

Strengthening Local Government: Delivering for People

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Q1. 1a. What practical steps could the Welsh Government take to make current regional working easier and more effective, for example in relation to education consortia, social services and the City Regions and City and Growth Deals?

I am currently employed in a state comprehensive school in a Welsh authority. Over the past few years, the growing prominence of regional consortia has, in my opinion, been a significant benefit. A major flaw of the Local Government (Wales) Act 1994 was the abolition of the 8 Local Education Authorities and the transfer of this between 22 smaller authorities, most of which are successor district-tier authorities with little or no LEA background. This has seen major issues in education, most specifically the loss of county-wide services in training and development. Whilst the successor authorities did maintain links with other successor authorities in the preserved county boundaries, I felt this had largely been superficial as new authorities became self-absorbed in their own administration. Political interference, where councils were operated by different political groups, was inevitable and the sense of clear coordination that existed under Clwyd County Council was largely wiped out. The development of regional consortia with greater powers, such as GwE, has given a chance for staff to network with others across a broader region, and GwE is able to give a far wider-reaching viewpoint of education in the region than merely the LA alone. Whilst the consortia have a firm mandate rooted in training and raising standards, I feel it would be inevitable that they will eventually subsume LA control in many aspects.

Social services I feel should be entirely integrated within the NHS structure. Whilst there are flaws in the NHS health boards, I feel Wales should follow the structure of Northern Ireland, and likely in the future, England. LAs are not best placed to deal with social care and the significant cuts imposed by councils (as a consequence of Westminster, thus then Cardiff budget cuts) have seen a significant deterioration and largely inconsistent approach to SC. Strategic SC planning needs to move to NHS Wales as a matter of urgency; the day-to-day operations of SC I feel would be best placed phasing from LA control to NHS, but eventually the structure needs to be holistic and consistent.

Having lived in Cardiff for a number of years, I am pleased with the City Deals which have been announced. However I feel that since 'Cardiff' is not solely restricted to within the Cardiff City and County Council area, a wider look at the local area is necessary. In England, the development of the Metropolitan Counties and more recently the Combined Authorities recognised the role a city has in the wider area surrounding the authority area. So far, I have only heard reports of significant disagreement between SE Wales councils, particularly where authorities are controlled by differing political allegiances (e.g. VoG preferring to 'merge' with Bridgend, despite being of greater strategic importance to Cardiff and forming part of the preserved county of South Glamorgan with it). There needs to be a similar metropolitan-style authority covering Cardiff that has oversight of city-specific issues, most importantly a Passenger Transport Executive (PTE). The abolition of SEWTA has in my view caused a lack of regional integration of public transport, however I realise the shallowness of the former consortias' remit. Similarly, in North Wales, far better cooperation with Merseytravel is urgently required, specifically in regard to the Borderlands railway line (which should be integrated with Merseyrail for ticketing purposes - it serves no other role other than a city commuter line) and the A494/A55/A548 corridor improvements.

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

I believe this process is flawed. I cannot base my judgement on fact, however I feel that this will lead to political interference and cause inevitable and irreversible damage. As we saw in the last process, 'friendly' authorities are more likely to want to merge (VoG/Bridgend, Conwy/Denbighshire) rather than mergers in those areas that have strategic importance. Whilst I don't want the WG to feel it has ultimate control to merge whichever authorities it wishes without consultation, I do feel all 22 authorities, consortia and associated groups to join the debate jointly. There are also going to be cases of authorities which refuse to a merger despite it being in the best interests of the local population and/or the authority is no longer sustainable.

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

I largely agree, however I do not feel the proposals are specifically clear. The Williams Commission's analysis was based too much on favouring the Health/Police/Fire authorities rather than the actual reality of the local populations. I do not feel creating more than 8 (possibly 9) authorities is sustainable to achieve the strategic role which existed prior to 1996. I do recognise that the district tier pre-1996 gave a greater sense of 'localism', and I feel if we returned to the 8-model from 1972 with unitary councils instead, greater role would need to be given to community councils to fill a more localised void which the current system does tend to favour. The 2015 white paper was more realistic and linked with the reality 'on the ground' and the administrative reality that still unites our current authorities around the old boundaries.

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

In terms of the layout of these authorities, I cannot better the development of the 8 preserved counties created by the 1972 LGA. The 2015 White Paper agreed with this viewpoint and sought to recreate the county council areas which preceded the 22 created in 1996. In terms of any further authorities beyond the original 8, I think the cost-benefit analysis of this would be splitting hairs and I would prefer a return to the layout as defined by the preserved counties. I think the main benefits of using the preserved counties is largely that:

- 1) The authorities in preserved county areas largely have continued to work together in some respect, e.g. Local Government Pension Scheme, Fire/Police Authorities
- 2) The preserved counties have remained in law unchanged - I think a major issue with the 1994 LGA was defining the new authorities as 'counties' - this has led to a geographical mess where a specific place can be defined by two 'counties' plus the historic county pre-1974. Changing boundaries yet again confuses the picture as to what we consider a 'county' in Wales, as well as causing administrative difficulties to the joint undertakings as outlined in number 1 above.
- 3) The preserved counties are used in relation to constituency boundaries, lieutenancy and other ceremonial purposes. In England, the Ceremonial Counties continue to be regarded as 'official' and all subsequent reorganisations since 1972 have largely respected those boundaries. I highly doubt that any further LG reorganisation would alter these ceremonial undertakings, leading to yet another tier of 'counties' that have led many confused as to which 'county' they reside in.

We know that the successor authorities of the 1972 eight counties still cooperate within those groupings in many ways and to alter this layout further would incur significant costs in making administration consistent across the 'new 10' authorities. To me, it is only logical to return to the layout of the 1972 act (as modified in 2003) as this gives us largely:

- 1) Clwyd - Conurbation of major towns in the North East of Wales and complements the Liverpool City Region, continues to be considered a single region as the 1996 authorities take focus away from strategic links with Merseyside/Cheshire.
- 2) Gwynedd - Significantly important to have Gwynedd separate from Clwyd in respect to Welsh language provision; Gwynedd and Anglesey are largely inseparable and the role of Anglesey as an independent authority with a small population is questionable. Aberconwy now resides in Conwy, in Clwyd since 2003.
- 3) Powys - unchanged. Largely worked well since its creation
- 4) Dyfed - West Wales region in general, with tourism a huge influence on the area a single coordinated approach would be beneficial.
- 5) West Glamorgan - Swansea Bay area
- 6) Mid Glamorgan - Merthyr, RCT, Bridgend - historically integrated and continue to work together
- 7) South Glamorgan - Cardiff, VoG - largely functional as a Metropolitan-style authority participating within a wider city region.
- 8) Gwent - historically Monmouthshire and strong identity of its own, including Gwent Police.

Mid Glamorgan, South Glamorgan and Gwent are most likely to depend critically on the role of the Cities of Cardiff and Newport, and should be considered to cooperate in a city-style region (as I believe the SE Wales Metro aims to do). This should be reflected in local governance in the area. Metro should become a PTE itself, operating above the role of the three LAs, giving a strategic role developing commuter routes to the cities.

I think it's also important to not label the new authorities as 'counties', due to the confusion that already exists. In Scotland, the 'council area' label is used to refer to authorities, whilst the 'counties' geographically still referred to are the ancient/historic ones pre-1974. In England, 'county' largely refers to the 'ceremonial counties' from 1972, which have strong associations. This role of the 'county' has been lost in Wales to some degree - hence why I feel the role of the 1972 counties remain important today, and if changes are made to Local Government in Wales, they should aim to use the most historically accurate names possible, including those of the 1972 Act.

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

As I've already mentioned, councils in 'preserved county' areas have tended to centrally retain some previous county-wide functions, including payroll, pensions and some administration. The cheapest option I feel would be to return to the preserved county layout of (1972) 2003, which retains these joint undertakings. Where an authority as a whole is admitted to the larger authority, it makes the reconfiguration of services and processes easier than if it were to be split up between several successor authorities. This was seen in 1996, where 'new' authorities such as Conwy were formed from pieces of two previous county council areas, leading to inconsistencies between the united 'parts'. In my opinion, returning to the pre-1996 system (in a unitary fashion) is the easiest option which reunites councils which have, and continue to do so, work together naturally.

Over the border, Cheshire County Council and its districts' 2009 transformation into the two unitary authorities of Cheshire West and Cheshire East was simplified by the fact that whole district councils were lumped together, and the role of the previous County Council has been in some ways retained where the two operate 'Shared Services'.

I do not feel a return to two-tier approach is useful and is needlessly expensive. Powys and Gwynedd have both demonstrated that the role of the former 'districts' can be retained following a move to the unitary structure. The same principal could be developed as current LAs merge into larger groupings.

Page 3: Chapter 4

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

Yes - as a local government employee we understand the pressures LAs face and any uncertainty causes 'short-termism' and a lack of strategy. In addition to that, taxpayers need to understand how their money is being spent and where it could be used more wisely, it is made clear.

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

I disagree that LA areas should be dictated by the needs of the health boards. As we well know, these too have their flaws and it should not necessarily mean their structure is sacrosanct. I disagree with the splitting of Clwyd and Gwent as outlined in the question 2c below.

I understand the WG's concern regarding local accountability. However I feel too much priority was given to the needs of district councils in the 1994 LGA, which has created a very uneven system of unitary authorities, particularly in the South Wales Valleys. I think on balance if Wales is heading towards gaining further benefits such as City Deals and integrated PTEs, the development of large, strategic planning authorities is essential and on-balance of greater benefit than the localism the current authorities provide. As a compromise, the role of community councils could be greatly increased, or as in the case of Gwynedd and Powys, use the existing authorities as 'area committees' and develop a greater local role in those ways.

I fundamentally disagree with the splitting of Gwent and Clwyd.

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

I disagree. I have discussed this in the previous section in some detail. I do agree with areas 1, 4, 5, 6, 7 and 8 as these are returns to the preserved counties. These councils largely retain some centralised administrative duties and joint undertakings from pre-1996 and it makes sense to re-unite these rather than split them up.

I disagree with regions 2 and 3 (splitting Clwyd into East and West), as the whole of North East Wales (Clwyd) continues to function 'on the ground' as a single region. The authorities in the preserved county of Clwyd continue to operate some functions jointly, such as the Clwyd Pension Scheme. Also, areas along the borders between both parts of these 'East Clwyd' and 'West Clwyd' regions are not necessarily aligned with the authorities the document suggests, e.g. Llangollen is far closely integrated with Wrexham above Rhyl, Prestatyn, Llandudno or Llanrwst. Growing up in Wrexham and working in Conwy, it has always been abundantly clear that the area is a single economy, which is closely integrated with that of Cheshire and Merseyside, and is impossible to split (even with the 1996 authorities). Clwyd remains a preserved county. Changing this further causes geographical confusion and unnecessary bureaucracy where the simplest option is to merely return the authority to its original state.

I am dubious on the merit of splitting Gwent into two parts (9 and 10). Blaenau Gwent is an unnecessarily small authority, despite its density, but is highly different from what is now considered 'Monmouthshire'. Gwent remains united in terms of its policing, healthcare and other joint undertakings, it seems an unnecessary backwards step (in an attempt to appease some of the smaller authorities) to carve up this region into one which lacks a major urban centre (region 10) and one urban one with an unusual (and unhelpful) geographical and socio-political makeup (region 9). Urban and rural areas require joint strategy.

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

A return to the layout used by the preserved counties, since 2003. As I've already mentioned, the unnecessary reorganisations of 1996 has caused unrequired geographical confusion and carved up key strategic regional authorities, making some authorities more inward-looking and subject to political interference.

The successor authorities still work together in their pre-1996 groups in terms of pensions, payroll, policing, healthcare and other joint administrative duties. It seems only natural to return them to prominence as full unitary authorities. Each region of the 1972/2003 map is a very well defined socio-economic region with a different character to others surrounding it. In terms of populace, these authorities seemed more well-balanced in terms of urban and rural areas, as well as clearly defined economic zones to nearby towns and cities. In terms of transport, each 1972/2003 county has a clearly definable public transportation map, which with a single authority overseeing it, could be far more strategic and respond to greater demands. The 1972/2003 layout also accounts for differing local cultures and social identities, whereas the 1996 replacements lack the regional identity that the 1972 layout held.

As I've previously mentioned, I would support:

Proposal 1:

- 1) Gwynedd (Gwynedd, Anglesey)
- 2) Clwyd (Wrexham, Denbighshire, Flintshire, Conwy*)
- 3) Powys (Unchanged)
- 4) Dyfed (Ceredigion, Carmarthenshire, Pembrokeshire)
- 5) West Glamorgan (Swansea, NPT)
- 6) Mid Glamorgan (Bridgend, RCT)
- 7) South Glamorgan (Cardiff, VoG)
- 8) Gwent (Newport, Caerphilly, Torfaen, Blaenau Gwent, Monmouthshire)

*I recognise Conwy could fall with Gwynedd instead as it equally works with Gwynedd authorities. I do feel the former Colwyn district sits better with the rest of Clwyd in NE Wales rather than the NW).

Proposal 2:

- 1) Gwynedd (Gwynedd, Anglesey)
- 2) West Clwyd (Conwy, Denbighshire)
- 3) East Clwyd (Wrexham, Flintshire)
- 4) Powys (Unchanged)
- 5) Dyfed (Ceredigion, Carmarthenshire, Pembrokeshire)
- 6) West Glamorgan (Swansea, NPT)
- 7) Mid Glamorgan (Bridgend, RCT)
- 8) South Glamorgan (Cardiff, VoG)
- 9) Gwent (Newport, Caerphilly, Torfaen, Blaenau Gwent, Monmouthshire)

Despite the changes, we cannot keep calling these authorities as 'counties' due to the geographic confusion this creates. If the preserved counties were to be re-used, then it is essential we do not re-name them to faceless or long-winded names such as "North East Wales" or "Cardiff and Vale"; the names of the 1972 LGA are strong and still widely recognised today, as well as remaining as preserved counties.

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?

I do believe the current system could work if Wales adopted a 'combined authority' style approach used in England. This would have to be centrally overseen rather than allowing councils to decide this for themselves, but the downside of this is largely the smaller geographical size of Wales as a whole (the North East Combined Authority is almost as large as Wales itself!) and the fact that CAs largely depend on a central metropolitan area, which Wales has only in the South East.

I disagree that two-tier council systems should be re-adopted, but informal arrangements that integrate strategic preserved county-wide services such as education, transport and housing are urgently required.

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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 - however again I disagree with the voluntary oversight of this. A 'grand council' is in effect, a prediction of the new council, which could equally do this work in lieu of the new authority. We should ensure that the Shadow Authority does not limit the voices of the existing authorities, which it should work alongside and not necessarily see as a needless predecessor.

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?

I do not agree with voluntary mergers.

I also think that 2021 is very over optimistic.

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

I would also like to see that the new authorities do not see a major reduction in councillors to sustain accountability and avoid political interference. Drawing up new ward boundaries is a tricky undertaking, and needs to be done independently to avoid political bias. A greater role for community/town councils would also be essential should a reduction of councillors be inevitable.

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.

I feel this is very over-optimistic. Whilst the previous LG reorganisation took place over 2 years, there are many more hurdles in play today.

Q15. 5. The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of wellbeing by Public Service Boards, which are linked to electoral cycles. We will make provision to make sure these tie into any new electoral cycles going forward. Are there any other plans or matters which might be tied into the electoral cycle which we need to consider?

No Response

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

Local accountability v strategic planning is a balance which will need to be addressed. As point 5.12 outlines, a review of the role of community/town councils will be subsequently required.

Page 5: Chapter 6

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

As many councillors as possible must be sustained by the Shadow Authorities. As I previously mentioned, any review into ward boundaries must acknowledge that the current system works well for local accountability and for a larger authority to be seen as locally viable, it must publically do all it can to value its local links. As I've mentioned, the area committee system used in Powys/Gwynedd could sustain the areas created by the 1994 Act and group similar councillors together into a subcommittee, which could be given some limited powers, particularly in cooperation with the town/community councils. I recognise that the changes will cause political control changes to some authorities, and the Boundary Commission needs to carefully weigh up how ward changes will affect political allegiances.

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?

A link needs to be made between elections for Parliament and those for the local Council. In essence, they are part of the same system, but MPs get greater exposure yet scrutiny at the same time. Ensuring all councils have an up-to-date record of "who's who" in the council, as well as voting records of councillors, would be important as is with Parliament and the Assembly.

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

A clearer role in planning; significant disagreements do occur between WG and LAs over specific planning issues. With a larger authority, these issues may be alleviated somewhat however WG must retain accountability over this.

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

No Response

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

Education, social care, transport, planning

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

We have current joint boards, but moving towards accenuating natural talents in the current preserved county groupings would benefit.

Q23. 10a. In ensuring we deliver a consistent approach across Wales, where consistency is important, how do you think the advice and support on each of these matters could be best provided?

No Response

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

No Response

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

No Response

Page 6: Impact assessments

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

All state bodies in Wales are required to treat both languages equally; I cannot see how the proposal would change this.

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

The creation of authorities, particularly Gwynedd and Dyfed, centralise the core Welsh L1 speaking areas and would, in my view, strengthen the role of Welsh in those areas. In general, I think that making larger authorities integrates a more balanced proportion of Welsh- and English- speaking areas, thus heightening the importance of Welsh language services in what have been (since 1996) largely English-speaking authorities.

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.

I do think that each Authority should have a department that deals specifically with this issue and its compliance with the Welsh Language Act. Consistency across the new authority will be immediately essential, from the way in which the Council converses with residents through to the prioritisation of Welsh on road signs. All Welsh authorities have websites equally available in Welsh and English, and there will be absolutely no excuse for a reduction in this service as authorities acquire greater talent to pool together better Welsh language services for their residents.

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

No Response

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

No Response

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

I think this gives more scope for Authorities to be publically seen as championing diversity. For example, some Welsh authorities are accredited by Stonewall for their commitment to LGBT+ rights, however this is not consistent across Wales. Having fewer authorities pools this expertise and means that diversity and equality have no excuse for being nothing other than excellently addressed in the new authorities.

the new authorities.

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

No Response

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

Please ensure that proposals for Wales are well integrated with those which lie on the border. I am most specifically concerned about 'short-termism' and isolation, particularly surrounding Wales' links with Bristol and Liverpool. In particular, North East Wales' inseparable links with Chester and Merseyside are critical to the economy, and I do not feel the existing authorities provide much care for cross-border cooperation. The Mersey-Dee Alliance is a good idea in principle, but the actions it can account for are extremely limited. Linking with the Liverpool Combined Authority and particularly its transport arm, Merseytravel, is essential for people in the North East where its economy is a single one with the wider Deeside/Merseyside area. The development of projects such as the 'North Wales Metro' can seem superfluous where simple integration with Merseyside is more feasible and locally supported. Any new authorities in this area must be entirely clear on this case.

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 Mark Jones

Organisation (if applicable) -

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

[REDACTED]

Q36. Telephone

No Response

Q37. Address

No Response

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

No Response

Annex C: Consultation Questions

Your Name	
Organisation (if applicable)	Maesteg Town Council
E-mail / Telephone	clerk@maestegcouncil.org
Your Address	Talbot Street Maesteg CF34 9BY

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?

