 years of academic research on the subject – some of which includes reports commissioned by WG – there is no data or evidence to suggest that outcomes are any better through larger delivery structures. Following the serious viability problems experienced by Northamptonshire Council and a

subsequent conclusion that merging into a larger structure would assist, former Head of the Civil Service, Sir Bob Kerslake re-published his 2014 review of Birmingham City Council. The review suggested that the council, the UK's largest, was already too large and it seemed 'unlikely' that its problems could be solved by merging it with surrounding areas.

We believe that the way local authorities are shaped is too important to be defined by financial matters and affairs alone. Should austerity end, there is a risk that we will find local government no longer suits the new circumstances. Will that precipitate more costly restructuring? Financial efficiency and viability is critical but so too, is community ownership and identity, local choice and local social action and, the number of councillors.

In the 2013 Williams Commission Report, it states in para 3.8 *'We agree, and explore issues of governance, accountability, leadership and culture elsewhere in our report. It would be wrong to say that smaller organisations provide worse services than large ones, or even that they tend to do so. Extensive academic research on this issue has, at least in recent times, failed to find any such direct relationship anywhere in the world'*.

(<https://gov.wales/docs/dpsp/publications/psgd/140120-psgd-full-report-env2.pdf>)

In addition, it states in para 3.9 *'That is not surprising. As Chapter 6 notes, performance varies greatly across Wales. It appears to depend on many socio-economic, geographical and demographic factors as well as on quality of leadership and management. It is impossible to disentangle any effect that scale might have from all of these influences to create a simple correlation between scale and measured performance'*.

Further research on the subject validates this (Chisholm 2002, DCLG 2010, Andrews and Boyne 2012 and Andrews 2012) setting out:

- Transition costs outweigh efficiency gains
- Greater importance of managerial, leadership and organisational challenges and skills
- Voluntary mergers in England led to higher expenditure and lower performance
- Some administrative savings had been realised over time but reserves had been depleted

We have further seen through recent reviews of entities set up to establish efficiency at scale, such as the National Procurement Service, the inability of large structures to not only fail to deliver on effectiveness, but fail to add value through local and community benefits and the promotion of 'circular economy' principles.

It is regrettable that the paper talks mainly to enforced mergers as a panacea – but without the evidence to back it up – but the real missed opportunity is around starting a real debate about change in practice and the art of the possible. There are many options to achieve change; radical efficiency, effectiveness and higher productivity in public services. Emphasis needs to be more on purpose and practice and what we do, why we are here – and less on how we do it and how we will organise to do it. Local autonomy and sovereignty are key. 'Business as usual' but from within larger amorphous structures will simply not cut it.

Our City Deal framework and the operation of a joint committee through which to enact the powers of a Regional Cabinet offers us a big picture vision and a platform for the big debates – but still sees us retain local delivery responsibilities where it is the right thing to do and thus,

local accountability. Sense of place, local identity and local engagement is key if we are going to encourage our communities to work with us to shape a different future. Addressing demand management, stimulating more community action and thinking differently about risk and reward – all need to be embedded in local conversations about local issues and priorities and how we build trust and intimacy. People and citizens are unlikely to step forward to contribute to something that does not feel connected to their local place. When people feel a connection and that something matters to them, their family and community they will be more inclined to act, support and strive to make a difference.

We believe it is these wider cultural, financial, community and systemic factors that need consideration. Moving the deckchairs is simply a matter of geography. In a climate where resources are increasingly constrained, LG needs the flexibility and autonomy to be creative, engage partners and communities in different ways in pursuit of new solutions to intractable industrial and societal problems. The debate about reorganisation is a distraction and it is a real shame the paper shows little interest in cutting to the important aspects. Risk is another important consideration that the report does not reflect adequately upon. Our City Deal is managing issues of significant risk every day. We understand that if we are to make the progress necessary, we cannot be constrained by risk and acceptance of it will be beyond tolerance of consequences – the key difference between risk and risky behaviour. Give the scale of the change needed in our economy, we cannot tread water and wait for better times, more certain times – we need to act now. Risk is always in direct proportion to reward. It is hard to see how big structures and linear, rigid and bureaucratic processes will be compatible with this and support intelligent risk-taking.

Driving Competitiveness

There is a real need for LG to engage in wider initiatives that drive competitiveness at a local and regional level. As stated above, the CCR remains one of the least economically competitive areas in the UK, with some of our LA areas remaining at the very bottom of the UK Competitiveness Index. This will grow in importance as the UK leaves the EU given the future operating context is likely to be ever turbulent and uncertain and Wales needs to develop a high state of preparedness. Brexit will affect Wales disproportionately given it is both a net beneficiary of EU funds and EU funded Science, Research and Innovation grants. We have to re-think our levels of wider influence and visibility and ensure we have comparative and credible levels of representation at the table of significant UK-wide policy agendas, like the Industrial Strategy. The Board of the new UKRI is recently established and there is no Welsh representation. With the recent announcement of the appointment process for the eight underpinning funding bodies and 'Councils' it is important we achieve a higher level of visibility, influence and profile. LG is uniquely placed to increase the profile and visibility of the region and its assets and strengths.

This will be important because whilst EU funds for economic and community investment and innovation will cease, we will need to compete for access to new investment channels such as the Industrial Strategy Challenge Fund, Strategic Priorities Fund and Industrial Fellowships. Research undertaken to inform our City Deal sets out the challenges around lower than average levels of investment in Research and Development, 'Assisted Area Status' remaining a feature in many places; under-subscription to R&D tax credits and fewer anchor and regionally important companies than other parts of the UK. Wages in the region are not only poor compared to UK averages, wage growth is low and out of step with the cost of living,

intensifying low productivity. Combined with our historic inability to attract some of the big funding programmes – there are key investments to make – and strong returns to achieve. LG as the conveners of City Deal has a huge role and contribution to make to this and to aligning and co-ordinating, the actions needed to evolve the productivity paradigm and deliver on the WG Economic Action Plan. We have the structure that is aligned to delivering against this aim. Why change what works?

New approaches to reforming and renewing practice

The Cardiff Capital Region has one of the highest levels of public sector employment within the UK. In fact, the proportion of the workforce employed in the public sector in Wales as a whole is far greater than the UK average. With a large number of public institutions, greater social disadvantage requiring higher investment in public provision and lower levels of productivity, especially in terms of rates of company formation, this relatively large public services sector and a historic over-reliance on it for employment, is regarded as a source of economic weakness.

To date, the responses to this challenge have mainly been around creating fewer larger authorities and either mandatorily or voluntarily merging. However, there is an alternative way of looking at the challenge. The CCR City Deal is considering how we might invert this typical perspective and turn the ‘problem’ of over-reliance on the public sector into a source of economic opportunity. This could mean turning dependency on the public sector into an opportunity to form and create new markets and ‘smart’ testbeds that build on the track record of public sector investment in innovation in the UK. This could mean developing new approaches to service delivery and problem solving through developing the tools and techniques needed to reform provision and build a fit for future public service. Government’s key role as an early-stage investor in new infrastructure and technology in areas like energy, recycling, transport and communications can also give the “entrepreneurial state” a key role in new industry cluster development. The purchasing power of public procurement could be mobilised to create economic opportunity with the opening up of data facilitating a new and more open approach to problem solving.

