

Annex C: Consultation Questions

Your Name	
Organisation (if applicable)	Chepstow Town Council
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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?
Communication should be improved to ensure that the County Councils fully understand regional working and are able to explain this clearer to the population.
b) What are your views on the common elements to the process of mergers we outline in this section?
In the long run they will be more cost effective in relation to core services. However disappointment that redundancies will occur and thought will need to be given to the process which is taken in relation to the mergers and staff.
c) What are your views on the options for creating fewer, larger authorities which we have set out?
In agreement but need to look at the long term effects ie during the transition periods vulnerable people could fall through the net therefore the transfer needs to be tightly managed.
d) Are there other options for creating fewer, larger authorities we should consider?
The number of Councillors allocated to each ward and how this would be calculated against population.
e) Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.
No.

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?
Yes this is essential but needs to be communicated well to the public.
b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?
Yes.
c) What are your views on the new areas suggested in this section?
Good as it will be each County a more diverse population.
d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?
None.
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?
Impossible to answer with the information given.

Chapter 5
<u>Consultation Question 3</u> Chapter 5 sets out the proposed approach to transition and implications for establishing Transition Committees and elections to Shadow Authorities under each option.
a) Do you agree with the proposed process of transition: namely establishing Transition Committees and ensuring elections to Shadow Authorities can be held ahead of vesting day for the new authorities?
Yes - people involved need to be representative of the population and the area.
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?
Absolutely.
c) Do you have any other thoughts on the proposed process?
Yes but it's not clear from the document if this is a proposal or consultation and if there are any further consultation stages to occur to get to the end result.

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.

Yes as the population of Monmouthshire voted Councillors in of a 5 year term.

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?

More information is required as they are newly formed and Town Councils need more information on their remit.

Consultation Question 6

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

Depending on the proposal which is agreed, further consultation would need to happen on the approach.

Chapter 6

Consultation Question 7

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

Introduction a maximum term for Councillors.

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?

Remuneration based on position may have a detrimental effect and motivate Councillors for the wrong reasons. Target measures should be put in place for success and Councillors should undertake training prior to any remuneration. Introduction of an appraisal process for County Councillors.

Consultation Question 8

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

Unable to answer given the detail in the document.

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

Unable to answer given the detail in the document.

<u>Consultation Question 9</u>
a) Which areas offer the greatest scope for shared transactional services?
Little knowledge of collaborative working however Highways, Social Services and Waste could be more efficient and reduce costs.
b) How might such arrangements be best developed?
Once the proposal has been decided this question can be better answered.
<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?
Internal emails, social media, Welsh Government, newspapers, tv adverts, cinema - in order to reach as far and wide as possible.
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?
Ensure that there is consistent communication with the welsh population.
d) Which of the issues identified above or in your response should be prioritised for early resolution?
Consultation on the preferred option should have happened first to enable people to better answer this consultation.
<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?
Anything which encourages the use of the Welsh Language - nothing in the consultation suggests and changes.
b) How could positive effects be increased, or negative effects be mitigated?
As above.
<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.
Promote the use of the Welsh Language and offer free courses to staff and Councillors.

<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>Already covered by the Future Generations and Well-Being acts.</p>
<p>b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?</p> <p>Find a way to reach out and engage with the young people. Network with schools and considered inclusion in the curriculum.</p>
<p><u>Consultation Question 14</u></p> <p>The Equalities Impact Assessment published alongside the consultation outlines the Welsh Government’s view of the effect of the proposals contained in the consultation on protected groups under the Equality Act 2010. The Welsh Government seeks views on that assessment.</p>
<p>a) Are there any other positive or adverse effects not identified in the assessment?</p> <p>Consideration must be given to how boundary changes will impact on transient people to enable service to be used.</p>
<p>b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?</p> <p>Unknown.</p>
<p><u>Consultation Question 15</u></p> <p>Please provide any other comments you wish to make on the content of this consultation.</p>
<p>More clarity regarding the questions, consultation should be been on proposals prior to this consultation.</p>

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**Chartered
Institute of
Housing**
Cymru

Strengthening Local Government: Delivering for People

CIH Cymru consultation response

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple – to provide housing professionals with the advice, support and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world. Further information is available at: www.cih.org

In Wales, we aim to provide a professional and impartial voice for housing across all sectors to emphasise the particular context of housing in Wales and to work with organisations to identify housing solutions.

For further information on this response please contact
Matthew Kennedy, policy & public affairs manager
at the above address or email matthew.kennedy@cih.org

General Comments

CIH Cymru welcomes the opportunity to provide information to inform the Law Commission's review and formulation of a new planning code for Wales.

Our response is informed by feedback from our members, our knowledge of the housing industry and expertise from our policy and practice teams.

CIH Cymru supports the development of Welsh policies, practices and legislation that aim to address the key housing challenges we face, to improve standards and supply, promote community cohesion, tackle poverty and promote equality. We promote a *one housing system* approach that:

- places the delivery of additional affordable housing at the top of national, regional and local strategies as a primary method of tackling the housing crisis;
- secures investment to ensure the high and sustainable quality of all homes in a sustainable framework;
- improves standards and develops the consumer voice within the private rented sector
- promotes the concept of housing led regeneration to capture the added value that housing brings in terms of economic, social and environmental outcomes;
- recognises that meeting the housing needs of our communities is a key aspect of tackling inequality and poverty;
- ensures that that there are properly resourced support services in place to prevent homelessness and protect the most vulnerable;
- uses current and potential legislative and financial powers to intervene in housing markets and benefit schemes;
- promotes consumer rights & tenant involvement;
- and supports the continued professional development of housing practitioners.

Introduction

The future of local government is a subject of vital importance to the work of the housing sector across Wales. Local authorities undertake a wide range of activities in supporting and enabling more homes to be built and housing related support services to operate across Wales.

As an organisation our membership spans housing association, local authority and private rented sector professionals. In this context we have a substantial interest in ensuring the discussions surrounding the proposed mergers and wider local government reform agenda remain true to the need of housing professionals tasked with delivering a range of services.

The housing landscape for local authorities has changed considerably and the current picture is one of variation across Wales. With some authorities continuing to operate, maintain and manage their own housing stock, whilst others have voluntarily transferred their stock creating in most cases, large housing associations tasked with managing housing stock previously held by a local authority. Whilst this process has been completed on the basis of democracy, it nonetheless creates some interesting scenarios where proposed mergers would see stock retaining and non-stock retaining authorities coming together.

We believe that it is important that the voice of housing professionals is recognised within the context of this consultation. Through our Tyfu Tai Cymru project, we have undertaken a survey of local authority housing professionals seeking their views on the proposals and we have included a full report on this survey in the 'additional information' section of this response.

In the following, we have responded to the consultation questions most relevant to our work as a membership body and to the work of our members.

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?*
- b) What are your views on the common elements to the process of mergers we outline in this section?*
- c) What are your views on the options for creating fewer, larger authorities which we have set out?*

Response

We note that different to the previous white paper on local government reform this green paper does not mention the creation of 'Joint Governance Committees' to progress regional working between authorities. This at the time seemed like a common sense, practical approach to progressing collaboration across departments and services.

Previously in our response we highlighted that our members felt the creation of regional “Joint Governance Committees” would offer a useful governance model in taking forward regional functions. For these committees to be fully effective it will be imperative that they receive up to date information on all matter being exercise regionally. Membership of the board should be accompanied by a robust strategy of briefings, learning and development and the relevant expertise drawn in as required.

Many authorities have traditionally set-up successful ways of working regionally. Under the banner of the Supporting People Programme, Regional Collaborative Committees were established to take forward the new grant arrangements and ensure all stakeholders could advice on how services are commissioned, evaluated, collect data etc. These committees are a good example of where representatives from local authorities, housing, health, social services, public protection and environmental health have all come together to jointly consider the advice provided to commissioners and other stakeholders on how services should be planned and reflected locally. Despite working slightly differently in each area, we believe this is one example where lessons should be drawn from to inform how regional working could be done in the future.

In North Wales, two initiatives represent positive steps forward in regional working. The first of which has seen all local authorities in North Wales come together to discuss producing a joint homelessness strategy, required under the Housing (Wales) Act 2014. Facilitated by CIH Cymru Director Matt Dicks, the group has considered how joint planning around homelessness services and activities could benefit across the entire region whilst reducing duplication in how these plans are drawn up by each individual authority.

The second example has been realised through ‘Movement 2025’ – a collaborative of health board, housing and local authority colleagues working to reduce avoidable health inequalities across North Wales. Each organisation provides a financial contribution to the project which in turn pilots new ways of working between partners in different areas and has to date undertaken work on matters such as social prescribing and reducing delayed transfer of care. Despite the legislative focus on health and social care working together, we strongly believe that incorporating housing into the discussion, as an equal partner, is a vital part of this equation – demonstrated clearly by this collaborative work. Again we believe learning from approaches like this is a vital part of how change is considered and taken forward in future arrangements.

The common features identified in the consultation appear to be reasonable. Providing clarity should be a priority throughout this process. A key theme which emerged from the Tyfu Tai Cymru research was that staff often felt unaware of the implications merger could have on their own department/role. We believe a key feature common to any process undertaken should be the existence of a comprehensive communication and engagement plan to ensure staff feel empowered and fully informed of any changes and have a clear voice in raising concerns or highlighting opportunities for positive changes.

On the option for creating fewer, larger authorities there is clear recognition within the consultation that plans similar to these have been proposed previously and previous attempts to for more regional working have produced varying results. We believe that regardless of the option preferred by authorities there is an urgent need to provide a sense of stability to those working on delivering services at the frontline.

Whilst we equally not wish to see an overly prescriptive process underpinning proposals for mergers, we believe that proposals should receive sufficient guidance in the interest of ensuring all efforts and resources which go in to producing proposals are well-informed.

Some members felt that the impact of proposals previously being rejected may have a legacy and that this in itself could be a barrier to future proposals being brought forward in the absence of sufficient guidance to inform the conditions for success.

Minimum expectation mergers should include:

- Detailed analysis of implication for the workforce
- Clear strategy for consulting the public and other stakeholders
- A clear understanding of the benefits gained through merging
- A clear understanding of the risks presented by merger and the steps to mitigating these

Question 2

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

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

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

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?

Response

We agree that providing clarity on the future footprint of local government is important. Local authority housing departments differ between authorities, but overall manage and provide a wide variety of services. This can include developing new homes, upgrading existing housing, community engagement, anti-social behaviour, installing housing adaptations and housing-related support services.

All of these services require certainty relating to the footprint on which the local authority is required to deliver services. As local authorities undertake assessments of housing need, they need certainty over the long-term longevity of the data they use, and plan where resources are focussed appropriately. We believe it is important that whilst clarity is established, support from authorities as a whole for the way forward is also nurtured.

Public Service Boards (PSB) have a key role to play in ensuring collaboration, across regions is achieved. At present however, this does not include a voice representing the housing sector on every PSB. Ensuring there is consistent representation from housing professionals on these boards would further aid their effectiveness.

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?

Response

The process outlined seems reasonable. Our primary concern however is the scale of work that will need to be undertaken by Transition Committees. Focussing on housing departments alone, the work required to ensure mergers take account of the different demographics, services, and make-up of housing functions is considerable. This will require expertise and insight from the housing profession on an on-going basis. We would strongly urge any terms of reference for the Transition Committees to embody a commitment to working closely with professionals at all levels with housing departments when focusing on this area.

Our Tyfu Tai Cymru research included in this response highlighted the views of local authority housing professionals regarding the proposed mergers. Whilst their views included many positive comments on the possible opportunities mergers may bring, many highlighted the need for more preparatory work.

As outlined in our research, the proposed mergers could provide a timely opportunity to focus on service innovation and to take a step back and consider how things could be done differently. This could include more effective use of new technology and IT systems, closer working between elected officials and housing officers and improve mechanisms for staff engagement.

Question 8

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

Response

Local authority house building is entering a critical period. As the Welsh Government seeks to achieve its 20,000 affordable homes target, local authorities have a crucial role to play in contributing towards this and future ambitions. As local authorities enter a period where renewed powers to begin building homes once again represents a positive step forward in ensuring we maximise our ability to boost the supply of affordable, accessible homes in Wales.

In order to fulfil their role effectively, local authorities will require further flexibility around borrowing to invest in developing new homes. The Minister for Housing and Regeneration announced her intention to explore how extra capacity in housing revenue account borrowing identified within some authorities could be spread to those authorities now seeking to accelerate their development programmes. We feel that this should be done with real urgency and local authorities should be provided with greater certainty over the level of investment they can realistically achieve through this measure.

Question 10

- a) In ensuring we deliver a consistent approach across Wales, where consistency is important, how do you think the advice and support on each of these matters could be best provided?
- c) Which of the issues identified above or in your response should be prioritised for early resolution?

Response

As highlighted previously, local authorities have an important role to play in supporting the delivery of Welsh Government's 20,000 affordable homes target. Ensuring that departments have a consistent and solid foundation upon which to work through is vital in ensuring local authorities can realistically help achieve this ambition.

As our report included as part of this submission highlights, as well as some positive views of merger that are also some significant negative feels towards the proposals from some stuff with a number of concerns. We believe that if merger is to be successful then it must be underpinned by a culture which is jointly working towards the same ambition.

Communicating clearly and frequently with local authority staff should be prioritised throughout the merger process. Ample opportunity should be provided for stuff to fully feed-in their views and expertise into how service could be delivered under the new footprint. For housing delivery this could mean exploring how authorities with and those without stock come together to provide a high quality service over a larger geographical area.

Additional Information

Background

Tyfu Tai Cymru (TTC) is a 5-year housing policy project with a focus on providing insightful analysis and filling evidence gaps to support policy progression. Funded by the Oak Foundation the project is managed by the Chartered Institute of Housing Cymru. TTC works across three key strands:

- Building the right homes to meet demand
- Making sure housing is always a priority for local government
- Demonstrating housing's role in keeping people well and healthy

Building the right homes to meet demand is vital given the current housing need in Wales, the increase in the ageing population and the need to prepare the right homes for future generations. We welcome the Welsh Government's 20,000 affordable homes target and the emphasis on housing within 'Prosperity for All' – working towards this ambition alongside accelerating delivery should also drive up standards, quality and accessibility.

Making sure housing is always a priority for Local Government, particularly as local authorities continue to consider how best to deliver high quality public services against the backdrop of austerity is vitally important. For us, understanding how housing functions within local authorities operate in this climate is imperative, particularly given the varying

picture of housing functions across Wales, and the recent drive for local authorities to begin building homes again.

Demonstrating housing's role in keeping people well and healthy is something that is recognised as vital by many people from the housing sector across Wales. Innovative practices have led to reductions in delayed discharges from hospital, less pressure on GP services, and the speeding-up of the installation of vital home adaptations. The TTC project will focus on how this practice can be spread and shared across Wales to ensure everyone is able to access fair and consistent services no matter where they live.

Mirroring the remit of CIH Cymru, the TTC project operates on a cross-tenure basis, recognising the need to ensure that whether renting or buying, people should have access to a safe, secure, affordable home.

In addition to a governance group made-up of experts from across the housing sector, the project team comprises:

Catherine.may@cih.org (Tyfu Tai Cymru Manager, CIH Cymru)

Matthew.kennedy@cih.org (Policy & Public Affairs Manager, CIH Cymru)

Matthew.dicks@cih.org (Director, CIH Cymru)

Sharon.dean@cih.org (Customer Support Coordinator, CIH Cymru)

1. Introduction

One of the aims of the Tyfu Tai Cymru project is to build the profile of housing in local government by amplifying the voices of professionals in housing departments across Wales. This report focuses on the proposed reforms of local government, with our response shaped by what staff told us about their expectations of this major shift in the public sector landscape.

Local Government reform is being conducted in-line with the aspiration of Welsh Government, who stated in 'Prosperity for All' that:

"Achieving our ambitions for Wales will require a different relationship not just between the Welsh Government and local authorities, but also between local authorities themselves. It is only through closer work, on a consistent regional basis, that the resilience and responsiveness of services can be maintained in the future"

In progressing the practicalities of delivering on this aim the Cabinet Secretary for Local Government and Public Services launched the Consultation Green Paper, 'Strengthening Local Government, Delivering for People' on 20 March 2018.

The Green Paper puts forward different ways through which local authorities could potentially merge – from voluntary mergers, to a phased approach with early adopters merging first and then followed by others, to a comprehensive merger programme. Recognising the desire of the Welsh Government to be informed by people with the most relevant experience, we launched a short survey to understand the experiences of housing professionals working within local authorities and attitudes towards the proposed mergers.

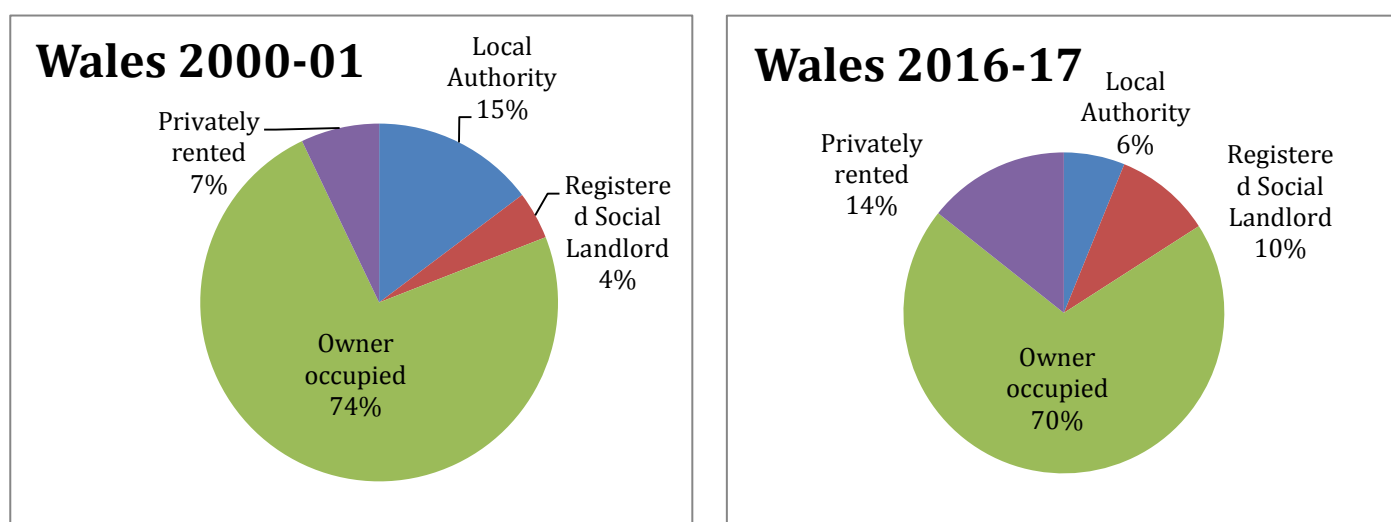
This report reflects the views of some housing professionals working within local authorities across Wales. Its purpose is to provide a sense of how previous changes and these most

recent proposals could impact the delivery of housing functions by housing professionals working within those authorities. Through this report, we wish to highlight the impact, both positive and negative. The findings demonstrate the range of opinions held about the reforms, from those who feel very strongly that they will have a negative impact on the services they deliver to those who feel the transformation is needed.