To give the full county budgets to the consortiums for redistribution to the schools, City regions are not going to work for upper valleys and should be scrapped.

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

We have no disagreement; we consider them very good to excellent.

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

We are in total agreement

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

Not that we can see any other options available at the moment.

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

We suggest we use your old tables No. 5 & 6 as full justification.

Chapter 4

Consultation Question 2

Chapter 4 has explained the need for clarity on the future footprint for local government and the range of factors which should be taken into account to

determine a new configuration. It sets out a suggested future footprint for local government, which could be reached via each of the options set out in the previous chapter.
a) Do you agree that providing clarity on the future footprint of local government is important?
Yes, we totally agree but hope that the proposed example is driven to a conclusion
b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?
Yes we agree, Would add that the proposed financial reconfiguration speaks for itself.
c) What are your views on the new areas suggested in this section?
We have no disagreement with the proposed new areas.
d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?
We have 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?
The proposals are a good way to streamline working arrangements.
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?
There is no other way.
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?
Yes but have doubts if you find any County Councils willing to lose their identity.
c) Do you have any other thoughts on the proposed process?

We can see no other way forward
<p><u>Consultation Question 4</u></p> <p>The consultation suggests holding any local government elections in June 2021.</p> <p>Are there any reasons why June 2021 would not be a suitable date? If so, please suggest an alternative date with the reasons why that would be more suitable.</p>
June 2021 in our opinion would be the very latest date this could be done
<p><u>Consultation Question 5</u></p> <p>The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of wellbeing by Public Service Boards, which are linked to electoral cycles. We will make provision to make sure these tie into any new electoral cycles going forward. Are there any other plans or matters which might be tied into the electoral cycle which we need to consider?</p>
We don't see any
<p><u>Consultation Question 6</u></p> <p>What are your views on the approach which should be taken to determining the parameters of electoral reviews?</p>
We believe there should be 1 councillor for every 4000 voters in urban areas, preferably by single transferrable vote and we have no view on rural areas.
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?
By listening to the elected members, and by councillors attending meetings they have been elected to.
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?
To go back to the old expenses system or to divide the yearly stipend between an average number of meetings a councillor is expected to attend i.e. 13 full councils a year and the same amount of committees.
<u>Consultation Question 8</u>
a) Are there other powers which local government should have? If so, what are they?
We should have at least 2 terms of the new authority before any extra powers are considered.

b) Are there other freedoms or flexibilities which local government should have? If so, what are they?
See above answer.
<u>Consultation Question 9</u>
a) Which areas offer the greatest scope for shared transactional services?
Transport, education, health planning and social services are the areas we see as the greatest gain in shared services.
b) How might such arrangements be best developed?
Through the councils work with the Assembly and other statutory bodies.
<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?
Through the Assembly Government and the WLGA
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?
We think Q9a answers this one.
d) Which of the issues identified above or in your response should be prioritised for early resolution?
That should be done by the Assembly.
<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 do not see how these proposals will have an adverse effect on the Welsh language, but we believe the Assembly should closely monitor the results and step in immediately if an adverse effect occurs and perhaps the counties should be encouraged to provide better Welsh language services and provision.
b) How could positive effects be increased, or negative effects be mitigated?
We do not know enough on this subject to offer an opinion

<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>Within our town the Welsh users do not use the full opportunities they have to use the Welsh language.</p>
<p><u>Consultation Question 13</u></p> <p>The Children’s Rights Impact Assessment published alongside the consultation outlines the Welsh Government’s view of the effect of the proposals contained in the consultation on children and young people. The Welsh Government seeks views on that assessment.</p>
<p>a) Are there any positive or adverse effects not identified in the assessment?</p>
<p>We can see none</p>
<p>b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?</p>
<p>We can see none</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>Not any present to oppose the Assemblies policies on Welsh Language</p>
<p>b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?</p>
<p>We believe Q14a gives our answer</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>We are answering this on the understanding that this consultation involves principle authorities only and not town and community councils.</p>

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?

As the two major roles of Local Government are currently Education & Social Care then bringing together planning, decision making and resources around these two major public services should achieve the greatest difference. The current artificial boundaries set by having 22 LAs prevents joined up approaches to these crucial areas and those services would be better provided by grouping LAs to deliver. Given that Social Care provision is intrinsically linked to NHS provision then coherence of LAs within each NHS regions or Area Health Boards would make the most logical sense. City and Growth deals are forcing LAs to work together but the economic agenda is driven by funding, not a big part of LAs work and the grouping of LAs around these activities do not provide a logic grouping for the rest of the services to be provided.

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

No Response

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

Currently there are too many LAs to provide cost effective local government and what comes with this are a myriad of artificial boundaries which prevent efficient working and complicate process. It will be difficult to create the change without the political will but change is required to create more joined up services and consistent deliver. Forcing change by dogma will meet resistance and therefore a clear plan and timetable with deliverable benefits must be laid out and early deliverers rewarded to encourage others. Unfortunately there will be losers whatever is done and the objective must be to minimize these if change is to be achieved

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

No Response

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

No Response

Page 3: Chapter 4

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

Yes. Without clarity it will be difficult to argue and win change or to measure success once delivered. As stated previously the NHS or Local Health Board boundaries should be a key synergy achieved by the change.

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

All these factors are relevant but not all of them can be satisfied by one solution. It is therefore critical that a small number are prioritized and used as the basis for change. Better delivery of social care and education choosing practical population and geographical combinations is vital

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

One of the difficulties is that no one solution will be ideal or politically acceptable. There will always be arguments for different combinations and, indeed, for some not merging at all. However we agree that there are too many authorities currently to run local government efficiently.

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

No Response

Q10. 2e. In the context of these proposals, are there other ways we should simplify and streamline joint working arrangements at regional level and among public bodies within the new authority areas? If so, what are they?

If the objectives are greater efficiency, better planning and service delivery then merger itself will not automatically deliver that. Some things may be better delivered on a whole Wales basis e.g. back office functions like payroll, some may be better delivered locally but with a common all Wales system like the collection of Business Rates and Council Tax, and some need to be totally local but shared and planned in conjunction with neighbouring authorities e.g. sport and leisure.

A straight merger approach will not recognize these different requirements and therefore, perhaps, services should be grouped according to type as above and authorities brought together where it best serves the delivery. Mergers would work where the majority of benefits services benefit.

Cost efficiency is important but better service delivery is potentially a greater benefit.

Page 4: Chapter 5

Q11. 3a. Do you agree with the proposed process of transition: namely establishing Transition Committees and ensuring elections to Shadow Authorities can be held ahead of vesting day for the new authorities?

No Response

Q12. 3b. Do you agree that, if option 1 were pursued, we should set a date by which voluntary merger proposals should come forward in each electoral cycle?

No Response

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

No Response

Q14. 4. The consultation suggests holding any local government elections in June 2021. Are there any reasons why June 2021 would not be a suitable date? If so, please suggest an alternative date with the reasons why that would be more suitable.

No Response

Q15. 5. The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of wellbeing by Public Service Boards, which are linked to electoral cycles. We will make provision to make sure these tie into any new electoral cycles going forward. Are there any other plans or matters which might be tied into the electoral cycle which we need to consider?

No Response

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

No Response

Page 5: Chapter 6

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

No Response

Q18. 7b. How could we better recognise the level of responsibility involved in being a local councillor? What changes to the remuneration and support councillors receive would enable a wider range of people to become involved in local democratic representation?

No Response

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

No Response

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

No Response

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

Already mentioned above, there must be many back office functions which could be more efficiently carried out through a central facility such as payroll and also many which could have common systems but operated locally such as IT and billing and debt collection. With so many LAs currently it is impossible for each one to have totally expertise and professional skills in every area and for groups of authorities or even all of them to share one service creates a better chance of high quality provision adequately resourced, skilled and resilient.

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

This is about good management and strong leadership to do the right thing. Given the pressures on authorities currently the Welsh Government would need to fully resource the change and ensure the savings were seen to benefit the authorities that participated/delivered. The front line users of any centralized service must also be allowed to drive the design to ensure the result is both practical and enhances the process

Q23. 10a. In ensuring we deliver a consistent approach across Wales, where consistency is important, how do you think the advice and support on each of these matters could be best provided?

No Response

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

No Response

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

As much consensus around the objectives and outcomes to be delivered as possible needs to be in place to maximize delivery. If all that is driven is merger for merger's sake then nothing is likely to improve.

Page 6: Impact assessments

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

No Response

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

No Response

Q28. 12. Please also explain how you believe the proposed policy within this consultation could be formulated or changed (if required) so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

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

No Response

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

No Response

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

No Response

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

No Response

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

No Response

Page 7: Submit your response

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

Name Martin Warren

Organisation (if applicable) ICAEW Wales

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

martin.warren@icaew.com

Q36. Telephone

No Response

Q37. Address

No Response

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

No Response

Dear Sir,

I write to advise that Merthyr Tydfil County Borough Council at its Council meeting held on the 6th June 2018 resolved in response to the above that:

“Merthyr Tydfil County Borough Council remains as it is and continues to favour working through consultation and collaboration.”

Please note our response.

Yours faithfully,

Gareth Chapman
Chief Executive
Merthyr Tydfil CBC

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?

Becoming more joined up and improved communications with MP's, AM's and quangos together with cross boarder agencies. Such quangos include Cadwyn Clwyd and North East Wales Food Forum.

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

There is a concern over few councillors and the impact on democracy.

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

Option 2 -phased approach with deadline of 2026.

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

Do away with local authorities altogether and have regional authorities with budgets down to town councils at a local level, mirroring European models.

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

No Response

Page 3: Chapter 4

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

Yes, Local authorities are here to deliver services and not anguish over structures.

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

Is this a Labour Welsh Government initiative or does it have cross party support? Would a future change to the political persuasion at Cardiff affect all this work.

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

Wrexham should be a power house for North Wales so this would be better for Flintshire to be combined with them.

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

If you were not following existing county boundaries it could be that parts of Denbighshire fit in better with Flintshire and Wrexham than Conwy, eg AONB - now includes the Clwydians and Dee Valley down to Wrexham.

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?

Transport and Health Board and the affect of Brexit and changes in population due to industrial changes following Brexit.

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, and it should be at the highest level in the Authorities to make sure it happens, eg. Chief Executives

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?

Public education and information on the new structures and process. Many people do not understand existing structures let alone the new ones.

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.

There will also be WG elections in May 2021, all elections should be combined for June 2021, reducing costs and increasing likelihood of increased turn out to vote. Having 2 elections a month apart will also cause problems for campaigners and increase costs.

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?

Brexit

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

The number of voters/demographics/rural and urban split/deprivation.

Page 5: Chapter 6

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

Listening to them! The lack of resources and powers elected members have creates a lack of ability to respond.

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?

Recognise the role as a profession and match it with the salary.

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

Need to empower council staff in order to empower councillors. No hypothecation of funding and give councils the ability to raise money from alternative sources.

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

The freedom to local authorities to choose how funding is spent

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

No Response

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

No Response

Q23. 10a. In ensuring we deliver a consistent approach across Wales, where consistency is important, how do you think the advice and support on each of these matters could be best provided?

The funding formula needs reviewing to make more fair.

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

No Response

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

Financial support for local authorities. There should not be harmonisation of fees for services as you can not compare deliver of services based on cultural differences/social economic differences. E.g people in Flintshire would not expect to pay the same fees for a burial as those people in inner cities such as Cardiff.

Page 6: Impact assessments

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

No Response

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

No Response

Q28. 12. Please also explain how you believe the proposed policy within this consultation could be formulated or changed (if required) so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

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

No Response

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

No Response

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

No Response

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

No Response

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

The review of the Town and Community council sector proposals would help to inform this piece of work. There is no idea of what will happen to Town and Community Councils.

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 Samantha Roberts

Organisation (if applicable) Mold Town Council

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

townclerk@moldtowncouncil.org.uk

Q36. Telephone

01352 758532

Q37. Address

Town Hall
Earl Road
Mold
CH7 1AB

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

No Response

Strengthening Local Government: Delivering for People

Page 2: Chapter 3

Q1. 1a. What practical steps could the Welsh Government take to make current regional working easier and more effective, for example in relation to education consortia, social services and the City Regions and City and Growth Deals?

No Response

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

No Response

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

No Response

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

In Monmouthshire, any mergers should reflect geography and socio-economic status. The existing NUTS 3 divisions would seem ideal for this task. The proposed merger of Newport and Caerphilly would create a geographically and socio-economically ridiculous authority area combining a valley area with coastal city, while leaving adjacent valley areas to be combined with another lowland area. The logical combination would be (as outlined in 2014) to merge Caerphilly, Blaenau Gwent and Torfaen; and Newport with Monmouthshire. This combines all the valley areas together and all the lowland areas together and mirrors the existing NUTS 3 divisions. We note this is also same area as the "Wye Valley and Vale of Usk" used by Visit Wales.

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

No Response

Page 3: Chapter 4

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

No Response

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

We believe that slavish adherence to other boundaries when determining those for local government is not helpful. The best boundaries for the service delivery that local government provides should be informed by what is best for the delivery of those services, not by attempting to "fit in" with other boundaries.

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

As previously expressed, we are of the view that, if the crude merger approach is to be followed, that the 2014 option of Newport and Monmouthshire being brought together and Caerphilly, Torfaen and Blaenau Gwent becoming a single local authority area is preferable for the reasons already stated.

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

The alternative in the Monmouthshire area is to adopt the 2014 proposals. This mirrors the existing NUTS 3 areas.

Q10. 2e. In the context of these proposals, are there other ways we should simplify and streamline joint working arrangements at regional level and among public bodies within the new authority areas? If so, what are they?

No Response

Page 4: Chapter 5

Q11. 3a. Do you agree with the proposed process of transition: namely establishing Transition Committees and ensuring elections to Shadow Authorities can be held ahead of vesting day for the new authorities?

No Response

Q12. 3b. Do you agree that, if option 1 were pursued, we should set a date by which voluntary merger proposals should come forward in each electoral cycle?

No Response

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

No Response

Q14. 4. The consultation suggests holding any local government elections in June 2021. Are there any reasons why June 2021 would not be a suitable date? If so, please suggest an alternative date with the reasons why that would be more suitable.

No Response

Q15. 5. The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of wellbeing by Public Service Boards, which are linked to electoral cycles. We will make provision to make sure these tie into any new electoral cycles going forward. Are there any other plans or matters which might be tied into the electoral cycle which we need to consider?

No Response

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

No Response

Page 5: Chapter 6

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

No Response

Q18. 7b. How could we better recognise the level of responsibility involved in being a local councillor? What changes to the remuneration and support councillors receive would enable a wider range of people to become involved in local democratic representation?

No Response

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

No Response

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

No Response

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

No Response

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

No Response

Q23. 10a. In ensuring we deliver a consistent approach across Wales, where consistency is important, how do you think the advice and support on each of these matters could be best provided?

No Response

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

No Response

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

No Response

Page 6: Impact assessments

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

No Response

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

No Response

Q28. 12. Please also explain how you believe the proposed policy within this consultation could be formulated or changed (if required) so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

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

No Response

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

No Response

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

No Response

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

No Response

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

There is a potential with any local government reorganisation to influence people's identities. In our view the reorganisation of 1974 negatively impacted identity, which is why many of the changes were reversed in 1996. However the 1996 reorganisation also sowed more identity confusion. There is an opportunity with any future reorganisation to restore a lot of what has been lost in the 1974 and 1996 reorganisations:

Any new local government areas constituted through this process should be known simply as "districts", not "counties".

The "preserved counties" should be realigned to match the historic counties, thus mitigating the loss of identity people in Pembrokeshire, Carmarthenshire, &c. may feel by the loss of their local government name, and restoring the identity of people in Montgomeryshire, Glamorgan, &c. who lost their local government areas in 1974.

Town councils which were previously boroughs should be allowed to use the style "borough".

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

-

Organisation (if applicable) Monmouthshire Association

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

info@monmouthshire-association.org.uk

Q36. Telephone

No Response

Q37. Address

PO Box 608
Newport NP10 8ZS
Monmouthshire

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

No Response

Strengthening Local Government: Delivering for people Consultation Response

Monmouthshire County Council
Approved by Cabinet
Matthew Gatehouse, Head of Policy and Governance
e-mail: matthewgatehouse@monmouthshire.gov.uk
Tel: 01633 644397

Our Response

We have chosen not to respond to your specific questions. We have determined the areas in the Green Paper that we believe require our input and have included reference to paragraph numbering where appropriate.

The Case for Change (Chapter 2)

There has been much that is positive in the papers that have been put forward by Welsh Government over the future of local government in recent years. We welcome the Cabinet Secretary's call for more powers and greater flexibilities for local authorities. However the Green Paper lacks sufficient detail on what these might be.

Pursuing mergers now would create new organisations setting back the progress that has been made on regionalisation where we have been making great strides. At the forefront of our concern is moving forwards with the Cardiff Capital Region City Deal. There is no guarantee that the new organisations would sign up for the deal which would jeopardise up to £4B in investment and the significant progress that is being made such as the investment in an industry-leading compound semi-conductor foundry in Newport.

Options for Strengthening Local Government (Chapter 3)

There seems to be a pre-occupation with putting the debate about form before function. Re-organising existing service models into new boundaries will not bring about the sorts of reform that will solve the complex societal challenges that councils in Wales are grappling with.

In 2016 the Welsh Government assured councils that there would no structural change for a decade. Less than two years on we have returned to the same debate.

Monmouthshire is proof that smaller authorities can deliver and can do well, creating a culture and operating model which encourages innovation and efficiency while continuing to deliver quality services.

We cannot solve complex problems with yesterday's thinking. Bigger is not always better, we need new ways of meeting needs, creating public value and delivering better outcomes for local people. Delivering the exactly the same service models on different footprint will not do this. There will be some minimal economies of scale but these will be set against the significant financial and non-financial costs of mergers. Paramount is the opportunity cost of inactivity in the years' leading-up-to mergers. We need public servants focused on meeting needs and making great leaps forward rather than spending their time seeking marginal efficiency gains.

There is insufficient detail on the arrangements for transition, council tax harmonisation, pensions and how potential redundancy costs could be met.

The foreword to the Green Paper argues that more money would not solve the problem and yet seems focused on financial gains as a result of economies of scale rather than addressing bigger questions about the purpose of local government, the need for innovation, opportunities for prevention and the allocation of resources to different parts of the public sector.

Finding agreement for a future footprint for local government (Chapter 4)

There is little evidence put forward that these proposals would deliver better outcomes or lower cost services than the current configurations. Indeed The Williams Commission report in 2013 recognised that, based on academic research, there was no discernible relationship between scale and performance anywhere in the world. Subsequent evidence has confirmed this conclusion.

We believe that the Green Paper does not bring forward any new evidence to suggest that larger councils would deliver better services. The case for reform is not sufficiently clear to justify the costs and risks associated with pursuing a programme of mergers.

We believe that service provision in Wales should be based on the principle that decisions must be taken as closely as possible to the citizen and welcome the commitment to empower local government and to champion local accountability and local democracy. However the Green Paper is largely silent about the functions and powers that would be transferring to councils.

If we were to follow a path of voluntary mergers the potential partners for any such agreement should be a matter for local democratic discretion and negotiation rather than in accordance with a pre-determined option.