Understanding some of the more successful global examples of public service innovation will be key to this continuing development. Some of the research suggests that transformative approaches, developing internal structures for R&D and teaching techniques aimed at testing, piloting, adopting and scaling up new ways of working – create radical efficiencies and better outcomes for communities and customers. Such a testbed or demonstrator could attract foreign direct investment in corporate R&D as well as generating indigenous spinouts and start-ups as is demonstrated with the compound semiconductor project.

It is our firm belief that the conversation about reformation and improvements in LG need to focus around debates and opportunities such as this – and not redrawing lines on a map.

We hope that you will receive all of the above comments, suggestions and views in the positive and constructive way in which they are intended. As the Regional Cabinet of the CCR City Deal, we are passionate about LG and the impact it can have on improving lives and life chances. However, our contention is that we have to start by posing the right questions and understanding the true nature of the challenge. A debate about boundaries and merged super-structures looks set to take us back at a time when we need to move urgently forwards.

Yours sincerely,



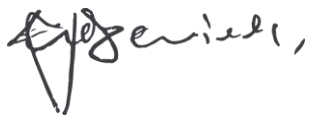
Cllr Andrew Morgan – Chair of Regional Cabinet & Leader Rhondda Cynon Taff CBC



Cllr Dave Poole Leader of Caerphilly County Borough Council



Cllr John Thomas Leader of Vale of Glamorgan Council



Cllr Nigel Daniels Leader of Blaenau Gwent County Borough Council



Cllr Peter Fox, Vice Chair of Regional Cabinet & Leader of Monmouthshire County Council



Cllr Huw Thomas Vice-Chair of Regional Cabinet & Leader of Cardiff City Council



Cllr Wilcox Leader of Newport City Council

A handwritten signature in blue ink, appearing to be 'Anthony Hunt', enclosed within a blue oval shape.

Cllr Anthony Hunt Leader of Torfaen County Borough Council

A handwritten signature in blue ink, appearing to be 'Kevin O'Neill', enclosed within a blue oval shape.

Cllr Kevin O'Neill Leader of Merthyr Tydfil County Borough Council

On behalf of the Cardiff Capital Region Cabinet

Annex C: Consultation Questions

Your Name	Karen Roberts
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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?

This would appear to be a redundant question as you propose to merge councils across areas that are currently engaged in certain elements of regional working such as RCT and Merthyr. There are also random patterns of regional working currently such as the education consortia.

There needs to be clarity as to what power lie exclusively with Local Authorities and what is for regional bodies to decide. There should also be some consistency in this and in what constitutes a “region.”

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

We don't disagree with the elements as outlined but there is little in the report as a whole that gives us the confidence that the challenges are fully understood given the strength of feeling in many quarters.

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

Totally unacceptable. There appears to have been very little real thought behind this and the geographical and demographical challenges it presents. It is simply a repeat of the exercise previously soundly rejected when put forward by a previous Minister, rubbing out existing boundary lines and pushing random Authorities together.

To be clear, we are not opposed to decreasing the number of local authorities in Wales, for many of the reasons outlined in this document – cost, economies of scale, better co-ordination across wider areas. It is this specific set of proposals we object to.

We agree with the sentiments in 2.5 that “this challenge is complex and requires a long term approach which is about more than money alone. We must look at the role of local government, how it works, what people expect – transforming service delivery and giving local authorities the tools to lead their communities”. However, we don't think these proposals live up to that.

2.1 talks about “ensuring we have strong democratically accountable councils working at the right scale”. 3.1 states “we need to create larger, stronger authorities to secure the financial viability of some councils, ensure the sustainability of services and provide a platform for transformation in delivery and outcomes

for people. “

Yet there is huge inconsistency in the size of the new proposed councils. The biggest proposed will be more than three and a half times size of smallest population wise. Three of the new authorities will be smaller than RCT and Swansea are now. Five smaller than Cardiff is now.

In 2.3 it states “local democracy will be vital in addressing the challenges we face, in finding the best local solutions” yet some of the proposed new council areas will be substantial both in terms of area and population - how can this assist in the “local” element of democracy.

The idea of voluntary mergers is mentioned, although not as a preferred option. Yet this was on the table last time and when certain councils did come forward with proposals for such mergers their requests were dismissed, as in the case of Bridgend and the Vale of Glamorgan. Why then waste time brining the subject up again? Furthermore the idea in 3.5 that “where two existing authorities within a proposed new local authority area wished to merge, but the other authority or authorities did not, we think there is a case for enabling the willing authorities to proceed on their own is little short of ludicrous. What then happens with the other authority and how can this possibly fit into a wider picture which works for the whole of Wales?

We further don’t believe that this should be a stepped process and that whatever is eventually decided upon it should be implemented across the whole country at the same time.

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

3.2 says “We lack a credible alternative proposition, apart from providing more money that we simply do not have, so we must return to the recommendations of the independent Williams Review”

This speaks volumes about the lack of innovative thinking at Welsh Government level in relation to this matter. Two years ago practically identical proposals were resoundingly rejected by all parties and all levels of government. There has been a similar outcry this time with the WLGA stating their views in no uncertain terms and one RCT Labour Councillor stating in the chamber “that lot down the Bay are on a different planet to the rest of us.”

Why haven’t alternatives been looked at?

It is our view that, as stated previously, we do need to cut down the number of councils. However, a far more in depth review should have been carried out if the stated aims in this report are to be met. Why is the only option presented that of merging existing authorities? Why has there been no request to the boundary commission to draw up alternatives that maybe cut across existing borders and split existing councils? Alternatives based on geography and demographics that would ensure more evenly formed councils in terms of the number of people they are expected to serve whilst still taking into account issues such as rurality and public access to services.

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

If the Welsh Government with all its resources cannot provide anywhere near definitive costs for this process, or indeed answers as to where the money is to come from then how does it expect anyone else to?

It appears that Welsh Government have no idea of the financial implications of reorganisation. Take for example in paragraph 6.33 you mention “using capital receipts from asset disposals to support transformational costs. Then in 6.52 “Our proposals for strengthening local authorities should over time, allow the release of estate assets. However, without a full understanding of the nature of the estate, it is difficult to identify the full extent of the opportunities. “

In other words this is a far from costed proposal and Welsh Government is taking a huge leap in the dark

here. How can anyone be expected to support that?

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?

Yes undoubtedly.

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

They appear reasonable. Although there is an inconsistency, as the report identifies, in that Bridgend is not currently in the Cwm Taf University Health Board area. Coincidentally, given that this is all to consultation and nothing has been decided anywhere, that may soon change. (Or is it suggestive that WG have already made up their minds regarding reorganisation.) This proposed change could, of course, be replicated elsewhere if necessary. Or would not be necessary if the proposal to join Bridgend with RCT and Merthyr were to be dropped as we believe it should be.

There is of course the prospect of Westminster constituency boundary change on the table and the possibility of changes with regard to Assembly systems and boundaries. These have not been taken into consideration.

Wouldn't it make sense to do a full public service and boundary review as one?

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

Population should be taken into account, but despite saying it is there are huge variations in the proposed new areas, as we have mentioned previously. You propose creating new authorities in North Wales one with a population of 193,350 and another with just 132,160. RCT has substantially more than that now, as does Swansea, and certainly Cardiff. Yet you intend to amalgamate these three with other authorities to make them even larger. Where is the sense or indeed the fairness in that?