2. The housing picture in Wales

The housing functions delivered by local authorities differ greatly depending on how services are structured by individual authorities and if an authority has transferred its stock, or not. By 'housing functions' we are referring to the range of activities local authorities undertakes to meet housing need – including preventing homelessness, housing management, stock improvement, managing empty homes and providing adaptations. The state of housing tenure in Wales has changed significantly in the last couple of decades:

¹

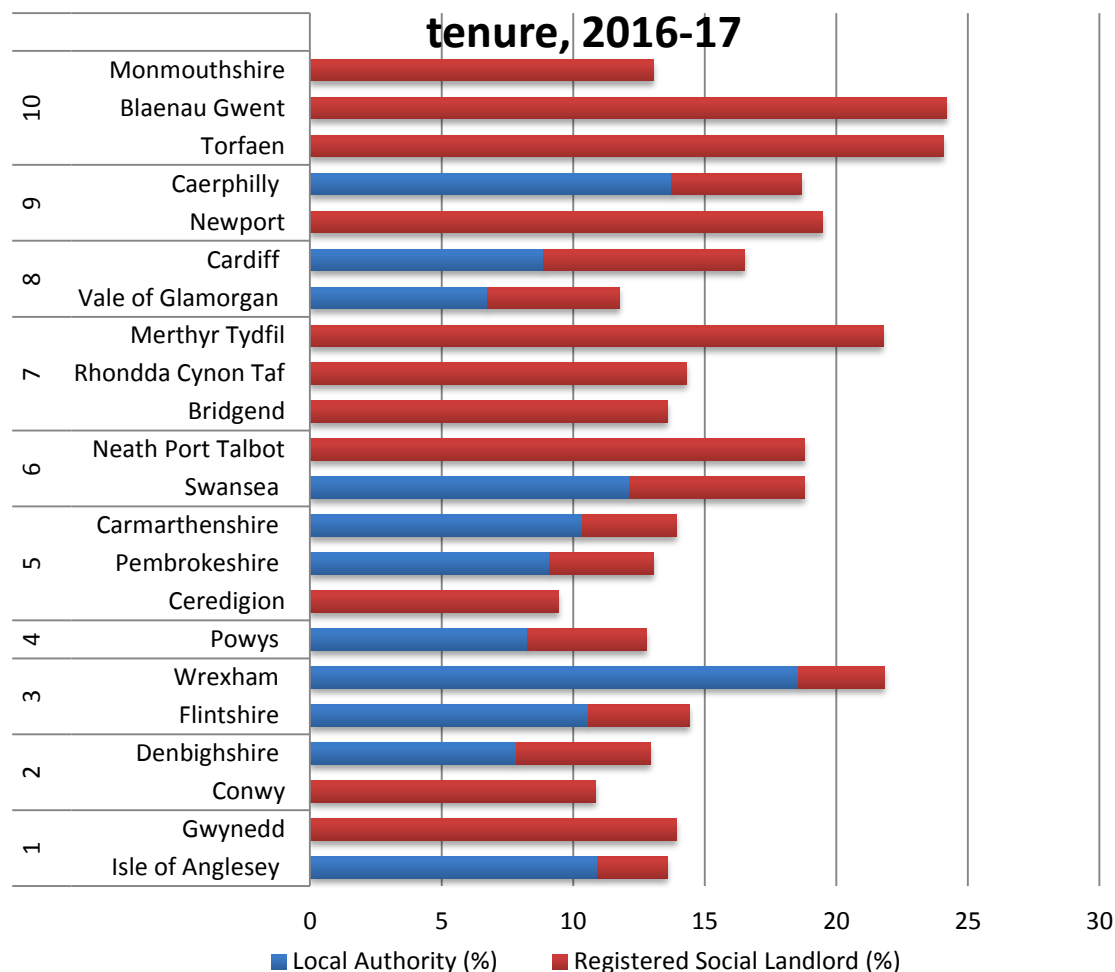


In the time period 2000/01 – 2016/17 the number of homes managed by local authorities has reduced from 15% of dwellings to 6% currently. This reduction is due in part to those authorities who transferred their stock wholesale via a large scale voluntary transfer arrangement and the sale of local authority homes. The period has also seen significant growth in the housing association and private rented sectors.

Over this time ten local authorities have transferred control of their housing stock through a large-scale voluntary transfer. This has resulted in a number of housing associations being formed to manage what was previously stock managed by a local authority. The following table reflects the current composition of housing stock between housing associations and local authorities across Wales according to the proposed regional areas set-out in the Green Paper.

¹ Stats Wales - <https://statswales.gov.wales/Catalogue/Housing/Dwelling-Stock-Estimates/dwellingstockestimates-by-localauthority-tenure> - Accessed 01/06/2018

Dwelling stock estimate by local authority and tenure, 2016-17



Building new homes

The Welsh Government commitment to building 20,000 affordable homes by 2020 signified a policy-shift with the announcement that local authorities could build new homes once again. For local authorities the focus on continuing to re-invigorate their housing development function is entering a critical period:

“The ‘housing supply pact’ signed in 2016 commits associations to delivering 12,500 of the five-year target, with councils contributing 1,000 units. While the associations are close to achieving this, local authorities will need to double their output (they built just 121 new homes in 2016/17).” - (UK Housing Review, Chartered Institute of Housing, 2017)

As the picture of housing continues to change in Wales, the proposals put forward to reform local government could have a considerable impact on how local authorities play their part. The following sections consider the findings of our survey of local authority housing professionals where we consider in detail the opportunities and challenges posed by the merger agenda.

2. Our research

Who did we speak to?

We surveyed staff from all 22 local authorities using contact details we held and social media to promote the survey.

We received 31 responses, from 16 different areas of Wales. All responses were anonymised to ensure that staff felt confident to share their views. We asked people about their role and respondents held a range of roles in their organisations; including Tenant Liaison, Housing Officers and Managers, Heads of Services, Planning and Services and Commissioning.

We are really grateful to those who gave their time to complete the survey. The submissions were so rich in detail we have included quotes throughout this report to ensure we are being led by their views.

4. Findings of our survey

Learning from experience

Recognising the importance of learning from experience, we asked people if they had experience of merging services before, 65% of respondents replied they had no experience of this. Those who had told us about:

- Positive experiences of services merging which had resulted in more streamlined services between contracted services and staff experiencing less travelling time.
- Some larger mergers had been managed poorly, with long delays before they were able to deliver services in a meaningful manner
- A perceived sense of loss amongst some elected officials who then demonstrated a reluctance to engage in the process
- A sense that there was not enough preparatory work done beforehand to prepare staff and councillors for the change. Also that major decisions about the final structures were taken at the last minute.

One respondent highlighted:

“There should have been more done with councillors to stop them fighting over decisions not in their remit. Their fighting overshadowed what could have been a positive process. If the political process had been better, officers would have handled the change better.”

Fewer, larger authorities - what would work well?

We then asked respondents what they thought would be the positive impact of creating fewer, larger authorities. Less than a third (8 out of 30) could not identify a positive impact. The rest of the respondents identified the following positive implications of proposed mergers.

More resources

A number of respondents identified that merging would offer opportunities for capacity within their own department to be increased, highlighting that this would have better outcomes for tenants and communities.

Respondents told us that the pooling of financial and staff resources would facilitate greater opportunities to learn from best practice about what works. This included opportunities to realise savings through procurement and economies of scale in addition to access to skilled-trade staff to both build new homes and maintain existing properties.

“less discrepancy in services for the public, more joined up working, better overview”

“share roles and research rather than reinventing the wheel”

“been talked about for a long time, needs to happen”

Collaboration

Some respondents highlighted that for tenants, aside from the potential increase in the quality of service received there would be potentially a wider range of properties to access: “develop work around the private rented sector covering access to PRS accommodation...bringing empty homes back into use”

Several respondents focused on the loss of knowledge and expertise in some local authorities that resulted from Large Scale Voluntary Transfer arrangements. The proposed reform would lead to 5 mergers between authorities who had retained stock and those who had transferred their stock. Respondents told us that they hoped this would lead to better resourced and experienced housing departments.

“merge with a stock-retained Council where the strategic housing function is far better resourced”

Respondents recognised the need for greater collaboration between authorities and the benefits of combining resources and knowledge. They suggested the public, and in particular, tenants would welcome a greater regional picture of available housing stock (and opportunities for including stock from the private sector and bringing empty homes back into use).

Fewer, larger authorities - what might not work?

Keeping it local

Respondents identified a range of concerns about the proposed merger programme. Over 50% highlighted concerns about losing touch with local needs and accountability.

“tenants would lose their point of contact with whom they trust and have a relationship with”
“danger that the new LAs fail to connect with certain parts of the community by losing the knowledge of the local area and its intricacies”

An example was given of an authority who had invested in homelessness prevention services fearing that merging with other areas would lead to their services being dominated by other priorities.

“authority with only retained stock I’m concerned this would become diluted and lose focus”

Getting it right

Some highlighted the difficulty of integrating with other authorities (including those who do not hold stock). Alongside the practical difficulties of merging services such as data-sharing and technology, respondents also identified the very different cultures between local authorities.

“concern re LA getting consumed by larger, neighbouring authorities.”

“demographics of different authority areas are very different”

“difficult to integrate with another authority that does not hold stock”

Respondents told us that they were worried about job-losses, policy-drift and policies and strategies having to be newly written to reflect new areas. There were also concerns about loss of Welsh Government revenue and capital grant allocations and the impact on Welsh language in areas where services are delivered predominately in Welsh.

“biggest concern is the time lost resolving issues, such as policies and strategies that will now need to be combined across wider, more diverse areas”

“requirement to work regionally is actually stopping some modernisation from going ahead as consensus is not possible”

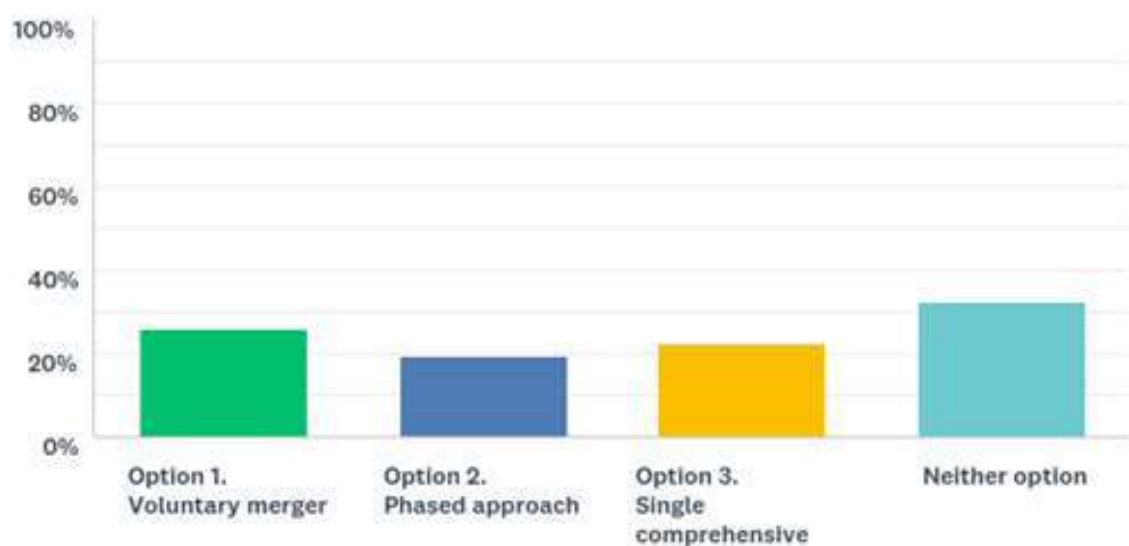
Communicating change

Some respondents told us that they were wary of the merger agenda as they were unsure what it would signify in their area

“it’s happened so many times historically, there needs to be demonstrable positives as to why it will work this time”

Views on the merger options

3. Which option would be the most appropriate for the housing function in your area?



We gave respondents 4 options as according to the Welsh Government consultation.

Option 1. **26%** chose **voluntary merger**, respondents citing that “forced merger would make working relationships very difficult”,

Option 2. **19 %** favoured a **phased approach**, highlighting that this “would allow better planning and consultation”

Option 3. **23%** preferred a **single comprehensive transfer programme**, describing their concerns that going down the voluntary route would lead to senior staff dragging their feet

Option 4. the highest number of respondent (**32%**) selected that their preferred option would be **no merger** “a merger offers nothing but loss”.

Some respondents welcomed the suggestions of greater merger and collaboration, but were not in agreement with the proposed regional areas

“there is a real opportunity to think afresh and reinvigorate a function is suffering from a lack of capacity and under-funding”

“merger of services within a local authority can be much more productive than mergers between authorities”

5. What do you think would improve the housing function in your local authority?

The responses to this question demonstrate that housing professionals working within local authorities have lots of ideas about what could be done better. Respondent highlighted a number of opportunities including:

- General call for better resources, more staff, higher wages
- Better working in collaboration with housing associations, private rented sector and health colleagues
- IT developments such as an 'app' for tenants to report repairs and make payments on rent
- Opportunity to work with elected officials with no experience of housing to improve their knowledge
- A more integrated approach between housing, social services, job centre/DWP and health to support people to remain/become independent and sustain their tenancy
- Reduce bureaucracy around certain functions. More flexibility to concentrate on what matters and what makes a difference
- Improved staff engagement to challenge some of the top-down culture in some local authorities

6. Recommendations

1. Local authorities should review with urgency their internal communications on potential mergers and the opportunities for staff to feed-in their expertise. This should be done at an early stage and arrangements put in place to ensure opportunities are ongoing and the quality of communication remains high.
2. The Welsh Government must ensure that merger discussion and progression do not have any unintended consequences for local authorities to deliver towards the 20,000 affordable homes target.
3. The Cabinet Secretary for Local Government and the Minister for Housing and Regeneration should convene a joint meeting with representatives from local authority housing departments to facilitate an open discussion about the proposed changes and explore how local authorities can be further supported in meeting Wales's housing need.
4. Assembly members and local authority councillors should engage proactively with housing departments to gain insight into the impact of proposals, both positive and negative.
5. The Welsh Government should consider undertaking a comprehensive analysis of the impact merger could have on delivering housing functions where the areas merging are a mix of those who still develop and manage homes, and those who do not.
6. The voice of tenants should be at the heart of any proposed, large-scale change to how their services are delivered. The Welsh Government must offer further support to local authorities in engaging tenants at an early stage to ensure their voice is visible in considering changes which could substantially impact the housing services they receive.



Children in Wales Plant yng Nghymru

Consultation response

Strengthening Local Government: Delivering for People

Children in Wales is the national umbrella organisation in Wales for children and young people's issues, bringing organisations and individuals from all disciplines and sectors together. One of our core aims is to make the United Nations Convention on the Rights of the Child (UNCRC) a reality in Wales. Children in Wales campaigns for sustainable quality services for all children and young people, with special attention for children in need and works to ensure children and young people have a voice in issues that affect them.

For further information on the work of Children in Wales, please see www.childreninwales.org.uk and www.youngwales.wales

Children in Wales works closely with its member organisations and has established working relationships with the Welsh Government and other funders. A key role for our organisations is to maintain a constructive flow of information between those working to develop policy and legislation and those working directly with children and young people. Our conference and extensive training programme, together with the forums and networks that are supported or managed by Children in Wales, serve as a means for ensuring that our members and Welsh Government officials are kept informed of current and evolving developments in the field, and that these developments help shape policies and enhance practice. Children in Wales membership covers a vast array of organisation who work to improve the lives of children in Wales and includes voluntary/third sector organisations, professional associations, local authorities and health bodies, as well as many smaller community groups, schools and individual members. At the time of writing, there are over 260 members

Our Response

Children in Wales welcomes the opportunity to respond to the Consultation paper **Strengthening Local Government: Delivering for People** and have structured our response in accordance with the questions Welsh Government are seeking responses to. We have provided responses to those questions in which we consider we are best placed to contribute to the developing dialogue.

Our response builds upon our previous submissions to recent related consultation opportunities, most notable the '**White Paper - Reforming Local Government: Resilient**

***and Renewed'* (March 2017) and '*Electoral Reform in Local Government*' (October 2017)**

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.

The case for change is compelling. We would support the development of fewer/larger authorities which we would see as being beneficial in being able to deliver many services on a bigger scale than is currently the case, especially for more costly and specialist services e.g. for disabled children. The steps Welsh Government must now take must be proportionate and ensure that the journey towards local government reform brings all partners together and that engagement is open, transparent and inclusive. The continued involvement of the Third Sector in Wales must form part of the approach moving forward. The option (2) of taking a phased approach with early adopters merging first followed by other authorities seeks to overcome the challenges and barriers which the voluntary option, and the comprehensive merger by 2022 both present.

Option 2 will allow for greater flexibility for local authorities to move more quickly, which will be more beneficial for those authorities which have existing strong cooperative relationships in place and joint working arrangements, and are currently working towards merging and /or re-configuring many of their existing services/strategic partnerships on a regional basis.

The timescales for the phased approach should be revisited at appropriate moments in the journey to avoid any drift, unnecessary delay and to help speed up the process if appropriate. We would also hope that the current deadline of 2026 could be brought forward as the merging of local authorities takes shape. There must be a clear and agreed end point which the Welsh Government must set in advance, but this could be amendable (but only by bringing the end date forward).

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

We agree that Welsh Government should provide clarity on the future footprint of local government and the range of factors which need to be considered to inform the journey forward. The Green Paper provides a compelling case for determining the new areas, drawing on current working partnership arrangements through the Public Service Boards, and the need to consider sufficiency of scale, the need to meet local need and importantly, maintain democratic accountability and improve outcomes for people within the new boundaries.

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

We welcome the proposal to establish transition committee and to bring forward legislation later this year which will introduce regulations and which will set out the detail of their functions. Should Option 1 (voluntary mergers) be pursued – not our preferred option - , we would advocate that Welsh Government set a date by which they need to be formulated within the present local government electoral cycle. Although it is not proposed to combine Powys with another local authority, it is essential that opportunities are in place to share the learning during the merger process amongst all current local authorities as other partnerships on a voluntary basis may emerge during the course of the journey.

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.

We do not have any objections to this proposal

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?

Consultation Question 6 - What are your views on the approach which should be taken to determining the parameters of electoral reviews?

This will largely be dependent on which is the preferred option of the three. Should it prove possible and agreeable, then Welsh Government will wish to begin the process of electoral reviews as early as possible

Consultation Question 7

The Green Paper makes reference to the challenging environment elected members have to operate in, the limitations on some of their powers, the increased demand on their time, and the distrust or antipathy sections of the electorate have in democratic institutions. Our response to the consultation on ***'Electoral reform in Local Government'*** which included the views of young people through our Young Wales programme of work, provided some suggestions as to how reform could attract new and a more diverse range of candidates willing and able to put themselves forward for office, and the extension of the voting franchise for 16-17yr olds. We would suggest that the Welsh Government continue to prioritise reform in this area, from which we would hope a more diverse group of elected members emerge, fully representative of their communities and constituents.

Improving the ICT facilities and communication channels, including more outreach events with parents and young people in the community, would be a positive start to showcase the role and functions of elected members in the new authorities.

Consultation Question 8

The Welsh Governments current approach of asking local government leaders to bring forward and identify where additional powers or greater flexibility would be helpful is supported, and we note the areas which have been identified to date. There will be many powers Welsh Government will wish to retain to ensure there is consistency across the whole of Wales, where this is desirable and which avoids any service lottery. We would support the dialogue between local and Welsh Government continuing, although stress that establishing the new areas should be this first phase and priority for the current process. Consideration will also need to be given to the outcome of the withdrawal of the UK from the EU as powers coming down from Westminster to Cardiff which could be devolved further.

Consultation Question 9

We support the Welsh Governments approach of working firstly with those authorities which are already showing an appetite to work together to help design services and regional solutions, and offer greater opportunities for the workforce and recipients of public services.

Consultation Question 10

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.

Although the reform programme contains no provisions specifically relating to the Welsh Language, we would hope that the provisions benefit all communities in Wales, by providing increased opportunities amongst the workforce to learn and use the Welsh Language. There will be financial benefits from the mergers for local authorities in relation to continuing to provide a bilingual service.

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.

We would expect that any workforce reform carried out as a consequence of the mergers to fully take into consideration the Welsh language needs of the new larger council boundaries as well as the current Welsh language profile of the existing workforce. All local authorities must continue to be compliant with requirements in respect of the Welsh Language, and that provision in Welsh is made available to all citizens in line with their language of choice.

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.

As the CRIA builds upon previous impact assessments and consultations regarding the reform of local government, there is little by way of anything new specifically in relation to the area of children's rights or any new direct impacts on children and young people. Much of the CRIA focuses on the vision and intentions as set out in the Bill rather than any direct consequence for children and young people from this particular Green Paper. For example Step 3 has been adapted from the CRIA in support of the then Draft Bill.

It's encouraging that the CRIA has considered potential negative as well as positive impacts on service delivery, however the context is more about how the structural changes will be more enabling and allow local authorities to take account of children's views without saying exactly how this will happen at this stage in the process. Finally it looks as though the CRIA was written prior to the consultation document and before the questions were decided. For example, the CRIA alludes to a consultation question in the Green Paper on the potential effects of the proposals on children and young people. There is no such question in this Green Paper.