We are required to set balanced budget and have continued to do so against a backdrop of real term budget reductions. We are the lowest funded council in Wales and have achieved this by being innovative and efficient, looking to prevent problems arising rather than solving them when things go wrong, developing collaborative ventures, working closely with local people - focusing on the things that matter most to communities and by transforming services rather than closing them.

The debate should not be about the shape of lines on a map, it should be about the shape of services, how councils should be resourced and what powers they should exercise. We recognise that this is a challenging time for local government. We are up for that challenge providing we are given the space, flexibilities and powers to work with local communities and partners from all sectors on our own terms to tackle it head on.

A clear and democratically-led process (Chapter 5)

The numbers of councillors and areas represented will need to change as a result of these proposals. The number of electoral divisions would also vary. These issues would need to be factored in to any transition arrangements, with the work and timescales of the Local Democracy and Boundary Commission for Wales being a key consideration. The early mergers date could make this very difficult to achieve.

We would want to be involved in this discussion to ensure that issues of rurality etc. are appropriately considered when determining ward boundaries and constituent / councillor ratios.

We do not have any evidence on costs, benefits and savings of each of the options described by Welsh Government and would expect this to have been produced by Welsh Government itself prior to the Green Paper being published.

We are concerned about the implications of Council Tax harmonisation. Monmouthshire residents pay considerably lower council tax than one of the authorities we are proposed to merge with and the Green Paper on not sufficient clear on the implications of this for organisations or residents.

Strengthening local government and support through the process of change (Chapter 6)

We welcome the positive comments about the role of elected members in chapter 6. Councillors work hard for their community and are under incredible pressure to balance their role with careers and the other responsibilities they have such as parents and carers.

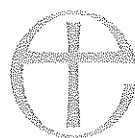
The elected members and paid officers of Monmouthshire County Council will always be passionate about our county. We identify with this place and we serve its people and communities with pride and integrity.

We aspire to deliver the strategic direction set by Welsh Government where this is set legitimately, alongside meeting the needs of the local people who elected us. We recognise the role of Welsh Government but do not see ourselves as subservient to it. Councils are democratically elected bodies responsible to local people at the ballot box and though the ward role of councillors.

We would welcome sight of any proposals to help councils make more effective use of their elected members' knowledge of, and connections in, their communities. This could include the development of digital tools to help members gather and process the wide range of statistical and qualitative evidence about their wards and to gather ideas from their local communities.

Conclusion

The Green Paper is silent on the core issues which are at the heart of the debate. When developing solutions we must understand the problem we are trying to solve. In this case the problem is not clearly understood. Whether or not 22 councils is the system that would be designed now is not the right starting point. We need to understand what it is that we want local government to achieve, how we want to work with communities and local people, the conditions needed for this to happen and the outcomes we expect. It is only when we understand these that we should consider pursuing the costly and distracting task of merging local authorities.



THE CHURCH OF ENGLAND EDUCATION OFFICE

The National Society (Church of England and
Church in Wales) for the Promotion of Education

Dear Sir/Madam

Re: Consultation Response: Strengthening Local Government

As the National Society (Church of England and Church in Wales) for the Promotion of Education we are involved in the support of Church in Wales schools and Church in Wales diocesan education teams.

We wish to make a general point about the involvement of the Church in Wales in schools in Wales and it seems more appropriate to do this in the form of a letter rather than focus on the specifics of the questions raised in the consultation document.

We understand that what is proposed involves the bringing together of the delivery of services across local authorities.

Our interest is in the delivery of education services where the Church in Wales is a longstanding partner with local authorities in the provision of education. We wish to see this partnership sustained into the future in the interests of children and communities throughout Wales. As there has been a move towards organising some service delivery via regional consortia, we would wish to ensure that partnerships between the education teams in Church in Wales dioceses and individual local authorities are also reflected at consortium level.

One of the ways in which the partnership with local authorities has operated has been through the system of scrutiny and overview committees which include diocesan representation. It is essential in our view that the rights to representation for Church in Wales dioceses on such committees is retained along with other current statutory rights.

We request clarity about the decision-making process in any new configuration of local authorities, and that the existing relationships with partners are appropriately reflected in the new arrangements so that rights and responsibilities of others including the Church in Wales are recognised and supported.

Yours faithfully

Nigel Genders

Chief Education Officer

www.churchofengland.org/education

The National Society (Church of England and Church in Wales) for the Promotion of Education – operating as The Church of England Education Office

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Annex C: Consultation Questions

Your Name	Keith Davies
Organisation (if applicable)	Natural Resources Wales
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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](#).

<p>Chapter 3</p> <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>Working together regionally is essential in moving towards a new model for public service delivery and the public service culture change required by the Well Being of Future Generations(Wales)Act in order to collectively understand and address the significant challenges facing Wales.</p> <p>The challenge, and opportunity, will be to move away from a sectoral `business as usual approach` towards clearly setting out cross cutting priorities and measures that deliver against the four pillars of well-being and seven well-being goals.</p> <p>The five ways of working will be particularly pertinent to help realise this culture change and provide leadership on well-being to ensure we embed an integrated collaborative approach to service delivery that improves the social, economic, environmental and cultural wellbeing of Wales.</p> <p>The Future Generations Framework for Service Design (WG and Future Generations Commissioner for Wales) provides a tool, together with the emerging National Development Framework, to facilitate and enable an integrated approach to regional working.</p> <p>Collaborative leadership will be important together with ensuring that the scale of collaboration matches the issue to be addressed and not be addressed by administrative constraints.</p>
<p>b) What are your views on the common elements to the process of mergers we outline in this section?</p>

<p>Natural Resources Wales have no comment to make on the respective merits of the principle of, or options for, merger.</p> <p>We note the common features for each option and agree that there is a need for agreement on a future footprint for local government and suggest this could apply to wider public service delivery in Wales.</p>
<p>We agree that there should be alignment with the boundaries of other public services operating together with the need to provide clarity for long term planning to ensure that decisions on service plans and projects can be made on a sound basis.</p> <p>The National Development Framework and the Future Generations Framework for Service Design should underpin the process.</p>
<p>c) What are your views on the options for creating fewer, larger authorities which we have set out?</p>
<p>No Comment</p>
<p>d) Are there other options for creating fewer, larger authorities we should consider?</p>
<p>No comment</p>
<p>e) Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.</p>
<p>We have no specific evidence on costs, benefits and savings.</p> <p>We note, however, that paragraph 3.21 of the Green paper acknowledges that mergers will have implications between organisations. Given the strategic importance to NRW of collaborative working with local authorities we would welcome engagement with the process proposed to update the regulatory impact assessment to ensure that any implications for NRW are captured and reflected in the assessment.</p>

Chapter 4

Consultation Question 2

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

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

We agree that it will be important to provide clarity on the future footprint of local government and wider public service delivery. We suggest this should focus on both structures and new ways of working, including adopting a systemic approach to identify where a strategic/regional approach is required to help address challenges and deliver opportunities. Institutional change should support the behavioural change required to address the significant challenges facing Wales.

The examples of working together in the document relate to the 'regionally focussed model' of economic development as set out in 'Prosperity for All' and the 'Economic Action Plan'. Our experience to date of the City and Growth deal processes to date suggests there is a continued lack of recognition of the role of the environment and sustainable management of natural resources in providing solutions to the wider well-being of Wales, the environment is seen as a 'bolt on' rather than an integral part of the process. We understand that WG have established three regions-North Wales, Mid and South West Wales and South East Wales-to better improve the integration of economic development, transport and land use planning. There is an opportunity to integrate the environment and sustainable management of natural resources with this process. This whole system approach would allow an evidence-based process to identify opportunities and solutions to potential issues at an early stage, ideally before proposals emerge during the local development plan process and before engagement on specific development management proposals.

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

Linked to our response to Q2a above, there is a need to factor in the statutory requirement of the Environment(Wales)Act for NRW to prepare, in collaboration, Area Statements to deliver the policy priorities of the WG Natural Resources Policy. This will help integrate consideration of the long-term resilience of ecosystems and the sustainable management of natural resources with wider public service delivery identifying nature-based solutions to inform decisions on directing the right development to the right locations

There will be 6 terrestrial area statements and one for the Marine area of Wales. External engagement with key stakeholders, including Local Government, will commence shortly and Area Statements will need to be completed by the end of 2019.

The attached diagram identifies the boundaries of our Area Statements. NRW is currently undertaking an organisational change process, including reconfiguring our operational delivery to focus on a place-based approach linked to our area statements. It would be useful to amend Table 1 in Annex B, to reflect the NRW place based approach to service delivery.

NRW is a statutory member of each of the 19 Public Services Boards in Wales. We have been supportive of the process, fully engaged locally and on a regional and national basis and have helped lead the PSB process to realise the public

service culture change required under the Well Being of Future Generations(Wales) Act to transform the social, economic, environmental and cultural well-being of Wales.

We are currently undertaking an analysis of the priorities emerging out of each Well Being Plan, including issues best resolved regionally and nationally. We will forward this when completed.

Our initial analysis of strategic issues indicates there are a few areas that have proved a consistent concern

- Lack of recognition of the magnitude of change required to reach a position of sustainability
- The impact of climate change and decarbonisation not really explored
- Little discussion on the potential impact of our exit from the EU
- An apparent lack of business involvement
- Little apparent response to the biodiversity duty under section 6 of the Environment Act
- Lack of recognition/synergy with neighbouring PSB processes and lack of all Wales learning from good practice examples.

NRW will shortly publish our biodiversity steer, recognising the link between biodiversity diversity and well-being and embedding biodiversity outcomes across the delivery of public sector functions.

With regard to any future change in arrangements for PSB`s we will engage with the discussion at relevant PSBs respecting the principle of a clear and democratically led process.

There will need to be a better understanding of the potential tension between the statement in paragraph 4.16 with regard to making the transition to new PSB areas ahead of new authorities coming into being given the different timescales linked to each of the 3 options for change.

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

No comment

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

No comment

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

See our response to Q10 below.

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?

Clarity will be required on the interface between this process and the PSB process, given the role of statutory PSB bodies in delivering joint work programmes in the context of Well Being Plans.

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

No comment

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

No comment

Consultation Question 4

The consultation suggests holding any local government elections in June 2021.

Are there any reasons why June 2021 would not be a suitable date? If so, please suggest an alternative date with the reasons why that would be more suitable.

No comment

Consultation Question 5

The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of wellbeing by Public Service Boards, which are linked to electoral cycles. We will make provision to make sure these tie into any new electoral cycles going forward. Are there any other plans or matters which might be tied into the electoral cycle which we need to consider?

The Area Statements prepared by NRW will form part of the evidence base underpinning Well Being Plans. It would be useful to explore how best to align future timelines for the preparation of both Well Being Plans and Area Statements.

Consultation Question 6

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

No comment

Chapter 6

Consultation Question 7

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

No comment
b) How could we better recognise the level of responsibility involved in being a local councillor? What changes to the remuneration and support councillors receive would enable a wider range of people to become involved in local democratic representation?
No comment

<u>Consultation Question 8</u>
a) Are there other powers which local government should have? If so, what are they?
We note that local government have suggested a number of areas where further powers or flexibility would be helpful, including the environment. It would be useful to understand what these measures might be together with any implications for the role and function of NRW.
b) Are there other freedoms or flexibilities which local government should have? If so, what are they?
No comment
<u>Consultation Question 9</u>
a) Which areas offer the greatest scope for shared transactional services?

Our emerging analysis of PSB priorities have identified the following strategic opportunities for sharing assets and resources;

Procurement

Recruitment and career progression across PSB member organisations

Apprenticeships, work experience, training, volunteering and secondments

Public property, land and assets including electric charging points/vehicles

Public engagement and consultation

Information, data, evidence, examples of good practice and staff training

Childcare provision for the workforce

Promotion (of the local area)

It would be useful to clarify if the process for identifying `regional` or `once for Wales` solutions will be limited to local authorities or if it will encompass other statutory bodies, including NRW.

b) How might such arrangements be best developed?

Consultation Question 10

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

From our experience of working with local planning authorities, we are aware of the difficulty a number of authorities have in recruiting and retaining suitably qualified people within certain areas of expertise. A model that has been used by a number of planning authorities in south Wales to overcome this is the pooled recruitment of a minerals planning officer who has responsibilities across a number of local planning authority areas, which seems to work well.

However, we are aware that a number of planning authorities are also having difficulty in recruiting and retaining landscape specialists and ecologists. This risks planning decisions being made without suitably qualified people being employed to inform the decision-making process. We should not approach this problem by expecting local planning authorities to address the situation. Instead all relevant expert bodies should be engaged to help find a solution to the problem.

For example, we are working with local planning authorities in north Wales on a Joint Improvement Project which adopts a whole system approach to improve the engagement between us and the authorities in recognition of the challenges being experienced by all bodies. We hope to extend this project to other parts of Wales over time

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?

See response to Q 9a above.

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

Consultation Question 11.

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

a) What effects do you think there would be?

No comment
b) How could positive effects be increased, or negative effects be mitigated?
No comment
<p><u>Consultation Question 12</u></p> <p>Please also explain how you believe the proposed policy within this consultation could be formulated or changed (if required) so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.</p>
No comment
<p><u>Consultation Question 13</u></p> <p>The Children's Rights Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on children and young people. The Welsh Government seeks views on that assessment.</p>
a) Are there any positive or adverse effects not identified in the assessment?
No comment
b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?

No comment
<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 comment</u>
b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?
<u>No comment</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>Budgets-paragraph 5.27</p> <p>NRW would welcome early engagement with WG and local government given the strategic nature of our collaboration with local authorities across a range of functions together with our role as a statutory member of PSB`s.</p>

Welsh Government
**Green Paper – Strengthening Local Government: Delivering
for People**
Tuesday 12 June 2018

1. The NASUWT welcomes the opportunity to comment on the proposals contained in the Green Paper – Strengthening Local Government: Delivering for People (the Green Paper).
2. The NASUWT is the largest teachers' union in Wales representing exclusively teachers and school leaders.

GENERAL COMMENTS

3. The NASUWT has already responded in detail to a number of consultations on local government reorganisation (LGR) proposals by the Welsh Government, including: Consultation on the Proposed Local Government (Wales) Measure, in October 2010; Supporting our Public Service Workforce through Collective Leadership and Legislation – Consultation on a draft Public Services (Workforce) (Wales) Bill, in February 2014; Devolution, Democracy and Delivery White Paper – Reforming Local Government, in October 2014; the White Paper Reforming Local Government: Power to Local People, in April 2015; National Assembly for Wales Public Accounts Committee (PAC) inquiry into Regional Education Consortia, in March 2017; Welsh Government's statement of intent about the future of Local Government in Wales and the proposals in the White Paper – Reforming Local Government: Resilient and Renewed, in April 2017.
4. The NASUWT remains fully committed to constructive dialogue and engagement over LGR in the interests of teachers, pupils and the education service. Nothing in this response should be interpreted to

mean that the NASUWT's views expressed in relation to these earlier consultations have changed.

5. The NASUWT maintains that the protection of the public sector workforce, including the school-based workforce, must be at the heart of local authority mergers, whether they are voluntary or forced. The Union is clear that all such proposals must be founded on a firm commitment to avoid making compulsory redundancies, though the establishment of no compulsory redundancy agreements.
6. As well as making provision for access to centrally held funds to assist in voluntary mergers, the Welsh Government must establish a workforce adjustment strategy, underpinned by a centrally held and regulated workforce adjustment fund, to ensure that where a need to rationalise and/or reduce the workforce is identified, those affected are treated with the dignity and respect they deserve.
7. The NASUWT has worked with the Wales TUC (WTUC) and affiliated trade unions on its response to the Green Paper and is pleased to support that response.
8. In particular in recognising the need for change, the NASUWT agrees with the WTUC that larger authorities may offer the opportunity for economies of scale and more sustainable services, but this must not be at the expense of the workforce. The NASUWT has also consistently advocated an approach which:
 - avoids compulsory redundancy and unilateral changes to terms and conditions;
 - avoids outsourcing of services;
 - provides sufficient scale and resource to allow a whole public sector workforce planning agreement to operate effectively;
 - utilises reserves, funding mechanisms, shared budgets, service delivery structures and multi-year planning; and
 - seeks advice via the appropriate social partnership arrangements at every stage.

9. In addition to supporting the WTUC response to the Green Paper, the Union submits this response to highlight those issues that directly affect, and impact on, the workforce within the education sector.

SPECIFIC COMMENTS

10. The NASUWT offers the observations and comments that follow in relation to the questions posed on the consultation response form.

Chapter 3
<u>Consultation Question 1</u> 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?
<p>The NASUWT has been engaged in discussions and consultation with the Regional Education Consortia (the Consortia) since their inception. However, the Union has had very mixed experiences when working with each of the four Consortia and believes that there is still a lack of understanding of their role both within the Consortia themselves and amongst schools, local authorities and the education workforce generally.</p> <p>The NASUWT firmly believes that the expectation that the provision of school improvement services, through the establishment of the four education consortia, would improve capability and capacity at senior level, and produce savings to be directed to the front-line or directed to supporting education activities, has not been realised.</p> <p>Despite an initial lack of understanding of partnership working within the Consortia, the NASUWT, as a key stakeholder, has attempted to work closely with them to ensure that the outcomes of their work are of benefit to schools, teachers and the wider education workforce. Whilst the NASUWT acknowledges that some progress has been made in terms of engagement with the Consortia over regional working, there remain significant issues regarding the openness, transparency and funding of the Consortia, with</p>

financial information often proving difficult to find, inconsistent and opaque.

As a result, the Union is of the firm view that the practice followed by the Consortia should not be used as a model for collaborative working between local authorities.

The NASUWT does not, therefore, accept the assertion of the Welsh Ministers that the Regional Education Consortia model presents a good example of collaborative working between local authorities.

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

The NASUWT expects the Welsh Government to seek to simplify current funding arrangements to ensure that local government funding and budgeting arrangements are more inclusive and transparent.

In addition, the Union maintains that the opportunity should be taken to address the school funding disparities and anomalies that exist between the 22 local authorities, which result in some schools stockpiling excessive reserves while others are strapped for cash and large sections of the workforce face year-on-year redundancies.

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

The NASUWT has consistently maintained that economies of scale were not realised within the structure and organisation of local government in Wales, following LGR in 1996. However, the Union remains to be convinced that greater regional working is the best way of achieving this.

As stated previously in this response, the NASUWT maintains that the protection of the public sector workforce, including the school-based workforce, must be at the heart of local authority mergers, whether they are voluntary or forced, and that there must be a commitment to no compulsory redundancies.