The same obviously applies to the number of households, and as for the age ratios they would be the same in existing authorities by and large so are immaterial.

In his introduction the Cabinet Secretary states:

“I am committed to delivering more powers to Welsh local government than at any time since devolution. And I want to give those new powers to councils which are robust and sustainable enough to use them.”

Just what size is deemed robust and sustainable enough? What justification can there be for creating these new councils with such huge variations?

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

Our suggestion would be to actually take into account some of the new areas you have added i.e. population. The three largest current councils, RCT, Swansea and Cardiff are already more than big enough to stand alone.

On a broader note, as already stated, we do not think that simply merging existing authorities is a good

enough option if you are looking for real change. A complete revamp of boundaries would be preferable. We appreciate that this would no doubt cause consternation in many areas and indeed resistance, but no more so than the proposals in this document.

Again, we have no argument with reducing the number of councils, but want to see new boundaries, drawn up by the boundary commission based on community links, geography, population size and make up, along with economic factors such as enhancing major urban centres of employment. We believe that a more realistic number of councils drawn up by this method would be around 14 / 15.

- 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?

Where there are joint working arrangements they should be along established guidelines and to a set framework.

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?

Once agreement is reached on the number and makeup of any new authorities yes.

However we disagree with the suggested date of June 2021 for elections to the new shadow authorities following an Assembly campaign in May. There would be too much overlap in campaigning and unless there is a marked upturn in the interest levels of the voting public before then many of them are once again likely to throw their hands up I despair at “another election.” There would also be even more confusion than usual as (if these proposed mergers were to take place) people were asked to vote for constituency and regional AMs across one set of borders and their representatives to a local authority that crosses different borders.

Furthermore we don't anticipate that political parties, including that of the Cabinet secretary, would be too thrilled at the idea of fighting two sets of election in such close succession.

- 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?

We disagree with this option but obviously if it were to be pursued it could not be done on a random basis with proposals coming forward at any time.

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

Yes. Precede it all with a Boundary Commission review and the setting of new boundaries for completely new authorities.

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.

No reply

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?
No reply
Consultation Question 6
What are your views on the approach which should be taken to determining the parameters of electoral reviews?
No reply
Chapter 6
Consultation Question 7
a) How can councils make more effective use of their elected members' knowledge of, and connections in, their communities?
<p>This would need a sea change in the mind-set of politicians who see councils as their fiefdoms. Ruling groups who are not in the least bit interested in the views of others who are of different political persuasion, who automatically dismiss any idea that is not their own – even if they then bring it back under a slightly different guise some months later. Legislation will not help this.</p> <p>6.7 states “they (councillors) should have access to information and be kept abreast of decisions being taken on behalf of their council.” Yet is not lack of resources that stops this happening but the political will of the ruling group that fails to provide this level of “support” for fear of giving away some of their perceived superiority. Merging councils will not help solve this problem.</p> <p>In 6.10 there is reference to these proposals providing “an opportunity to have a conversation with the people of Wales about restoring that trust by making our new councils as open and transparent as possible and by engaging and involving their citizens in their work.</p> <p>Just how is this going to happen? Councils such as RCT already claim to engage people in decision making with consultations and surveys, but then go on to ignore the results and do what they intended to in the first place. Unless there is going to be an obligation placed on the new authorities to abide by the results of any consultation then this is not going to change and it is disingenuous to suggest it will.</p>
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?
<p>We believe, as we stated in the previous consultation on Members' allowances, that the level of remuneration for Councillors is fair. Unless there is a marked increase in workload and a need for Councillors to become full time then we see no reason that this should change. We believe that it is not the salary that puts people off from standing for Council but rather</p> <ul style="list-style-type: none"> a) A lack of understanding of the democratic process and how local government works. b) The public attitude of many towards Councillors and the abuse they receive from certain members of the public. c) A general apathy amongst the public for politics in any form.
Consultation Question 8
a) Are there other powers which local government should have? If so, what are they?
More control and powers over economic development and therefore more responsibility and accountability for encouraging business growth in their areas.

Green Paper – Strengthening Local Government: Delivering for People
Annex C: Consultation Questions

There needs to be a merging of appropriate health and social care services – again as part of a look at the provision of public services as whole across Wales.
b) Are there other freedoms or flexibilities which local government should have? If so, what are they?
No reply
<u>Consultation Question 9</u>
a) Which areas offer the greatest scope for shared transactional services?
HR Legal services Planning Services Social Care
b) How might such arrangements be best developed?
They are already being developed by some councils but you now propose to merge those councils, so what next? Shared services between the larger authorities? Then maybe a few years down the line merge those?
<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?
Consistently? (and maybe in a better written fashion. A consistent approach where consistency is important?)
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?
No reply
d) Which of the issues identified above or in your response should be prioritised for early resolution?
No reply
<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?
None
b) How could positive effects be increased, or negative effects be mitigated?
No reply
<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.
No reply

<p>Consultation Question 13</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>No reply</p> <p>b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?</p> <p>No reply</p>
<p>Consultation Question 14</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>No reply</p> <p>b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?</p> <p>No reply</p>
<p>Consultation Question 15</p> <p>Please provide any other comments you wish to make on the content of this consultation.</p> <p>This submission is on behalf of Rhondda Cynon Taff Welsh Liberal Democrats. The views reflect those of the local party only and not necessarily of the wider Party within Wales.</p> <p>Seeing as the Cabinet Secretary has by and large seen fit to simply re-present the proposals put forward by one of his predecessors then we make no apologies for repeating some of what we said in response to the 2016 consultation.</p> <p>As we stated then, we agree with the basic premise that there are currently too many local authorities in Wales and that there needs to be a reduction in number. Also that many of the existing Authorities are too small in size to provide value for money from a purely financial viewpoint, although it has to be recognised that some small authorities – Ceredigion being a prime example – perform very well. It is not always the case that the larger the authority the better the service, that depends on a wide variety of other factors. The process of creating larger authorities will, by itself, not solve the problem of poor service provision in too many instances.</p> <p>Again as we have said previously, where we disagree is on the detail and on a number of the assumptions made and we are disappointed that despite huge opposition and some very well-reasoned arguments against the plans last time they were presented we are once again faced with the same ill thought out and uncostered proposals.</p> <p>It appears that random numbers have just been plucked out of the air at various stages.</p> <p>The Commission on Public Service Governance and Delivery which concluded its review in 2013 recommended reducing the number of Local Authorities in Wales through a series of mergers.</p> <p>The Welsh Government accepted their arguments in a White Paper published in July 2014, which set out the Welsh Government's preference to merge local authorities on the basis of the Commission's Option 1, which would have resulted in 12 new Authorities.</p> <p>In 2015, the Welsh Government announced its preference for the future configuration of Local Government in Wales, based on 8 or 9 new principal local authorities. These proposals were widely condemned.</p>

Now we have a revamped proposal which sets a seemingly arbitrary figure of 10, again based simply on rubbing out existing border lines and pushing existing authorities together.

In the introduction there is talk of wanting to see more people coming into local government as Councillors, seeing strong democratic debate and accountability something nobody could disagree with, but we fail to see how anything in this report is going to bring this about. There are lots of fine words about more open ways of working and local accountability but no amount of reorganisation is going to bring that about. For that there needs to be a change in the mind set of those who have become far too used to walking in to power and holding on to it regardless of what they do. There is already plenty of pretence of consultation and valuing people's views but experience has shown that there is very little actual listening or taking notice of public opposition to certain plans.