Given the high level nature of the Green Paper, it's not possible to give a definitive answer as to whether the proposals will be positive or adverse for children at this stage and in the absence of more detail around how the vision will lead to changes in practice.

We welcome the children and young people's version being made available as part of the consultation, noting our previous disappointment that this wasn't made available in respect of the previous White Paper

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.

We do not have any additional points as to the potential effects of the proposals on equalities within this Green Paper, noting the comprehensive engagement which has taken place to date in respect of the related and previous consultation exercises

Sean O'Neill
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June 2018

Welsh Government

**Strengthening Local Government:
Delivering for people**

A Submission by:

**The Chartered Institute of Public
Finance and Accountancy**

June 2018

CIPFA, the Chartered Institute of Public Finance and Accountancy, is the professional body for people in public finance. CIPFA shows the way in public finance globally, standing up for sound public financial management and good governance around the world as the leading commentator on managing and accounting for public money.

Further information about CIPFA can be obtained at www.cipfa.org

Any questions arising from this submission should be directed to:

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1. Executive Summary

- 1.1 CIPFA is the leading expert on local government financial management. CIPFA sets accounting standards and directly assists local government throughout the UK to drive public service improvement. The extent of our assistance and experience is set out over a series of documents and tools and materials. The scale is such that it is not possible to properly summarise all in a single document. We have therefore elected to submit this short summarised response but in doing so make an offer to discuss assistance further.
- 1.2 The reorganisation of the 22 Local Authorities in Wales is at the centre of this Green Paper. Structural reform on its own will not necessarily lead to better outcomes. CIPFA recommends that prior to any reform there should be clarity on how the delivery of outcomes can be improved. CIPFA's previous work on Aligning Local Public Services¹ explores this in depth and we would consider it a useful model to share.
- 1.3 Financial pressures within the public sector shows no sign of improvement. This means that Local Government will continue to operate within a constrained financial envelope. CIPFA continues to urge the Welsh government to consider creating the foundations for the future sustainability of all public services. CIPFA has previously recommended a five point blueprint² and would be keen to talk through the merits of this approach with Government.
- 1.4 The impact of EU funding changes must be taken into consideration. CIPFA has recently responded to the consultation on EU funding and any future local government reorganisation must have regard to the consequences associated with the withdrawal of EU funding.³
- 1.5 CIPFA would support additional research to ensure that any final decision is made on the basis of robust evidence. Data on the cost of the reorganisation and longer term financial benefits does not

¹ Aligning Local Public Services CIPFA 2017

² CIPFA submission The Commission on Public Service Governance and Delivery September 2013

³ Inquiry into preparations for replacing EU funding for Wales May 2018

appear to be complete. CIPFA's previous work on the costs of reorganisation identified the significant costs that can be incurred. Based on data at that time CIPFA estimated that merger costs ranged from £159m to £268m.⁴ Crucially, these costs would be incurred to drive organisational change only, rather than service improvement.

- 1.6 CIPFA would welcome the opportunity to provide oral evidence as part of this consultation and, as indicated at the outset of this paper, to develop these recommendations further.

⁴ CIPFA report for the welsh Government Associations Report on the transitional cost benefits and Risk of Local government reorganisation Nov 2014

2. Aligning Local Public finances

- 2.1 CIPFA's work in this area has confirmed that only by coming together and aligning local public services, can the public sector address current delivery challenges.
- 2.2 This research identifies the challenges involved in delivering aligned local public services, and uses case studies to illustrate how some local areas are succeeding in doing that to achieve pre-agreed outcomes for local people, places and communities.
- 2.3 CIPFA believes that when looking to collaborate it is important to understand and map the range of services and resources that are available within that local delivery landscape⁵
- 2.4 The work contained in this publication would allow organisations that are subject to change to take a structured long term view and allow improved medium term financial planning.

3. Financial Resilience

- 3.1 CIPFA's work on financial management, budgeting and resilience would assist councils during this period of transition. This builds on the original blue print⁶ which created a framework for future sustainability of public services in Wales.
- 3.2 CIPFA would recommend that this framework is revisited in light of the current consultation and suggested approach.
- 3.3 In the light of recent financial headlines, CIPFA is in the process of developing further its own response and support to local government. We plan to develop a new professional code which effectively would set mandatory standards for budget setting and financial management within local government. The proposed Code would be applicable to the UK and consequently to local government in Wales. Representatives from the Welsh Government have been invited to contribute to CIPFA's steering group.

⁵ CIPFA aligning Local Public services – mapping the delivery Landscape

⁶ CIPFA submission The Commission on Public Service Governance and Delivery September 2013

4. EU funding

- 4.1 Uncertainties with Brexit funding make it difficult for organisations to develop strategic plans. Structural and Investment funds received from the EU into Wales amount to €3.1bn over the funding period 2014 to 2020. These EU funds leverage additional finance for projects and infrastructure, raising the total funds available to €4.7bn over this period.
- 4.2 CIPFA would argue that reaching agreement between the Welsh and UK governments on structural and investment funding post Brexit needs to take place quickly, in order to offset any uncertainty and mitigate delays in project planning and implementation due to future funding concerns.⁷

5. The Cost of Mergers

- 5.1 The Green paper provides a number of options for the way forward. It also allows flexibility around the timescale. Therefore, it is difficult to estimate costs at the current time. Once the consultation has concluded it will be clearer and a more accurate measurement of cost can take place. CIPFA would welcome the opportunity to discuss the measurement of cost and support an independent assessment.

⁷ Inquiry into preparations for replacing EU funding for Wales May 2018

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?

Positive.

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

Positive.

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

Agree, no need for 22 councils, most services should be regulated and this provided by Welsh Government . The minor responsibilities should be devoted to Town and community councils. 22 councils with duplication the " name of game" is dysfunctional financially. The sooner we reduce the Numbe of councillors, increase the responsibility of Welsh Government and fully devolve minor Local Government matters to Town and Community councillors the better.

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

Yes please - Caerphilly
, Merthyr and RCT is a better fit as is Monmouth and Newport . Torfaen and Blaenau Gwent, Bridgend ,Swansea and Neath and port talbot.
Powys to be retained . Dyfed to be reestablished . Gwynedd & Ynys Mon , Conway and Denbigh ,Wrexham and Flintshire .

Nine is enough .

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

Economic scale. E.G licensing taxis - you don't need CBR checks at Merthyr, Caerphilly & RCT if you run a taxi business serving Treharris,Nelson and Abercynon.

Page 3: Chapter 4

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

Yes.

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

No , needs more private sector input.

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

See above .

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

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?

Use community and Town councillors more effectively.

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

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. However, ASAP.

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

Get on with it and use economies of scale to reduce the yearly inflation busting community charge increases.

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 very sensible .

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.

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

Take observations from a further study.

Page 5: Chapter 6

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

Use community councillors.

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?

Pay community councillors a fixed 1 K a year salary .

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

Only devolve to community and Town councillors.

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

No.

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

Transport - social services - education.

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

Clearly it's a question of current border issues. e.g. Welsh language Education facilities

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?

Public meetings.

Q24. 10b. Are there any other challenges or opportunities from structural change or providing additional powers and flexibilities that have not been identified above? If these areas require support, what form should this support take?

No.

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

The time scale to change in 2021.

Page 6: Impact assessments

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

Improve to avoid borders and duplication.

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

Less administrators more = more workers on the ground .

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.

This will be an improvement due to scale .

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

No.

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

Change is practical and best practice .

Change is practical and best practice .

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

Hope is positive .

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

No.

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

Please act ASAP. The kings of castles will never allow their throne to be under threat .

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

[REDACTED]

Organisation (if applicable) -

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

[REDACTED]

Q36. Telephone

[REDACTED]

Q37. Address

[REDACTED] Pontypridd [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

WG34071 Consultation

Date: June 2018

Introduction

1. The CLA (Country Land & Business Association) is a well-established representative organisation with headquarters in London and a national office in Wales. We work closely with both the UK Government and the Welsh Government as a consultee-of-choice on issues concerning agriculture, land-use and the rural economy.
2. We represent 30,000 members in England and Wales, around 10 per cent of whom are in Wales. The needs of the rural community are often under-represented in UK politics. Our membership footprint accounts for the ownership/management of around half of the rural land in both countries. About 80 per cent of land-use in Wales is consigned to farming and rural business.
3. While we participate as experts in agricultural issues, we offer insight into the whole rural community including issues affecting businesses, concerning planning, investment and economic management, housing, connectivity and physical infrastructure and social issues. A key part of our role is consistently to engage with government and political representatives in Westminster and Cardiff. To ensure that the rural dimension is considered in policy and legislative development.

Regional Working

4. More and more Welsh legislation, policy areas and delivery mechanisms focus on delivery approaches based on regional working. This trend is seen again in the recently launched Economic Action Plan and it is essential that the formation of new approaches to delivering Local Governments services will contribute positively with these regional ways of working and to ensure that business and communities can develop and grow.
5. We know that current regional working takes place through the education consortia, health boards and growth deals. However, currently these models don't always align and we strongly urge that the creation of new structures gives careful consideration to creating further complexities.

Future Footprint

6. We agree that it is important to provide clarity and consistency on the future footprint of Local Governments. This is needed to be sustainable for the long term. As mentioned in the previous section, we also argue that there should be an alignment with the boundaries of other public delivery consortia to ensure a smooth operation for businesses and communities on the ground. It is too complex for individual businesses to have to look in separate directions for different services.
7. As expected, the focus of the CLA is to ensure that the rural voice is not overshadowed by population driven democracy. Any reform to structures needs to take into account that Wales is an undeniably a rural nation, and that geography and people are not evenly distributed across Wales – there is an even split of people living in our cities in comparison to our towns, smaller settlements and open countryside (see Table 1). The sustainable future that Welsh Government wishes to deliver cannot be achieved if our geographically rural areas are not given equal focus when considering the best options for delivering local services.

Settlement size	People (%)	Land (%)
Under 2k	19	83
2 – 10k	21	9
10 – 25k	19	4
25 – 100k	20	3
Over 100k	21	2

Table 1: Data derived from ONS 2011 Census

8. Only 25% of the population lives in urban areas, (population >100k) and 20% live in villages with less than 1,500 people. Powys, the most rural Local Government, has just 26 people per square mile – it has also, in recent years, suffered significant budget cuts.
9. It is already costly to provide some services to these rural communities and many are short-changed on public service provisions relative to urban centres. The challenge of viability and public value for rural areas is that providing services to remote locations will always be more costly than providing the same service to more densely populated areas. Savings due to collaboration or regionalisation will naturally be greater in urban areas. This does not mean that our rural communities should be left behind.
10. Regionalisation of transport is logical, especially given its impact on economic development. Regional decision-makers must, however, have regard to the suitability of transport. There are often few transport options in rural areas and it is important that this situation is considered pragmatically to provide the improvements to the local economy.
11. Rural economic development cannot compete with urban areas when using traditional economic measures of success like of job creation. Yet rural businesses have a lot to offer. There are 650,000 rural businesses in England and Wales employing 3.4 million people and contributing more than £237 billion of Gross Value Added (GVA) to the national economy. The rural economy should not become a subsidiary to urban-centric economic development.

Similarly, our rural communities should not, by default, become commuter villages or second home/week-end destinations

Transition

12. As mentioned in the previous section, clarity during the transition period will be important. Members of the Transition Committee should be able to make the right decisions in the best interest of their area and generally for the Local Government. It is also important that the missed opportunities during previous Local Government reforms are understood and utilised.
13. Local Government reform is a process of significant change and for that journey to be successful, better understanding of broader context and practical end goals are essential. Whilst CLA Cymru have no comment on which scenario would work the best, Local Governments who are willing to adapt and take their people and communities with them with a positive outlook are more likely to be successful.

Electoral Cycles

14. We have no comment on the date of elections. Periods of change are often disruptive, and the reform of the Local Governments should be done with the least amount of disruption possible. We have identified a few policy areas not linked to electoral cycles, but nonetheless could be effected by the merging of the Local Governments. These include Local Development Plans, Planning and Areas Statements under the Environment (Wales) Act which will need to be considered as part of the process.

Councillors and Constituency

15. In creating bigger Local Government structures which will encompass bigger areas and more constituencies, it is important that representation is distributed in way that ensures the rural voice is not lost. It is important that Local Governments use their elected members' knowledge to their best ability, and should strive to be as inclusive as possible to represent the views of their constituencies. There needs to be balance between localism and nimbyism.
16. There is a general problem of public disengagement in Wales exacerbated by a general dissatisfaction and distrust in the system as evidenced by the May 2017 local election, where less than 40% of the electorate voted.¹ The role of a Councillor is to interact and engage with their local constituents so it is troubling that a minimum threshold is deemed necessary. CLA Cymru would question how measureable or imposable any standards would be – it would be redundant to implement a system that results in artificial practices and tick-box exercises. The new ways of working introduced by the Well-being of Future Generations Act demand collaboration and involvement of people with long-term needs. If these requirements are to

¹ Bevan Foundation *Strengthening Local Government*: <https://www.bevanfoundation.org/current-projects/strengthening-local-democracy-delivering-good-government/>

be successfully met by Local Governments, it will require more positive and impactful engagement with local constituents and population

17. We have no comment of the powers Local Governments should have. Further powers requested by Local Governments such as planning, housing and transport are already within their remit, but improved utilisation of these powers will be necessary for consistency throughout the new Local Government areas.
18. There needs to be structure in place to control the decisions made by the Local Government to ensure they include the interests of their whole area, including rural areas that are often overlooked. There also needs to be consistency between the Local Governments so that projects that would otherwise take place in one area is not restricted in another. Appropriate governance and support structures must be in place to enable effective delivery of all regional powers. These must be adaptive and flexible so that we can learn from best practice.

Shared Transactional Services

19. It is important for Local Governments to work collaboratively, and should be encourage to share information and expertise not only between departments but also between Local Governments. Whilst carrying out the reform, it is vital that the challenges and the distrust that arose in previous Local Government mergers are overcome and the same mistakes aren't made again.
20. There needs to be a culture change in the attitudes, actions and decisions of those operating in the Local Government system but this requires time. This change could be accelerated and managed pro-actively through Welsh Government taking a more authoritative role in influencing and steering outcomes through a strong national policy that facilitates positive change at a local level.
21. There is considerable inconsistency between Local Governments interpreting and implementing different policy areas. This inconsistency is the biggest barrier to private sector investment. There are 25 planning authorities in Wales and Local Government reform must have more regard for National Parks Authorities and the role they can play in economic development through their planning functions. In addition, the CLA urges Welsh Government and planning authorities to reconsider the role and scope of permitted development rights and the useful role that they can play in enabling positive economic development. Whilst we would support an approach which is fit-for-Wales, the Class Q permitted development rights introduced in England offer a working example which has seen benefits for a significant number of rural businesses
22. Whilst back-office cost savings can and should be explored, it is important to remember that Local Governments deliver a public service and are often one of the largest employers in rural areas. Back office-type functions should be as streamlined as possible so that the private sector and the public can enjoy reliable, accessible, easy-to-use services. Administrative or transactional arrangements that lead to time delays or barriers must be avoided.

For further information please contact:

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Annex C

Consultation Questions

Your Name	Wisset Barrett
Organisation (if applicable)	① North Shropshire County Council employee ② Councillor Chester Town Council
E-mail / Telephone	
Your Address	

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?

Improve communication between the different agencies

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

It makes sense but in the long run it will be more cost effective

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

I think it is a positive move my only concern is that local voices will not be heard.

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

Not that I can think of

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

NO

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?

Essential in just covered the message won't get to the Welsh population.

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

Yes it makes sense

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

I don't know enough about the geography of Wales to reply with authority but as for my count it increases diversity which I like

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

No I don't have any alternative suggestions

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?

Don't know

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?

Yes I agree with the elections ready for the new authorities. I worry that Transition Committees will just be 'taking steps'.

- 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?

Absolutely otherwise, as is human nature it will be put off indefinitely.

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

I prefer the single comprehensive merger programme. It prevents ~~costly~~ obstructive authorities preventing change and is fair on the whole population as everyone's experience is the same.

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 reason why it is not a suitable date.

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?

Can't think of any.

Consultation Question 6

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

It should be based broadly on other boundaries eg. Health board boundaries.

Chapter 6

Consultation Question 7

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

Firstly don't assume ^{all} elected members know or ever care about their communities. Motivation to be a councillor are wide & varied.

- 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?

Stop paying them extra for positions such as sitting on committees. Everyone should be remunerated equally. If you value people by remuneration then you are failing to acknowledge others who work harder.

Consultation Question 8

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

I don't have enough awareness of their powers to answer this. This highlights how poor WAB and LA and community councils are at making themselves

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

Don't know

Consultation Question 9

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

Don't know

- b) How might such arrangements be best developed?

Don't know

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?

Internal emails, WhatsApp, mailing lists
Facebook, Twitter, Direct to businesses

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

Communicating what is being
done & why

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

Communication

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?

I imagine it would improve
Welsh language visibility, something
I would be glad of in Monmouthshire
where residents dread the derision about the
language

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

Increase in positive effects by
getting WhatsApp message across clearly
Deal with local authorities who
are resistance with empathy BUT firmly.

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.

Stop using bilingual signs just
use Welsh. People cope when they go
abroad and don't speak the language
of foreign countries - They can do
it here too!

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?

Yes I don't see or hear the voice of children in this consultation.

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

Find a way to reach out to young people to engage them in their future.

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?

Can't see any.

How would it impact on Travellers / migrants / refugees? :

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

Don't know

Consultation Question 15

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

Stay strong push it through those local Authorities are really going to mess you about if you don't set boundaries.

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

Strengthening Local Government: Delivering for People

Conwy County Borough Council response

Approved by Council 8th June 2018

Executive Summary:

Conwy considers the real challenge for Councils in Wales is lack of resources - fair and sustainable funding – and the limited ability therefore to forward plan due to constraints in the current Welsh Government (WG) budgeting process.

We believe that this is the worst of times to be contemplating the reorganisation of local authorities in Wales.

We have an uncertain political and financial climate due to BREXIT. We have in prospect an imminent change in leadership in Welsh Government. We have the Parliamentary Review into the integration of health and social care and the emerging collaborative role for local government in the development of primary and community care, just a few examples of the major disrupting influences (some positive, others not) in which local government will be operating.

We have had years of crippling financial austerity. Local Government needs to be given the freedom to do more, not less, with less to meet increasing demand and increasing pressure.

Conwy considers that, against this climate and backdrop, Local Government requires appropriate funding and a period of stability rather than the disruption that would be caused by reorganisation.

Austerity in Wales has been disproportionately hard on Local Government with significant budget reductions already banked. This leaves minimal opportunity to achieve meaningful economies of scale from mergers. It is a matter of fact that Councils, merged or not, need appropriate funding to be sustainable and resilient, able to meet rising demand for the vital services upon which their citizens depend.

Conwy's alternative proposal is that, rather than a wholesale restructure, Councils should be supported to continue to work regionally, sub-regionally and locally to adopt the most appropriate approach to the presenting issue(s). We believe that in a devolved Wales, solutions should be co-designed, not imposed, and that appropriate resources should be made available to meet needs.

A continued focus on 'form' over 'function' will have a devastating effect on Councils striving to meet the challenges of increasing demand and additional unfunded policy responsibilities from within ever reducing resources.

The presenting circumstances, challenges and opportunities require Councils to be focussed and strong, not grappling with avoidable restructuring and resourcing issues.

Consultation Responses

Your Name	Council
Organisation (if applicable)	Conwy County Borough Council
E-mail / Telephone	
Your Address	lwan.davies@conwy.gov.uk

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>A key issue that is hampering progressive regional working is the limited governance options available, namely the joint committee. Arrangements that would provide more flexibility in terms of membership (i.e. other than being restricted to local authority members) would assist. For example, in the context of growth deals, where the private sector and Further and Higher Education partners do not have full representation on the proposed decision making body which, under current arrangements, is limited to local authorities only.</p> <p>b) What are your views on the common elements to the process of mergers we outline in this section?</p>

The 'case for change' articulated in section 2.1 of the Green Paper is not compelling and is not based on sound logic or evidence. In particular a financial case is not made.

Reference is made to the 'Williams Commission' report (January 2014) and the proposals for merger at that time. The Williams Commission looked at the reform of public services as a whole. Of its 62 recommendations for change, only 4 related specifically to local government, but it is those 4 (or parts thereof) that appear to have attracted most interest from WG since the report's publication.