The Union asserts that the commitment to no compulsory redundancies will require access to centrally held funds to assist in voluntary mergers, and the establishment of a workforce adjustment strategy, underpinned by a centrally

held and regulated workforce adjustment fund.
d) Are there other options for creating fewer, larger authorities we should consider?
The Union suggests that it may be beneficial to consider the coterminosity of local authority areas with the National Assembly for Wales (NAfW) electoral constituencies to provide clarity for the public and to better ensure that communities feel properly engaged, represented and connected to elected representatives.
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 NASUWT notes that, following LGR in 1996, many of the much smaller local authorities replicated the senior management structures of their predecessors. By way of example, there was a Director of Education and three Assistant Directors of Education in the South Glamorgan County Council before LGR. After the South Glamorgan County Council split into the City and County of Cardiff Council and the Vale of Glamorgan Council, both councils replicated the former senior management structure. This led to the appointment of a Director of Education and three Assistant Directors of Education in the Vale of Glamorgan, despite there being, at that time, only seven secondary schools, two of which were Grant Maintained and, therefore, outside the control of the Council.</p> <p>This was replicated in other Directorates in many of the newly formed authorities. As a result, the field at senior level across Wales was spread exceedingly thinly. This has, despite cutbacks, continued largely unchanged to this day. The NASUWT, therefore, welcomes the prospect of a return to well-configured local authorities with the benefit of suitably experienced and capable personnel in senior posts.</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?
In recognising that fewer, larger local authorities would be desirable, the NASUWT acknowledges the merit in providing clarity on the future footprint of local government.
b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?
<p>The NASUWT notes that paragraph 4.6 of the consultation document sets out some of the factors which were taken into account by the Welsh Government in formulating the proposals contained in this consultation, namely:</p> <p><i>‘There are many challenges associated with bringing local authorities together. These include:</i></p> <ul style="list-style-type: none"> <i>• staffing issues: including pay, structure, policies and pensions</i> <i>• system and process alignment, including data sharing and ICT</i> <i>• service reconfiguration and transformation: including understanding of capacity and capability</i> <i>• workforce issues, including recruitment and retention.’</i> <p>The Union questions whether the Welsh Government has a clear understanding of the relationship between local authorities and schools, as there is no recognition in the Green Paper of the position of schools within local government, and no assurance has been provided that schools will remain under the control of the reformed local authorities.</p> <p>The Welsh Government is reminded that, although the local authority is the employer in law for maintained and voluntary controlled schools, it is not the employer in foundation and voluntary aided schools and most certainly not in the further education (FE) sector.</p> <p>Furthermore, the Education Act 1986 (the 1986 Act) provided governing bodies with the power to hire and fire staff. However, in local authority maintained and voluntary controlled schools, the contracts of employment of staff and dismissal notices are issued and held by local authorities. As long as correct procedures are followed, a contract of employment or dismissal notice, as determined by a governing body, must be issued by a local authority upon notification of the same. Regrettably, this situation limits the control and/or influence that local government has over staffing matters in schools.</p>

The NASUWT has made representations to the Welsh Government over many years about providing local government with the ability to properly manage the school workforce by amending or introducing legislation which would have the effect of repealing those elements of the 1986 Act that relate to governing body powers of appointment and dismissal, insofar as they prevent the redeployment of school-based staff by local authorities. In addition, as a direct result of the inability of local authorities to redeploy school-based staff, the NASUWT has been in dispute with the Welsh Government since 2011 over the perennial compulsory redundancies that blight schools and the lives of teachers, and narrow the curriculum.

The NASUWT has also called upon the Welsh Government repeatedly to return the FE sector to the control of local authorities. In terms of value placed on integrated and collaborative regional working referred to in the Green Paper, the Union questions seriously why the opportunity has not been seized to increase the democratic accountability of the incorporated FE colleges as they are a crucial element of the education system.

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

Whilst acknowledging the merit of moving to fewer, larger local authorities, the NASUWT does not hold a firm view on the precise number and configuration of these authorities.

However, the Union believes that it would be beneficial if there was coterminosity of local authority areas with the NAFW electoral constituencies in order to provide clarity for the public and to better ensure that communities feel properly engaged, represented and connected to elected representatives.

The Union, therefore, suggests that the Welsh Government considers the boundaries of the suggested new areas alongside the proposals in the recent consultation undertaken by the NAFW, 'A Parliament that Works for Wales'.

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

As stated previously, whilst acknowledging the merit of moving to fewer, larger local authorities, the NASUWT does not hold a firm views on the precise number and configuration of these authorities.

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?

As referred to elsewhere in this response, the NASUWT does not accept that the Consortia model presents a good example of collaborative working between local authorities.

The Welsh Government has advocated an approach to school improvement that places schools at the centre of a self-improving system which relies on school-to-school support, co-ordinated through the Consortia. In noting that this system is not yet fully embedded or, indeed, working consistently and effectively, the NASUWT recognises that the process implies a built in obsolescence for the education Consortia.

The NASUWT does not view the eventual demise of the Consortia as a problem because the legal responsibility for school standards rightly remains with local authorities, and in the education sector at least, the move to fewer, more viable and sustainable local authorities should considerably reduce the need for joint working at regional level, as currently provided through the Consortia.

Furthermore, the structures adopted by the Consortia differ across Wales. Three are run by joint local authority committees, whereas the Education Advisory Service (EAS) in south-east Wales is a company limited by guarantee. Despite acknowledging that the EAS has proven to be both streamlined and relatively efficient, the NASUWT is of the view that its formulation is outwith the policies of the Welsh Government as it presents an out-sourcing, since the EAS is its own employer.

However, as recognised elsewhere in this response, the other three Consortia do not present good models as their organisation and funding arrangements are opaque.

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?
<p>The NASUWT maintains that the joint transition committees must be required to work within the framework of a policy of no compulsory redundancy and that the position of the school-based workforce is fully embraced and protected by such a policy.</p> <p>The Union strongly assert that the joint transition committees must be required to recognise fully the employer function of local authorities in relation to the staffing of maintained schools and must have due regard for the legislation applying to the transfer of staff to a new employer.</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?
The NASUWT acknowledges that the setting of a date by which voluntary merger proposals should come forward in each electoral cycle would provide clarity and consistency in the process.
c) Do you have any other thoughts on the proposed process?
<p>The NASUWT agrees with the position presented in the WTUC response which maintains that transition committees should be part of a wider social partnership model and that it will be vital for the recognised trade unions to have a voice in the deliberations of those committees.</p> <p>Further, the Union supports the view that there is a need to ensure that those authorities who merge voluntarily do not begin a race to the bottom, in relation to contractual arrangements and the terms and conditions which are subject to local negotiation, if disputes are to be avoided.</p> <p>Likewise, the NASUWT supports the view that the need to involve representatives from all the recognised trade unions at the formative stages of merger proposals, rather than just consulting with staff and staff representatives, will assist in preventing disputes. The Union maintains that this is particularly pertinent to the school-based workforce as, all too often,</p>

senior management purports to speak on behalf of the school staff when no consultation with the workforce, let alone the workforce trade unions, has taken place.

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.

The NASUWT has not identified any reasons why June 2021 would not be 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?

The NASUWT is not aware of any other plans or matters that could be affected by changes to electoral cycles.

Consultation Question 6

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

The NASUWT reserves its position on this matter.

Chapter 6

Consultation Question 7

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

The NASUWT maintains that this question goes to the heart of local government and the role of local councillors. The communities represented by local councillors must be able to have confidence that their elected representatives have an effective voice in the decision-making process and that their vote will count.

In October 2003, the NASUWT cautioned the then Local Government and Public Services Committee that the structures that had been introduced for

local government, as a result of the Local Government Act 2000, presented an affront to local democracy.

The NASUWT complained that the move to a 'cabinet' system had reduced local accountability rather than enhanced it, reduced transparency and openness, placed too much power in the hands of a small group of councillors, reduced the role and effectiveness of backbench councillors, exacerbated the 'funding fog' that engulfed education spending and provided 'paid' positions for cabinet members.

In 2010, in preparation for the Consultation on the proposed Local Government (Wales) Measure, the NASUWT conducted a poll across each of the 22 Welsh local authorities. The returns revealed that the concerns expressed by the NASUWT in 2003 not only continued to apply, but that the situation appeared to have worsened with 'cabinet government' being described as 'behind closed door politics', 'consultation by camouflage' and 'closed shop government'.

The Union continues to maintain that the move to cabinet government has weakened democracy within local government and that the process of scrutiny distances those outside the cabinet, and other stakeholders and interested parties, from the decision-making process.

The NASUWT believes that the committee structure had the merit of being inclusive of community, trade unions and other interested parties and provided an opportunity for proposals to be debated fully and/or campaigned against before the decision-making process was completed, and that a return to this form of government would facilitate reconnecting councillors to their communities.

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

The NASUWT acknowledged the merit espoused in the White Paper, Devolution, Democracy and Delivery, Reforming Local Government: Power to Local People in April 2015, of ensuring that the elected politicians rather than the paid officials run councils, of reviewing the remuneration of elected

members and senior management and of increasing diversity among elected members.

The NASUWT is of the view that the remit of the Independent Remuneration Panels must be to identify the need to ensure public confidence in the level of allowances paid to councillors by recognising that the payments are in recognition of a calling rather than a career.

The Union has also responded to previous consultations welcoming the statement by the Minister for Public Services in 2015 that Cabinet Members and those with senior responsibility payments should not simply become another part of the paid bureaucracy.

Consultation Question 8

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

The NASUWT maintains that the following powers and responsibilities should be returned, rather than devolved, to the control of local authorities:

- full employment functions for schools to ensure complete workforce planning, with the power to redeploy the school workforce;
- the overarching control of school budgets (resulting in an end to cheque-book management); and
- responsibility for the provision of further education.

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

The NASUWT reserves its position on this matter.

Consultation Question 9

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

The NASUWT believes that all local authority provisions should be viewed and delivered as shared services. In this context, the Union has consistently rejected the delegation of money to schools which should be used to provide local authorities' central services.

The delegation of this money to schools has led to the out-sourcing of services for payroll, governor support, health and safety, insurance and human resources advice to private companies which, as referred to elsewhere

in this response, is outwith the policy position of the Welsh Government.

The NASUWT has consistently raised concerns regarding other central services that are delegated to schools which have included behaviour support, county music services and support for pupils with English as a second language. The Union does not believe that this approach provides value for money and acknowledges that the proposed arrangements present an opportunity to return to a more sustainable, secure and efficient provision of central service for schools which should not be missed.

As referred to elsewhere in this response, the direction of travel that the Welsh Government has taken in relation to schools improvement services has been to promote school-to-school support in a self-improving system. The NASUWT does not believe that allowing individual schools to opt out of central local authorities provisions is conducive to this model and that legislation is require to prohibit such out-sourcing.

The NASUWT firmly believes that the reorganisation of local authorities into fewer more financially secure and efficient groups presents a real and rare opportunity to restore central services for education that have been lost due to excessive delegation rates to schools, a dogmatic approach to school autonomy and cuts to local government resources.

The Union maintains that a key priority among the central services that has been lost is the restoration of local authority pools for supply teachers. Many local authorities have removed their provisions entirely around supply teachers, including the provision of payroll facilities, to enable schools to employ supply teachers through the local authority in accordance with the provisions of the School Teachers' Pay and Conditions Document (STPCD) and be provided with access to the Teachers' Pension Scheme. As a result, supply agencies have created a market economy for the provision of supply teachers and support staff in which there are inconsistencies in the rates charged to schools, and the contracted supply staff have experienced a dramatic worsening of their pay and conditions of employment. The NASUWT asserts that this constitutes out-sourcing at its very worst.

The NASUWT has campaigned for many years to stop the exploitation of supply teachers and to improve their pay and conditions. The NASUWT believes that full restoration of the organisation and administration of supply pools must now be established on a regional, or even an all-Wales, basis. In any event, the Union maintains that the move to new larger authorities, as proposed in the Green Paper, should at least increase the capacity to provide payroll facilities to schools so that supply teachers can be employed, and paid accordingly, under the provisions of the STPCD, and are able to have access to the Teachers' Pension Scheme and to professional development opportunities.

b) How might such arrangements be best developed?

The NASUWT believes that most cross-border arrangements between local authorities can be developed with a single local authority being the host, with others making financial contributions. There would need to be democratic oversight provided by way of joint committees, but the NASUWT maintains that such joint committees would, in any case, need to be put in place for a range of joint working arrangements.

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?

The NASUWT welcomes the commitment by the Welsh Government to social partnership arrangements which recognise that supporting, developing and ensuring a fair deal for the public services workforce is fundamental to the Welsh Government's aim of protecting and improving public services across Wales. The Union firmly believes that the consistency of the provision of advice and support is a fundamental part of the principle of social partnership working between public services employers and the trade unions, and that this is the model which needs to be established.

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?

The NASUWT is clear that local authorities will need assistance and guidance

to ensure that the first call on funds realised through the disposal of property and assets will be to support a workforce adjustment strategy that avoids compulsory redundancy.

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

The NASUWT maintains that the protection of the public services workforce from compulsory redundancy must be the key priority.

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?

The NASUWT is deeply concerned about the statement made in section 6.59 of the Green Paper:

‘We believe that the creation of new authorities, if we proceed, will present an opportunity to strengthen the use of the Welsh language in the delivery of services and as the language of internal administration in local authorities.’

The Union responded to the consultation on the ‘Welsh Government draft strategy: a million Welsh speakers by 2050’ in October 2016, and stated that the Welsh Government should:

‘...ensure that the Vision is taken forward on the basis of mutual respect and tolerance and that the legislation envisaged, which, as stated in the consultation document, will provide an unequivocal basis for organisations to act in support of the language and for Welsh speakers to use, has this at its heart’

The NASUWT has long argued that the key to reinvigorating the Welsh language is to concentrate on the early years of education so that the journey can be an adventure for the citizens of Wales, rather than a crusade.’

However, the Union cautions that the consequence of this element of the

reorganisation of local authorities could place barriers in the way of, or discriminate against, non-Welsh speakers in gaining employment in local authorities.

The NASUWT acknowledges that local authorities provide good employment opportunities for the citizens of Wales but maintains that the opportunities presented should not favour one group of workers over another. The Union asserts that the statement in the Green Paper has gone beyond the recommendations of the Working Group on the Welsh Language:

‘The Welsh Government, in a full and equal partnership with Local Government, should develop and implement a linguistic-economic strategy for the counties of Anglesey, Gwynedd, Ceredigion, Carmarthenshire and adjacent and relevant areas, based on the towns of Bangor, Aberystwyth, Carmarthen and Llanelli.’

The NASUWT notes that the average proportion of Welsh speakers in the areas outside of these counties stands at 12.7% and that it would therefore be wholly unreasonable to treat the English language speakers less favourably than Welsh language speakers.

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

The NASUWT questions the relevance of this question, given that the proposals in the Green Paper could impact negatively on non-Welsh speakers.

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.

The NASUWT questions the relevance of this question, given that the proposals in the Green Paper could impact negatively on non-Welsh speakers.

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?
The NASUWT has not identified any shortcomings in the Children's Rights Impact Assessment.
b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?
The NASUWT has not identified any shortcomings in the Children's Rights Impact Assessment.
<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 NASUWT believes that better resources and efficient and more sustainable local authorities could have a positive impact on the provision of services to people with protected characteristics.
b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?
The NASUWT believes that there is always more that can be done to impact positively on equalities issues. The Union maintains that local authorities currently do not act sufficiently to fulfil their Public Sector Equality Duties in monitoring the impact of their policies on persons with protected characteristics. The NASUWT recognises that larger, more sustainable local authorities may have greater capacity to effect improvement in this area.
<u>Consultation Question 15</u> Please provide any other comments you wish to make on the content of this consultation.
The NASUWT reminds the Welsh Government that the NASUWT, and other teacher trade unions, are currently challenging a proposal that would, if pursued, subject the pay and conditions of teachers to a public consultation exercise on an annual basis, following the devolution of teachers' pay and conditions on 30 September 2018.
It was resolved at this year's Wales TUC Biennial Conference to oppose this

practice, as it is not only irreconcilable with the First Minister's statement that the Welsh Government is committed to '*the extension of collective bargaining and access to unions*', but also because it would set an unacceptable precedent. The resolution is clear that a public consultation exercise has no place in pay and conditions consultation and negotiation, as this is the business of employers and recognised trade unions representing the workforce involved.

The NASUWT expects the Welsh Government to give due regard and weight to this Wales TUC 2018 Congress resolution if the proposals in the Green Paper are taken forward.



Chris Keates (Ms)

General Secretary

For further information on the Union's response, contact Rex Phillips, National Official for Wales.

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Strengthening Local Government: Delivering for People

Page 2: Chapter 3

Q1. 1a. What practical steps could the Welsh Government take to make current regional working easier and more effective, for example in relation to education consortia, social services and the City Regions and City and Growth Deals?

The boundaries should be as consistent as possible in relation to consortia, City Regions and other joint working arrangement between local authorities.

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

I am against the proposals that have been set out.

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

I am against the proposals set out in the consultation.

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

Changes to unitary authority boundaries in Wales need to be redrawn based on community links, identity and how practical the authority will work.

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

None

Page 3: Chapter 4

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

I agree with the above statement.

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

No, I do not agree with the factors.

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

I am against the proposals on the new areas suggested.

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

New boundaries for local government need to be redrawn from scratch. There have been 2 previous local government reorganisations in Wales in 1974 and 1996. Both these reorganisations have occurred because the system beforehand didn't work. And by merging councils together doesn't necessarily mean they will work after this reorganisation.

Some of the current authorities should remain untouched because of their size, the nature of the area they govern or because bringing in other areas would be impractical or detrimental. The areas are:

- Cardiff
- Swansea
- Newport
- Carmarthenshire
- Pembrokeshire
- Ceredigion
- Powys

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?

The boundaries of the Health Boards, Police forces, Fire service, Welsh Assembly Electoral Regions and other joint working areas need to have common boundaries because at present they are inconsistent. Examples include:

- Bridgend is under the Abertawe Bro Morgannwg Health Board area, but comes under South Wales Fire and Rescue service, even though Neath Port Talbot and Swansea are not
- Merthyr Tydfil is one of 6 local authorities in the South Wales East Assembly electoral region but comes under South Wales Police Force area. The remaining 5 Come under Gwent Police.
- There are 5 local authorities that work together in the Prosiect Gwyrdd partnership across 2 of the preserved counties, South Glamorgan and Gwent. Both South Glamorgan councils (Cardiff and the Vale of Glamorgan) are part of this partnership but 2 of the Gwent authorities are not – Torfaen and Blaenau Gwent – only Caerphilly, Monmouthshire and Newport.

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?

I disagree with this proposal. Any councillors elected to serve in the current 22 councils should be able to remain in their current roles until full elections can be held.

Q12. 3b. Do you agree that, if option 1 were pursued, we should set a date by which voluntary merger proposals should come forward in each electoral cycle?

No, I do not agree with this proposal

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

Merging the existing councils is not a suitable option.

Q14. 4. The consultation suggests holding any local government elections in June 2021. Are there any reasons why June 2021 would not be a suitable date? If so, please suggest an alternative date with the reasons why that would be more suitable.

The proposal to hold elections in June 2021 is unsuitable. It would be held within 4 to 8 weeks of the elections to the Welsh Assembly and it is not unknown for elections for 2 different institutions to interfere with each other. This was evident in 2016 with the Welsh Assembly election and the European Union Referendum being within 7 weeks of each other. The same happened in 2017 with the elections to councils across Wales were affected by the snap 2017 General Election.

Elections should not be held within 6 months of a General Election, Welsh Assembly Election or any major UK wide or Wales wide referendum.

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?

None that I am aware of.