A change in the way in which members are elected is the only way to address the democratic deficit in our local authorities. Councillors should be elected via STV – this should be compulsory not a voluntary option. At least then the electorate will know that every vote does indeed count.

There is no end to the inconsistencies being created by the proposals. The biggest proposed authority will be more than three and a half times the size of smallest population wise. Three of the new authorities will be smaller than RCT and Swansea are now and five will be smaller than Cardiff is now. Yet the proposal is to make Rhondda Cynon Taff, Swansea and Cardiff bigger than they already are. How can that fit in with the repeated mantra of local democracy which takes account of local communities and maintains democratic accountability.

RCT has already lost many of its services to Merthyr – its main Police presence and Magistrates Court for example. Health services including paediatric and maternity services have been polarised at Merthyr and Bridgend as part of the South Wales Programme. People here feel they are in forgotten territory and to further lose their identity in a merger with these two authorities will make them even more disillusioned with the democratic process.

How is local democracy going to be helped by making huge authorities even more physically remote from the people they serve? At least when there was a Mid Glamorgan County Council (which this almost takes us back to) there were also borough councils which gave a degree of localism. Community / Town councils are mentioned but these do not exist everywhere. All very well to speak of giving them greater powers and responsibilities, but what happens where they don't exist? There is then even more of a democratic imbalance.

What happens where services are being provided differently in local authorities that are to be merged? Merthyr for example has no sixth forms in their schools but instead have sixth form colleges. You cannot have such variations in different parts of the same authority.

Why is Powys being treated as a special case? There are other rural areas in Wales, although admittedly not as large. It does, however, make a mockery of all the reasons given for merging other authorities.

If the idea really is to revamp public services across Wales then look at them all and look at some more innovative solutions. Split existing councils where it makes geographical and demographic sense to do so and do it in line with a review of Assembly boundaries and of necessary a review of Health Board boundaries too – after all that is already being partially done by suggesting that Bridgend be moved into Cwm Taf UHB.

The Cabinet Secretary states that "I simply do not believe that this vision of powerful, robust and energised local government can be built without a serious debate about local government structures." So let's do just that – have a serious debate about serious solutions that offer genuine alternative for the benefit of the people, not a simple throwing together of existing authorities.

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



Dyddiad/Date: 8th June 2018

Dear Alun,

RE: Strengthening Local Government: Delivering for People

At the Full Council meeting on Wednesday, 28th March, Council Members agreed to establish two Working Groups of the Cabinet and Overview and Scrutiny Committee to consider the proposals outlined in the Green Paper. The comments and thoughts of both Working Groups were subsequently presented to Full Council at the meeting on Wednesday 25th April. Please find the response of Rhondda Cynon Taf County Borough Council outlined in the below.

The majority of Members supported the findings of the Working Groups in expressing reservations that the proposals outlined in the Green Paper do not sufficiently address the challenges faced by Local Government in an era of austerity, and that the pursuit of an increase in scale is not a solution to either the pressures on public finances or service delivery on a regional or national level.

Ultimately, the revisiting of the reform agenda has the potential to cause unnecessary concern and uncertainty in Local Government at a time when all focus should be on the protection of key frontline public services; whilst it also represents a stark contrast to the commitments given only recently by your predecessor, Professor Mark Drakeford AM, in guaranteeing that the current structure of Local Government would be in place for at least two full Council terms. It is the view of members that government policy should not change so significantly as a consequence of a Cabinet reshuffle. You will already be aware from your discussions with the WLGA that Local Authorities across Wales have been left confused and concerned by your announcement.

The Green Paper alleges that collaboration amongst Local Government has not developed as intended. However, a look across Wales will prove this

unsubstantiated as there are countless examples of effective regional working arrangements already in place, many of which have productively developed as a result of the direction set by the previous Cabinet Secretary. The most immediately obvious example of this can be seen in the City and Growth Deals currently established that are driving forward significant regeneration programmes by connecting associated services such as transport and planning in their respective regions. In addition to this, in Rhondda Cynon Taf alone, there are numerous examples of effective collaborative working arrangements that are delivering tangible and measurable outcomes, including the Central South Consortium which covers almost 400 schools and 30% of the total number of children in Wales. The CSC has contributed to an incremental improvement in attainment levels over the last five years and has demonstrated that effective regional collaboration has produced tangible and positive outcomes in education performance. This has led to the CSC being recognised as the best performing regional consortium in Wales by Estyn.

Local Government is continuing to prove itself capable of doing things differently and has risen to the challenge set by the Welsh Government in adopting a more collaborative approach to service delivery. Surely, given this positive progress and the previous commitments made, it makes more sense to encourage an extension of joint-working arrangements to cover regional footprints? Furthermore, many of the existing regional and even national examples of collaboration are delivering improved services through effective cross-party relationships.

Members of this Council are of the belief that robust local services need to be delivered by locally-based Authorities, and we have serious reservations about a programme of reform that would result in the creation of grossly inflated structures. This approach has been taken in health, with the present Cwm Taf UHB, the smallest Health Board in Wales, outperforming all other Local Health Boards. Under the proposals, RCT would be incorporated into a vastly wider geographical area containing over 400,000 residents dispersed across many different and unique communities. This clearly presents Local Government not only with challenges in the delivery of services, but also with issues of democratic engagement. The ERSC has previously called on the Welsh Government to exercise caution in proceeding with reorganisation plans, pointing to similar examples across Europe where the pursuit of similar programmes of reform have only served to increase voter apathy and undermine confidence in the Authority's ability to deliver services.

Most concerning for members of this Council, the Green Paper does not present any clear vision or detail for how the reorganisation process would be funded, and only presents estimated figures based on the failed plans of 2014. Fully costed and transparent funding arrangements are absolutely fundamental to any programme of reform receiving the support of local government, and simply recycling long outdated figures with a commitment to bring a new RIA forward is not enough. This Council is of the belief that the Welsh public would prefer to see the Welsh Government continuing to defend and invest in our much-valued public services instead of

pursuing a costly and arduous restructure that would involve huge sums of public money at a time of financial austerity for Welsh Councils.

Additionally, the Green Paper provides no guidance on the harmonisation of Council Tax levels or fees and charges - a matter of utmost concern to the public; whilst it would also present issues concerning staff retention and settlement costs, which would of course add further costs to the reorganisation bill. This Council has worked tirelessly to protect staff, where possible, and we have sought to provide a stable environment for our workforce, but the mere mention of reform has the potential to undermine staff confidence and performance. This is the true cost of reorganisation, and streamlining local government structures to achieve efficiencies would only serve to increase costs and pressures to other areas of public provision. This Council has saved over £2M in senior management savings over the last three years, having already been identified as having the lowest administrative costs of any Welsh Local Authority as part of a KPMG report commissioned by Welsh Government. We do not believe merging Rhondda Cynon Taf with our neighbouring Authorities would deliver any further senior management savings and would more likely increase costs based on the need to increase Senior Officers up to the same salary levels and reflect increased responsibilities.