Improvement (where necessary) to the Welsh public sector should be WG's priority, rather than pursuing local government mergers in the absence of credible cost/benefit analysis. Improvements within the Health sector should be WG's priority.

An example of a public service approach is the Community Assistance Team, established by the North Wales Fire and Rescue Service in August 2016 to respond to falls in the home. The Fire Service team attended some 906 cases, relieving the Ambulance Service from having to attend. Of those 906 cases 785 (86%) did not require transfer to hospital; this resulted in a saving of some 1250 hours for the Ambulance Service. Unfortunately, due in large part to the way public services in Wales often fail to capitalise on support for each other, funding is not available to continue with this initiative which provided clear benefits to the Ambulance Service.

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

Conwy is wholly opposed to the proposals to create fewer, larger authorities:

- (1) There is no compelling evidence that 'bigger is necessarily better'. On the contrary experience in North Wales is that creating the large single health board has created problems which will continue to have negative impacts for years to come. Examples of mergers of FE colleges in North Wales have displayed difficulties and with limited benefits, as has the creation of Natural Resources Wales
- (2) Conwy County Borough Council is of a size that enables a positive organisational culture to be felt throughout the organisation. In the Council's most recent staff survey (2018) **88%** of respondents (with a response rate across the Council in excess of 65% of employees) indicated that they feel proud to work for Conwy; **87%** indicated that they speak positively about Conwy to others; and **86%** would recommend Conwy as an employer. At a time when we are more and more reliant on the positive motivation of staff to continue to deliver services and innovation for our people, the risk of destroying the positivity displayed by such dedicated colleagues to an organisation which they feel a close affinity with must not be discounted as a key issue.
- (3) The Council has not encountered difficulties in recruiting and retaining staff (an argument that has been put forward in support of fewer, larger Councils). The Council is recognised as a good employer – again, as identified in the recent staff survey referred to in (2) above
- (4) Similarly, Conwy has strived in recent years to support its key tourism sector through its Events Strategy. This has led to the Council having a recognised expertise and 'brand' associated with high quality events, with substantial benefit to local

businesses. The loss of such 'brand' association should not be overlooked or minimised.

- (5) This Conwy 'brand' contributes towards the people of Conwy feeling positive about the Council: in the ONS National Survey results released in 2017 54% of respondents considered that Conwy does all it can to improve its area and 62% considered that Conwy is providing high quality services, displaying a level of trust and confidence in the Council that has been achieved through years of effort, but would be dismantled in a single blow through merger.
- (6) Conwy benefits from a very good working relationship with its Youth Council, comprising dedicated young people who always display a public service ethos by wanting to improve things for the people of Conwy. One of the challenges they deal with is their ability to attend meetings from their schools/homes currently dotted around the County Borough of Conwy – a doubling of the geography for a new Council would make such arrangements untenable, as the young people will struggle more to attend from further dispersed areas and the benefits of the Youth Council would be lost.
- (7) Any headline grabbing savings that might be perceived through mergers (e.g. halving the number of local authority chief executives) would be wiped out through the costs of merger and the organisational price that would be paid. By organisational price we mean/include the distracting impact of mergers at a time when all focus needs to be on meeting the challenges directly in front of us – namely, increasing complex demands at a time of diminishing resources.
- (8) The cost of local government reorganisation will be an added burden which simply cannot be borne by Conwy CBC and, we submit, need not be borne at all. Whilst WG has not yet calculated the cost it is inevitable that it will run into many many millions – millions that would be far better spent on providing services.
- (9) Creating fewer, larger authorities and therefore fewer elected members would create a big gap between communities and their local representative, which would work contrary to the fundamentally important principle of localism. This would inevitably lead to a reduction in engagement and in local authorities being able to hear the 'voice' of local people and communities. Similarly the larger Councils' senior officers would inevitably be more remote from grass route activities, with detrimental consequences.
- (10) A great deal of good work is being achieved on a regional basis and sub-regionally and it is highly likely that more would have been achieved to date had local authorities not had the spectre of local government reform hanging over them since early 2014. That spectre, with significant changes in WG direction each year since, has stifled innovation and inhibited partnership working
- (11) Experience of local government re-organisation in 1996 is that it takes some 10 years for complex bodies such as local authorities to settle into new properly functioning, fully integrated organisations and the disruption during such period will impact negatively on the services we seek to provide to the vulnerable in our communities..
- (12) WG will be aware that local government has shouldered much of the burden of austerity cuts in Wales. By 2020 it is envisaged the local government budgets will have been cut by 32%; this should be contrasted with a mere 5% cut in WG and a 22% increase for Health.
- (13) In Conwy, between 2013 and 2018 £42million has been removed from budgets, against an annual net revenue budget of approximately £200million. This is why we argue strongly that the well of budget reductions to possibly

finance local government reorganisation is already dry. Being the size that it is will enable Conwy to introduce a new impetus for income generation to support its budgets in future years. It is the Council's contention that such a cultural shift would be more difficult to implement in an organisation twice its current size.

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

Immediate or imminent forced merger of local authorities is not the answer.

Councils can be put on a sustainable footing through reasonable funding being provided by WG. With a reasonable level of funding, including the loosening of the resource debilitating grants regime, we have no doubt that Conwy as a Council and as a County would thrive.

Councils across Wales who may feel the need to merge, either because of their small size or any other reasons, should be encouraged to merge using the legislative powers already available to them – and should be properly funded and supported by WG to do so.

The real and realistic alternative to the proposals in the Green Paper is for WG to provide a period of supportive stability. Public Service Boards have been in place for only a couple of years and, having worked through the process of undertaking an Assessment of Wellbeing and producing its Wellbeing Plan the Conwy and Denbighshire PSB is now in a position to begin making an impact. Conwy's submission is that WG should permit the evolution of such recent arrangements to bear fruit. We envisage that such sub-regional working (complemented fully by important elements of regional working) would lead to closer and better working relationships where opportunities of mutual benefit (and ultimate benefit to our citizens) will be identified: whether in the fields of social care, additional learning needs, mental health or transactional or support services.

Conwy and Denbighshire work in tandem already through our joint Public Services Board, the joint Community Safety Partnership and joint Youth Offending Team and others. The footprints of other public bodies in North Wales: Health, Police and Fire and Rescue also lend themselves to a Conwy/Denbighshire approach, but there is no need to force merger of the two Authorities. Given space and time and resources it is inevitable that further joint sub-regional approaches will evolve: to meet the challenges facing our communities.

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

We enclose a report dated November 2014 prepared by CIPFA for Conwy and Denbighshire Councils for the purposes of the Expression of Interest in merger that was submitted to WG that same month.

That report began to tease out some of the very substantial hurdles that would need to be overcome (especially financial hurdles) in order to make a success of merger

at that time.

It must be noted though that the data on which that initial report was based is now almost 5 years old and the Councils have since then endured many years of financial austerity whereby many of the potential savings referred to in that report have been cashed already and would no longer be available through forced mergers.

Irrespective of structural and boundary changes, it is a matter of fact that around 31% of what we spend is spent on pupils in schools. Any reform of Conwy would still mean that around one third of our funding would be all but ring fenced to pupil support through our delegation to schools. If you then consider the cost of direct care to clients, a further proportion of around 28% of our budget is similarly ring fenced. Further examples of uninfluenceable (by reform) spend would include Levies and debt costs in respect of historic capital expenditure. In short you quickly get to a point where the perceived benefits of **any** financial economies of scale can only be applied to a greatly diminished budget influenced by reform.

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?

We agree that clarity and stability is important and argue strongly that the current arrangements provide such clarity. The 'threat' of re-organisation has a destabilising and distracting impact on the key people that we rely on to deliver vital services day in, day out and on those planning for the future, with all of its uncertainties and pressures. Removing the uncertainty about the future existence of the organisation and on individual's positions within potential new arrangements would be highly beneficial to the delivery of vital services

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

We do not agree with the factors that have been identified in chapter 4. Specifically they ignore the importance of a sense of connection between staff and the organisation which they identify with and ignore the devastating distracting effect of local government reorganisation at a time of uncertainty and coming hard on the heels of austerity.

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

<p>For the reasons set out elsewhere in this response (in particular section 1 b) to c)) we do not agree that a forced merger of Conwy and Denbighshire at this time is the right thing to do and we refer you to our alternative proposal in 1 d) as a more appropriate and sustainable way forward.</p> <p>By way of evolution, matching regional working with, where more appropriate, sub-regional working it is likely that Conwy and Denbighshire would work more closely together over time. That said, it may well also be necessary and more appropriate for different configurations of Councils to work sub-regionally. For example WG has recently asked Conwy to work with Gwynedd and Ynys Mon Councils on the implementation of the 30 hours a week free child care offer and, historically, there have been and remain sub-regional arrangements involving Conwy with Gwynedd and Mon in relation to library services, for example.</p>
<p>d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?</p>
<p>Conwy's alternative suggestion is to retain the status quo in relation to lines on the map but to support Councils to work regionally, sub-regionally and locally to meet presenting needs and opportunities.</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>Chapter 5</p>
<p><u>Consultation Question 3</u></p> <p>Chapter 5 sets out the proposed approach to transition and implications for establishing Transition Committees and elections to Shadow Authorities under each option.</p>
<p>a) Do you agree with the proposed process of transition: namely establishing Transition Committees and ensuring elections to Shadow Authorities can be held ahead of vesting day for the new authorities?</p>
<p>For the reasons set out above (in particular 1 b) & c)) we do not agree that merging local authorities is appropriate and therefore it is not appropriate to comment on mechanisms for implementation at this stage</p> <p>It is accepted that any move to merging Authorities will inevitably involve Transition Committees and their like, which will be an additional burden on elected members and administrative functions which have been reduced over the years through the inevitable service cuts and therefore would need to be resourced in some way.</p>

<p>b) Do you agree that, if option 1 were pursued, we should set a date by which voluntary merger proposals should come forward in each electoral cycle?</p>
<p>For the reasons set out above (in particular 1 b) & c)) we do not agree that merging local authorities is appropriate and therefore it is not appropriate to comment on mechanisms for implementation at this stage</p> <p>The Council's alternative proposal for evolution would be far more effective in the long run, than setting what would in essence be an arbitrary date or dates for change.</p>
<p>c) Do you have any other thoughts on the proposed process?</p>
<p>For the reasons set out above (in particular 1 b) & c)) we do not agree that merging local authorities is appropriate and therefore it is not appropriate to comment on mechanisms for implementation at this stage</p>
<p><u>Consultation Question 4</u> 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>For the reasons set out above (in particular 1 b) & c)) we do not agree that merging local authorities is appropriate and therefore it is not appropriate to comment on mechanisms for implementation at this stage</p>
<p><u>Consultation Question 5</u> The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of wellbeing by Public Service Boards, which are linked to electoral cycles. We will make provision to make sure these tie into any new electoral cycles going forward. Are there any other plans or matters which might be tied into the electoral cycle which we need to consider?</p>

For the reasons set out above (in particular 1 b) & c)) we do not agree that merging local authorities is appropriate and therefore it is not appropriate to comment on mechanisms for implementation at this stage
Consultation Question 6 What are your views on the approach which should be taken to determining the parameters of electoral reviews?
For the reasons set out above (in particular 1 b) & c)) we do not agree that merging local authorities is appropriate and therefore it is not appropriate to comment on mechanisms for implementation at this stage

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>We agree that elected members knowledge of and connection in their communities is a vital component of healthy local democracy and we believe strongly that the proposals to create fewer, larger authorities would be catastrophic through creating a much bigger gap between communities and the (inevitably fewer) local members. Such a gap would not only be in terms of a Councillor to elector ratio but also physical/geographical in that distances to be travelled from and to meetings and to liaise with constituents would be inefficient.</p> <p>We believe that such issues would be a significant deterrent to new, younger, working people putting themselves forward for election and would thereby run counter to recent WG initiatives to change the diversity of elected member representation.</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>Elected members are in essence, volunteers who receive a payment. Candidates do not put themselves forward for election in order to receive payment. Experience shows that many councillors are surprised on first election that they will receive payment.</p> <p>What motivates candidates is the potential to make a positive difference in and for their community. Mergers as envisaged in the Green Paper will inevitably make electoral divisions larger and therefore eliminate the primarily 'community based' motivation for candidates, thereby reducing interest in standing for election – again, contrary to recent WG initiatives.</p>

<u>Consultation Question 8</u>
a) Are there other powers which local government should have? If so, what are they?
We believe that WG should work with local government to identify and remove any barriers to improved public services across Wales. Any additional or new powers should be available to all Councils and not (as proposed in the Green Paper) just those Councils who merge.
b) Are there other freedoms or flexibilities which local government should have? If so, what are they?
WG's micro-management of local government must be reduced. It stifles local innovation, is wasteful of resources both for local government and one must expect within WG.
The complex rules relating to the governance of PSBs is an inhibiting factor.
The Grants regime which is administration hungry and therefore not best use of available funding should be relaxed.
<u>Consultation Question 9</u>
a) Which areas offer the greatest scope for shared transactional services?
Allow Councils to continue without (1) micro-management by WG and (2) the continuing threat of re-organisation: then opportunities will be realised.
By way of example: without prompting by WG Conwy's Translation Service has developed in recent years so that it now provides services to 3 other local authorities and a registered social landlord as well as to the WLGA. This initiative provides a cost effective, sustainable high quality service and is the type of evolution of service that is likely to develop given time and stability.
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?

We would agree with the observations made from paragraph 6.22 onwards about the value of a dedicated, valued workforce. Our fear is that renewed debate about local government reorganisation is sending the wrong message to our staff – namely that there is something ‘wrong’ with the organisation for which they work and feel proud of. In the Council’s latest staff survey 88% of staff indicated that they felt proud to work for Conwy and 87% indicated that they speak positively about Conwy as an employer. What stronger indicator could there be that bringing an end to Conwy CBC would be a negative step?

And it is not just the Council workforce itself that feels that way. In the ONS National Survey results released in 2017 54% of respondents considered that Conwy does all it can to improve its area and 62% considered that Conwy is providing high quality services.

The disruption to the workforce that would be caused by a merger of Authorities must not be overlooked or down-played. Not only in the years in the lead in to reorganisation, but for many years thereafter.

The issues identified in section 6.29 can be listed succinctly, but each one will create major challenges and disruption. As the beginning of 6.30 notes, ‘These challenges are not insurmountable’ – this is correct, but at a time of unprecedented pressure on public services (increasing demand with diminishing resources in an unstable environment) they are avoidable and should be avoided by not pressing ahead with reorganisation at this most inappropriate of times.

The suggestion at the end of paragraph 6.33 that one method of funding the inevitable, substantial costs of reorganisation is ‘using capital receipts from asset disposals’ is incorrect insofar as Conwy is concerned. In recent years we have consolidated our asset base to move to a three key centre approach for offices, having funded that consolidation substantially from the disposal of some 16 other satellite offices. Therefore any funding from such asset disposal is already committed.

Capital receipts from land and other sales are channelled to support housing and extra care provision, being key priorities of both local government and indeed the WG

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

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

<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>
<p>a) What effects do you think there would be?</p>
<p>At best it is envisaged that creating fewer, larger Councils would have a neutral impact on the use of the Welsh Language. In reality however, the disruption caused by reorganisation of Councils by way of merger is likely to deflect attention away from our ability and intention to promote the Welsh language in support of the Welsh Government's target of one million Welsh speakers in Wales by 2050.</p>
<p>b) How could positive effects be increased, or negative effects be mitigated?</p>
<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>Please refer to the answer to 11 above</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> <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>The Equality Impact Assessment (EIA) suggests that if we opt for mergers, it will be positive for everyone, but that only appears to be addressing the political picture. It says it will provide the opportunity to address the unrepresentative nature of elected members across all communities in Wales but presumably there is still a limit to what we can do to influence the democratic process in this regard, which will remain largely driven by political parties. It fails to refer to the work already done in Diversity in Democracy or give credit to the positive steps already taken in this direction. The EIA talks very generally about improving access to members and local government for the public, making it more open and accessible, strengthening participation, becoming more transparent, etc and states that the whole of the public domain will benefit from the mergers – but there is no depth as to how this will be achieved or why it will all be positive – or more positive than it is now. In fact it is this Council's contention that fewer elected members representing larger constituencies (both in terms of numbers and geographically) will be a disbenefit. For some protected groups, having to liaise with very large organisations can be overwhelming and can result in disengagement and further distance between the organisation and the public. This doesn't seem to have been contemplated in the EIA.</p> <p>Under engagement, the EIA states that a small number of respondents explicitly suggested equalities had not been discussed sufficiently by the proposals and we would agree with this as section 4.1 is very superficial and makes the assumption that by treating protected groups equally, it will result in equal outcomes, but in equalities, this does not normally follow, hence the need for Equalities legislation and Equality Impact Assessments. It is unclear what evidence there was of "an over-emphasis on equalities" as suggested from a small number of respondents during the engagement, particularly as it states elsewhere in the document that: <i>"Although the reform programme contains no provisions specifically relating to equality, the provisions should benefit all communities in Wales"</i>. Including this comment could be misleading.</p> <p>The EIA states that there will be no changes to services as a result of the mergers and therefore there will be no impact. This broad statement appears naïve and fails to address the practical side of implementing the mergers which will inevitably require all local authorities to review their structures for delivery of this new model as well as the inevitable need to harmonise activities and terms and conditions that will be necessary. Consequently, there is likely to be significant adverse impact on the workforce of Local Government employees across Wales, with job uncertainty, potential job losses and regrading/salary reductions necessary to bring this change about, which is likely to have a differential and adverse impact on a predominantly female workforce of around 70% females. This level of change will inevitably result in a possible adverse impact on service users and the public,</p>

affecting some sections of communities more adversely (eg, vulnerable, young, old, disabled, etc), not to mention the disruption and interruptions to service delivery as each local authority grapples with implementation plans whilst still trying to deliver services, as well as an adverse impact on local economies with increased uncertainty and unemployment. This does not seem to have been considered anywhere in the EIA.

The EIA does not appear to contemplate that there are any negative aspects of introducing new merged, larger authorities and whether they will be able to (or how they will) provide personal and directed services locally, which many minority and vulnerable groups value and need.

The EHRC Wales documents, How Fair is Wales? and Is Wales Fairer? do not seem to have been considered in the list of publications reviewed.

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

The EIA appears to be one-sided, only considering the positive angle and has not considered the reality of implementation and the impact on staff, communities and service users. This should be evidenced in more detail at this national decision making level rather than delegating this task to the individual authorities to pick up once the top level decision has been made based on an insufficient EIA. The EIA states that there will need to be EIAs undertaken locally to look at this in more detail, however, the top level proposal and EIA should also take this into account as these issues can be readily anticipated now and the EIA needs to portray a thorough picture, rather than a precursory top level “everyone will benefit” approach and once decided, local authorities being left to pick up the pieces during the implementation.

There are a lot of sweeping statements made in the EIA about local authorities failing to have good policies, meet service needs, build relationships with communities, etc. These things are already being done well in Conwy (and probably in many other Welsh Councils too) and the document needs to be more factual and provide a better balance from both aspects rather than being biased solely towards the “for” argument as it currently is.

Consultation Question 15

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

Conwy is a progressive Council, which is continually seeking ways to meet the challenges that it and its people are facing.

At the heart of the sustainability issue is the chronic underfunding of local government aggravated by the continued imposition of additional yet unfunded responsibilities, for example the national living wage, apprenticeship levy and national pay awards – all of which the Council would support but have had to resource itself. Before contemplating changes to form or structure, the debate really needs to be had about the future function of local government in the context of external pressures.

The main challenge for the short and medium term is being able to satisfy the increasing demand for vital services to our most vulnerable and deserving at a time of ever diminishing resources.

Local government mergers as described in the Green Paper will, at the very best, do

nothing to assist in meeting that challenge but in all likelihood will actually make the situation worse by directing Councillor and Management attention at the complexities and risk of reorganisation and therefore away from the provision of key services.

The Council's alternative proposal is that the Welsh Government does not place its and Councils' emphasis on 'structures' but rather concentrates on resourcing local government fully so that it can play its preventative, collaborative and integrated role in helping to meet the needs of the present without compromising the ability of future generations to meet their own needs.