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

My views on this matter are:

- Individual Councils should be able to decide their own election dates for themselves and the community councils they are responsible for, not have the date set by the Welsh government. Councils should be able to hold elections on any day and month of their choice, excluding any date between the 10th December and 22nd January to avoid having the election and associated campaigning taking place at Christmas. Elections must be held every 5 years, but with an emergency provision that the council can postpone or curtail the elections by up to 12 months to prevent interference with Elections to the Welsh assembly, Parliament or Wales-wide or UK-wide referenda or any other local emergency. An independent body should be formed to ensure that the provision stated above is not misused.
- Elections to councils must be by either Single Transferrable Vote (STV), Alternative Vote Plus (AV+) or a hybrid of the two. When using AV+ or hybrid, party lists must cover the entire authority area and at least 40% of the seats must be list seats to minimise deviations.
- Council wards should be represented by at least 2 councillors and no more than 7. Ward boundaries and number of councillors must be reviewed every 10 years using the most recent census data.
- The creation of an elected executive to replace some of the current senior roles in the current local authorities (e.g. Chief Executive). This would consist of an Elected Mayor elected via the Alternative Vote election system and between 8 and 10 elected executive officers elected via an open party list system with seats allocated by either STV or D'Hondt method. The terms for the executive officers can be either 5 year terms elected in full, 10 year terms with elections every 10 years or 10 year terms elected by halves every 5 years. Terms for the elected mayor should be for 10 years. Councils can decide when to hold these elections according to their own electoral arrangements.

Page 5: Chapter 6

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

By exploring connections in different groups and organisations councillors are involved in, for example:

- Scouts and Guides movement
- Religious bodies
- Sports clubs
- Social clubs

Q18. 7b. How could we better recognise the level of responsibility involved in being a local councillor? What changes to the remuneration and support councillors receive would enable a wider range of people to become involved in local democratic representation?

The changes that I would recommend include:

- The provision of a team of people who support each party group on the council – like those provided to party groups in the assembly.
- Specialised support for councillors with Additional Needs
- Defining "reasonable time off work" for members who are full time employees into law
- Clearer information to prospective members what the role of a councillor involves.

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

Councils should have full powers over:

- Business rates
- Council Tax
- Other forms of local taxation
- Election Arrangements and dates

The view should be that councils should be self-sufficient in raising revenue rather than having 75-80% of their revenue coming from the Welsh Government and having more autonomy on how the councils are run.

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

Councils should have the ability to:

- Alter how the council tax system works (e.g. defining council tax bands or introducing a local income tax based on resident's wages)
- Set their own date of election (as mentioned earlier).
- Dissolve the council early and propose motions of no confidence. The extraordinary election would be in addition to the next scheduled election (e.g. if Newport Council had its scheduled election on 7th July 2023, it's election would next be held on 7th July 2028. However, if the council had an extraordinary election on 12 May 2026, the July 2028 election would still go ahead as if no election had been held). The extraordinary election would supplant the next election if it held within 12 months of the next scheduled election. This is in line with the current arrangements for the Welsh Assembly and the Scottish Parliament.

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

Unsure

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

Unsure

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?

Unsure

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?

Unsure

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

Unsure

Page 6: Impact assessments

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

Unsure

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

Unsure

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.

Unsure

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

Unsure

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

Unsure

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

Unsure

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

Unsure

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

None

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 Nathan Tarr

Organisation (if applicable) -

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

[REDACTED]

Q36. Telephone

No Response

Q37. Address

No Response

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

No Response

Strengthening Local Government: Delivering for People

Page 2: Chapter 3

Q1. 1a. What practical steps could the Welsh Government take to make current regional working easier and more effective, for example in relation to education consortia, social services and the City Regions and City and Growth Deals?

The first thing Welsh Government could do to make current regional working easier and more effective is to leave Local Government alone to deal with it themselves.

Recognising the importance of regional working is an important step, but the Welsh Government's muddled thinking on how councils should work together could be simplified with a very simple practical step which would be to recognise that collaboration is now working. Further structural changes are not required or desired by the sector as a whole.

Had the latest proposals been formulated 10 years ago, references to collaboration not advancing with sufficient momentum would have been accurate.

It is disingenuous that again Welsh Government has sought to put this work in jeopardy by promoting an agenda of wholesale reorganisation which will distract local government from working together where it makes clear sense to do so (and is happening) and being able to focus on local delivery of services.

One of the key considerations for the Council's is that they work with the combination of partners that make business sense, and not on the basis that they are considered "neat" on a map.

Our citizens' needs are not linear and are not built around our governmental structures. Therefore, service delivery needs to be structured to work with and across organisations where it makes sense to do so.

Local Government understands the complexity in meeting customer needs and these kinds of "sub-regional" arrangements reflect the need to think outside of just local government to the way in which the wider public sector works together to deliver services. Council's embrace the Well-being of Future Generations Act in the ways of involvement, collaboration and integration. There is a well-made case for changes to the way funding is organised to support this kind of delivery.

One of the concerning elements of previous proposals is the establishment of strict structures for regional, sub-regional and service-based governance. This is not considered helpful and, in all instances, unnecessary layers of additional and bureaucratic governance should be avoided. This is particularly the case with mandated mergers. All service areas do not necessarily share the same objectives due to the nature of the proposed constituent areas.

There are cases where moving to different governance models is sound, where it is proportionate with the way services are designed. A key example of this is the City Region, where strategic planning, economic development and transport make very real sense to be undertaken on a ten-authority basis. However, the proposals set out in the Green Paper pose a significant risk to progressing the City Region arrangements by distracting members and officers from pursuing these initiatives (and many other collaborative projects) and presents potential complications of constituent authorities merging during the most critical time for delivering this work.

Health and Social Care have clearly demonstrated an ongoing commitment to sharing resources and making best use of skills to provide improved outcomes for the citizen. Previous grant funding allocated regionally initially to support the implementation of the Social Services and Well-being (Wales) Act 2014, continues to work regionally despite this money now being incorporated into the organisation's RSG. Other examples include use of the Integrated Care Fund (ICF) and use of transformation monies as a consequence of the Parliamentary Review for Health and Social Care.

This evidences that we have a proven track record to work effectively, efficiently and prudently with the citizen at heart, without being mandated to do so. This progress of work with partners and the maturity of the relationship indicates that where regional planning and service delivery are considered best value either financially or for the greatest citizen benefit – then we work together to achieve this.

Spend on Social Care is a significant proportion of the Council's budgets due to the high demand placed on these services and this should be properly recognised by Welsh Government as it does with

the Health Authorities. For example, Welsh Government increased the budget available for Health Authorities but reduced it for local authorities, creating an inevitable pressure for social care.

The Parliamentary review explicitly and repeatedly determines that a local response is what is needed for the future. To be clear, the emphasis on local arrangements is mentioned 86 times in the document. - "This document is of paramount importance as it guides how we develop seamless and local(sic) health and social care delivery arrangements."

The ability to share resources and support regional working for the benefit of the citizen is working well by choosing the partners based on the scenario. This is a stronger more productive way of working, based on trust, knowledge and a clear vision to improve services for the citizen. Mandating will be a step backwards, where tensions will exist as the organisations will not be 'buying-in' and owning the work. The choice of partner(s) is crucial to reflect the needs of communities, priorities, cultures and working practices of the organisations involved.

Another example is where there is evidence of an improvement over time is that of the Central South Education Consortia. To change that now would be wrong and detract from the work that has been achieved and could serve as a distraction to their primary function.

I have already referred to the Shared Regulatory Service in the Vale of Glamorgan, but there also joint internal audit service and Regional Adoption Service.

The publication of the Green Paper has put all of this work at potential risk, is causing delays in progressing this agenda and leading to uncertainty amongst those working to develop projects as the work may be seen as abortive (yet again). This is a very real consequence of Welsh Government's continued changing stance and demonstrates how counterproductive this Green Paper is to Local Government in Wales.

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

Once again, your questions are skewed towards the acceptance of Local Government reform. I do not accept it as a premise.

The starting point is that the Green Paper, throughout, makes reference to the debate being more than just about structures but also about powers and flexibilities, but is extremely 'light' on the latter.

There is no specific detail relating to the additional powers and flexibilities (the bribes) that will apparently follow.

The paper focusses on the issue of mergers and, apart from the options of timing, provides no other options which could achieve the assumed objectives of the paper. This preoccupation on mergers is hugely damaging, and the content of the Green paper is extremely disappointing given the Cabinet Secretary's foreword which states "local government is not simply about structures and lines on a map". Regrettably this is in total contradiction to the body of the Green paper.

I reject the proposed process of mandated mergers and as a result, the common elements of the process.

Reducing uncertainty, ensuring democratically-led change and providing greater powers for local government are all eminently achievable without the completely unnecessary redrawing of county boundaries and upheaval involved in reorganisation. If additional powers and flexibilities are warranted, necessary and desirable, these could be provided now. Welsh Government has an opportunity to do what is right and necessary and not to use structural change as a Trojan Horse.

• Clarity & Footprints

I do not support the view that mandating a footprint which sees the Vale of Glamorgan Council merging with Cardiff Council to create a single authority is an appropriate way to provide 'clarity' on how services should be provided.

In other areas of Wales, colleagues may feel that there is a natural 'fit' with the footprint and merging

authorities may make sense in those instances. However, for reasons well-argued and documented previously there remain fundamental disparities between the Vale of Glamorgan and Cardiff which would make it difficult for a merger on equal terms to happen.

Although I (as Leader of Council and personally) have made this point repeatedly in response to previous consultations, these well-made and well-documented comments have been seemingly ignored when drafting this. These disparities are essentially about size (Cardiff Council is roughly three times the Vale's size) and about the nature of the communities the councils serve: Cardiff is a densely populated urban conurbation and capital city with all that that entails, while the Vale's character focuses on a significant rural area, small district towns and villages and coastal towns. Stability is what is important and with it would come clarity.

A merger is not required to 'add clarity' to situations which are already working effectively. A merger would, however, detract from much of this on-going collaboration and there is a real danger that collaborations that are adding value and make sense could be unpicked as a direct result of diverting attention away from such activity.

- Democratically-led Change

I support the view that any changes introduced to the services we provide should be managed through a structured and democratically-led change process as is the case for all major undertakings currently. There is absolutely no need for this to be one laid out by the Welsh Government. It should instead, be one designed and carried out by our own elected members who have the local knowledge, skills, experience and mandate to oversee change in this area of Wales. An excellent example of how change can be introduced successfully is in the development and delivery of the Shared Regulatory Service for the Vale of Glamorgan, Cardiff and Bridgend. This project (supported by Welsh Government's Regional Collaboration Fund) demonstrates that when provided with the correct package of support and the independence to select appropriate partners and operating model, significant change can be delivered at pace and at scale with appropriate oversight by those elected locally to ensure local services are provided efficiently and effectively. This is the future of Welsh local government as the WLGA have clearly and consistently stated.

- Support & Assistance

The provision of appropriate support and assistance from Welsh Government would be welcomed to further develop agile and appropriate regional working activity.

But spending £250m on a national reorganisation of local government at a time of significant financial constraint is an appropriate use of public funds. The proposed savings are estimated at £400-930m which are far less certain to be achieved than the known costs of reorganisation. These savings were estimated several years ago as part of the Williams Commission work, which is now out of date as well as being disputed at the time.

Indeed, the reliance and constant reference back to the Williams work throughout the Green paper demonstrates a worrying lack of robustness and necessary analysis in these proposals.

As such, it is disappointing that this Green paper does not more accurately consider and acknowledge the way certain Councils are already transforming and changing approach to ensure they remain at the forefront of service delivery. In this context and in the context of on-going transformation and collaboration, it is not clear what the actual level of saving would be and whether this could be offset by the costs – both financially and in-service delivery terms. Funding could be used more flexibly to support local authorities to deliver further change (including collaboration and, in some instances, mergers) rather than a wholesale and arbitrary restructuring.

- Emergency Powers

There may be a time when the appropriate use of emergency powers to amalgamate authorities in serious difficulties, but that would and should be on a case by case basis. It should not be used to force mergers as I believe is the intention of Welsh Government, despite this further sham of a consultation.

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

Once again, your questions are skewed towards the acceptance of Local Government reform. I do not accept it as a premise.

I do not agree with the options for creating fewer, larger authorities on a decreed footprint. The premise of Welsh Government's position is based on an assumption that fewer, larger authorities are more efficient and effective. This is a flawed argument.

The Welsh Government has not provided any real options other than mergers and this determination to push through reforms lacks thought and recognition of working more constructively with local government to form a plan for how services could be delivered in the future.

The Green Paper states:

"there are different ways in which we can arrive at larger, stronger authorities".

"local government reform is about more than structural change".

The Green Paper, however, makes no provision for an option whereby some local authorities remain as currently structured, but instead requires all to merge.

This is arbitrary and unnecessary to meet the service delivery objectives that the Welsh Government is apparently seeking within the Green Paper to achieve:

- Councils which are valued by their communities;
- Councils with the powers, capability and capacity to deliver the public services our citizens need;
- Local authorities which support communities by using public money efficiently and effectively.

The assertion of the Williams Commission which "identified that smaller council areas were 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" will undoubtedly apply to some councils. However, in addressing the question whether there is a link between a council's size and its capacity, I believe there is a critical mass that has to be attained if all the functions of a unitary authority are to be delivered effectively.

I have consistently argued that the Vale of Glamorgan Council's size enables it to sustain that range of functions while still being responsive to local needs and maintaining local democratic accountability. I can say this with confidence as the track record, audit reports and Local Government comparisons indicate.

It is not the case that the bigger an organisation is, the more economical or effective it becomes. Remoteness from the public and its own staff, and the need to introduce structures to compensate for its size, are both disadvantages. These disadvantages seriously detract from the Welsh Government's argument for structural reform of all local authorities in Wales driven by a desire to be responsive to local communities and an exercise capable of saving significant sums of money.

This is the case in particular for the Vale of Glamorgan and Cardiff where the size of the proposed authority, geographical spread and the different characteristics of various communities being served (and challenges facing those communities) would require compensatory measures to be put in place to manage across the new authority, outweighing the proposed benefits of scale. A good example of this in practice is the locality structures which are put in place across the two local authority areas by the Health Board to reflect the geographical size and different nature of parts of Cardiff and the Vale of Glamorgan, with three 'locality' areas being in place to coordinate and manage delivery of services. Further, health boards, under the direction of Welsh Government, continue to develop local cluster arrangements (64 across Wales) to deliver to people locally. This approach to health services appears incongruent with the suggestion that bigger is best, or the proposals of Williams. It is also not borne out by the delivery of services and the costs of running the Health Boards themselves.

There are practical examples where the movement away from local determination and delivery has impacted upon the ability of services to be locally responsive, such as the management of Rural Community Development Funding (RDP) and other RDP schemes which has led to a dramatic slowdown in the appraisal process and has now led to a postcode lottery across Wales with some areas doing well and others with no projects approved.

There is no easy answer to the question of what the optimum size of an organisation is such as a unitary authority. All it can do is demonstrate its capability to carry out its functions effectively. Judgement on Councils will be brought to bear by external regulators, partner organisations and local people (the latter making their view known by engagement mechanisms introduced by the council).

On a personal and local basis, there is compelling evidence that the Vale of Glamorgan Council's unit costs are low while its services are delivered effectively. There is a deliberate emphasis on the Council's part on keeping costs low by an expectation of high staff productivity, and the wide range of

duties managers typically perform. Benchmarking information gleaned when drawing up business cases for collaboration with other councils consistently demonstrates a lower cost per service in comparison with other councils, and this is confirmed by the Council's position as fourth lowest spender per head of population in Wales. As long as this is accompanied by a good quality of service, it is something the council believes should be a constant aim.

The Vale of Glamorgan Council receives the second lowest level of funding per head of population in Wales, whilst when I was Council Leader, we were ranked the top performing local authority in Wales for three years consequently (based on the performance data produced by the Wales Data Unit). The top five highest performing Councils in Wales based on this data set would not be classed by Welsh Government as 'large' yet their performance outranks the larger councils considered as potential partners. Performance should be a key driver in any changes, levelling up, not diluting the quality of services provided. The failure to consider performance and ability is a significant and fundamental weakness in the Green Paper.

In the Council's most recent comprehensive Corporate Assessment by the Wales Audit Office, again while I was Leader, the conclusion of the WAO was that "the Council has a clear vision of what it wishes to achieve and is making positive changes which should ensure it is well placed to continue securing improvement". It is relevant that Mark Drakeford A.M. commented at the time, "There is a clear line of sight in what the local authority wants to achieve and how it intends to improve the lives of the people it serves".

In the most recently commissioned Public Opinion Survey (carried out between December 2016 and January 2017), overall satisfaction with Council services improved to 92% compared with 84% in 2014/15. The Council is able to work with communities because it is close to those we serve. Our staff survey (March 2018) results highlight an increase in positivity across 15 of the 20 Staff Charter commitments made to staff, with overall positivity rising from 71% to 72% over the year.

The Council was shortlisted in five categories for six submissions for the Local Government Chronicle Awards 2018, notably for Business Transformation relating to our transformational change programme and staff engagement entries. This comes less than a year since being shortlisted for Local Authority of the Year by the Municipal Journal. The Vale of Glamorgan Council has an established transformational change programme, Reshaping Services. Adopting a mixed economy model to service transformation across the organisation, the programme is targeting significant savings (£15m over 4 years) and driving a culture change in our council on an unprecedented scale. The results are paying off and our staff are indicating their buy-in with high approval ratings for the way they are engaged. The authority is committing significant time to achieving this that would be diverted away and the results put at risk by a process of mergers.

I would argue that this evidence supports the proposition that the Vale of Glamorgan Council has sufficient scale, capacity and capability to deliver as Welsh Government desires. It also has a track record. The "lack [of] credible alternative proposition, apart from providing more money" referred to in Chapter 3 applies only if considering structural change to be necessary for all councils. The requirement to 'commit' to merger before being able to be granted any new powers is restrictive as this council could benefit from those additional powers and further enhance performance without the diversion of managing a merger.

My view on each of the proposed 'options' follows.

Option 1 – Voluntary Mergers

I do not support the idea of a voluntary merger with Cardiff Council.

The Vale of Glamorgan Council submitted a well-developed and coherent proposal for voluntary merger with Bridgend Council in 2014. This was developed in response to the Welsh Government's then policy to seek the views of local authorities in how to progress what was apparently a definite agenda of mergers. It was also carried out after discussions with Leighton Andrews, who later rejected it as it crossed two Health Boundaries. It is ironic that the Green Paper proposes crossing those Health Boundaries and incorporate Bridgend into Cwm Taf as opposed to the one both councils agreed – Bridgend into Cardiff and the Vale Health Boundary, which was actually proposed because many Western Vale citizens use Bridgend Hospital, which at the time made sense.

However, such a proposal would still now not be considered by Welsh Government due to the imposed footprint described in the Green Paper.

It should be emphasised that although that was the proposal put forward at the time, the return t that but in any case, the arguments made in 2014 by the Vale and Bridgend Council would not be feasible. Since that time, much has changed in the landscape of local government. The effective mix of locally and collaboratively delivered services and further strengthening of the Vale of Glamorgan's performance has resulted in it taking the position that a merger with any other local authority is an untenable prospect in securing the quality of services rightly expected by their citizens and I agree with that assertion.