The consultation also fails to sufficiently recognise that proceeding with any of the three options outlined would entail inherent challenges in service delivery in the period between the announcement of reform and vesting day. Whilst it is true that “blocking Authorities” could hamper the progress of the restructures, it pays little attention to the fact that larger Authorities will be able to expend far greater resources on the process than smaller Authorities, and therefore any progress can only occur at the rate of the slowest moving constituent Authority. This naturally creates its own problems in regards to service delivery in the interim, and can indeed prove extremely challenging as each constituent part must balance this with the inevitable competition for influence within the new structures.

Members also noted that a number of mergers proposed within the Green Paper create combined Authorities which would be smaller in population terms than Rhondda Cynon Taf currently is.

On a positive note, all members strongly welcomed the commitment to considering providing additional powers to local government in Wales, to allow greater opportunity to direct and influence areas which can address the many economic and social challenges our communities face now and in the future. As a result of the local connection that Councils provide to the needs of their communities, many members were keen to embrace the opportunity to further extend the ability of Councils to ensure such responsibilities and services can reflect and respond appropriately to local needs.

Nobody would argue that certain and selective change is needed, but the proposals outlined in the Green Paper are not sufficient in addressing the broader challenges facing local government. As Councils across England are now showing, larger Authorities are not necessarily more efficient, and they are ill-equipped to deal with continually increasing pressures on key services - particularly in social care and education. In this Council's view, reorganising local government is not the only answer to providing better services and managing the immense pressures on their delivery. Instead, we are calling for the Welsh Government to support the commitments provided by Professor Drakeford and assist in the furthering of collaborative, regional arrangements that would provide a more localised and effective means of service delivery without experiencing the unnecessary pain and distraction of reorganisation.

Yours Sincerely,

A handwritten signature in cursive script that reads "A Morgan".

Y Cynghorydd Andrew Morgan
Arweinydd Cyngor Bwrdeistref Sirol Rhondda Cynon Taf
Councillor Andrew Morgan
Leader of Rhondda Cynon Taf County Borough Council

Alun Davies AC,
Ysgrifennydd y Cabinet dros Lywodraeth Leol
a Gwasanaethau Cyhoeddus,
Llywodraeth Cymru,
5ed Llawr,
Tŷ Hywel,
Bae Caerdydd,
CF99 1NA



Dyddiad: 8 Mehefin 2018

Annwyl Alun,

Parthed: Cryfhau Llywodraeth Leol: Cyflawni dros ein Pobl

Yng nghyfarfod y Cyngor Llawn ddydd Mercher, 28 Mawrth, penderfynodd Aelodau sefydlu dau Weithgor – un y Cabinet a'r llall y Pwyllgor Trosolwg a Chraffu – er mwyn trafod y cynigion sy'n cael eu nodi yn y Papur Gwyrdd. Cafodd sylwadau a barn y ddau Weithgor eu cyflwyno, wedyn, i'r Cyngor Llawn yn ei gyfarfod ddydd Mercher 25 Ebrill. Fe gyflwynwn ni ymateb Cyngor Bwrdeistref Sirol Rhondda Cynon Taf isod.

Cytunodd y rhan fwyaf o Aelodau â chanfyddiadau'r Gweithgorau o ran mynegi peth amheuaeth nad yw'r cynigion, fel sydd wedi'u hamlinellu yn y Papur Gwyrdd, yn mynd i'r afael yn ddigonol â'r heriau sy'n wynebu Llywodraeth Leol mewn cyfnod o galedi ariannol, nac ychwaith, y byddai troi at gynyddu maint yn ateb y broblem o ran y straen sydd ar y pwrs cyhoeddus neu gynnal gwasanaethau yn rhanbarthol nac yn wladol.

Yn y bôn, gallai troi eto at yr agenda o ddiwygio beri, o bosib, bryder ac ansicrwydd diangen ym myd Llywodraeth Leol ar adeg pan ddylai'r ffocws cyfan fod ar ddiogelu gwasanaethau cyhoeddus rheng-flaen allweddol; yn ogystal â bod yn hollol groes i'r ymrwymïadau a gafodd eu rhoi gan eich rhagflaenydd, yr Athro Mark Drakeford AC, ynglŷn â sicrhau y byddai strwythur presennol Llywodraeth Leol yn ei le am ddau dymor llawn y Cynghorau, ar y lleiaf. Barn aelodau yw na ddylai polisi'r Llywodraeth newid mor sylweddol o ganlyniad i ad-drefnu'r Cabinet. Fe fyddwch chi'n gwybod yn barod, yn dilyn eich trafodaethau gyda Chymdeithas Llywodraeth Leol Cymru (WLGA) fod Awdurdodau Lleol ar draws Cymru wedi cael eu gadael mewn sefyllfa o ddryswch a phryder yn sgîl eich cyhoeddiad.

Honni y mae'r Papur Gwyrdd nad yw cydweithredu ym myd Llywodraeth Leol wedi datblygu fel roedd y bwriad. O gael edrych ar dystiolaeth ar draws Cymru, di-sail yw'r honiad hwnnw, gan fod enghreifftiau di-rif o drefniadau cydweithio rhanbarthol effeithiol i'w cael. Yn wir, fe gafodd llawer o'r rhain eu datblygu o ganlyniad i'r cyfeiriad a gafodd ei osod gan yr Ysgrifennydd i'r Cabinet blaenorol. Yr enghraifft fwyaf amlwg yn ddiweddar o hynny yw'r Cytundebau/Bargeinion Dinas/Twf sy'n cael eu sefydlu ar hyn o bryd ac sy'n gyrru rhaglenni adfywio sylweddol yn eu blaen trwy gysylltu gwasanaethau, megis trafniadaeth a chynllunio yn eu priod ranbarthau. Yn ogystal â hyn, yn Rhondda Cynon Taf er enghraifft, mae nifer o enghreifftiau o drefniadau cydweithio effeithiol sy'n dwyn canlyniadau a deilliannau gwirioneddol a mesuradwy, megis Consortiwm Canolbarth y De sy'n gwasanaethu bron 400 o ysgolion a 30% o'r plant i gyd yng Nghymru. Mae'r Consortiwm wedi cyfrannu at welliannau cynyddol mewn lefelau cyrhaeddiad dros y 5 mlynedd diwethaf, ac mae e wedi dangos bod cydweithredu effeithiol yn rhanbarthol wedi dwyn canlyniadau cadarnhaol a gwirioneddol o ran cyflawniad addysg. Mae hyn wedi arwain at y Consortiwm yn cael ei gydnabod fel y consortiwm rhanbarthol gorau yng Nghymru o ran ei gyflawniad gan Estyn.

Mae Llywodraeth Leol yn parhau i brofi'i hun yn alluog i wneud pethau'n wahanol, ac mae hi wedi ymateb i'r her sydd wedi'i gosod gan Lywodraeth Cymru o ran gweithredu dull mwy cydweithrediadol tuag at gynnal gwasanaethau. Ar sail y cynnydd cadarnhaol a'r ymrwymïadau blaenorol, siawns ei bod hi'n gwneud mwy o synnwyr i hybu estyn trefniadau cydweithio o fewn ôl-troed rhanbarthol? Yn ychwanegol at hynny, mae llawer o enghreifftiau o gydweithredu presennol, yn rhanbarthol ac hyd yn oed yn wladol, yn cyflawni gwasanaethau gwell trwy berthynas draws-bleidiol effeithiol.