**Report on the Strategic Implications of a
Voluntary Early Merger between Conwy CBC
and Denbighshire CC**

November 2014

1. Purpose of the Report

The purpose of this report is to advise the Councils of Conwy and Denbighshire on the following matters:

- The likely costs of voluntary merger;
- Any additional costs associated with being an early adopter or pathfinder;
- Likely ongoing financial benefits of merger;
- Advantages and disadvantages of early voluntary merger.

2. Introduction

The elected members of Conwy CBC and Denbighshire CC are meeting on 17 November 2014 to decide whether or not to submit a Merger Proposal to the Welsh Government. Both authorities have supported exploratory negotiations with each other and with Welsh Government. Such negotiations are subject to the level and form of support offered by Welsh Government.

Notwithstanding this, both authorities are aware that the adoption of an early merger will create a number of challenges, not simply in terms of rationalising organisational structures, but also in terms of service delivery. This report considers a number of key questions as follows:

- What will be the implications for the delivery of services to the combined population?
- What will be the key issues to be resolved by being one of the first two authorities to merge?
- What will be the financial consequences in terms of funding?
- What will be the cost of transition and, perhaps more importantly, what will be the additional costs associated with being the first merger?
- What savings can be achieved and what is the likely pay-back period compared with the cost incurred in achieving a successful merger?

Both authorities are aware that being amongst the first to consider these questions will require additional resources due to the intractability of some of the issues that will need to be resolved. They feel that it is fair for early merger work to be seen by Welsh Government as a "Pathfinder" for solving merger issues and for that to be recognised through financial support. They will be able to develop a model for merger that can be used by those undertaking subsequent mergers. The experience gained by all involved can be cascaded to other authorities through developing a blueprint for merger, training workshops, mentoring and the dissemination of information on legal and technical issues.

3. Implications for Service Delivery

First and foremost Conwy and Denbighshire exist to provide services to local people. Inevitably there are differences in the way the two authorities deliver those services and in the level of funding provided. The merger will need to find a way of harmonising both the methods of delivery and the levels of funding while, at the same time, sustaining and improving the services provided.

In terms of the overall profile of the two councils there is a marked difference in terms of population and the level of spending per head shown in the table below:

TABLE 1 – STATISTICAL PROFILE

Authority	Population 000s	Gross Revenue Spend 2014/15 £000	Spend Per Head £
Conwy	115.3	272,028	2,359
Denbighshire	93.9	238,057	2,535

Conwy/Denbighshire Merged	209.2	510,085	2,438
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The merger will offer up the opportunity for the merged councils to look afresh at levels of service provision and it is anticipated that this will need to be done within the overall envelope of resources available. However, there are some areas where the differential in spend will require a significant rebalancing of resources between the two areas. In the following table we show the levels of spending per head for each of the main service areas:

TABLE 2 – EXPENDITURE PER HEAD OF POPULATION

SERVICE AREA	CONWY SPEND PER HEAD £	DENBIGHSHIRE SPEND PER HEAD £	DIFFERENCE £
EDUCATION	844.14	983.60	139.46
SOCIAL SERVICES	522.43	558.66	36.23
HOUSING	353.52	328.71	24.81
ENVIRONMENTAL SERVICES	162.89	132.20	30.69
ROADS & TRANSPORT	85.79	96.78	10.99
LIBRARIES, CULTURE ETC.	89.94	104.25	14.31
PLANNING & ECONOMIC DEVELOPMENT	18.23	27.66	9.43

Notes to the tables:

1. The figures in this, and subsequent tables, are based on research carried out by CIPFA for the WLGA.
2. Approximately 85% of the figure for Housing costs relates to Housing Benefit.
3. Housing excludes the HRA.

We discuss the key issues for the largest services in the following paragraphs.

4. Education

On the basis of the research that we have carried out to date we foresee a potential major issue with the education service, that being the distribution of resources under the LMS formula. Currently there is a difference in spending between the two authorities amounting to £139.46 per head of population with Denbighshire being significantly higher than Conwy. Under a merged authority there would be a need for a major redistribution of resources with money flowing from Denbighshire to Conwy. The same conclusion is reached when looking at figures for schools delegated budgets. Inevitably there would be winners and losers and lower levels of funding in some areas could lead to some schools being no longer viable and consequently a

need to review service delivery models and school provision. This could be overcome by increasing total resources either through increased central funding or through savings generated elsewhere.

5. Social Services

Traditionally Wales has tended to adopt an integrated approach to social services provision rather than splitting children's and adult services. However, the Social Services & Well-Being (Wales) Bill, which is currently going through the Welsh Assembly, is set to create a new agenda including moving adoption services in Wales towards regional consortia of councils, allowing courts to give social workers and police the right to enter premises where abuse of vulnerable adults is suspected and introducing national eligibility criteria for local authorities to follow. There are also measures to encourage more co-operation and collaboration between health and social care and measures, such as portable assessments, designed to ensure consistency of services people receive when they move within Wales. A new merged authority could bring added benefits to the Health agenda in that the merged authority would be coterminous with the emerging geographic divisions within the Betsi Cadwaladr LHB.

Building on the vision set out in the Welsh Government's strategy, local government leaders have developed an ambitious implementation plan that has been described as 'a landmark document which demonstrates the absolute commitment of local government to transforming social services in Wales'. The plan combines the delivery of regional programmes alongside national projects, with clear political and professional ownership. Denbighshire is the lead in the North Wales Commissioning Hub along with the five other councils. Conwy hosts the Telecare Service across North Wales (excluding Wrexham).

Four regional social services improvement collaboratives across Wales are managing key aspects of the programme. Managed by Directors of Social Services and with support from council Leaders, Cabinet Members and Chief Executives, these collaboratives are involved in a wide range of projects such as; the Older People's Project (Western Bay) focusing on early intervention and prevention; the Fostering Services Project (South East Wales) exploring collaboration between local authorities in the recruitment, assessment and training of foster carers; the development of sustainable learning disability services (Mid and West Wales) and the Commissioning Strategy (North Wales).

The transformation in services which the Bill is seeking comes at a time of severe public sector austerity, with even more cuts to budgets expected across Wales in the near future. Add to this the acute and unsustainable growth in demand for care and support services that have been evident in recent years, the pressures on services are severe. There are also issues with the rising numbers of children looked after by local authorities or with child protection plans; people with profound disabilities and with very old people with complex conditions and extensive support needs.

In addition, there is a particular local issue that the fees paid to private sector care providers are much higher in Conwy than in Denbighshire. Conwy currently spends £15m on private sector providers while Denbighshire spends £12m. Potentially charges could be harmonised upwards leading to a need for additional resources. Given that this fits with the Welsh Government agenda there could be a good case for specific and additional funding.

There may be differences between the eligibility criteria currently applied across the two authorities, together with variations in service delivery approaches to current clients. There is a risk that until harmonisation of service is achieved across the merged area the new authority may face challenge or even Judicial Review in relation to those services delivered to, what would be one larger client base.

6. Waste Recycling Arrangements

Public interest, and hence political interest, in any changes to waste collection, disposal and recycling should not be under-estimated. However, the current arrangements across Wales at the household level are broadly similar. The significant differences appear in the cost to councils particularly for disposal. This will be an issue requiring a focus on producing efficiencies and

increased effectiveness for the merged councils over the medium term. Conwy and Denbighshire are already collaborating on the North Wales Residual Waste Treatment Partnership. However, there are some differences on the waste collection process. Denbighshire's recycling rate is slightly higher, while Conwy's waste and recycling service costs are significantly lower, so harmonisation could be difficult. Welsh Government's national strategy recommends that all local authorities carry out source separated rather than commingled recycling, which may also be a significant factor.

7. Service provision conclusions

We have identified a number of areas where the harmonisation of service provision will necessarily lead to local debate and decision. Until these decisions have been taken and the precise changes agreed it is not possible to assess the financial implications for transitional costs with any degree of precision at this time. This is due to a range of factors including:

- The political dimension caused by future elections which may change the composition of the merged council and may lead to changes in the direction of service delivery;
- The political appetite to move further towards commissioning rather than in-house delivery;
- The growing agenda for cross public sector working, for example, between social services and the health sector;
- The change in the public's demand for services over the period between now and the creation of the merged authorities;
- The style and organisation of the merged council.

Our overall understanding is that Conwy and Denbighshire will continue to respond to the growing pressure on spending and will change service levels and models of delivery accordingly. We are aware that the authorities are concerned about a period of potential stagnation during the uncertain times ahead. Each authority has plans in place to change services. However, decisions on implementation are likely to be delayed so that a change in one authority will not adversely impact the other. In essence there could be a period of "planning blight" where potential service improvement will not be made. This is a good argument for pushing on with the merger plans for 2018/19 and not delaying until 2020/21.

8. Financial issues

There are three major financial issues that will require resolution if voluntary merger is to proceed and these are:

- Council Tax harmonisation;
- Superannuation arrangements;
- Revenue Support Grant arrangements.

9. Council Tax Harmonisation

Harmonisation of Council tax may occur under a number of scenarios i.e. authorities could level down to the lowest, they could equalise around the weighted average or they could level up to the highest. To assist with financial stability the third option is the most prudent. However, under this scenario it is possible that a significant amount of income could be foregone. This could arise in circumstances where the higher rate authority is forced into a standstill situation while the lower rate authority catches up. Assuming a 5% cap on increases this could take more than one year during which time the higher authority may have to limit increases to a rate lower than that which it would otherwise have chosen to set. Other scenarios could be developed that would lead to little or no income foregone. At this stage we have not carried out any research into what would be the most likely approach to harmonisation and hence we have not calculated a figure for income foregone. A further issue is that, at the moment, the legality of charging different council tax levels for different areas of a merged authority is untested but it might be possible for Welsh Government to apply a form of transitional Council Tax relief to assist those households in Conwy that would otherwise face an increase in Council tax purely as a consequence of merger.

10. Superannuation arrangements

At the moment Conwy's superannuation fund is managed by Gwynedd while Denbighshire falls within the Clwyd pension fund. Each fund will have different contribution rates for employers and each has different arrangements for eliminating its pension liability. This will undoubtedly lead to significant transition cost in terms of unravelling the different arrangements but, more importantly, there will be a need to decide how pension funds will be managed in the future. There are many options including setting up new regional funds or creating a single fund for Wales in addition to maintaining the status quo. The Staff Commission has superannuation arrangements included within its terms of reference but a potential early merger would require earlier consideration of this issue for Conwy and Denbighshire.

11. Revenue Support Grant (RSG)

Another issue that will require resolution on a national basis is the question of RSG arrangements. Of particular concern to Conwy is the operation of the RSG floor which was of benefit to Denbighshire in 2014/15 and to Conwy in previous years. Transitional arrangements will be required to mitigate the impact of any floor not applying to a merged authority compared with separate settlements for the financial years 2018/19 and 2019/20 during the lead up to vesting day for the rest of Wales.

12. Transition Costs

Clearly there will be significant costs attached to planning the merger and actually making the transformation of the two organisations into one a reality. Whilst that would be true for any merger we believe that the transition costs could be greater for an early adopter for a variety of reasons that we set out in this section of our report. In particular extra cost could arise from:

- Solving problems for the first time. As a pathfinder the two authorities will be investing time in identifying challenges and finding original solutions that can be used by the second phase of mergers;
- Carrying out the merger in a shorter time. This will mean investment in a period of intensive change requiring staff dedicated to the project. Experienced staff that understand both authorities will need to be freed up to work on the transformation issues. Their posts will need to be backfilled giving rise to real costs. Carrying out the merger over a longer time period could enable more work to be absorbed in-house without the same degree of backfilling;
- Changing services within a tight timeframe. Services will have to be harmonised more quickly which will lead to the need for financial support during the transition phase. A good example will be the schools funding formula which could give rise to a major redistribution of funds for schools. In the short term financial support may be required to mitigate the impact of redistribution whilst service redesign takes place, which would take time to introduce;
- Contract termination costs. A shorter lead in time could give rise to potential contract termination costs in areas such as buildings, ICT, vehicles and those service areas which have contacts with private sector providers.

Transition costs there are likely to be in four main areas:

- People – including the cost of redundancy;
- Property Assets – comprised of the costs of disposal of surplus accommodation or re-modelling retained accommodation;
- Systems/ICT – these are the costs of systems integration and moving staff and services onto a common platform;
- Programme Costs – these relate to the change management project team that will be required to integrate the two organisations.

For each of the above we have set out the rationale behind our thinking together with an estimate of the cost that would be incurred, highlighting the additional costs associated with being an early adopter:

13. People Costs

We have considered the following areas of cost:

- Post TUPE harmonisation of grading structures or salary protection including job evaluation;
- Additional travel costs;
- Redundancy/early retirement payments;
- Recruitment costs;
- Backfilling of posts for any staff seconded to the transition programme – (see Programme Costs later in this report);
- Contingencies required to cover the above where accurate estimates cannot be made.

The assumptions that we have made and our cost estimates are as follows:

- Estimate of the cost of carrying out the job evaluation process - **£272,000**
- Harmonisation of grading structures/salary protection based on harmonising salaries at the average of the two authorities. Depending on the detailed assumptions made, the cost of harmonisation could be somewhere in a range of £3m to £9m spread over three years and starting in 2018/19. Given that the Staff Commission may well enforce a method of harmonisation we have not included a figure for these costs in our calculations, at the present time;
- Additional travel costs – in examining the location and size of offices it appears that few, if any, would be closed although there would be probably be co-location of staff by function. We have therefore included a small cost element in property related costs (see below);
- Redundancy – we have assumed a de-layering of management posts and the elimination of apparently duplicated posts. We have not included any posts which might be lost due to efficiencies in service provision. We have used figures provided by authorities for the average length of service by department and salary band. We have also used enhanced payment multipliers as appropriate - **£1,231,000**;
- Recruitment costs – we have assumed no additional recruitment costs due to the relatively small number of posts affected;
- Early retirement payments – the authorities allow access to pension benefits for all those aged over 55 years and there are schemes in Conwy and Denbighshire for enhanced redundancy or compensation payments in excess of the statutory minimum redundancy payment i.e. 1.5 x the statutory amount. These compensation or enhanced payments can be used by individuals to buy added years in the LGPS. No added years are granted by the authorities;
- Pension Actuarial Reduction of Benefits costs – where staff access pension benefits early, no actuarial reduction is applied and the cost of this “pension strain” would fall on the revenue account. However, we have assumed that the costs would be relatively small given that the age for accessing benefits is set to increase to 57 from 2015 and that a relatively small percentage of staff would fall into this bracket. This is also an issue that is likely to be decided by the Staff Commission.

14. Property Costs

We have considered the following areas of cost:

- Options to reduce the property portfolio;
- Costs of disposal of surplus property;
- Costs of remodelling retained properties;
- Potential rental income;
- Potential for capital receipts from property disposal.

We have not evaluated:

- Contract termination/novation costs;
- Branding and marketing costs.

The assumptions that we have made and our cost estimates are as follows:

- There is a mixed portfolio of office space containing numerous small properties;
- Given the relatively small number of staff being made redundant we have not been able to identify any offices that could be closed;
- We have assumed that some expenditure will be incurred in the co-location of staff and in re-modelling retained accommodation amounting to **£250,000**.

15. Systems/ICT Costs

We have considered the following areas of cost:

- Systems integration costs – external costs;
- Systems costs – cost of backfilling posts for internal team;
- New hardware, software; networks, cabling etc.;
- New software licences;
- Transfer from legacy systems;
- Contingency sums to cover the above.

We have not evaluated contract termination/novation costs for all systems.

The assumptions that we have made and our cost estimates are as follows:

- We have examined details of the main systems used e.g. GL, CT, CRM etc. and we reviewed contract/licence termination dates;
- In all cases contracts/licences are held on a rolling renewal basis or end well before 2018/19. Therefore, we have assumed no cost for contract termination;
- We have also assumed a neutral position on software and hardware costs as the cost of technology changes constantly;
- Most costs will be incurred on systems harmonisation and migration carried out mainly in-house with external assistance from suppliers;
- For the latter we have estimated costs at **£180,000**;
- The bulk of the cost will be incurred on backfilling posts to create an internal programme team. We have assumed that this will take two years using seven staff. Using “typical” salaries and on-costs we have estimated these costs at **£772,000**.

16. Programme Change Costs

We have considered the following areas of cost:

- Programme management costs;
- Transition management;
- Organisational development and business process re-engineering;
- Workforce remodelling costs;
- External support costs;
- Contingencies.

We have not evaluated prescribed legislative consultation and stake-holder engagement costs associated with establishing the new organisation. Nor have we looked at any ‘Close Down’ costs or ‘Shadow’ authority costs. In reality there may be a need for a third “Management Team” in the year before vesting day but, as the precise mechanism for setting up the new authority is unknown at this stage, we have not evaluated the cost of that team.

The assumptions that we have made and our cost estimates are as follows:

- Backfilling of posts for the staff seconded to the transition/change programme – we have assumed that a Programme Team will be required for a period of 2 years. Staff would be released and their posts backfilled leading to additional staff costs;
- We have assumed that 20 staff will be required for the merger and using “typical” salaries and on-costs the costs would be **£1,768,000**;
- We have also assumed that a small amount of external consultancy support would be required amounting to **£241,000**.

Because Conwy and Denbighshire will be early adopters we have allowed for the fact that they will need to identify issues and challenges and find solutions in advance of other authorities. We

have assumed that they will need to set up a project planning and research team for the three years before vesting date commencing in 2015/16. Based on five people drawn from the disciplines of HR, Finance, Legal, Estates and IT this will incur an additional cost of **£841,000**. By acting as a "Pathfinder" authority they will be able to develop a blueprint for the second phase of mergers and they could share their learning with other authorities.

17. Summary of financial issues

Clearly these costs will fall over a period of time both before and after vesting day on 1 April 2018. In the following two tables we set out our current estimate of the likely costs in total, together with our comments on those costs. An indication of the possible timing of those costs is also included. We have grouped the costs to reflect the way that they have been presented in the earlier sections of this report. As noted above these figures are based on research carried out by CIPFA on behalf of the WLGA.

TABLE 3 – SERVICE AND FINANCIAL ISSUES

ISSUE	RANGE OF COSTS	PERIOD	COMMENTS
Equalisation of school spend per pupil	Up to £1.5m p.a.	2018/19 to 2019/20	The current difference is significant and any adjustment would depend on democratic and WG approach
Harmonisation of rates paid to private sector care providers	Not possible to quantify at the present time	2018/19 to 2019/20	This depends on negotiations with providers but likely to harmonise at higher rates
Waste recycling	Not possible to quantify at the present time	2018/19 to 2019/20	Key factors relate to recycling and that will be influenced by local choices and WG recommended approach
Council Tax harmonisation	Range of £1m to £7m	2018/19 to 2019/20	The amount of any Council tax foregone depends on local political decisions and WG approach
Superannuation	Not possible to quantify at the present time	2018/19 onwards	Issues around contribution rates and arrangements for the elimination of the deficits will depend on directions from the Staff Commission
Revenue Support Grant	Not possible to quantify at the present time	2018/19 and 2019/20	Transitional arrangements will be required to mitigate the impact of any floor not applying to a merged authority compared with separate settlements
Pay harmonisation	Up to £3m p.a. for three years	2018/19 and then annually or protection period	Dependent on advice to WG from Staff Commission in particular in respect of pay protection

TABLE 4 – TRANSITION COSTS

ISSUE	TOTAL COSTS £'000	PERIOD	COMMENTS
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Redundancy	1,231	2018/19	Estimated for vesting day but could be spread over a longer period
Job evaluation process	272	2018/19 to 2019/20	Cost of the process
Change programme teams	1,768	2017/18 to 2018/19	Change programme to commence in year before vesting day
Change management consultancy support	241	2017/18 to 2018/19	External support commencing in year before vesting day
Property	250	2018/19 to 2020/21	Cost of remodelling/moving people
Systems migration consultancy	180	2017/18 to 2018/19	External costs of systems migration
Systems migration Programme teams	772	2017/18 to 2018/19	Costs of internal systems migration team
Merger planning team	841	2015/16 to 2017/18	Internal team involved in research and planning before vesting day
Total	5,555		

18. Savings Opportunities

Although there will be additional costs incurred in the short to medium term we have identified some savings that will, over time, help to off-set the transitional costs and lead to the delivery of more sustainable and efficient services over the long term. In arriving at our estimate of savings we have made the following assumptions:

- The creation of a single management team;
- Staff and operational savings arise from the creation of single corporate and support services 'back office' functions in e.g. Policy & Democratic Support, Legal Services (including Elections), Financial Services (including Audit), ICT support, Procurement, Asset Management, HR administration; Contact/Customer Services - **£2,259,000**;
- Staff and operational savings derived from merged and rationalised management of "middle office" and "front line" services. The former includes services such as Planning, Building Control, Environmental Health, Revenue and Benefits and Registration while front line services includes Education, Social Services, Waste and Leisure services - **£1,081,000**;
- Possible savings in ICT estates;
- Possible savings in administrative accommodation - **£98,000**;
- Savings in members' allowances based on SRAs, savings from a reduced number of members and savings on election costs spread over the electoral cycle.