The disadvantages of uncertainty for the workforce and citizens apply to reorganisation of local government as a whole and are key factors in the Council not supporting a merger of the Vale of Glamorgan Council with any other local authority.

Without further detail relating to which services or solutions a 'once for Wales' approach is being sought, it is difficult to comment. However, should this be based on transactional services as described in Chapter 6, there is no need for mergers to take place to provide a catalyst to do so. Welsh Government support and the identification of benefits to local authorities would be incentive enough.

To reiterate, I do not support the idea of a voluntary merger with Cardiff Council.

Option 2 – Phased Approach

I do not support the idea of a voluntary merger with Cardiff Council.

Purely, as an academic debate, the phased approach would enable those authorities who choose to merge to be able to do so at an earlier time. It would also enable Welsh Government attention to be focused on a more manageable set of mergers where there is a clear desire, willingness or need to do so. However, mandating all other mergers by 2026 does not take into account this Council's central message which is that merging all authorities is unnecessary to achieve the objectives of the Green Paper.

It is unclear why the new powers and flexibilities offered to merged councils could not be made available for all local authorities as a means of supporting transformational change and enabling the objectives of the Green Paper to be achieved across all local authorities. Welsh Government's lack of willingness to provide these powers after several years of discussion is disappointing.

To reiterate, I do not support the idea of a voluntary merger with Cardiff Council.

Option 3 – Single Comprehensive Merger Programme

I do not support the idea of a voluntary merger with Cardiff Council.

Again, as an academic debate, the imposition of wholesale reorganisation is considered unnecessary and legislating for mergers in 2022 is likely to exacerbate the risks outlined in the Green Paper. The capacity of Welsh Government and every council to manage such a process in this timescale is a key risk and likely to be an impossible task. Without costing, funding etc. this is not in my opinion a feasible proposal.

Without further detail relating to which services or solutions a 'once for Wales' approach is being sought, it is difficult to comment. However, should this be based on transactional services as described in Chapter 6, there is no need for mergers to take place to provide a catalyst to do so. Welsh Government support and the identification of benefits to local authorities would be incentive enough.

As outlined above, it is unclear why additional powers and flexibilities could not be granted to non-merged authorities as this is the cause of divergent powers. The arguments relating to 'scale' are set out above and we believe we have sufficient scale, accessing regional collaborative arrangements where appropriate, to meet the challenges facing us, despite our funding position.

To reiterate, I do not support the idea of a voluntary merger with Cardiff Council.

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

Welsh Government's preoccupation with creating fewer, larger authorities across Wales as a whole does not reflect the reality of organisations which perform well because they are of a sufficient size and scale to do so. There is an obvious missing option in the Green Paper and that is to seek the views of Welsh local government on a case-by-case basis and respond to those views on a case-by-case basis.

As outlined above, the options provided in the Green Paper require all local authorities to merge which appears arbitrary and does not consider performance alongside supposed 'size' as a key factor in identifying the sustainability of councils.

An alternative approach would be to seek the views of local government to identify the appetite of councils to merge, but the views expressed by the WLGA appear to be very clear. There appears to be no appetite and I concur with that feeling.

It is important to emphasise one again, the environment is very different than it was in 2014 when this was previously Welsh Government policy. Adopting a policy whereby councils who wish to merge, or where there is a very clear case based on the relative performance of the council to force a merger, is very likely to deliver a mix of fewer, larger authorities with mid-size, high performing ones such as the Vale of Glamorgan and others being retained. This would reduce the overall risks associated with reorganisation, focus effort where the greatest benefit could be derived and avoid unnecessary distraction in those organisations where it is questionable whether the long-term benefits outweigh the costs of the exercise.

Welsh Government and Local Government's focus should remain on regional working where it makes sense to do so and, on a footprint, which also makes sense. Local accountability and delivery are vital in local government and remoteness from the communities we serve would not achieve the objectives Welsh Government are seeking.

For example, if we wish to be truly transformative then legislation needs to be reconsidered to support practice and natural partnerships to ensure a citizen's care, support and well-being are improved holistically. The Parliamentary review of health and social care recognises this, and Welsh Government's investment in systems such as WCCIS clearly articulate the need for health and social care structures to be supported and integrated in much the same way as the Vale Locality already operates and has done for more than 4 years. Integrated management between the Health Board and Vale of Glamorgan Council demonstrates that this way of working is effective as the links can be made across the sector and improve the outcomes for citizens.

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

Once again, this pre-supposes that I agree with the proposals and that there are benefits. It is also strange you ask this question – clearly you do not have the answers.

I do not believe there are any cost benefit to wholesale reorganisation and Welsh Government have not done their home work on this point. Perhaps they should look to the costs and disruption of the previous reorganisations. I understand that the WLGA have the figures if Welsh Government do not.

Therefore, this is a very strange question, as the proposals contained in the Green Paper are Welsh Government's and it is my view that prior to Welsh Government publishing the consultation, there should have been work undertaken to ensure that the 'options' were appropriately appraised including identifying the accurate costs, savings, benefits and risks. Without this, the argument creating fewer, larger authorities to deliver savings and benefits is wholly unsubstantiated.

The Green Paper makes reference to "With more time, more capacity and shared objectives, more could be achieved with the money available".

However, such a comment is totally unsubstantiated and not based on any robust analysis. As a result, it is unclear how mergers would create more time and more capacity if financial savings of the magnitude quoted in the Green Paper are to be realised. The highest area of cost in local government is in staff and reorganisation to realise savings in excess of £400m would result in a significant number of job losses. This would inevitably impact upon the capacity to deliver essential services and would without doubt result in the larger, merged Council being far more remote from the communities it serves, particularly when the needs of those communities will be so disparate.

The Welsh Government appears to be proposing that local government should be organised on a similar basis to the health service. The assumption is therefore that the Health Boards are a given and consistently perform efficiently and within budget, an assumption that was present when the Williams Commission reported. Evidence and facts are clearly at odds with this assumption. It is also noteworthy, that the Health Boards are organisations that consistently have to put in place compensatory sub-structures and locality-based solutions to address issues of 'scale'.

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

Once again, this pre-supposes that I agree with the proposals and I do not.

Local government has endured four years and counting of a lack of clarity in strategic direction from Welsh Government. This Green Paper continues to provide a total lack of clarity. Despite the on-going impact that this is having on morale, this council continues to perform, transform and collaborate. Footprints are a distraction given the need to collaborate on a network, not on a linear basis. The previous Cabinet Secretary promised ten years of stability. This Cabinet Secretary has not provided ten months' worth.

The latest attempt at 'clarity' has caused further uncertainty for the workforce in councils across Wales and based on previous attempts at reorganisation, a great deal of effort being expended on discussing structures rather than the specifics of funding arrangements and service delivery.

Providing clarity for local government is important and has lobbied successive ministers to work with the sector and to maintain a consistent approach to local government policy. It was pleasing that Welsh Government rejected previous proposals for imposed local government reorganisation and provided funding and time to enable regional collaborative work to continue.

There is a commitment to the regional agenda and has been at the forefront of some significant advances, notably the City Deals the education improvement consortia, regional adoption services, Shared Regulatory Services, integrated health/social care, regional safeguarding units, regional emergency duty teams, joint equipment stores, integrated autism services, regional mental health team for older people, s integrated family support teams and a regional training units are already operating in many areas.

The WLGA proposals supporting subsidiarity in the design of services are important and should be a driving force behind any proposed reorganisation of service delivery arrangements whether they are collaborations or the structure of councils. I believe in the principle that local authorities themselves are best able to determine the arrangements which reflect local priorities and the ability to meet those priorities. Any attempt at central prescription from Welsh Government of a "one size fits all" model is very unhelpful

The level of prescription contained in the Green Paper is therefore not supported for these reasons.

The footprint approach is overly simplistic as it does not recognise the complexity and interconnections between councils and a wide range of other public-sector organisations.

The performance of existing local authorities does not appear to have been a factor that was considered when drafting these latest proposals, which is extremely worrying and short-sighted. The success of existing and emerging collaborative working arrangements are borne out of their flexibility.

Should Welsh Government try impose the footprint of the Vale of Glamorgan and Cardiff merging, it is highly likely that other footprints would fall and no new ones would emerge as there will be deflection away from on-going collaborative approaches and the scaling back of activity on important collaborations due to lack of capacity and distraction.

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

No!

I do not agree that the factors identified inform your thinking, other that Welsh Government think they are right and Local Government's views are wrong.

The factors being used by Welsh Government describe precisely the argument Council's and the WLGA are is making about what good local government should be about – reflective of local communities, ensuring democratic accountability and of sufficient scale to protect public services.

There is no rationale to suggest merging with any other local authority.

The Welsh Government, however, does not include factors such as:

- performance
- resource management, or
- regulatory opinion

all of which would be important determining factors which indicate strength and sustainability for the future. These factors further strengthen our argument and in applying these factors and I do not support the proposals to merge the Vale of Glamorgan with Cardiff Council or any other authority.

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

I do not agree with any of the proposals.

I do not consider that a re-drawing of administrative boundaries will lead to better services for our citizens.

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

There appears to be an assumption within WG that the Williams Commission was correct, that there was support from the sector for structural change and that the result was a well evidenced piece of work. It was not.

There was not.

It was not.

The decision of whether any future mergers takes place elsewhere in Wales should be the result of either agreement by those local authorities or such significant shortfalls in performance and/or resource management that the Welsh Government would be justified in intervening.

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?

I support the position of the Welsh Local Government Association in that Councils are best placed to determine these arrangements based on the partnerships which offer business sense for the service area(s) involved.

The Welsh Government should support this and not propose bureaucratic structures that reduce local accountability and add an unnecessary tier to service delivery and planning.

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?

I do not agree or support the idea of a voluntary merger with Cardiff Council and therefore this question is an academic one and I will not answer it for my area, as it is hypothetical.

However, for other areas that wished to merge it would be essential for elections to Shadow Authorities to be held ahead of the vesting day for new Authorities to ensure that appropriate governance arrangements are established to enable key resolutions to be made in advance of vesting day. The appropriateness of the role of Welsh Ministers in resolutions of a Transition Committee are queried as this could expose Councils to legal challenge.

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?

I do not support the idea of a voluntary merger with any Council in Wales unless it is done on a voluntary basis by those constituent councils.

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

I do not support any proposals that relates the Vale of Glamorgan (Option 3 is considered unachievable)

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.

I do not support mandatory mergers.

The risk of significant administrative error would be high should local elections be held in such close proximity to the May 2021 National Assembly for Wales Elections.

Further concerns with a June 2021 Election include voter confusion as a result of campaign overlap, voter apathy and the shift in direction by Welsh Government away from the intended 5-year term for Local Members to align with the term of office of UK Parliament and National Assembly for Wales Members (Welsh Government's consultation document "Electoral Reform in Local Government in Wales" and Mark Drakeford AM's 23 June 2016 written statement refer).

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?

Any attempt to coordinate the delivery of the various plans and in particular, it is useful for the work of Public Service Boards to dovetail with council planning processes.

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

Regard should be given to the Principal Area Reviews currently being undertaken by LDBCW (a programme which commenced in 2017 and is not due to conclude until 2021).

The Local Government (Democracy) (Wales) Act 2013 has established principles in respect of electoral arrangements and it is suggested should continue to be the foundation for all Principal and Community Area Reviews.

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

The ability of elected members to know and be connected to their communities is a central to any Council.

The argument regarding the need to balance the size of an authority with the ability to be locally responsive. Creating fewer, larger authorities with fewer, more remote elected members is not the way to achieve this.

The proposals contained within the Green Paper will have the opposite effect. Bigger does not mean better. Fewer and more remote councillors will result in a disconnect with the electorate and impact negatively on local democracy and decision making. It will also negatively impact on the ability of councils to work with local groups and organisations in delivering and also designing locally accountable services.

Being able to develop knowledge and connections requires members to have the time and capacity to do so. Reducing the number of elected local members (at a time of increasing the number of ones on a more national basis of Assembly Members) is counter-productive.

Currently elected members can represent their constituents because they are close to them. A more remote structure would not assist members in gaining better knowledge and connections in their communities. Regularly assembly members look to local members to obtain advice and local knowledge on issues. The role of local members is considered therefore to be significant and valued.

Council have invested significantly in supporting elected members and are committed to further developing the support that is available to enhance member's roles. This includes strengthening feedback mechanisms and developing a series of six-monthly development sessions to support further two-way communication.

Q18. 7b. How could we better recognise the level of responsibility involved in being a local councillor? What changes to the remuneration and support councillors receive would enable a wider range of people to become involved in local democratic representation?

The recent findings of the Independent Remuneration Panel for Wales are helpful in identifying how Welsh Government could achieve the outcomes intended from this part of the Green Paper.

The Independent Remuneration Panel for Wales (IRPW) has recently issued its Report on the outcomes of its visits to the 22 Unitary Authorities during 2017. The Panel's Main Findings are as follows:

- The Basic Salary is not adequate remuneration for the hours worked: in many cases Members are working for less than the minimum wage.
- Senior Salaries are not adequate remuneration for the skills and qualities required, especially compared with other public-sector posts.
- The workload and role of Members has changed: hours have increased and the role now demands a more strategic outlook and ability to work with partners.
- Representing constituents is now only part of the role.
- The quality of support provided for Members is an issue in some councils (That is not considered to be the case here and our approach to, for example Member Induction and Development and member ICT provision was commented on during the Panel's visit).
- The diversity of membership is slowly improving, but several factors have the potential to militate against a greater diversity among people standing for election. These include the reluctance of existing members to take the full salary and to claim costs.

By means of background, the Basic Salary originally set by the Panel was based on the all-Wales average earnings and pro-rated to three fifths. At that time the accepted view was that a backbench Member would spend 23 to 25 hours a week on council and constituency business. Any excess time was regarded as "public service discount" If the same alignment was used currently the basic salary would be well in excess of £15,000 rather than the current salary of £13,600. Senior Salaries were determined using multiples of the basic.

As far as increasing diversity is concerned, the Panel found "encouraging signs" that local authority membership is becoming more diverse with younger and more females entering local government. However, they are still in the minority. There is evidence that payment of salaries has been a factor in improving diversity. To quote responses from a few individuals "I am not doing this because it is paid but I couldn't do so if it wasn't".

Reimbursement of the costs of care should be another factor to encourage diversity but the take up continues to be disappointing and many members who would be eligible and probably have the need are self-precluded because of perceived criticism from the public that they would be subjected to when claims are published. Councils have the option to publish these costs as a total without naming the individual members.

Notwithstanding the above, the economic pressures prevailing have resulted in an increase in the Basis Salary entitlement for members of just £200 p.a.

In terms of the future, officers have begun engaging with members in terms of their knowledge "pre-election" of what is involved in being an elected Member and any information available to prepare them for the role if elected. This process will, in turn, inform the Council's approach in terms of preparing for the 2022 election.

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

I welcome the proposal of Welsh Government to legislate to provide Councils with a general power of competence and supports the view that this would enable this authority to adopt even more innovative approaches in meeting the needs of communities. However, this power (and those outlined below) should not be provided only to those authorities who merge (the bribe). Councils embrace the agenda for change in local government and as stated, is supportive and an active contributor to regional working. As such, Welsh Government should legislate to provide all local authorities with the general power of competence and those described below.

What matters is what is right in the delivery of local services. Holding authorities to ransom by adopting a stance that only those that merge will benefit from additional powers and flexibilities is short-sighted. If a Council has a good track record in terms of service delivery and reputation with regulators and citizens would benefit from that Council receiving additional freedoms and responsibilities, then why would the Welsh Government withhold those powers?

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

The significant issue is that freedoms and flexibilities should only be made available to those councils who agree to merge whether there is a real case for doing so or not. Holding local government to ransom in this way is belittling and unhelpful. Welsh Government should provide local councils equally with the freedoms and flexibilities which have consistently been asked for in order that we focus on what matters – our citizens and delivering quality services for them.

As articulated by the WLGA, Councils should have the flexibility to form collaborative partnership arrangements with other public-sector organisations where there are clear benefits of doing so to the partners. Local government should be free to choose the partner(s) and not be mandated to do so. These arrangements should be flexible around the service/subject matter, build upon existing arrangements and not add an unnecessary layer of bureaucracy.

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

The principle of shared transactional services where a business case can be made that ensures partners taking part in the shared service secure benefits in both cost and service quality terms. The Green Paper indicates that "Creating new authorities with additional powers and greater flexibilities would provide an opportunity to reconfigure and redesign services". However, it is possible for these additional powers and flexibilities to be granted without the imposition of a new structure for all councils in Wales and to be used to develop further shared services.

The following services may be worthy of investigation in terms of their potential for developing shared services:

- Council Tax and Business Rates collection and administration (with locally set rates remaining)
- Purchasing of common items – a potential extension to the National Procurement Service through a purchasing arm
- Contact centres
- Pension administration
- ICT support
- Children in employment licencing
- Benefits administration
- Payroll and transactional HR processes
- Concessionary travel passes
- Blue Car Badge processing
- DBS Processing

Other shared service opportunities (which are not necessarily transactional) could include:

- Training and organisational development
- Performance management
- Internal Audit
- Additional Learning Needs services
- Health & Safety
- Passenger Transport
- Highway Design and Construction

Regard should be given to the performance of existing 'transactional' or 'routine' shared services such as the National Procurement Service. Whilst the underlying principles of these arrangements have merit, the ability to perform on the 'all-Wales' stage can be complex and ultimately lead to organisations established to deliver savings actually coming at an overall cost to the public purse.

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

I do not believe mergers are a pre-requisite to delivering shared services.

WG support via changes to legislation, increased flexibility and support through access to specialist skills and investment in technology would act as incentives to deliver shared services. They would be a positive way to move this agenda forward without the threatening tone contained elsewhere in the Green Paper which appears to make the offer to reform services contingent upon signing up to a costly and unnecessary merger agenda.

Welsh Government should seek to work with local authorities and the WLGA to develop these arrangements. Significant energy and experience exists within local government and Councils have well developed change management approaches which, if fostered positively, would be able to work constructively with Welsh Government to deliver reform.

Q23. 10a. In ensuring we deliver a consistent approach across Wales, where consistency is important, how do you think the advice and support on each of these matters could be best provided?

The proposals attempt to standardise the reform of local government without considering the varying local circumstances driving the need for mergers. This broad-brush approach to 'reform' is potentially more damaging than it is an approach that could benefit the citizens of Wales. There is potential to support shared services on a national level and this should be positively fostered by the Welsh Government and not mixed up as part of an attempt to redraw all boundaries.

Consistency is important in the approach to policy development and setting is clearly required on a national basis. With consistency, also, comes fairness and this is the reason I condemn the assertion within the Green Paper that powers, freedoms and flexibilities would only be made available as a 'reward' to those Councils

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

The most damaging proposals within the Green Paper is the offer of additional powers and flexibilities only where Councils accept Welsh Government's proposal that mergers are the only options.

The need to provide flexibility to enable the best performing local authorities to continue with the good work that is being done and not be side-tracked by a lengthy and costly distraction. Giving additional powers to some councils and not others is not helpful (the bribe).

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

The priority would be for the Cabinet Secretary to announce that this consultation has led to the right decision in that Local Government should be supported to provide high quality services in the structure which makes sense locally, and not by national direction by mandatory sanctions.