Mae Aelodau o'r Cyngor hwn o'r farn fod angen i wasanaethau lleol cadarn gael eu cynnal gan Awdurdodau sydd â gwreiddiau lleol, ac mae pryderon go iawn gyda ni am y rhaglen o ddiwygio a fyddai'n golygu ffurfio strwythurau sydd wedi'u chwyddo'n ormodol. Mae'r dull yma i'w weld ym meysydd ieuchyd, gyda Bwrdd Iechyd Prifysgol Cwm Taf, y Bwrdd Iechyd Lleiaf yng Nghymru, yntau'n rhagori ar gyflawniad y Byrddau Iechyd Lleol eraill i gyd. O dan y cynlluniau, byddai RhCT yn cael ei ymgorffori yn rhan o ardal ddaearyddol llawer ehangach, a fyddai'n cynnwys dros 400,000 o drigolion, hwythau ar wasgar ar draws lliaws o gymunedau gwahanol ac unigryw. Mae hyn, wrth reswm, nid yn unig yn rhoi her i Lywodraeth Leol yn nhermau cynnal gwasanaethau, ond mae hefyd yn codi materion ynghylch ymgysylltu â democratiaeth. Mae'r Cyngor ar Ymchwil Economaidd a Chymdeithasol wedi galw ar Lywodraeth Cymru o'r blaen i bwyllo wrth fwrw ymlaen â chynlluniau ad-drefnu, gan dynnu sylw at enghreifftiau tebyg ar draws Ewrop lle mai unig effaith rhaglenni tebyg o ddiwygio fu corddi difaterwch ymhlith pleidleiswyr a thanseilio hyder yng ngallu'r Awdurdod i gynnal gwasanaethau.

Y prif bryder i Aelodau o'r Cyngor hwn yw'r ffaith nad yw'r Papur Gwyrdd yn nodi unrhyw weledigaeth/delfryd clir na manylion ynglŷn ag ariannu'r broses ad-drefnu,

gan nodi ffigurau ac amgyfrif ar sail y cynlluniau aflwyddiannus yn 2014 yn unig. Heb os nac oni bai, mae trefniadau wedi'u costio'n llawn a thryloyw yn hanfodol i unrhyw raglen o ddiwygio sy'n derbyn cefnogaeth llywodraeth leol, a dyw ailgylchu hen ffigurau gydag ymrwymiad i gyflwyno Asesiad Effaith Rheoleiddiol newydd ddim yn ddigon. Mae'r Cyngor hwn o'r farn y byddai'n well gan y cyhoedd yng Nghymru gweld Llywodraeth Cymru yn dal ati i ddiogelu'r gwasanaethau cyhoeddus gwerthfawr a pharhau i fuddsoddi ynddyn nhw, yn hytrach na mynd ar drywydd ail-strwythuro costus a blin a fyddai'n golygu symiau enfawr o arian cyhoeddus ar adeg llymder ariannol i Gynghorau Cymru.

Yn ychwanegol at hynny, dyw'r Papur Gwyrdd ddim yn nodi unrhyw gyfarwyddyd ynghylch cysoni lefel Treth y Cyngor, neu ffioedd a thaliadau - mater o gryn bryder i'r cyhoedd; yn ogystal â dod â materion ynghylch cadw staff a chostau talu i'r wyneb, a fyddai, wrth reswm, yn ychwanegu at gostau'r ad-drefnu. Mae'r Cyngor wedi gweithio'n ddiflino i ddiogelu staff, lle y bo'n bosibl, ac rydyn ni wedi ceisio darparu llwyfan sefydlog i'n gweithlu. Fe allai dim ond sôn am ad-drefnu andwyo hyder staff a gwanhau cyflawniad. Dyma wir gostau ad-drefnu, a byddai newid strwythurau llywodraeth leol at ddibenion gwireddu arbedion effeithlonrwydd dim ond yn arwain at gostau a phwysau cynyddol ar agweddau eraill ar ddarpariaeth gyhoeddus. Mae'r Cyngor wedi arbed dros £2 filiwn trwy arbedion ar haen yr Uwch Reolwyr dros y tair blynedd diwethaf, ac mae e wedi cael ei gydnabod bod ganddo'r costau gweinyddu lleiaf ymhlith Awdurdodau Lleol Cymru yn ôl adroddiad KPMG a gafodd ei gomisiynu gan Lywodraeth Cymru. Dydyn ni ddim o'r farn y byddai uno Rhondda Cynon Taf â'n hawdurdodau cyfagos yn esgor ar ragor o arbedion ar haen yr Uwch Reolwyr, ac y byddai'n fwy tebygol o gynyddu costau yn seiliedig ar yr angen i godi Uwch Swyddogion i'r un cyflogau gan adlewyrchu mwy o gyfrifoldebau.

Mae'r ymgynghoriad hefyd yn methu â chydabod yn ddigonol y byddai bwrw ymlaen ag unrhyw un o'r tri opsiwn sydd wedi'u nodi yn peri heriau cynhenid o ran cynnal gwasanaethau yn y cyfnod rhwng y diwrnod cyhoeddi'r ad-drefnu a'r diwrnod breinio. Er ei bod hi'n wir y gallai Awdurdodau sy'n "codi rhwystr" amharu ar hynt y gwaith ad-drefnu, prin yw'r sylw ynglŷn â'r ffaith y bydd modd i'r Awdurdodau mwy ddefnyddio llawer mwy o adnoddau ar y broses na'r Awdurdodau llai eu maint, ac felly dim ond yn ôl cyflymder yr Awdurdod cyfansoddol mwyaf araf y gall unrhyw gynnydd ddigwydd. Yn naturiol, mae hyn ynddo'i hun yn creu problemau mewn perthynas â chynnal gwasanaethau yn y cyfamser, ac yn wir y gall hyn fod yn her sylweddol gan y bydd raid i bob rhan gyfansoddol gydbwysu hyn â'r gystadleuaeth anochel am ddylanwad o dan y strwythurau newydd.

Nododd Aelodau hefyd fod nifer o'r cynigion uno yn y Papur Gwyrdd yn creu awdurdodau cyfun a fyddai'n llai yn nhermau poblogaeth nag ardal Rhondda Cynon Taf yn ei ffurf bresennol.

Ar nodyn cadarnhaol, rhoddodd pob aelod groeso brwd i'r ymrwymiad parthed ystyried rhoi pwerau ychwanegol i Lywodraeth Leol yng Nghymru, er mwyn rhoi mwy

o gyfle i gyfeirio a dylanwadu ardaloedd a meysydd sy'n gallu mynd i'r afael â'r heriau economaidd a chymdeithasol niferus sy'n wynebu'n cymunedau ni nawr ac yn y dyfodol. O ganlyniad i'r cysylltiadau lleol y mae Cynghorau'n darparu i anghenion eu cymunedau, roedd llawer o Aelodau yn awyddus i gofleidio'r cyfle i gryfhau gallu Cynghorau er mwyn sicrhau bod modd i'r cyfryw gyfrifoldebau a gwasanaethau adlewyrchu anghenion lleol, ac ymateb iddyn nhw mewn modd priodol.