In considering how quickly savings might be achieved there is a need to consider the following issues:

- The savings represent a snapshot in time and may not be realisable in the lead up to merger;
- It will probably take two to three years (or longer) to implement all the savings;
- The opportunity to realise savings will diminish over time;
- Future forecasts on settlements could mean that authorities' ability to make savings will be eroded;
- Although the authorities may be early adopters of a merger, savings may not be achieved earlier due to the service issues referred to above and the need for additional funding in the short term to mitigate the effects of shifting resources from one authority to the other. Welsh Government may need to consider granting favourable terms and flexibilities to the authorities

Notwithstanding these comments we believe that realistic savings can be achieved in the areas set out in the following table. Note that these are annual figures.

TABLE 5 – ESTIMATED SAVINGS

Area	%	£'000
Support/Back Office Services	8	2,259
Merged and rationalised management of 'Middle Office' and 'Front-Line' Services	4	1,081
Administrative Accommodation		98
TOTAL		3,438

We also believe that savings can be made through the ability to pay only one set of Members' SRAs, in a reduced number of Members from 106 currently to, say, 75 and in reduced electoral costs. In calculating these annual costs we have converted election costs into an annual figure by assuming a four year election cycle:

TABLE 6 – DEMOCRATIC SAVINGS

SAVINGS FROM SRAs £'000	SAVINGS FROM REDUCED NUMBER OF MEMBERS £'000	SAVINGS FROM ELECTION COSTS £'000	TOTAL SAVINGS £'000
189	406	34	629

19. Timetable for costs and savings

In the table below we set out a summary of the costs that we can identify with any degree of certainty in the run up to vesting day on 1 April 2018. Many more costs and savings will be realised after vesting day and some of the factors that will influence this are set out below:

- Savings on redundancies may start in 2018/19 but a full year effect will not be felt until 2019/20;
- Savings on property will be small and will start in 2018/19;
- Savings on Members Special Responsibility Allowances, a reduced number of Members and elections will commence in 2018/19. The saving on elections is an annual cost based on a four year cycle;
- Council tax harmonisation may start in 2018/19 but we have not costed the impact at this stage;
- Redundancies will be made on vesting day and costs will be incurred in 2018/19;

- There will be some costs associated with staff relocations, property disposal and the re-modelling of buildings;
- Systems migration will start in the year before vesting day and will comprise mostly internal costs with back-filling supported by external consultancy;
- A Merger Team will be set up in 2015/16 and will operate for the three years leading to vesting day;
- A change programme team will be set up a year before vesting day and will continue until the end of 2018/19. Costs will be mostly internal with backfilling supported by external consultancy;
- The process of grade harmonisation has not yet been quantified due to the number of variables involved and the fact that the methodology may be defined by the Staff Commission. We have assumed that there will be no efficiency savings although the reality is that the workforce will be reduced over the timetable period.

In Table 7 below we set out the total savings for each year from 2015/16 to 2017/18 and the net position at the end of that period. However, the table does not take account of the additional costs that will arise from issues that cannot be quantified accurately at the present time. These are the issues described in Table 3 above.

TABLE 7 – SUMMARY OF COSTS AND SAVINGS

YEAR	SAVINGS £'000	COSTS £'000	NET POSITION £'000
2015/16	-	280	-280
2016/17	-	280	-280
2017/18	-	1,761	-1,761
TOTAL	-	2,321	-2,321

20. Overall conclusions

We have set out above the case for an early merger between Conwy CBC and Denbighshire CC; we have considered the service delivery challenges, the key financial issues, the transitional cost of setting up the new authority and the potential savings that could be achieved. The whole process is still subject to a number of risks and uncertainties and we summarise these as follows:

- Uncertainty over the enabling legislation – timing and content;
- The need to respond to the Williams exhortation to reduce the number of public sector bodies;
- Impacts from required Public Consultation;
- Political management and impacts on politicians and the electoral cycle;
- The impact of uncertainty and the process of transition on all those involved creating 'paralysis' in day to day activity;
- The community dimension – the impacts on everyone in the existing separate communities;
- Maintenance (and improvement) of service delivery in a time of change, uncertainty and declining resources;
- Issues of merging organisational cultures;
- The need for timely, effective and honest communication with trades unions and staff at all levels ;
- Clarity and detail over the level of investment that will be required, the benefits likely to be realised and the potential payback period;
- Harmonisation of working practices;
- Arrangements for staff not required in the new councils;
- Harmonising local terms and conditions and results of Job Evaluation to be incorporated;
- Alignment of statutory and local policies;
- Consideration of the effects on corporate costs, e.g. accommodation, of the potential relocation of many services;
- Existing partnerships with other public sector bodies will need to be examined, their future decided and all parties informed accordingly;

- Issues around the location of different services;
- Officers with new joint responsibilities will have to work hard to win and retain the trust of both of their clients. In effect they have to prove that an officer does not have to be on site to be working effectively for the Authority.

Annex C: Consultation Questions

Your Name	
Organisation (if applicable)	Colwinston Community Council
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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	
<u>Consultation Question 1</u>	
<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>The first step is to reduce the plethora of requirements on public bodies for monitoring and reporting. A series of slimline measures should be developed to measure performance since there are excessive requirements which have generated many additional posts in the public sector. There needs to be a business-like approach adopted to service provision. You do not see the extensive range of consortia in the private sector and most of what is being done at present is unnecessary and more importantly costly to the public purse. Whilst the monitoring of outcomes is important this should be limited to a smaller number of measurement targets that do not require extensive work to maintain.</p>
<p>b) What are your views on the common elements to the process of mergers we outline in this section?</p>	<p>The report from the Williams Commission identified that there are council areas which are significantly challenged in “delivering consistently, securing the resilience, expertise and leadership capable of transforming their organisations and supporting their communities in a complex and changing world”. These issues remain unchallenged. The Williams Commission also believed that the smaller local authorities were further limited by proportionally greater administrative overheads. There is an issue around there being sufficient individuals with the necessary skills to effectively run the local authorities as they exist presently in Wales. This can only be addressed efficiently through a reduction in the number of local authorities.</p>
<p>c) What are your views on the options for creating fewer, larger authorities which we have set out?</p>	

The public sector in Wales is much too large and uses excessive public resources. WAG also tend to adopt a “nanny state” approach and unnecessarily try to restrict and impose unnecessary legislation on the people of Wales. Option 3 proposed in the document provides a range of advantages:

1. it addresses the sustainability challenge quickest and potentially offers a more cost-effective way of arriving at the future footprint.
2. It offers a single, clear solution and minimises the length of the change process. It provides for a timely response to the financial and service pressures local authorities face. It would see capacity increase and savings emerge more quickly than the other options. It offers the greatest certainty for the workforce and citizens.
3. It does not allow a ‘blocking’ authority to prevent progress. It has been clear for some time that local authorities have been resisting the introduction of better and more effective arrangements because of selfish, self-preservation reasons
4. It will keep to a minimum the period the Welsh Government has to provide support to the process and would allow the focus to switch to transformation.
- 5 It would offer more scope to find ‘once for Wales’ solutions to common challenges.

Whilst the consultation document suggests that the disadvantages of this approach are that it provides no choice for local government on the pace of change, it does mean however, that mergers would happen regardless of the level of support in a local authority. There are likely to be places where there is opposition and the transition process will be variable. In places where there is opposition, there is a risk of service delivery suffering because of the distraction of trying to resist change.

These concerns should not be a deterrent to the need for change and the Welsh Government needs to insist on the implementation of local government arrangements that are not only more cost effective, but also more appropriate to the needs of the population of Wales. The time for political dog-in the -manger approaches is now long past and swift action is urgently needed.

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

There are no other options to be offered. However, the Welsh Government should immediately adopt an approach whereby there is a freeze on all local government senior posts to start the process of reducing the current size of this sector. The Welsh Government must make use of voluntary redundancy in the first instance, for senior posts to move the process forward. Whilst there is a cost to this, in the longer term, a leaner, less expensive structure is needed. The Welsh Government cannot leave the process to local government itself to take forward, it must do this itself if it is to achieve the objective of more cost-effective structures in as short a time as possible.

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

The most striking evidence indicates that Wales suffers from a significant level of overrepresentation. There are 40 Members of Parliament 60 Assembly Members and 22 local authorities for a population of approximately 3,170,000 people (2017). This comes at a cost to the public purse. Whilst the Assembly does not have powers to change the Parliamentary representation, it does have the power to tackle the gross overrepresentation of local councils and councillors.

Wales has more local councillors in the 22 authorities than Scotland whose population is approximately 5,424,800 (2017). Scotland has 1,223 councillors with an average of 1 councillor for 4,327 people. In Wales there are 1,254 councillors over the 22 local authorities providing one councillor for 2,472 people.

Unlike Wales, Scotland does not have a further tier of community and town councils and if the same ratio for Scotland is applied to Wales there should be a maximum of 716 councillors. If account is also taken of the community and town councils then this number could be even less.

The present set up is expensive. Each councillor in Wales is paid a minimum of £13,600 and if account is then taken of the additional allowances that are paid for Committee Chairs etc. this could rise to at least £ £26,300 to £32,300 p.a. for Cabinet members. The reduction in the number of councils and councillors would save the public purse a minimum of £8 million and possibly at least £11 million each year. Community and Town councillors are not paid (but can claim expenses). However, the main financial savings from the reduction in the number of authorities will be much greater.

The Welsh Government's StatsWales website shows that in 2017-18 the costs of Central Administration for these 22 authorities was just under £187 million. This would be further enhanced by the management costs of each department as well. Simple mathematics shows that by reducing the number of local authorities by at least a half of the present number there would be an annual saving of £93 million for Wales. The total savings across all expenditure heads would be significantly higher than this one figure.

The consequence of having 22 authorities is an enormous cost for providing public services. Senior staff enjoy salaries much higher than the First Minister which equally cannot be justified.

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?

It is all very well trying to achieve a structure that meets all circumstances. The

reality is however being that the Welsh Public Purse can no longer AFFORD the wide range of services favoured by the Welsh Government and change MUST take place quickly.
b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?
See above.
c) What are your views on the new areas suggested in this section?
See above.
d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?
No.
e) In the context of these proposals, are there other ways we should simplify and streamline joint working arrangements at regional level and among public bodies within the new authority areas? If so, what are they?
The only way to streamline is through a radical cut in staff numbers for local government as the first stage. This must be through a reduction from 22 authorities to perhaps 8 authorities. The other relationships with public bodies will follow the pattern set and there should be a reduction in the numbers of staff currently engaged with the 22 local authorities and the corresponding public organisations dealing with other public services.

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?
Provided that the Welsh Government is driving the process of change, It should consider various mechanisms to achieve this objective in as short a time frame as possible.

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 don't agree that voluntary mergers will achieve the scale of change now required in Wales.
c) Do you have any other thoughts on the proposed process?
See above.
<u>Consultation Question 4</u> The consultation suggests holding any local government elections in June 2021. Are there any reasons why June 2021 would not be a suitable date? If so, please suggest an alternative date with the reasons why that would be more suitable.
There are no reasons to postpone the change and June 2021 is sufficiently long a period to achieve this.
<u>Consultation Question 5</u> The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of wellbeing by Public Service Boards, which are linked to electoral cycles. We will make provision to make sure these tie into any new electoral cycles going forward. Are there any other plans or matters which might be tied into the electoral cycle which we need to consider?
None.
<u>Consultation Question 6</u> What are your views on the approach which should be taken to determining the parameters of electoral reviews?
Once the Welsh Government determined the number of local authorities, the only parameters should relate to achieving parity of electoral divisions across Wales as far as geographical remoteness allows. The concept of equal weight for electing councillors should be key.

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?

The size of the changes required will not be assisted by any contribution by existing members who have a vested interest in maintaining their local positions. Parity for electors and the ratio of electors to councillors should be the key here.
b) How could we better recognise the level of responsibility involved in being a local councillor? What changes to the remuneration and support councillors receive would enable a wider range of people to become involved in local democratic representation?
The Independent Remuneration Panel for Wales can undertake this role impartially.
<u>Consultation Question 8</u>
a) Are there other powers which local government should have? If so, what are they?
None.
b) Are there other freedoms or flexibilities which local government should have? If so, what are they?
No.
<u>Consultation Question 9</u>
a) Which areas offer the greatest scope for shared transactional services?
See above.
b) How might such arrangements be best developed?
See above.
<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?
Simply by the Welsh Government taking the lead on the change process.
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.

d) Which of the issues identified above or in your response should be prioritised for early resolution?
Freezing of local government appointments.
<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?
There will be advantages in grouping Welsh speaking populations together in the new electoral divisions which will be required by these reforms.
b) How could positive effects be increased, or negative effects be mitigated?
There are no obvious solutions to this.
<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.
The Welsh Government have a Welsh Language Commissioner and this function could be strengthened to assist on these issues. At present the Commissioner does not have sufficient powers and these need to be improved.
<u>Consultation Question 13</u> The Children's Rights Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on children and young people. The Welsh Government seeks views on that assessment.
a) Are there any positive or adverse effects not identified in the assessment?
There are no obvious issues here.
b) Could the proposals be reformulated so as to increase the positive effects or

reduce any possible adverse effects?
No.
<p><u>Consultation Question 14</u></p> <p>The Equalities Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on protected groups under the Equality Act 2010. The Welsh Government seeks views on that assessment.</p>
a) Are there any other positive or adverse effects not identified in the assessment?
<u>No.</u>
b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?
<u>No.</u>
<p><u>Consultation Question 15</u></p> <p>Please provide any other comments you wish to make on the content of this consultation.</p>
<p>The Welsh Government needs to be proactive if change is to take place: actions speak louder than words!</p>



GRAIG COMMUNITY COUNCIL

Response to the Local Government Reorganisation Green Paper.

As members of the Graig community council, within the City of Newport, we took the opportunity to look at and discuss the above proposal in detail. After reviewing this document, we have decided that it is not aimed at community councils at this stage. However, we would still be interested in future developments. We are basically in favour of change, provided that community councils and communities are not adversely affected in terms of service and financial impacts.

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Graig Community Council supports Fairtrade

Annex C: Consultation Questions

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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?
<ol style="list-style-type: none"> 1. We are concerned at the lack of direct answerability of such regional structures to local electors and at the lack of democratic scrutiny of their decisions and actions. We suggest that principal local authorities' subject scrutiny committees should be able to scrutinise directly the work of regional consortia and other bodies which cover their area, requiring members of the regional boards (whether or not members of the same local authority) to attend to be scrutinised. 2. We are also concerned at the current lack of a legal basis for regional working, and support in principle the Welsh Government's intention to place such working on a statutory footing. 3. We believe that the best services to consider for regional delivery are those where local authorities currently administer nationally determined standards, e.g. 'back-office' finance and payroll administration, public protection, and building control. 4. We are aware that education improvement is already delivered regionally, and are not convinced that the public, schools or pupils understand the split between LEAs and consortia. If this is to continue we do agree however that ALN provision can be best administered regionally. We would urge that in this respect - as in all others - Welsh language provision be carefully considered. We are aware that in the case of specialised services especially, it may be easier to make full Welsh language provision across a region than within each individual local authority. 5. Economic development plans across a wider area can be beneficial, by reducing wasteful competition between LAs, and ensuring that areas with less favourable economic conditions, services, or circumstances have an equal say alongside the big investment and job-creation 'magnets'. This is especially true of dispersed rural communities in the so-called 'hinterland' of larger urban areas. These advantages have been seen in the development of the City Regions.
b) What are your views on the common elements to the process of mergers we

outline in this section?
Cytûn's Wales & Europe Working Party is concerned that all the timetables proposed envisage local government being reformed in parallel with the major changes to the governance of the UK at UK and Welsh level as a consequence of leaving the European Union. While welcoming debate on the future nature of local government post-Brexit, we are concerned at the consequences of reorganising every level of government simultaneously. We question whether Welsh Government has the resources adequately to manage all these process simultaneously. On balance, we would suggest that the reorganisation of local government should wait until the overall pattern of post- Brexit governance is clearer and the implications of losing the EU tier of authority for local government can be seen. Only once we know what local government will need to do post-Brexit can it be decided how best to structure it.
c) What are your views on the options for creating fewer, larger authorities which we have set out?
d) Are there other options for creating fewer, larger authorities we should consider?
e) Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.
<p>The cost of reorganisation of this kind is almost invariably greater than initially thought, and the long-term cost savings less than initially believed. Many of our church members have lived through two previous reorganisations of local government and are acutely aware of the costs in finance, staff morale and general disruption which such reorganisation involves.</p> <p>The Wales and Europe Working Party of Cytûn is particularly concerned at the prospect of facing these costs at the same time as the costs of reorganising the governance of the UK and the Welsh devolved settlement as a result of Brexit.</p>

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?
Yes, subject to the qualifications in 1(b) and 1(e) above
b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?
<p>We note that the use of population size as a governing criterion in determining authority boundaries seems to be based on an underlying assumption that 'big is good' and that larger authorities are necessarily more effective than smaller ones. We do not believe that the Green Paper provides an adequate evidence base to support this assumption.</p> <p>We would wish to emphasise:</p> <ol style="list-style-type: none"> 1. Local accountability is key, with the population identifying as quickly as