Page 6: Impact assessments

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

There should be no difference. Equalities is the way forward, bearing in mind the needs and requirements of the communities being served.

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

There should be no positives or negatives.

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.

Why ask the question as there is a requirement to treat everyone equally? See above.

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

The larger the organisation is, the more disconnected it is likely to be from the communities we are here to serve. There would, therefore, be an impact on children and young people due to a greater disconnect between this group and the organisation. With fewer elected members to represent them and a larger organisation, children and young people are likely to be less engaged.

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

The children and young people of today are those who will have to carry the impact of the decisions being discussed and agreed. If, as highlighted, local government should represent the communities it serves then children and young people should be required to discuss/debate the implications of these changes and their views taken seriously.

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

The larger the organisation is, the more disconnected it is likely to be from the communities we are here to serve. In this way, protected groups would be no different.

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

The reorganisation of local government is likely to be a distraction from focusing on the needs of communities, and as such, negative effects could be mitigated by taking a more flexible approach as described throughout this response.

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

I would like to begin by making a basic comment.

It is said that a week is a long time in politics, but the Welsh Government has surpassed itself on this occasion in changing the meaning or interpretation. It seems that the promise stability in Local Government for 10 years was a sham. It also means to Welsh Government that 10 years means 10 months!

If a promise from a Cabinet Secretary cannot be relied upon, what hope is there that the Welsh Public can believe anything that any member of the Welsh Government promises in the future.

Previous Consultations and responses (and I have responded every time) has made it clear that Local Government does not agree with any of the proposals. but yet again we see the 'war of attrition'. It's about time Welsh Government listened to its Elected Local Members and the WLGA.

I am aware of the responses from the Vale of Glamorgan Council and agree wholeheartedly with the spirit of the response. It follows very closely the same principles that we submitted when I was the Leader of the Council and supported by the Labour Group.

I am also aware of the response from the WLGA and although I took no part in its formulation on this occasion, I support their stance.

Enough is enough! The premises on which this and previous consultations on reform of Local Government is flawed and it always has been. The Williams Commission proposals are outdated, ill informed and its recommendations are lacking in the extreme. It is based upon Health Authority boundaries, formulated by the same 'Williams' that produced the report. The Health Authorities are not fit for purpose and should be looked at seriously before looking to change Local Government. The belief that 'big is beautiful' has been proved to be WRONG and you have to look no further than the same Health Authorities.

On the contrary to the above you only have to look to the best performing Councils in Wales and they are the Vale of Glamorgan, Ceredigion and Monmouth Councils to name but three. This proves the REVERSE of the Williams proposals, so let this matter rest as promised for at least 10 years.

In summary: Please allow locally elected Members to get on with dealing with the matters appertaining to Local Government and let the Welsh Government get on with dealing with what it is supposed to be doing and getting their act in order.

To answer in further detail:

The Green paper is a significant disappointment as it is simply a 're-hash' of the previous work undertaken by the Williams Commission, albeit with no additional and up to date evidence.

The Foreword expresses the view that local government is more than structures, yet a significant element of what follows is a pre-occupation with structures, whilst not offering any options or choice as to what form should follow.

The flawed proposals are not supported by any hard evidence. It is suggested that there need to be flexibility and the promise (for what any promise means [see above]) of additional powers (if Local Government plays ball), but there is no detail or content on this issue.

The proposals do not consider issues of track record, performance, ability and management of the existing 22 Councils. This counts for nothing and the proposals merely seek to impose a new local government structure with no regard to the track record of existing Councils. As a result, the proposals are ill-conceived and short-sighted.

Collaboration and partnership are key in taking many of the issues raised in the Green paper. However, it seems that the part that Local Government has played in advancing Partnership and collaboration has been ignored, perhaps intentionally, as this drives a coach horses through the presumptions made by 'Williams' and this re-hashed process.

You cannot ignore that local government has significantly 'upped the pace' in these areas in recent years. The Green Paper ignores this point.

Evidence has provided that the many Councils including the Vale of Glamorgan Council is an active player in collaboration and has also been at the forefront of designing, delivering and hosting shared services across numerous boundaries. The Vale of Glamorgan Council has referred to their transformation programme – the Reshaping Services, which provides an insight into the innovative way in which we are working to redesign local services and ensuring their sustainability and longevity at a time of declining budgets. Such initiatives are possible as Councils. Throughout Wales have invested time in engaging with staff and communities, something that would be put at significant risk as a result of the latest reorganisation proposals.

This has been achieved despite the disadvantageous settlement from Westminster and Welsh Governments, year on year, and one which continues to be based on out of date methodologies. Perhaps time would be better spent reflecting on the way in which Westminster funds Wales through the Barnett Formula and how the Welsh Government funds local government to ensure more consistency and fairness to each citizen.

The distraction, cost and upheaval involved in restructuring local government would most definitely stall progress in improving services and meeting the challenges faced by the public sector. Councils facing such structural review would lose focus on innovation and service delivery and concentrate on the issues surrounding organisational change. Those paying the price would be the citizens and communities that we seek to serve despite facing such disregard of opinion, performance and direct accountability for the services we provide.

Finally, it seems that the costs of such proposals have not been considered. Where is the money coming from to fund the process, the inevitable redundancy costs and set up costs, running several (8-10) extra Transitional Councils while at the same time trying to run the services that the citizens of Wales require and deserve.

As I began this section, I will reiterate my comment.

We were promised 10 years of stability in Local Government, so please allow that to happen. There will inevitably be progressive changes, but that should be decided on a case by case basis and decided by those Councils that will be effective. A prime example being the Shared Regulated Services between Bridgend, Cardiff and the Vale of Glamorgan Council's, something that is exemplary and a model of good practice. I rest my case.

those Councils that will be effective. A prime example being the Shared Regulated Services between Bridgend, Cardiff and the Vale of Glamorgan Council's, something that is exemplary and a model of good practice. I rest my case.

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 Neil Moore

Organisation (if applicable) -

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

[REDACTED]

Q36. Telephone

[REDACTED]

Q37. Address

[REDACTED]

Barry

[REDACTED]

[REDACTED]

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

No Response

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

Dear Cabinet Secretary,

I write formally on behalf of Neath Port Talbot County Borough Council in response to the Welsh Government's Green Paper on Local Government Reorganisation, published on 20 March 2018. This letter reflects a discussion in both the Council's Cabinet and Full Council during May. What follows also has the support of the two Opposition Groups on the Council – Plaid Cymru and the Independents. At the request of council, I am also enclosing a copy of the report considered by Council on 30 May.

As I have pointed out previously, this Council does not believe that a compelling case has been made for a single comprehensive merger programme (Option 3). Members here were not convinced that the evidence base provided in the Green Paper was sufficiently robust or coherent and, in particular, there remain too many unanswered questions in relation to the financial implications of what is proposed (under any of the options) and other matters. I return to these issues below.

We are particularly unconvinced by the assertion that fewer/larger Councils would necessarily be better/stronger either in terms of financial resilience or the quality of service delivery. It is largely unsupported by the evidence in Wales and elsewhere. In fact the reverse is true in some places – notably Northamptonshire at present.

However, Members here are equally sceptical by the continuing emphasis on regional working – mandatory or otherwise. I shall not rehearse all the arguments here; but suffice to say that twelve years on from the Beecham Report, this agenda has produced very minimal benefits (as the Green Paper itself implies) and has certainly been inadequate as any sort of response to austerity.

Turning to the other options in the Green Paper, we are not convinced by the concept of voluntary mergers either (Option 1). As you know, it has been tried before and simply didn't work. We see every likelihood of a repeat performance or a real shortage of volunteers. However, whilst not in favour of pursuing a merger with the City and County of Swansea at this stage (and by 2022), we see

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some merit in the proposals contained within Option 2. Our major issue is timing. We are doubtful whether mergers are practicably achievable by 2022. For example, this would require the Local Democracy and Boundary Commission for Wales to completely redraw ward boundaries. On past experience small scale exercises of this nature have taken 18 months to two years to complete and we doubt whether the Commission has the capacity to complete a far more extensive exercise in the timescale required. However, we accept that other authorities may be in a different position and if they wish to pursue merger options, we do not believe that they should not be denied that opportunity.

I should also emphasise that if this Council was ever to pursue a merger we would require far greater clarity on a number of key issues and we believe that a minimum of three tests need to be applied:

- First, far greater clarity on the key financial issues. The Green Paper does not contain an updated Regulatory Impact Assessment and the estimates of the cost and savings involved are very wide indeed and dated. Equally, it is unclear who is to meet these costs? Moreover, there are a range of other issues including Council Tax harmonisation, the local government funding formula and other issues identified in the Green Paper (e.g. staffing, pay, etc.) which are only listed rather than addressed in substance;
- Second, there needs to be greater realism in terms of the capacity of local government and other partners to undertake complex transformation programmes more or less simultaneously. In our case, this could involve a restructuring of a local health board, local government reorganisation and delivery of Health and Social Care integration following the Parliamentary Review, all at the same time or in quick succession. This won't work in our view; and
- Third, we believe that there would need to be an absolutely unequivocal political commitment from all parties to any merger proposals (including the Welsh Government) before such a journey could commence or the scope for wasted effort and resource would be almost unlimited. Those conditions do not currently exist.

We are more than willing to continue with the dialogue – directly and/or through the WLGA; but after many years of rather circular debate, I think there needs to be a very clear political direction set or the tone of the debate is unlikely to change.

Yours sincerely,

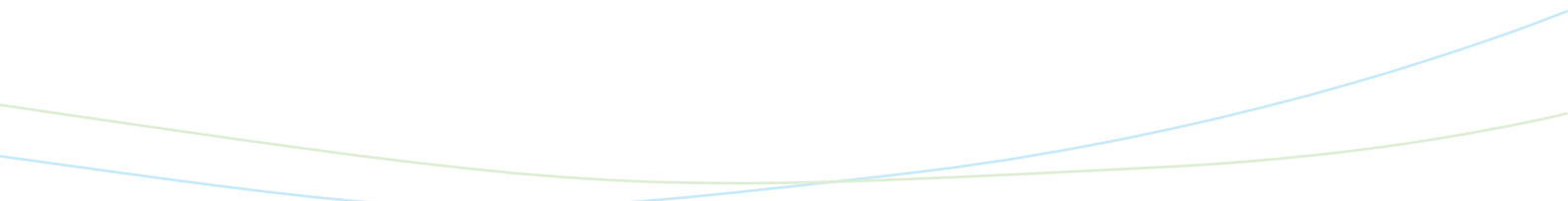


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The Council welcomes correspondence in English or Welsh

Mae'r Cyngor yn croesawu gohebiaeth yn y Gymraeg neu'r Saene

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

SPECIAL COUNCIL

30 May 2018

Joint Report of the Chief Executive and Assistant Chief Executive

LOCAL GOVERNMENT REORGANISATION

Matter for Decision

Wards Affected: All

Purpose of Report

1. To provide Members with advice on the Welsh Government's Green Paper "*Strengthening Local Government, Delivering for People*" issued on 20 March 2018 (at Appendix 1) and the terms of a suggested response.

Background

2. This is the fifth Green or White Paper since the Williams Commission Report in 2014¹ (excluding others on the subject of electoral reform for example). It is also the third set of proposals for local government reorganisation/reform in as many years.
3. In all probability, it will result in a continuation of the stalemate that has characterised this debate for years i.e. the Welsh Government/ National Assembly will not impose a solution and local government is clearly not going to reorganise itself. This is despite the Green Paper stating that "*the need for radical change is urgent and pressing*"². Thus the discussion has become almost completely circular - and the opprobrium heaped upon the proposals from local government and opposition parties in the Assembly has been entirely predictable.
4. However, the proposals are not completely without merit (see below) and some aspects might usefully be explored further on a basis to be determined by Members.

¹ Officially known as the Commission on Public Service Governance and Delivery.

² At Paragraph 2.15.

Analysis

5. The basic problem is that the Green Paper is too high level in a number of key areas, particularly the financial aspects. Nor does it really develop the arguments which have been articulated several times before in previous White Papers and policy statements or set a vision for the future of local government in a devolved context.
6. The Williams Commission is referenced frequently in the Green Paper as a source of evidence; but Williams stated *that “it is a myth that there is some ideal structure or configuration of the public sector in Wales or anywhere else that will eliminate problems of governance and delivery by design”*³. The Commission also made clear that its recommendations were to be taken as an integrated package and not subject to cherry picking of individual components.
7. For its part, local government/the WLGA continues to champion the voluntary collaboration agenda; but some 12 years on from the publication of the Beecham Report⁴, it represents an agenda that has produced minimal benefits – most certainly as a response to austerity. The Green Paper describes the benefits as “*patchy and inconsistent*”; but we would go further. There have been some modest successes; but the budgetary dividend from collaboration has never featured in successive budget rounds here simply because there hasn’t been one. Moreover, the often quoted collaboration models such as the City Deal and the school improvement consortia – to name but two – do not represent a panacea either. At the time of writing, there is a particular issue with the school improvement consortia where Welsh Government appear to wish to exercise control through funding whilst local authority Members remain accountable through the Joint Committee. That represents sub-optimal governance arrangements in our view.
8. Moreover, in some cases, collaboration has actually increased costs to this authority or failed to deliver significant savings⁵. It also brings with it a significant overhead in terms of demands on Member and officer time and the current arrangements have created an industry of legal agreements and complex structures. They are not well understood by local Elected

³ At Paragraph 1.57

⁴ Delivering Beyond Boundaries: Transforming Public Services in Wales: Sir Jeremy Beecham 2006

⁵ The Auditor General’s report on the National Procurement Service: November 2017

<https://www.wao.gov.uk/publication/national-procurement-service>

Members with a consequential negative impact on accountability and the recommendations presented by Williams to address complexity are not taken on board in the Green Paper even though the Commission was clear that this stifles innovation and creates a risk averse, short term compliance culture.

9. Perhaps the essential point here is that the Green Paper proposes to maintain regional working in its current form and implement structural change. This looks like a fudge (particularly as the geographical boundaries are not always coterminous between the two e.g. the City Deal⁶). To be clear, we are not opposed to the concept of regional working; but as currently configured it does not produce the benefits that have been claimed.
10. The Green Paper poses 15 questions to which responses are requested. This report does not address most of them because they are secondary issues and/or we have already addressed many (directly or indirectly) in responses to previous White Papers. Instead, the report addresses the core issues.

Where does Neath Port Talbot sit in the equation?

11. As things stand today, we do not believe that there is a compelling case for this Council to immediately merge with the City and County of Swansea (or anyone else).
12. Without blowing our own trumpet or underestimating the challenges ahead, our budget is structurally sound - despite cutting some £77m since 2011 - and we continue to receive favourable reports from the Wales Audit Office, more recently Estyn and other regulators on the quality of the services we provide. However, there are no guarantees that this will remain the case as we must find another estimated £58m over the next four years from 1 April 2019. It would therefore be foolish to rule out mergers indefinitely - particularly as there are no credible alternatives on the table - and the imperative to merge may already exist elsewhere. Perhaps it would therefore be more achievable/realistic to instigate a reorganisation of 22 Councils to, say, 15 or 16 rather than down to 10 in one go?

⁶ Ceredigion would be part of the proposed new West Wales Council; but is not part of the Swansea Bay City Deal.

13. The Green Paper's central thesis is that a significant reduction in the number of local authorities would improve financial resilience medium/long term; enhance the quality of services and the new authorities would benefit from more powers (notably a general power of competence which already exists in England and Scotland). That might be the case; but the Green Paper's "*Case for Change*" (Chapter 2) lacks an evidence base as other commentators have pointed out since its publication⁷ - certainly one that is applicable to this authority. The Green Paper is particularly weak in terms of the evidence that larger Councils are necessarily better/stronger. Indeed in Northamptonshire, it has been proposed to split the all but bankrupt local authority into two smaller Councils and the largest Council in the UK, Birmingham, has a history of major problems on service delivery.

The Options for Reorganisation

14. The Green Paper identifies three at Chapter 3 (described below) and paragraph 5.5 states that final proposals would be part of a Bill to be introduced into the National Assembly this autumn.

Voluntary mergers

15. This option would see the Welsh Government enable local authorities to come forward with merger proposals if they were within a specified future footprint (paragraph 3.5).
16. Basically, this won't work in our opinion – and the Green Paper itself (at paragraph 3.7) lists many of the disadvantages. Despite the claim that this wouldn't be a repeat of 2014/15 (where three sets of two Councils had voluntary merger proposals rejected), we suspect that there will few, if any, volunteers this time around. In any event, the chances of all 22 Councils participating in such a process are zero. Thus it inevitably represents a piecemeal approach - to a greater or lesser extent - where, even if two or more Councils had voluntary merger proposals accepted, the potential and unforeseen knock on effects next door (or even across Wales) could cause as many problems as they would solve.

⁷ For example Mike Hedges AM (Swansea East) has contributed a number of thoughtful articles on the subject. His two latest pieces are to be found at these links: <http://www.iwa.wales/click/2018/03/reorganisation-welsh-government-funded-welsh-public-sector/> and <http://www.iwa.wales/click/2018/04/reorganisation-welsh-government-funded-welsh-public-sector-part-2/>

A phased approach with early adopters merging first followed by other authorities

17. As paragraph 3.10 states, this would see the Welsh Government make provision for local authority mergers in 2026, in line with a specified future footprint for local government; but also enable local authorities to move more quickly in time for new authorities to be vested in 2022.
18. This proposal could bring a long period of uncertainty; but it has some merit and should not be entirely discounted for the reasons outlined above. The Green Paper sets out the advantages and disadvantages of this approach (at paragraph 3.11 and 3.12 respectively). The former may outweigh the latter and we can see ways in which the end point of 2026 might be brought forward; **but** the tests outlined at paragraph 20 below would need to be met first.
19. So, as things stand, we would not recommend that this Council aim for a merger by 2022. However, it may be that other, smaller Councils who face proportionally greater financial challenges and diseconomies of scale, would wish to pursue this option. They should not be denied that opportunity if they wish to pursue it.
20. If we were ever to go down this route, officers conclude that a minimum of three tests would need to be met:
 - First, the Welsh Government would need to be far clearer on the key financial issues. There has been a sterile debate on the cost of reorganisation in recent years with the Welsh Government and the WLGA trading and contesting each other's estimates. The Green Paper does not provide an updated Regulatory Impact Assessment (RIA) and paragraphs 3.19 and 6.31 outline a very wide range of potential costs and savings. There is an assumption that capacity would increase and savings would be achieved; but there is no evidence to support this assertion. The more likely reality is that at least for the medium term there would be a reduction in capacity and increased costs and no clarity as to how those additional costs could be funded (see immediately below).

This last point is perhaps equally as important: who is expected to meet the cost? The Green Paper is silent on this. 80/20 Welsh Government/local government? 50/50? 40/60? If there are real concerns about the financial resilience of some local authorities

then there should be a proposed mechanism to address it; but there isn't.

Similarly, on Council Tax harmonisation, the issue is identified; but not addressed in substance. It could result in significant increases in Council Tax for anyone merging with this authority as our relatively high Council base is very largely a legacy of the last local government reorganisation in 1996 and this has produced inequities across Wales in terms of the contribution of residents to funding public services. Chapter 5 suggests that this would be a matter for the Transition Committees and Shadow Authorities

In our view, there is also a strong case for revisiting the local government funding formula which has created imbalances in the funding levels between existing Councils. For example, the rural authorities habitually occupy the bottom end of the funding table year on year and funding floors have had to be deployed to mitigate the worst of these impacts; but if, say, Powys Council is to remain as it is, one might ask whether services there or in other rural authorities are sustainable under the status quo?