Fyddai neb yn dadlau yn erbyn yr angen am newid penodol a dethol, ond dyw'r cynigion yn y Papur Gwyrdd ddim yn ddigonol i fynd i'r afael â'r heriau ehangach sy'n wynebu llywodraeth leol. Fel y mae Cynghorau ar draws Lloegr yn dangos, dyw Awdurdodau mwy ddim o reidrwydd yn rhai effeithlon, nac ychwaith mewn sefyllfa i ddelio â'r pwysau cynyddol ar wasanaethau allweddol - yn enwedig gofal cymdeithasol ac addysg. Ym marn y Cyngor, nid ad-drefnu llywodraeth leol yw'r ateb mewn perthynas â darparu gwasanaethau gwell a rheoli'r pwysau enfawr ar wasanaethau. Yn hytrach na hynny, rydyn ni'n galw ar Lywodraeth Cymru i barchu ymrwymadau a wnaed gan yr Athro Drakeford a bod yn gefn i hyrwyddo'r trefniadau cydweithio rhanbarthol ymhellach a fyddai'n darparu modd mwy lleol ac effeithiol o gynnal gwasanaethau heb brofi'r niwed ac ymyrraeth a ddeuai yn sgîl ad-drefnu.

Yn gywir iawn,



Y Cynghorydd Andrew Morgan
Arweinydd Cyngor Bwrdeistref Sirol Rhondda Cynon Taf
Councillor Andrew Morgan
Leader of Rhondda Cynon Taf County Borough Council

12 June 2018

Response from the Royal College of Nursing Wales to the consultation on Strengthening Local Government

The Royal College of Nursing is grateful for the opportunity to respond to this consultation. Whilst the consultation questions cover a number of specific areas, our response below focuses on a few overarching points relevant to the nursing profession.

It is widely agreed that the current working arrangements for local government in Wales mean that services are not delivered as efficiently or effectively as they should be, and the 22 existing local authorities are therefore not consistently able to deliver health and social care services to the standard that should be expected of them. These inefficiencies are due to a combination of factors such as some local authorities being too small to effectively commission specialist services, duplication of functions between authorities and services and, from a nursing perspective, the complexities of delivering care across local authorities and in different settings. The Royal College of Nursing Wales welcomes then the commitment from the Welsh Government to improve the responsiveness and accountability of local authorities.

Integration of health and social care

The Royal College also agrees with the general consensus that achieving closer integration between health and social care is central to improving the current system of service delivery. This was reflected in the final report from the Parliamentary Review which called for 'one system of seamless health and care for Wales' and 'bold new models of seamless care'. Greater integration does, in many ways, implies coterminosity between local authorities and local health board boundaries (and, where relevant, with primary care cluster catchment areas). The drivers for increased integration must of course be improving the quality of care and improving patient safety, and never solely the need to reduce costs and ease pressure on the system.

In the spirit of greater integration and closer alignment between services, one suggestion which the Royal College would like to put forward is for the Public Services Boards (PSBs) established by the Well-being of Future Generations Act, to be merged or combined with Regional Partnership Boards (RPBs). As acknowledged in the consultation document, there have been consistent calls for there to be fewer Public Services Boards. They also have similar roles in terms of assessing the well-being needs of the relevant populations, and devising plans about how to meet those needs; "parallel working" as noted in the consultation document. The recently published 'Healthier Wales' Plan for Health & Social Care, states that Regional Partnership Boards will "occupy a strong oversight and coordinating role" in helping to develop and deliver an increased level of integration between health and social care. Further consideration may want to be given therefore about how to streamline the functions of both the PSBs and RPBs in order to improve productivity, accountability and clarity around their roles.

In the context of integration, it is also important to take into account one of the founding principles of the NHS, that being that health care should be free at the point of delivery. This of course is not the case across all care settings within local authorities, with some services within the social care sector incurring charges. This is a fundamental difference between the two systems, and further consideration should be given as part of this consultation how they can be mutually accounted for and a level of consistency achieved across settings.

Senior representation

The fact that Wales is relatively early on in the process of integration, represents an opportunity for the nursing profession to be involved from the start, and to help shape the process. The nursing voice must be maintained at all levels, including the most senior level. Nurses are the single largest group of health care employees, delivering 80% of direct patient care. The profession has a high level of experience to call upon, and ensuring appropriate representation and involvement of the nursing profession is needed not only to ensure service development reflects the priorities and capacity of the workforce, but also to ensure that those best placed to advocate on behalf of patients are involved in designing and delivering services.

The Royal College of Nursing represents over 25,000 nurses, midwives, health visitors, nursing students and healthcare support workers across Wales. In the context of this consultation, it is important to note that approximately two-thirds of these members work in the community and independent sectors, meaning that they work outside of the hospital setting, often in people's homes and delivering care in community settings. As a result, there are significant parts of the nursing workforce who will be key to delivering the new integrated agenda, and will be at the centre of delivering on any future reforms to local government and the associated care systems.

Professional accountability

The process for investigating and following-up areas of concern and failures in delivery needs careful consideration, as inevitably there will sometimes be a variety of professions and therefore different regulators involved. There must be clear lines of accountability in order to ensure that, in the unfortunate situation when failings occur, it is absolutely clear who has the responsibility for investigating and reporting, and subsequently being held to account. This will need to involve communication between the authorities involved (perhaps with an underlying Memorandum of Understanding to outline how the relationship must work) and a well-defined and transparent process which is understood and adhered to across sectors.

Community Health Council/Democratic accountability

As a membership organisation which aims to influence and contribute to public policy, nursing policy and standards, we actively encourage our members to engage and lobby where appropriate. We are therefore supportive of the aims in the consultation to strengthening local democracy, with a greater level of engagement and scrutiny of local government. We also maintain that any changes to existing systems, must

incorporate Community Health Councils (CHCs) to ensure that the invaluable role they play in representing the interests of the users of NHS Wales and the public, is factored in and promoted.

CHCs are an important mechanism which allow for the public to have a voice in their local health services, the way they are delivered and in any proposals to change service delivery. They also provide a mechanism by which the patient perspective is represented and incorporated into decision making. At their best, CHCs can provide both an independent patient voice, whilst also providing local health bodies with a strategic partner in designing and delivering local services. This not only means that local communities are able to be involved in the way their local health services are run, it can also mean that the public have a greater confidence in their NHS because the CHCs have enabled them to have a voice.

To that end, it is essential that there is a clear and accessible complaints system available to patients, service users and the general public, regardless of what service is in question. The governance routes surrounding the complaints system must be clear and understood by all parties, to ensure that complaints are followed up promptly and effectively, and not delayed by any ambiguity in the system.

Also essential is the need for the process of redesigning local service delivery to be transparent and properly communicated to the profession and the public. For instance, the jointly produced population needs assessments and well-being area plans produced by Regional Partnership Boards, should be shared and publicised widely, with a view to getting feedback and input from relevant partners and stakeholders, particularly those likely to be involved in delivering the plan.

IT & Infrastructure

World-class health and care services cannot be achieved without an infrastructure for information management and supportive technology, RCN Wales maintains that there should be a renewed focus on investing in eHealth. In order to be able to effectively plan, deliver and subsequently performance manage the services delivered across local authorities in Wales, the appropriate activity and outcomes data must be collected, recorded and reported. Without this, the necessary data will not be available to make informed decisions about the services required and how they are to be delivered in the future. Not only is appropriate investment needed to ensure this infrastructure is in place, a level of national oversight and coordination is also required by Welsh Government in order to ensure consistency and quality.