<p>possible with the new local authorities. We would encourage the use of familiar names with historic resonance.</p> <ol style="list-style-type: none"> It would make sense for local authority boundaries to follow natural geographical boundaries and current transport links. Social justice. It is important that not only the size of the population in each authority be viable, but also that we do not create ‘poor’ and ‘rich’ authorities. This would mean extensive redistribution between authorities by Welsh Government – always a source of political debate and local resentment – whereas economically diverse areas provide the opportunity for redistribution within (rather than between) local authorities by ensuring that each has a viable tax base.
<p>c) What are your views on the new areas suggested in this section?</p> <p>In the light of our comment in (b)2 and 3 above, we are concerned at the creation of authorities 7 and 10 (‘Valleys’ authorities likely to struggle economically) alongside authorities 8 and 9 (M4/coastal authorities likely to be more prosperous). The tax base of authorities 7 and 10 is likely to be highly inadequate, especially given the higher level of need and lower property values in these areas. By the same token, authorities 7 and 10 do not follow important transport links or geographical boundaries – along valleys which run from north to south – but rather try to link valleys which are not naturally connected.</p>
<p>d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?</p> <p>Given that most travel to work and for leisure in south east Wales follows a north-south pattern, and the prevalent public transport links, we would urge that authority boundaries reflect this travel and economic pattern, and that each authority should follow geographical contours with boundaries running north-south, rather than the proposed east-west boundaries dividing authority 7 from authority 8, and authority 9 from authority 10. The pattern we prefer has been followed for authority 6, which we endorse.</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>Chapter 5</p>
<p><u>Consultation Question 3</u></p> <p>Chapter 5 sets out the proposed approach to transition and implications for establishing Transition Committees and elections to Shadow Authorities under each option.</p>
<p>a) Do you agree with the proposed process of transition: namely establishing Transition Committees and ensuring elections to Shadow Authorities can be held ahead of vesting day for the new authorities?</p>
<p>b) Do you agree that, if option 1 were pursued, we should set a date by which voluntary merger proposals should come forward in each electoral cycle?</p>

c) Do you have any other thoughts on the proposed process?
See 1(b) above.
<u>Consultation Question 4</u> The consultation suggests holding any local government elections in June 2021. Are there any reasons why June 2021 would not be a suitable date? If so, please suggest an alternative date with the reasons why that would be more suitable.
<u>Consultation Question 5</u> The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of wellbeing by Public Service Boards, which are linked to electoral cycles. We will make provision to make sure these tie into any new electoral cycles going forward. Are there any other plans or matters which might be tied into the electoral cycle which we need to consider?
<u>Consultation Question 6</u> What are your views on the approach which should be taken to determining the parameters of electoral reviews?
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? It is vital that local councillors can continue to use their knowledge of the communities they represent in scrutinising regionally delivered services. This requires a right for Scrutiny Committees of individual local authorities to be able to scrutinise the boards and officers of all regional bodies which provide services in their area.
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? We regard with some concern the proposal that councillors should, in effect, be paid for a full-time job. This carries with it the risk of creating a group of career politicians, dependent on maintaining their seats for their own livelihoods. We believe that local government should enable local people to represent the communities in which they serve, rather than providing a career path for those seeking further advancement. We support the provision of an ongoing education and formation programme for elected councillors in order that they fully understand their responsibilities. In all fields we believe that the principal aim of education and formation for councillors should be to raise awareness, rather than to provide them with specific expertise, for which employed officers and cabinet members are available.
<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?
We support the introduction of a general power of competence for local authorities, giving them greater flexibility in the use of their resources and being innovative in seeking the well-being of their communities.
<u>Consultation Question 9</u>
a) Which areas offer the greatest scope for shared transactional services?
We are concerned that any shared transactional services should continue to be accountable to democratically elected councillors. We believe that the multiplication of situations where the elected councillors of one authority are responsible for a company running services in another authority, to which they are not answerable, is undesirable and undermines public confidence in local government.
b) How might such arrangements be best developed?
Where such arrangements are made, we would suggest: <ol style="list-style-type: none"> 1. That such arrangements should always be made within Wales, and thus be subject to a common legislative framework. We are concerned at instances of services in Wales being run by companies controlled by local authorities in England. Where local authorities need to purchase very specialised services from authorities in England (e.g. some forms of specialised social care), it should be clear that accountability for the services and for the Welsh citizens who receive them remains in the hands of local councillors in Wales. 2. We would suggest that Welsh Ministers issue statutory guidance to local authorities regarding the administration, accountability, risks and scrutiny of shared transactional services.
<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?
1(b) and 4(b) in our response.
<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?
We note with some concern the proposed merger of Ceredigion – which currently

uses Welsh as an internal administrative language – with neighbouring authorities which do not do so, and would urge that steps be taken to ensure that this use of the Welsh language not be reduced as a result of local government reform.
b) How could positive effects be increased, or negative effects be mitigated?
<u>Consultation Question 12</u> Please also explain how you believe the proposed policy within this consultation could be formulated or changed (if required) so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.
<u>Consultation Question 13</u> The Children's Rights Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on children and young people. The Welsh Government seeks views on that assessment.
a) Are there any positive or adverse effects not identified in the assessment?
Cytûn member the Children's Society is especially concerned that local councillors understand their role as corporate parents for looked after children and that compulsory training be provided to all elected councillors in this field, as well as with regard to safeguarding more generally.
b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?
<u>Consultation Question 14</u> The Equalities Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on protected groups under the Equality Act 2010. The Welsh Government seeks views on that assessment.
a) Are there any other positive or adverse effects not identified in the assessment?
The assessment does not identify the effects on pupils with Additional Learning Needs in local authority schools, including those educated outside their own local authority. Given that a new system for assessing and providing for such needs is currently being introduced, we would urge that such an assessment be made.
b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?
<u>Consultation Question 15</u> Please provide any other comments you wish to make on the content of this consultation.
We do not believe that bigger is necessarily better. The case for larger authorities needs to be made rather than assumed.

Annex C: Cwestiynau Ymgynghori

Enw	Gethin Rhys
Sefydliad (os yw yn berthnosol)	Cytûn – Eglwysi Ynghyd yng Nghymru
E-bost / Rhif Ffon	gethin@cytun.cymru / 029 0246 4378
Eich Cyfeiriad	58 Heol Richmond, Caerdydd CF24 3AT

Mae'r hysbysiad preifatrwydd yn [y ddogfen ymgynghori](#) yn esbonio sut byddwn yn defnyddio eich gwybodaeth.

Pennod 3
Cwestiwn Ymgynghori 1 Yn bennod 2, dywedem unwaith eto ein bod wedi ymrwymo i weithio'n rhanbarthol mewn meysydd allweddol, gan gydnabod hefyd fod angen gwneud newidiadau pellach i gefnogi hyn. Yn bennod 3, rydym yn cyflwyno'r opsiynau cyffredinol ar gyfer symud tuag at lai o awdurdodau, a'r rheini'n rhai mwy o faint, ac rydym yn crynhoi nodweddion y broses a fyddai'n gyffredin i bob opsiwn.
a) Pa gamau ymarferol allai Llywodraeth Cymru eu cymryd i wneud y trefniadau gweithio'n rhanbarthol presennol yn haws ac yn fwy effeithiol, er enghraifft mewn perthynas â'r consortia addysg, gwasanaethau cymdeithasol a'r Dinas-ranbarthau a'r Bargeinion Dinas a Thwf?
<ol style="list-style-type: none">1. Rydym yn gofidio am ddiffyg atebolrwydd uniongyrchol strwythurau rhanbarthol o'r fath i etholwyr lleol a diffyg craffu democrataidd ar eu penderfyniadau a'u gweithrediadau. Awgrymwn y gallai pwyllgorau craffu pynciol y prif awdurdodau lleol graffu'n uniongyrchol ar waith y consortia rhanbarthol a chyrrff eraill sy'n cwmpasu eu hardal, gan orfodi aelodau o fyrddau rhanbarthol (p'un ai ydynt yn aelod o'r un awdurdod lleol ai peidio) i fynychu er mwyn cael eu craffu.2. Rydym hefyd yn poeni am ddiffyg presennol sail gyfreithiol i weithio'n rhanbarthol, ac yn cefnogi mewn egwyddor bwriad Llywodraeth Cymru i osod gweithio o'r fath ar sail statudol.3. Credwn mai'r gwasanaethau gorau i'w hystyried ar gyfer eu cyflwyno'n rhanbarthol yw'r rhai lle mae awdurdodau lleol ar hyn o bryd yn gweinyddu safonau a bennir yn genedlaethol, e.e. gweinyddiaeth ariannol a chyflogres y 'swyddfa gefn', gwarchod y cyhoedd a rheolaeth adeiladu.4. Rydym yn ymwybodol fod gwella addysg eisoes yn cael ei gyflwyno'n rhanbarthol, ac nid ydym yn argyhoeddedig fod y cyhoedd, ysgolion na disgyblion yn deall y dosraniad rhwng awdurdodau addysg lleol a consortia. Os yw hyn i barhau, fe gytunwn y gellid gweinyddu darpariaeth ADY orau yn rhanbarthol. Byddem am bwyso yn y cyd-destun hwn - fel ymhob un - y dylid ystyried yn ofalus darpariaeth Gymraeg. Rydym yn ymwybodol y gall fod yn haws darparu gwasanaethau arbenigol yn gyfangwbl trwy'r Gymraeg ar draws rhanbarth yn hytrach nag o fewn awdurdod lleol unigol.5. Gall cynllunio datblygu economaidd ar draws ardal ehangach fod yn fanteisiol, trwy leihau cystadlu gwastraffus rhwng awdurdodau lleol, a sicrhau fod ardaloedd ag amodau economaidd, gwasanaethau neu amgylchiadau llai ffafriol yn cael llais gyfartal â'r 'magnedau' buddsoddi a chreu swyddi mawr. Mae hyn yn arbennig o wir yn achos cymunedau gwledig gwasgaredig o amgylch ardaloedd trefol mawr. Gellir gweld y manteision hyn yn natblygiad y Dinas Ranbarthau.

b) Beth yw eich barn chi am yr elfennau cyffredin i'r prosesau uno yr ydym yn eu cyflwyno yn yr adran hon?
Mae Gweithgor Cymru ac Ewrop Cytûn yn poeni fod yr holl amserlenni a gynigir yn awgrymu diwygio llywodraeth leol ar yr un pryd â'r newidiadau mawr i lywodraethiant y DU ar lefel y DU a Chymru o ganlyniad i ymadael â'r Undeb Ewropeaidd. Tra'n croesawu trafodaeth am natur llywodraeth leol y dyfodol ar ôl Brexit, rydym yn pryderu am ganlyniadau ad-drefnu po lefel ar lywodraeth ar yr un pryd. Rydym yn amau a oes gan Lywodraeth Cymru yr adnoddau i reoli'r holl brosesau hyn ar y cyd. Wedi pwysu a mesur, teimlwn y dylai ad-drefnu llywodraeth leol aros nes bod patrwm llywodraethiant ar ôl Brexit yn gliriach, ac y gwelir beth fydd oblygiadau colli awdurdod yr UE ar lywodraeth leol. Dim ond wedi deall beth fydd llywodraeth leol y dyfodol am ei wneud y gallwn benderfynu sut orau i'w threfnu.
c) Beth yw eich barn chi am yr opsiynau a gyflwynwyd gennym ar gyfer creu llai o awdurdodau, a'r rheini'n rhai mwy o faint?
d) A oes unrhyw opsiynau eraill y dylem eu hystyried ar gyfer creu llai o awdurdodau, sy'n fwy o faint?
e) A oes gennych dystiolaeth ynglŷn â chost, manteision ac arbedion pob opsiwn a allai helpu i lywio'r penderfyniad? Os oes, rhowch fanylion.
Mae cost ad-drefnu o'r math yma wastad yn fwy nag yr amcanir yn wreiddiol, a'r arbedion hir-dymor yn llai. Mae llawer o aelodau'n heglwysu wedi byw trwy ddau ad-drefniant blaenorol yn llywodraeth leol ac yn ymwybodol iawn o'r costau o ran arian, morâl y staff a thrafferth gyffredinol sy'n ymhyg wrth ad-drefnu. Mae Gweithgor Cymru ac Ewrop Cytûn yn arbennig o bryderus ynghylch wynebu'r costau hyn ar yr un pryd â chostau ad-drefnu llywodraethiant y DU a setliad datganoli Cymru o ganlyniad i Brexit.

Pennod 4
<u>Cwestiwn Ymgynghori 2</u>
Mae pennod 4 wedi egluro'r angen am eglurder ar y patrwm ar gyfer llywodraeth leol yn y dyfodol a'r ystod o ffactorau y dylid ei hystyried wrth benderfynu ar ffurf newydd. Mae'n cynnig patrwm posibl ar gyfer llywodraeth leol yn y dyfodol, y gellid ei gyflawni drwy bob un o'r opsiynau a drafodwyd yn y bennod flaenorol.
a) Ydych chi'n cytuno ei bod hi'n bwysig rhoi eglurder ynghylch y patrwm ar gyfer llywodraeth leol y dyfodol?
Ydyn, yn ddarostyngedig i'r sylwadau yn 1(b) ac 1(e) uchod.
b) Ydych chi'n cytuno â'r ffactorau a nodwyd gennym i lywio ein syniadau? A fydddech chi'n ychwanegu ffactorau eraill neu'n newid unrhyw ffactor?
Nodwn fod defnyddio maint poblogaeth yn sail llywodraethol wrth ad-drefnu ffiniau awdurdodau lleol fel petai'n seiliedig ar yr egwyddor fod 'mwy yn well' a bod awdurdodau mwy o reidrwydd yn fwy effeithiol na rhai llai. Nid ydym yn credu fod y Papur Gwyrdd yn cyflwyno sail tystiolaeth ddigonol i hyn. Byddem am bwysleisio: 1. Mae atebolrwydd lleol yn allweddol, gyda'r boblogaeth yn uniaethu mor fuan ag y bo modd â'r awdurdodau lleol newydd. Byddem yn argymhell defnyddio enwau cyfarwydd a chanddynt gyffyrddiadau hanesyddol cyfarwydd. 2. Byddai'n synhwyrol sicrhau fod awdurdod lleol yn dilyn ffiniau daearyddol

<p>naturiol a llinellau trafnidiaeth a chludiant.</p> <p>3. Cyfiawnder cymdeithasol. Mae'n bwysig bod nid yn unig maint y boblogaeth ymhob awdurdod yn ddichonadwy, ond hefyd nad ydym yn creu awdurdodau 'cyfoethog' a 'thlawd'. Byddai hyn yn golygu fod angen ail-ddosbarthu sylweddol gan Lywodraeth Cymru – sy'n anochel yn creu trafodaeth wleidyddol a gofid lleol – tra bod ardaloedd cymysg yn economaidd yn creu'r gallu i ail-ddosbarthu o fewn (yn hytrach na rhwng) awdurdodau lleol trwy sicrhau fod gan bob un ohonynt sail drethadwy ddichonadwy.</p>
<p>c) Beth yw eich barn chi am yr ardaloedd newydd a awgrymir yn yr adran hon</p> <p>Yn wyneb ein sylw yn (b)2 a 3 uchod, rydym yn gofidio am greu awdurdodau 7 a 10 (awdurdodau yn y cymoedd sy'n debyg o gael trafferthion economaidd) ochr yn ochr ag awdurdodau 8 a 9 (awdurdodau M4/arfordirol sy'n debygol o fod yn fwy llewyrchus). Y tebygrwydd yw y bydd sail drethiannol awdurdodau 7 a 10 yn annigonol iawn, yn enwedig o gofio'r anghenion uwch a'r prisiau tai is yn yr ardaloedd hynny. Yn yr un modd, nid yw awdurdodau 7 a 10 yn dilyn llinellau cludiant na daearyddol pwysig – sy'n rhedeg o'r gogledd i'r de lawr y cymoedd – ond yn hytrach yn ceisio rhychwantu cymoedd nad ydynt yn cysylltu'n naturiol.</p>
<p>d) A oes gennych unrhyw awgrymiadau eraill ac, os felly, pa wybodaeth sydd gennych i gefnogi'r rhain fel dewis arall?</p> <p>Gan fod y rhan fwyaf o deithiau i'r gwaith ac ar gyfer hamdden yn ne ddwyrain Cymru yn dilyn patrwm gogledd-de, byddem yn argymhell y dylai ffiniau'r awdurdodau hyn ddilyn ffiniau gogledd-de yn hytrach na gorllewin-dwyrain – fel y gwneir gydag awdurdod 6, sy'n ymddangos yn fwy addas.</p>
<p>e) Oes yna unrhyw ddulliau eraill y dylem eu defnyddio i symleiddio trefniadau cydweithio ar lefel ranbarthol a rhwng cyrff cyhoeddus â'i gilydd yn yr ardaloedd awdurdod newydd? Os oes, beth ydyn nhw?</p>

Pennod 5
<u>Cwestiwn Ymgynghori 3</u>
Mae'r pennod hon yn trafod y dull arfaethedig ar gyfer trawsnewid a'r goblygiadau ar gyfer sefydlu Pwyllgorau Pontio ac etholiadau i'r Awdurdodau Cysgodol o dan bob opsiwn.
a) Ydych chi'n cytuno â'r broses bontio arfaethedig: sef sefydlu Pwyllgorau Pontio a sicrhau bod etholiadau i Awdurdodau Cysgodol yn gallu cael eu cynnal cyn y diwrnod breinio ar gyfer yr awdurdodau newydd?
b) Ydych chi'n cytuno, pe byddai opsiwn 1 yn cael ei ddilyn, y dylem bennu dyddiad terfynol ar gyfer cyflwyno cynigion ar gyfer uno gwirfoddol ym mhob cylch etholiadol?
c) A oes gennych unrhyw sylwadau eraill ar y map arfaethedig?
Gweler 1(b) uchod.
<u>Cwestiwn Ymgynghori 4</u>
Mae'r ymgynghoriad yn awgrymu cynnal unrhyw etholiadau llywodraeth leol ym mis

<p>Mehefin 2021.</p> <p>A oes unrhyw reswm pam na fyddai mis Mehefin 2021 yn ddyddiad addas? Os felly, awgrymwch ddyddiad arall gan nodi'r rhesymau pam y byddai'r dyddiad hwnnw yn fwy addas..</p>
<p><u>Cwestiwn Ymgynghori 5</u></p> <p>Mae Llywodraeth Cymru yn cydnabod bod rhai cynlluniau neu asesiadau sy'n gysylltiedig â chylchoedd etholiadol, er enghraifft asesiadau llesiant a baratoir gan Fyrddau Gwasanaethau Cyhoeddus. Byddwn yn gwneud darpariaeth i sicrhau bod y rhain yn cyd-fynd ag unrhyw gylchoedd etholiadol newydd yn y dyfodol. A oes unrhyw gynlluniau neu faterion eraill a allai fod ynghlwm wrth y cylch etholiadol y mae angen inni eu hystyried?</p>
<p><u>Cwestiwn Ymgynghori 6</u></p> <p>Beth yw eich barn am y dull y dylid ei ddilyn i benderfynu ar derfynau'r adolygiadau etholiadol?</p>

<p>Pennod 6</p>
<p><u>Cwestiwn Ymgynghori 7</u></p>
<p>a) Sut gall cynghorau ddefnyddio gwybodaeth eu haelodau etholedig am eu cymunedau, a'u cysylltiadau ynddynt, yn fwy effeithiol?</p> <p>Mae'n angenrheidiol fod cynghorwyr lleol yn gallu parhau i ddefnyddio'u gwybodaeth o'r cymunedau meant yn eu cynrychioli wrth graffu ar wasanaethau a gyflwynir yn rhanbarthol. Mae hyn yn gofyn am hawl i bwyllgorau craffu awdurdodau lleol unigol graffu ar fyrddau a swyddogion pob corff rhanbarthol sy'n darparu gwasanaethau yn eu hardal.</p>
<p>b) Sut y gallwn gydnabod yn well lefel y cyfrifoldeb o fod yn gynghorydd lleol? Pa newidiadau i'r gydnabyddiaeth ariannol a'r gefnogaeth mae cynghorwyr yn eu cael fyddai'n galluogi ystod ehangach o bobl i fod yn rhan o'r gynrychiolaeth ddemocrataidd lleol?</p> <p>Rydym yn bryderus braidd am yr awgrym y dylai cynghorwyr, i bob pwrpas, gael eu talu am swydd amser llawn. Mae hyn yn peryglu creu grwp o wleidyddion gyrfa sy'n ddibynol ar gadw eu seddi er mwyn cynnal eu bywoliaeth. Credwn y dylai llywodraeth leol alluogi pobl leol i gynrychioli'r cymunedau y meant yn eu gwasanaethu, yn hytrach na darparu camau yng ngyrfa rhywrai sy'n ceisio mynd ymhellach.</p> <p>Cefnogwn ddarparu rhaglen addysg a ffurfiant barhaus ar gyfer cynghorwyr etholedig er mwyn iddynt llwyr ddeall eu cyfrifoldebau.</p> <p>Ymhob maes fe gredwn mai codi ymwybyddiaeth ddylai fod yn brif nod addysg a ffurfiant cynghorwyr, yn hytrach na darparu arbenigedd penodol, gan fod swyddogion cyflogedig ac aelodau cabinet ar gael ar gyfer hynny.</p>
<p><u>Cwestiwn Ymgynghori 8</u></p>
<p>a) A oes unrhyw bwerau eraill y dylid eu rhoi i lywodraeth leol? Os oes, beth ydyn nhw?</p>