The Green Paper acknowledges (at paragraph 4.6) that there are "*many challenges*" to be addressed e.g. staffing issues, pay, ICT, etc. but again only lists them.

- Second, there needs to be greater clarity in terms of prioritising Welsh Government expectations in a number of policy areas. Put another way, is it realistic to expect local authorities and local health boards to be transforming Health and Social Care⁸ at the same time as our local health board is undergoing structural change (with the Bridgend area likely to transfer to Cwm Taff) and reorganise local government simultaneously? The simple answer is "No" in our view. Realistically, there is a limit to the capacity available to this Council, other local authorities and other partners to accomplish complex transformation programmes (and that capacity is reducing); and
- Third, if we were to enter into any preliminary discussions about mergers, it would be reasonable to seek an unequivocal political commitment from the other party (and them from us) that we were

⁸ The Green Paper identifies implementing the Parliamentary Review of Health and Social Care as a priority and we are working with Swansea Council and ABMU to address these issues in response to a recent dialogue with Welsh Ministers.

both fully committed to the process from the outset as was the Welsh Government.

The scope for wasted effort and resource is virtually unlimited otherwise – it has already cost a great deal of time and money - and the Green Paper perhaps betrays a sense that the Welsh Government prefer to take a hands off approach with the stated desire to keep “*to a minimum the period the Welsh Government has to provide support to the process*”⁹.

A single comprehensive merger programme

21. This option would see the Welsh Government make provision for local authority mergers in 2022, in line with a specified future footprint. We don't think this is a practical proposition. It would require a more or less immediate consensus on a way ahead (unless the Welsh Government impose it); but that is very unlikely for the reasons explained above. Moreover, it is possibly too late already in the current Assembly term to start such a process and complete it before the next Elections in 2021.
22. The advantages and disadvantages of this approach are set out in paragraphs 3.14 and 3.15 of the Green Paper respectively.
23. The other practical obstacle is that this process would require the Local Democracy and Boundary Commission for Wales (LDBCW) to completely redraw the ward boundaries across the whole of Wales in little more than two years (paragraph 5.18). Based on previous experience and the convoluted nature of the process, we seriously doubt whether the Commission has the capacity to do the job. Fairly recently, it took eighteen months to determine whether half a street should be in the Taibach or Margam ward.

Other issues

24. We have no particular problem with the remainder of the issues identified in Chapters 6-8. They are largely framed in aspirational language. There are warm words about the role of Elected Members; but no discussion about what “*strengthened*”, “*empowered*” or “*reinvigorated*” actually means in terms of the role and function of

⁹ Paragraph 3.14

local government. Moreover, the Councillor to elector ratio varies enormously for the proposed ten new authorities.

25. The additional powers would be welcome (but paragraph 6.14 suggests that these would only be available to Councils who merge); but conversely the call for service transformation does not really reflect what is already going on by way of change and reform here and elsewhere in local government – e.g. social care, the digital services agenda, income generation and so on – and they do not depend on structural change anyway.
26. Chapter 7 on Community Councils adds nothing to what has gone before. We have already given evidence to the Review Panel; but the future role and functions of Community Councils needs to be an integral part of any process, not some sort of subsequent add-on.

Financial Implications

27. None at this stage (they are impossible to assess on the basis of the information available). However, as noted above, the financial implications of the whole exercise are a key consideration if the proposals are taken forward.

Sustainable Development

28. Not required at this stage; but the Green Paper is silent on how citizens and other stakeholders will be engaged in this process of debate (required under Future Generations Act 2015).

Workforce Implications/Equality Impact Assessment

29. None/not required at this stage; but again, these would be another key factor going forward.

RECOMMENDATION

That Members agree:

1. That the Leader of Council write to the Cabinet Secretary for Local Government and Public Services in terms of the draft letter at Appendix 2 conveying the Council's response to the Green Paper. This majors on the points in paragraphs 11-23 above including the "tests" outlined.

Reasons for proposed decision

To invite Members to endorse the Council's response to the Green Paper. The deadline for responses is 12 June.

Implementation of the decision

The decision is proposed for implementation after the three day call in period.

Appendices

Appendix 1 – Welsh Government Green Paper: “*Strengthening Local Government, Delivering for People*” 20 March 2018 (available via the link below):

<https://beta.gov.wales/sites/default/files/consultations/2018-03/180320-strengthening-local-government-consultation-v1.pdf>

Appendix 2 – Draft reply from the Leader of Council to the Cabinet Secretary for Local Government and Public Services

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Green Paper Consultation Strengthening Local Government: Delivering for People

A Response from Neath Port Talbot CVS

June 2018

Neath Port Talbot CVS

Tŷ Margaret Thorne

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Neath

SA11 1EF

A response to the Green Paper – Proposed Local Government: Delivering for People

Introduction

Neath Port Talbot CVS is the County Voluntary Council and a Charitable Company set up to promote, support and develop the Third Sector in Neath Port Talbot. It has over 500 member organisations and is in touch with over 1,000 Third Sector organisations operating in Neath Port Talbot covering various communities of interest, public services and geographical communities (from small local groups covering smaller wards and deprived communities to large national organisations). Some are wholly volunteer-led and run, and others employ a workforce.

As an infrastructure organisation, our role in supporting the development of communities and building community resilience is clear. We provide capacity building, support and guidance to third sector organisations, helping them to develop, plan for growth and sustainability, to deliver services, opportunities and activities that positively impact on, and improve outcomes for, citizens and service users. We also have an important role in engagement and representation.

Our aim is to promote the development of a local third sector that is effective and efficient, informed and influential; a sector which is able to improve and achieve positive outcomes for local people. The organisation has strong partnership links locally and regionally and works in a number of strategic areas, such as Health, Education and Learning, Regeneration, and Children and Young People.

As part of this work and its key representative function, Neath Port Talbot CVS facilitates a range of third sector forums and networks, which engage the sector in Neath Port Talbot in order to gather the views of the sector and to feed these views into key decision-makers and delivery partners. The organisation also promotes a range of messages to its staff and to the wider community through its newsletters, website and social media.

This paper sets out the response to the consultation on behalf of Neath Port Talbot CVS.

We feel that change should focus on culture rather than structure, and consider how individuals and communities can be empowered to develop their own solutions.

A focus on empowerment would require a change in approach as well as a greater role for town and community councils in working with their communities and shaping the future of communities. This focus should be built around communities, not Authority areas, with a greater focus on strengthening community based assets so communities can become resilient and thrive.

Local and regional governance arrangements are becoming more numerous and more complex, with increasing demands for third sector involvement. For many organisations, these governance arrangements can be perceived as distant from their vital work organisations and volunteers are delivering in communities and with individuals, and consuming time and resource they feel could provide greater benefit elsewhere. It would be helpful if there is greater clarity of the roles and functions between the many structures at local, regional and national level.

It is hoped that the proposed reforms for Local Government will present an opportunity to empower people to play a more active role within their communities to transform the way services are delivered locally. At the current time, we would not feel there is a need for “larger, stronger” Welsh councils as we feel these would further distance Local Government from local communities and local people.

Office of Lynne Neagle AM
and Nick Thomas-Symonds MP
73 Upper Trosnant St,
Pontypool
NP4 8AU

Welsh Government
Cathays Park
Cardiff
CF10 3NQ
E-mail: StrengtheningLocalGov@gov.wales

11th June 2018

Dear Sir or Madam,

CONSULTATION RESPONSE

This letter constitutes our response to the request for views on the *Green Paper Consultation Document: Strengthening Local Government: Delivering for People*. Whilst we appreciate a number of specific questions are asked in the Consultation Document, we also note that the final question asked for general comments, so we are providing this letter in that spirit and trust our views will be taken into account.

We are pleased to see that the increasing work on collaboration that is taking place between Councils across Wales. We believe that this is important work during such straitened economic times and that such work needs to be encouraged going forward. We are, however, very concerned about the prospect of a wholesale reorganisation of the structure of local government in Wales. Please find below our reasons for taking this position.

1. **Up-front cost of reorganisation:** We believe this to be a prohibitive factor at this time. Wales is eight years in to the programme of austerity pursued by the UK Government. Money for frontline services is already scarce and to take on a further major spending commitment like that involved in reorganisation would only create further challenges at this time;
2. **Funding:** Whilst the Welsh Government has tried to mitigate the impact of austerity on our communities, the reality is that funding cuts from the UK Government present the major issue for local government going forward. Reorganisation does not solve this problem; the answer is for there to be wholesale change at UK Government level, and to have a Government that will pursue a different economic policy that will provide the Welsh Government with the funding it needs to pass on to Councils;
3. **Jobs:** Areas such as Torfaen have a very large public sector workforce. Put simply, the Council is a large and vital employer in the Borough. Should those local jobs be removed in a process of reorganisation, this not only has an adverse impact on the workers themselves, it also removes a crucial economic motor from the local

economy with people who spend time and money in the locality possibly being transferred elsewhere.

4. **Scale:** We are unconvinced that there is any evidence that scale results in better services. In Wales, there appears to be little correlation between size and performance in areas like education or health. Elsewhere, large authorities in England have struggled in areas like social care. We also note that internationally, some of the most successful regional governance arrangements involve smaller units. The key would seem to be effective leadership and a partnership approach.
5. **Democracy:** The old Gwent County Council, abolished in 1996, was an example of having functions such as education dealt with at a regional level by a larger authority. However, this brought its own issues with electors often seeing the Council as distant from them. In any event, regional solutions can still be offered in the modern day by Councils working together on a collaborative basis.
6. **Disruption:** On top of the danger of reorganisation disrupting service delivery in the short to medium term as new councils are formed, there is danger in any reorganisation that existing regional working in areas like education and the City Deals will be disrupted by structural change in councils.
7. **Collaboration:** Our reticence about changing the number of councils does not mean we think no change in how councils work is the best option. Collaboration seems to be essential, both between councils and with other public services, whatever the structure of local authorities. We would therefore commend an option going forwards that seeks to further the good work done by Councils like Torfaen on collaborations, including some form of compulsion where necessary to stop things moving at the pace of the slowest.
8. **The current intake in councils:** In Torfaen, we have made great progress getting new and capable councillors elected – a situation reflected in many councils and which shows the progress that has been made in recent years. We feel this cohort deserve a chance to make progress working with us at different levels of representation, and believe this can bring results if given the chance.

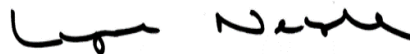
We trust our views will be taken into account.

Yours faithfully,



Nick Thomas-Symonds MP

Member of Parliament for Torfaen



Lynne Neagle AM

Assembly Member for Torfaen

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Our Ref./Ein Cyf. NJD/MM/MH

Your Ref./Eich Cyf.

Contact:/Cysylltwch â: Councillor N.J. Daniels

12th June, 2018

Dear Cabinet Secretary

Green Paper- Strengthening Local Government: Delivering for People
Consultation response from Blaenau Gwent County Borough Council

Blaenau Gwent CBC welcomes the opportunity to comment on the Green paper. The Council is supportive of the WLGA response to the paper which was discussed and agreed at the WLGA Executive board meeting on 25th May. This response does not therefore provide specific comment on each consultation question, but we would make the following comments in support of the WLGA response.

On the central point of sustainability and strengthen the role of local government, as the current evidence base and academic analysis shows, it is the current and projected levels of funding to councils in Wales that is the issue not simply the structure of local government. The Council supports the view that a more equitable and sustainable distribution of funding is needed. The reference to the 22% uplift to a number of large local health boards is pertinent, given the significant reduction in local government funding over the same period.

The points in relation to local public services being under-funded and the case for adequate resources for Local Government are well made, brought into sharper focus by the socio demographic profiles and demands of our communities in Blaenau Gwent with high levels of deprivation and a low council tax base exacerbating the problem of reduced government funding. The Paper makes no reference to how significant issues such as harmonising Council Tax would be achieved as a result of mergers and gives no recognition to the huge importance of local government as an employer in the Welsh Valleys, local economies could be further decimated as local government centralises into larger organisations and moves south towards the larger population centres.

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Mae'r Cyngor yn croesawu gohebiaeth yn Gymraeg a Saesneg a byddwn yn cyfathrebu gyda chi yn eich dewis iaith, dim ond i chi rhoi gwybod i ni pa un sydd well gennych. Ni fydd gohebu yn Gymraeg yn creu unrhyw oedi.

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

Continuation Sheet No. 1

The Council would echo the points made by the WLGA in relation to the evidence on the case for reform and the argument that the size of operating units determines its effectiveness. We would therefore welcome sight of any new evidence to substantiate the case for reform and the proposition that larger organisations are better placed to deliver better services and believe the evidence does not support this argument. If we want local government to engage with and deliver for local communities we fail to see how mergers will achieve this and are far more likely to create a local government which is seen as being more remote from local communities and therefore less able to respond to local needs and to design services suitable for local circumstances.

Blaenau Gwent Council believes that it is not imposed mergers which will secure the sustainability of local government in Wales. The proposed empowerment and greater flexibilities in the Paper are welcomed but the Council supports the stance that withholding such powers unless or until structural reform is delivered is counterproductive. Granting local government in Wales greater powers, now, to generate income and act in a more commercial way e.g. through investment and more effective use of assets, will provide access to sources of funding currently not available and thereby would reduce the over reliance of RSG and Council Tax revenue and enable councils to act more innovatively and create sustainable solutions.

Blaenau Gwent Council, in line with other councils in Wales, has ambitious plans to transform how we deliver services, generate income and engage with our communities. We do not believe that Wales is lagging behind the rest of the UK. The transformational change agenda resonates with Blaenau Gwent, we have and will continue to invest effort in programmes of change that will allow us to challenge service pressures and support the most vulnerable. This includes internal restructuring for both ongoing viability and securing our place as a strong regional influencer.

An excellent example of this is that Local Government is providing bold and determined leadership through many regional partnerships. The Cardiff City Region Deal is delivering programmes to support skills, housing, innovation and improved connectivity and will deliver real benefits into communities across the region. In other areas we are working with public sector partners through our Regional Partnership Board (Health and Social Care), Regional Education Improvement Consortia and Public Service Board to address our local priorities and to work in partnership to move to more preventative and earlier interventions to reduce the reliance on public services and promote independence.

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Continuation Sheet No. 2

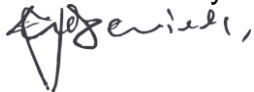
We are committed to driving as much collaborative working as feasible but firmly believe that this needs to develop through effective local partnerships and stronger joint working between Welsh and Local Government and other parts of the public sector, not by being enforced through local government mergers. The fact is that the strong partnerships that have been developed will suffer and stall if local government mergers are imposed on the sector.

In Blaenau Gwent there is real momentum building in our work to transform how we deliver services through Digital by Design, restructuring our management arrangements, alternative delivery models, shared services and developing a more commercial approach to our business through income generation, trading services and better use of our assets. We should not underestimate the negative impact and disruption that mergers would have on this work and the inevitable shift of focus away from our current agenda to one of mergers and structures. The work we are doing would quickly take a 'back seat' as the focus of our effort and resources shifts away from the needs of our communities. We must not let that happen.

The Council is generally supportive of the concept of voluntary mergers and agrees that there should be the opportunity and mechanism for Councils to bring forward proposals, if they believe the case is made to do so. The key issue here is that these decisions should be made locally and should be based on structures and boundaries which make sense for those communities and are built on strong and effective partnerships.

In summary the Council does not believe that the evidence exists that mergers and a move to the 10 Council Model will provide the net savings and benefits suggested and that the disruption that would result would set back the collaboration already gaining momentum across public services in Wales. It is right that local government needs to change to meet the challenges created by reduced funding, growing demand for services and the need to raise the performance of our economy and reduce reliance on public services. However we agree with the WLGA position that this can and is being achieved through strong and effective collaboration and by transforming services, reducing costs and shifting spend to support prevention and early intervention. There is a strong case for a stronger public sector in Wales with Welsh and Local Government working together to meet these challenges.

Yours sincerely



Councillor Nigel Daniels
Leader of Blaenau Gwent County Borough Council

North Wales Regional Response to the LGR Merger Green paper

The Six Councils of North Wales are not opposed to reform – where a compelling, thorough case for change is agreed between Councils and Welsh Government.

There is a strong feeling in the region that such a case for change, in particular the change proposed in the Green Paper, is in no way compelling.

Merging Councils in the manner and in the timescales proposed will go no way towards meeting the presenting and future challenges facing Councils: namely the challenges of meeting increasing complex demand with continued diminishing resources, in an environment of uncertainty caused by BREXIT and changes in Welsh Government leadership.

Indeed, it is likely (as history demonstrates) that the disrupting effect of local government reorganisation in the manner proposed and in the timescales suggested will have a significantly debilitating impact on service delivery, deflecting attention of managers and councillors towards the major complexities of merger and away from the major challenges of maintained service delivery.

We have a good track record in North Wales of collaborating at a regional level and also at different configurations, sub-regionally: fitting the ‘form’ to the ‘function’. Examples include our residual waste arrangements, the Economic Ambition Board, GwE, Safer Communities Board, joint PSBs and joint Youth Offending Teams – some regional, some sub-regional as best fits the issue(s)/service(s) in question. A further period of stability in terms of ‘form’ or ‘shape’ will enable Authorities to develop and implement more changes – for the benefit of service delivery and the communities we serve.

We also have a good track record as Welsh Councils in delivering budget savings in recent years, whilst continuing to innovate as well as continue to provide good services to, in the main, the more vulnerable in our society. This does not appear to be acknowledged in the Green Paper, or indeed by Welsh Government in general.

We would agree with the Green Paper’s notion that Councils should be ‘strong’ in order to operate to their best and we would encourage the Welsh Government to have a positive dialogue with local government as to what additional powers and freedoms would contribute to such strength. That said, we do not agree with the notion that ‘strength’ equates to, or is delivered through being ‘bigger’. We would therefore urge the Welsh Government to provide such agreed powers and flexibilities to Councils as currently configured, to equip us better to meet the presenting challenges.

Strength is also provided through the democratic accountability provided through current arrangements. Local councils are not, and should not be viewed, as simply a delivery mechanism of Welsh Government. Local councils are elected by the local people and remain accountable to the local people. A diminution of that strong local democratic accountability should be avoided.

The importance of a strong linkage between councillors and the communities they serve should not be underestimated. Local government thrives on the voice of local people being heard (via their elected representatives) in the Council Chambers of Wales. The inevitable diminution of that strong linkage through merger to make fewer, large Councils would be a huge loss to the people of Wales and to Welsh democracy.

To conclude: North Wales Councils are not opposed to change, but are opposed to the particular changes proposed in the Green Paper. With the uncertainty in our operating environment, and the challenges our services are already facing, this could well be the worst of times to implement forced change of the scale proposed.

A constructive dialogue in terms of the future role of local government within Wales - around additional powers, freedoms and flexibilities and financial sustainability - would be welcomed and should take priority over structural change.

Signed by 6 Leaders