About the Royal College of Nursing

The RCN is the world's largest professional union of nurses, representing over 430,000 nurses, midwives, health visitors and nursing students, including over 25,000 members in Wales. The majority of RCN members work in the NHS with around a quarter working in the independent sector. The RCN works locally, nationally and internationally to promote standards of care and the interests of patients and nurses,

and of nursing as a profession. The RCN is a UK-wide organisation, with its own National Boards for Wales, Scotland and Northern Ireland. The RCN is a major contributor to nursing practice, standards of care, and public policy as it affects health and nursing. The RCN represents nurses and nursing, promotes excellence in practice and shapes health policies.



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12 June 2018

e-mail response sent to: StrengtheningLocalGov@gov.wales

Dear Sir/Madam,

Response to: Strengthening Local Government: Delivering for Local People

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 25,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

The response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

Thank you for the opportunity to contribute our views to the above consultation.

Our response to the consultation questions are set out below.

If you require further assistance, please contact RTPI Cymru on 029 2047 3923 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,

Dr Roisin Willmott OBE FRTPi
Director
RTPI Cymru

General Comments

We are responding to this consultation in particular from a perspective of looking to safeguard and strengthen the delivery of local authority planning services in Wales. In doing so, we have particular regard to the Welsh Government's Prosperity for All strategy, and its recognition of the planning system as one of the four key levers to deliver its central goal of prosperity for all. As the strategy says: *"The right planning system is critical to delivering our objectives in this strategy."*

In this context, we note with concern the reduction in resources which have taken place in the delivery of planning services through the local authorities in recent years. We are not convinced that the merger of authorities as proposed in the consultation document will on its own be sufficient to address the financial and service pressures experienced by planning authorities. Mechanisms need to be found for putting more resources into local authority planning services.

In June, we published figures which demonstrated the value that planning services bring to their areas and provide evidence to explain the benefits of a strong planning service. Details can be found at: <http://rtpi.org.uk/media/2896429/Value-of-Planning-Handout.pdf>

We have no comments in relation to many of the specific questions, but have concentrated our comments on those where we have particular issues and concerns.

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?

We welcome the recognition in the document (para 2.18) that strategic land use and transport planning is needed at the regional level. The Planning (Wales) Act 2015 makes provision for Strategic Development Plans to be prepared at the regional level, and the recent Planning Policy Wales consultation encourages their preparation. However, progress has been disappointing, reflecting the underfunding problems highlighted above. There is a strong case for the Welsh Government to take a more leading role in ensuring that planning authorities prioritise their preparation.

There are already areas of collaboration between authorities at the regional or sub-regional level in specialist areas of planning, including minerals, waste and flood risk management, and we would hope that these arrangements will be supported and encouraged.

On transport planning, we note that some local authorities have collaborated on the preparation of their Local Transport Plans at the regional or sub-regional level, while others have prepared them individually. We hope that all authorities will be encouraged to prepare them collaboratively when they are next updated, and that they will be prepared in an integrated manner with Strategic Development Plans.

We note that, in South East Wales, the local authorities have collaborated in creating a non-statutory regional transport authority in support of the City Deal. We believe that the Welsh Government should consider the use of its powers to create a statutory regional Passenger Transport Authority (PTA) for this region and other regions in Wales. A critical benefit of a PTA is the ability to levy a precept on council tax bills. This would provide a source of revenue funding for bus and rail services, and would widen opportunities for borrowing. It would also level up the playing field in competing with the English city regions.

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

No comment.

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

RTPI Cymru believes that there is a need to ensure that there are sufficient elected Members to enable the effective, democratic input to the discharge of local government functions, including planning. We feel that the establishment of significantly larger local authorities and in particular LPAs would give rise to concerns regarding the ability to connect with local communities. The perception of remoteness and peripherality is an issue at present, particularly for the large rural counties, and this would be significantly more difficult to address if authorities were geographically larger and lacked the sense of identity that the current authorities have.

Performance figures for the LPAs across Wales do not demonstrate that larger authorities necessarily perform better. We are concerned about the impact of a reduction in the numbers of councillors could have on their ability to effectively engage in the planning processes involved in dealing with planning applications and LDPs, which could in turn lead to a greater distancing between Council Members and electors, with the risk of creating a democratic deficit.

Interaction with community and town councils is an important part of the planning process. We note there is a Cross Party Independent Review of the Community and Town Council Sector underway. We understand its final report is due in October 2018 - <https://gov.wales/topics/localgovernment/communitytowncouncils/review-of-community-town-council-sector/?lang=en>

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

No comment

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

No comment

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?

Discussion around local government reorganisation has been taking place over a considerable number of years and this causes uncertainty for those not only working in the sector but also those engaging. This includes investors looking to take forward projects and decisions. It is important that clarity is provided to avoid the confusion and uncertainty the ongoing discussions are having.

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

In the event of mergers being progressed, new authorities' boundaries should be determined by the way in which people live their lives, reflecting travel to work patterns and housing markets. It is essential that they are based on evidence.

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

No comment.

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

No comment.

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?

If local authority boundaries are to be changed, it would also be worth reviewing other public boundaries to enable a strong framework for joint working across sectors and in particular within the context of the Public Service Boards and taking forward the Well-being of Future Generations Act.

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 would be worth reviewing lessons learned in the 1996 local government reorganisation in terms of transition, but recognising that at this time use of IT was minimal.

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?

No comment.
c) Do you have any other thoughts on the proposed process?
No comment.
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.
No comment.
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?
No comment.
Consultation Question 6 What are your views on the approach which should be taken to determining the parameters of electoral reviews?
No comment.

Chapter 6
Consultation Question 7
a) How can councils make more effective use of their elected members knowledge of, and connections in, their communities?
No comment.
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?
RTPI Cymru commissioned research into the effectiveness of Planning Committees in Wales. A number of the findings from this study would be relevant here, including the need for compulsory training for members and also 'customer care' arrangements for the public. The study can be found at: http://www.rtpi.org.uk/the-rtpi-near-you/rtpi-cymru/policy-in-wales/wales-legislative-programme/study-into-the-operation-of-planning-committees-in-wales/
Consultation Question 8
a) Are there other powers which local government should have? If so, what are they?

No comment.
b) Are there other freedoms or flexibilities which local government should have? If so, what are they?
No comment.
<u>Consultation Question 9</u>
a) Which areas offer the greatest scope for shared transactional services?
In a planning context, we would recommend consideration of strategic issues, which include those land uses which by their nature cross multiple boundaries, such as transport.
b) How might such arrangements be best developed?
Through Strategic Development Plans and the National Development Framework.
<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?
No comment.
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?
No comment.
d) Which of the issues identified above or in your response should be prioritised for early resolution?
No comment.
<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?
No comment.
b) How could positive effects be increased, or negative effects be mitigated?
No comment.
<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.

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?

No comment.

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?

No comment.

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.

The consultation draft update of Planning Policy Wales encourages the preparation of Place Plans at the community or neighbourhood level as "a powerful tool to promote collaborative action and placemaking". In areas with town or community councils, it is expected that these local councils will take the lead in initiating the preparation of Place Plans. However, those parts of Wales which lack town or community councils are not well-placed to engage in collaborative action in this way, and are at a disadvantage, experiencing a democratic deficit which we feel would be worsened in the event of local authorities merging to create larger authorities.

We therefore refer again to the ongoing review of town and community councils, mentioned at Q1, c.