b) A oes rhyddid neu hyblygrwydd eraill y dylid eu rhoi i lywodraeth leol? Os oes, beth ydyn nhw?
Cefnogwn gyflwyno grym cymhwysedd cyffredinol ar gyfer awdurdodau lleol, er mwyn rhoi mwy o hyblygrwydd iddynt wrth ddefnyddio eu hadnoddau a bod yn fentrus er lles eu cymunedau.
<u>Cwestiwn Ymgynghori 9</u>
a) Pa feysydd sy'n cynnig y cwmpas mwyaf i rannu gwasanaethau trafodiadol?
Credwn yn gryf y dylai unrhyw wasanaethau trafodiadol barhau if od yn atebol i gynghorwyr a etholir yn ddemocrataidd. Credwn fod lluosî'r sefyllfaoedd lle mae cynghorwyr un awdurdod yn gyfrifol am gwmni sy'n cynnal gwasanaethau mewn awdurdod arall, nad ydynt yn atebol iddo, yn anaddas ac yn tanseilio hyder y cyhoedd mewn llywodraeth leol.
b) Beth yw'r ffordd orau o ddatblygu trefniadau o'r fath?
Lle gwneir trefniadau o'r fath, byddem yn awgrymu: <ol style="list-style-type: none"> 1. Y dylai trefniadau o'r fath wastad gael eu gwneud o fewn Cymru, ac felly bod yn ddarostyngedig i fframwaith ddeddfwriaethol gyffredin. Rydym yn gofidio am sefyllfaoedd lle bo gwasanaethau yng Nghymru yn cael eu darparu gan gwmnïau a reolir gan awdurdodau yn Lloegr. Lle bo angen i awdurdodau brynu gwasanaethau arbenigol iawn gan awdurdodau yn Lloegr (e.e. rhai mathau o ofal cymdeithasol arbenigol), fe ddylai fod yn glir bod atebolrwydd am y gwasanaethau ac am y dinasyddion Cymreig sy'n eu derbyn aros yn nwylo cynghorwyr etholedig yng Nghymru. 2. Byddem yn awgrymu y dylai gweinidogion Cymru gyhoeddi canllawiau statudol i awdurdodau lleol parthed gweinyddu, atebolrwydd, peryglon a chraffu ar wasanaethau trafodiadol.
<u>Cwestiwn Ymgynghori 10</u>
a) Er mwyn sicrhau ein bod yn datblygu dull cyson ar draws Cymru, lle bo cysondeb yn bwysig, sut ydych chi'n meddwl fyddai orau i ddarparu'r cyngor a'r cymorth ar y materion hyn?
b) Oes unrhyw heriau neu gyfleoedd eraill yn deillio o newid strwythurol neu ddarparu pwerau a hyblygrwydd eraill nad ydynt wedi eu nodi uchod? Os oes angen cymorth ar y meysydd hyn, ym mha ffordd y dylid rhoi'r cymorth hwnnw?
c) Pa un o'r materion a nodwyd uchod neu yn eich ymateb ddylai gael blaenoriaeth i'w ddatrys yn gynnar?
1(b) a 4(b) yn ein hymateb.
<u>Cwestiwn Ymgynghori 11.</u>
Hoffem wybod eich barn am ba effeithiau y byddai'r cynigion yn yr ymgynghoriad hwn yn eu cael ar y Gymraeg, yn enwedig ar y cyfleoedd i bobl ddefnyddio'r iaith ac o ran peidio â'i thrin yn llai ffafriol na'r Saesneg.
a) Beth fyddai'r effeithiau yn eich barn chi?
Nodwn â pheth pryder y bwriad i gyfuno Ceredigion – sydd ar hyn o bryd yn defnyddio'r Gymraeg yn iaith weinyddol fewnol – ag awdurdodau gerllaw nad ydynt yn gwneud hynny, ac yn pwyso am gamau i sicrhau na fydd diwygio llywodraeth leol

yn lleihau'r defnydd o'r Gymraeg o fewn llywodraeth leol.
b) Sut y byddai modd cynyddu'r effeithiau cadarnhaol, neu liniaru'r effeithiau negyddol?
<p><u>Cwestiwn Ymgynghori 12</u></p> <p>Eglurwch hefyd sut y credwch y byddai modd ffurfio neu newid (os bydd angen) y cynigion yn yr ymgynghoriad hwn er mwyn arwain at effeithiau cadarnhaol, neu fwy o effeithiau cadarnhaol, ar gyfleoedd i bobl ddefnyddio'r Gymraeg a pheidio â thrin y Gymraeg yn llai ffafriol na'r Saesneg, ac er mwyn peidio â chael effaith andwyol ar gyfleoedd i bobl ddefnyddio'r Gymraeg nac o ran trin y Gymraeg yn llai ffafriol na'r Saesneg.</p>
<p><u>Cwestiwn Ymgynghori 13</u></p> <p>Mae'r Asesiad o'r Effaith ar Hawliau Plant a gyhoeddir ochr yn ochr â'r ymgynghoriad yn amlinellu barn Llywodraeth Cymru am effaith y cynigion sydd wedi'u cynnwys yn yr ymgynghoriad ar blant a phobl ifanc. Mae Llywodraeth Cymru yn ceisio barn ar yr asesiad hwnnw.</p>
a) A oes unrhyw effeithiau cadarnhaol neu andwyol sydd heb eu nodi yn yr asesiad?
Mae Cymdeithas y Plant, sy'n aelod yn Cytûn, am bwysleisio'r angen i gynghorwyr lleol ddeall eu rôl fel rhieni corfforaethol plant yng ngofal yr awdurdod lleol ac y dylid darparu hyfforddiant gorfodol i bob cynghorydd lleol yn y maes hwn, yn ogystal ag o ran diogelu plant yn gyffredinol.
b) A ellid ail-lunio'r cynigion er mwyn cynyddu'r effeithiau cadarnhaol neu leihau unrhyw effeithiau andwyol posibl?
<p><u>Cwestiwn Ymgynghori 14</u></p> <p>Mae'r Asesiad o'r Effaith ar Gydraddoldeb a gyhoeddwyd ochr yn ochr â'r ymgynghoriad yn rhoi braslun o farn Llywodraeth Cymru ar effaith y cynigion sydd wedi'u cynnwys yn yr ymgynghoriad ar grwpiau sy'n cael eu diogelu o dan Ddeddf Cydraddoldeb 2010. Mae Llywodraeth Cymru yn ceisio barn ar yr asesiad hwnnw.</p>
a) A oes unrhyw effeithiau cadarnhaol neu andwyol eraill sydd heb eu nodi yn yr asesiad?
Nid yw'r asesiad yn nodi'r effeithiau ar ddisgyblion ag Anghenion Dysgu Ychwanegol yn ysgolion yr awdurdodau lleol, gan gynnwys y sawl a addysgir y tu allan i'w hawdurdod lleol eu hunain. Gan fod trefn newydd ar gyfer asesu a darparu ar gyfer anghenion o'r fath yn cael ei chyflwyno ar hyn o bryd, fe fyddwn yn pwysu am wneud asesiad o'r fath.
b) A ellid ail-lunio'r cynigion er mwyn cynyddu'r effeithiau cadarnhaol neu leihau unrhyw effeithiau andwyol posibl?
<p><u>Cwestiwn Ymgynghori 15</u></p> <p>Rhowch unrhyw sylwadau eraill sydd gennych ar gynnwys yr ymgynghoriad hwn.</p>
Nid ydym yn credu yn athroniaeth 'po fwyaf, po orau'. Rhaid cyflwyno'r achos dros awdurdodau mwy o faint, yn hytrach na chymryd yn ganiataol eu bod yn fanteisiol.

Cyngor Sir CEREDIGION County Council

Y Cyngorydd / Councillor Ellen ap Gwynn

Arweinydd y Cyngor /

Leader of the Council

Neuadd Cyngor Ceredigion, Penmorfa, Aberaeron, SA46 0PA

www.ceredigion.gov.uk



Cryfau Llywodraeth Leol
Llywodraeth Cymru
Parc Cathays
Caerdydd
CF10 3NQ

Dyddiad
Date

12/06/2018

Gofynnwch am
Please ask for

Lowri Edwards

Llinell uniongyrchol
Direct line

01545 572005

Fy nghyf
My ref

Eich cyf
Your ref

Ebost
Email

Lowri.Edwards@ceredigion.gov.uk

Danfônwyd drwy e-bost yn unig / Sent by e-mail only:

CryfauLlywleol@llyw.cymru

Annwyl Syr / Fadam

Dear Sir / Madam

Dogfen Ymgynghorol Papur Gwyrdd – Cryfau Llywodraeth Leol: Cyflawni dros ein Pobl

Amgaeaf ymateb Cyngor Sir Ceredigion i'r
Ymgynghoriad Papur Gwyrdd "Cryfau
Llywodraeth Leol: Cyflawni dros ein Pobl".
Diolch am roi'r cyfle inni ymateb ac i gyfrannu at
drafodaethau pellach.

Os oes gennych chi unrhyw gwestiynau
ynghylch yr ymateb, cysylltwch â Lowri
Edwards gan ddefnyddio'r manylion cyswllt
uchod.

Y Cyngorydd / Councillor Ellen ap Gwynn
Arweinydd y Cyngor / Leader of the Council

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

Please find enclosed Ceredigion County
Council's submission to the Green Paper –
"Strengthening Local Government: Delivering
for People" Consultation. Many thanks for giving
us the opportunity to respond and to inform
future discussion.

If you have any queries in relation to the
response, please contact Lowri Edwards using
the contact details above.

Mr Eifion Evans
Prif Weithredwr / Chief Executive

Amg. / Enc.

Rydym yn croesawu gohebiaeth yn Gymraeg a Saesneg. Cewch ateb Cymraeg i bob gohebiaeth Gymraeg ac ateb Saesneg i bob gohebiaeth Saesneg.
Ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome correspondence in Welsh and English. Correspondence received in Welsh will be answered in Welsh and correspondence in English
will be answered in English. Corresponding in Welsh will not involve any delay.

Prif Weithredwr / Chief Executive :
Cyfarwyddwyr Corfforaethol / Corporate Directors :

Eifion Evans
Sue Darnbrook
Barry Rees



Cyngor Sir
CEREDIGION
County Council

YMATEB CYNGOR SIR CEREDIGION I'R PAPUR GWYRDD 'CRYFHAU LLYWODRAETH LEOL: CYFLAWNI DROS EIN POBL'

Mae Cyngor Sir Ceredigion, wrth ymateb am danlinellu materion sylfaenol sydd yn sail i'w gweledigaeth ynglŷn â rôl Llywodraeth Leol. Cytunwn gyda gweledigaeth y Papur Gwyrdd ynglŷn â sicrhau "bod awdurdodau lleol wedi'u grymuso a'u bod yn meddu ar y rhyddid, y pwerau a'r gwerthoedd i'w hybu i edrych tua'r dyfodol, gan ddysgu o'r gorffennol ond heb fod yn gaeth iddo". Cytunwn gydag egwyddorion sylfaenol y papur sef:

- i) Y dylai pob Cyngor Sir bod yn gweithio yn agos at eu cymunedau ar lawr gwlad i sicrhau bod y cymunedau hynny yn ffyniannus a llwyddiannus ac yn cael eu cynrychioli yn dda ac yn ddylanwadol. Byddem yn honni'n gryf na ellid sicrhau hyn o fewn Awdurdodau Lleol sydd yn rhy fawr ac felly yn rhy bell oddi wrth eu trigolion.
- ii) Y dylai pob Awdurdod Lleol, waeth beth fo ei faint, cael pwerau ychwanegol i'w cryfhau er mwyn eu cynorthwyo i arloesi ac esblygu o'r gwreiddiau i fyny, i fod yn agored a thryloyw ac i sicrhau bod eu gwasanaethau yn cael eu gwerthfawrogi gan eu cymunedau.
- iii) Y dylai gweithlu'r sector cyhoeddus cael ei werthfawrogi a'i barchu, cael ei gefnogi a'i annog i fod yn arweinyddion creadigol. Mae hyn eisoes yn rhan o raglen waith Cyngor Sir Ceredigion ac rydym hefyd yn sicrhau cyfleoedd hyfforddi i wella cymwysterau ein staff yn ogystal a rhoi cyfleoedd i brentisiaethau a phrofiad gwaith i myfyrwyr o Brifysgol Aberystwyth.
- iv) Y dylai aelodau etholedig fod yn fentrus ac uchelgeisiol, gyda rhan blaenllaw mewn llywio a dylanwadu ar benderfyniadau. Dyma yw'r ffordd o weithio o fewn Cyngor Sir Ceredigion gyda'r Strategaeth Corfforaethol yn seiliedig ar y manifesteau yr etholwyd y Glymblaid Arweiniol arnynt.
- v) Mae'r Cyngor am ailddatgan pwysigrwydd parhau i gydnabod a dosrannu'r cyllid i'r 22 Awdurdod Lleol presennol, oni bai bod yna gynghorau yn dymuno symud ymlaen i uno'n wirfoddol.
- vi) Dylai'r dyletswyddau statudol, a'r swyddogion statudol hefyd, aros o fewn pob un o'r 22 Awdurdod Lleol.
- vii) Mae Ceredigion wedi gweithio ar lefel ranbarthol ac o fewn hybiau'r rhanbarthau hynny, a bydd yn parhau i wneud hynny. Fodd bynnag, yr egwyddor sylfaenol yw bod unrhyw waith ranbarthol er budd dinasyddion Ceredigion. Rhaid bod yna achos busnes cryf sy'n dangos budd ariannol clir i gefnogi'r patrwm ranbarthol.
- viii) Gydag unrhyw batrwm gwaith ranbarthol rhaid bod yna fodel llywodraethu clir, gydag atebolrwydd democrataidd clir i'r prif awdurdodau perthnasol. Nid ydym am weld sefydlu haen newydd o cwangau anetholedig

- ix) Mae atebolrwydd lleol trwy waith goruchwyllo a chraffu'r cynghorwyr lleol yn hanfodol mewn perthynas ag atebolrwydd gwasanaethau sirol a rhanbarthol, i sicrhau eu bod yn cwrdd â gofynion ein cymunedau.
- x) Ni ddylai gwasanaethau ar y cyd fod yn gyfystyr â chanoli gwasanaethau. Ni ddylai arwain at lai o staff o fewn awdurdodau unigol, a fyddai'n cael effaith negyddol ar yr economi leol.
- xi) Mae angen cydnabod baich ariannol cudd gweithio ar draws ardal wledig a daearyddol fawr a phennu'r gost o wasanaethu ardal prin ei phoblogaeth yn llawn.

Hoffem nodi ein cefnogaeth lawn i'r sylwadau a gyflwynir gan y WLGA gan bod yr Arweinydd wedi bod yn rhan o'r trafodaethau a fu'n sail iddo. Cytunwn bod Llywodraeth leol eisoes yn gweithio ar raglen i drawsnewid gwasanaethau yn wyneb deddfwriaeth newydd ddiweddar ac oherwydd y cyfyngiadau ariannol sydd yn ein gwynebu. Yn ogystal, yn dilyn cyhoeddi Bargeinion Twf i bedwar rhanbarth economaidd Cymru maent yn gwynebu'r heriau o sefydlu rhaglenni datblygu economaidd rhanbarthol arloesol.

Gyda'r llwyth gwaith a'r gofynion ariannol presennol ni fyddai'n ymarferol i ddargyfeirio sylw ein staff arweiniol ar ad-drefnu llywodraeth leol pan na fyddai'n dwyn unrhyw fudd i'n trigolion ond, yn hytrach yn symud gwasanaethau yn bellach oddi wrthynt ac yn gwanio'r atebolrwydd democrataidd sydd ar gael iddynt nawr.



Cyngor Sir
CEREDIGION
County Council

CEREDIGION COUNTY COUNCIL'S RESPONSE TO THE GREEN PAPER 'STRENGTHENING LOCAL GOVERNMENT: DELIVERING FOR PEOPLE'

In responding, Ceredigion County Council wishes to underline fundamental issues that underpin their vision regarding the role of Local Government. We agree with the Green Paper's vision of ensuring that "local authorities are empowered and have the freedom, powers and values to drive them to look to the future, learning from the past but not stuck to it". We agree with the basic principles of the paper namely:

- i) Every County Council should work closely with their communities on the ground to ensure that those communities are prosperous and successful and are well represented and influential. We would strongly contend that this could not be achieved within Local Authorities that are too big and therefore too far from their citizens.
- ii) Every Local Authority, irrespective of size, should have additional powers to become stronger in order to help them to be innovative and evolve from the roots upwards, to be open and transparent and to ensure that their services are appreciated by their communities.
- iii) The workforce of the public sector should be valued and respected, supported and encouraged to be creative leaders. This is already part of Ceredigion County Council's work programme and we also provide training opportunities to improve the qualifications of our staff as well as to provide opportunities for apprenticeships and work experience for students from Aberystwyth University.
- iv) Elected members should be ambitious and enterprising, with a leading role in steering and influencing decisions. This is the way of working within Ceredigion County Council with the Corporate Strategy based on the manifestos on which the ruling Coalition was elected.
- v) The Council wants to express once again the importance of continuing to acknowledge and allocate funding to the existing 22 Local Authorities, unless there are councils who voluntarily wish to proceed to join forces.
- vi) The statutory responsibilities, in addition to statutory officers should remain within each of the 22 Local Authorities.
- vii) Ceredigion has worked on a regional level and within regional hubs and will continue to do so. However, the basic principle is that any regional work undertaken should benefit the citizens of Ceredigion. There must be a strong business case to reflect a clear financial benefit to supporting the regional pattern.
- viii) There must be a clear governance model within any pattern of regional work with clear democratic accountability to the main relevant authorities. We do not wish to see the establishment of a new layer of unelected quangos.

- ix) Local accountability via scrutiny and supervision by local councillors is essential in ensuring accountability of services on a county and regional basis. This must be undertaken in order to ensure that we meet the needs of our communities.
- x) Providing services jointly should not be synonymous with centralizing services. It should not lead to less staff within individual authorities, which in turn would have a negative effect on the local economy.
- xi) The hidden financial burden of working within a large rural and geographic area and the cost of fully serving an area with a disperse and sparse population must be recognized.

We lend our full support to the comments presented by the WLGA, as the Leader has been part of the discussions which have formed a basis to those comments. We concur that Local Government is already working on a programme of transforming services in the wake of new and recent legislation and due to the financial constraints we currently face. In addition, following the publication of Growth Deals for the four economic regions of Wales there is a need to address the challenge of establishing innovative regional economic development programmes.

In view of the current work load and financial pressures it would not be practical to divert the attention of our Leadership Group to the reorganization of local government as it would not be of any benefit to our residents. Indeed it would effectively move services further from our residents and weaken the democratic accountability which is provided to them at present.

Cynon Valley Constituency Labour Party

20 Cae Felin Paec

Hirwaun

ABERDARE

CF44 9QG

June 11th 2018

Dear Alun,

RE: Strengthening Local Government: Delivering for People

We wish to express our 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 will cause concern and uncertainty in Local Government at a time when all focus should be on the protection of key frontline public services. 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. 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, we see no justification for this assertion and a look across Wales shows that 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. For example, the City and Growth Deals which are driving forward significant regeneration programmes by connecting associated services such as transport and planning in their respective regions. 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 produced tangible and positive outcomes in education performance and is 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.

We believe 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 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. At a time of financial austerity it is vital that the Welsh Government should defend and invest in 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 upmost 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.

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.

We also do not understand the logic of proposals when 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.

We welcome 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.

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. 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,

Alun Williams

Secretary, Cynon Valley Constituency Labour Party

Alun Davies AM,

Cabinet Secretary for Local Government and Public Services,

Welsh Government, 5th Floor, Tŷ Hywel, Cardiff Bay, CF99 1NA

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?

These larger services tend to work better regionally as they have greater economies of scale and provide a better spread of resources and wider services.

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

-

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

some believe that two Councils for North Wales would be a better solution (aka the old Gwynedd and Clwyd).

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

see 1 c above. There are options elsewhere also including the break up of Powys which doesn't seem to be working very well as it stands so clearly needs looking at.

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

-

Page 3: Chapter 4

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

-

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

-

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

-

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

-

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?

There are many barriers and cultural differences to overcome. It also should be recognised that bigger doesn't necessarily mean better or better value for money. some services are better delivered locally and therefore more powers given to Town and Community Councils to do so.

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

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?

-

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.

-

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?

-

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

-

Page 5: Chapter 6

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

-

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?

-

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

-

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

-

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

Larger services

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

regional

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?

-

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?

It should be recognised that bigger doesn't necessarily mean better services or good value for money. Some services are better delivered locally and more efficiently and therefore more powers given to re-structured Local Town and Community Councils to do so.

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

10b - part of the re-structure process underway

Page 6: Impact assessments

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

Locally - little effect although Gwynedd has a higher Welsh speaking percentage of population than Ynys Mon

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

-

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.

-

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

-

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

-

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

-

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

-

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

-

Page 7: Submit your 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 Ian Jones, Clerc y Dref/Town Clerk

Organisation (if applicable) Cyngor Dinas Bangor City Council

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

townclerk@bangorcitycouncil.com

Q36. Telephone

01248352421

Q37. Address

[REDACTED]

Bangor

[REDACTED]

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

No Response