

Vale of Glamorgan Council

Strengthening Local Government: Delivering for People

Green Paper Consultation Response

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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?

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 unhelpful 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 Vale of Glamorgan Council is that we 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.

We are comfortable with complexity in terms of 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. A fixation on local government in this way does not 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 where it is not clear that for all service areas there are shared objectives due to the nature of the proposed constituent areas of the new authority. There is a very real need for local elected members to oversee and scrutinise the performance of the services they are responsible for and to enable citizens to influence and partake in decision making which dovetails with existing arrangements. 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.

This Council can demonstrate significant effort has been put into collaborative working over the past five years and there are benefits being delivered as a result.

Within health and social care we have clearly demonstrated an ongoing commitment to sharing resources and making best use of skills to provide improved outcomes for the citizen. We have ensured that 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. 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. We continue to progress this work with our 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. 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.

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 service. For example, Welsh Government increased the budget available for health services 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 in Vale of Glamorgan and we choose 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.

For example, there is evidence of an improvement over time since the establishment of the central south education consortia; these existing relationships are working. However, there is a need to respond to the challenge of curriculum reform and the need for the consortia to evolve, therefore the transfer of any additional services to consortia could serve as a distraction to their primary function.

This council has a range of other effective collaborations with varying partners which are described in detail throughout this submission. These include the Shared Regulatory Service, joint internal audit service and Regional Adoption Service. At our most recent all-senior manager seminar, collaboration was a key topic for discussion and a number of new initiatives have been identified and initial work had commenced to scope the potential across all service areas with a wide range of partners. 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.

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

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. However, the paper is extremely 'light' on the latter. There is no specific detail relating to the additional powers and flexibilities that will follow. The paper focusses on the issue of mergers and, save for 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.

The Vale of Glamorgan Council rejects 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**

This council does 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 and Cardiff which would make it difficult for a merger on equal terms to happen. Although this Council has made this point repeatedly in response to previous consultations, these well-made and well-documented comments have been seemingly ignored when drafting this paper (although passing references are made to concerns expressed previously in the former Gwent region and North East Wales (page 22, paragraph 4.4 refers). 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. The proposals as set out would not see an alignment of school improvement services, the Regional Adoption Service, Shared Regulatory Services, or our shared internal audit service, for example. All of these collaborative services work effectively because they are on a scale and footprint which make sense and have clear benefits to the citizens who access these services. A merger is not required to 'add clarity' to situations which are already working effectively between ourselves and Cardiff Council, notably in the field of health and social care and between ourselves and other partners in terms of other service areas. 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**

The council supports 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. This council cannot support the view that 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. The Green Paper nevertheless recognises that many savings have already been delivered through shared and collaborative working as well as within individual Councils through transformation. To reiterate, since this time significant savings have been delivered by local government. In this Council, our own Reshaping Services programme has delivered significant financial savings, transformation in the way services are delivered and more innovative approaches to delivering front line services. In the Vale of Glamorgan, we have not closed libraries but are working with community groups to keep them open, whilst at the same time delivering annual savings of £500k. We are working with other partners to deliver shared services as in the case of Internal audit (Bridgend CBC) and Shared Regulatory Services (Cardiff and Bridgend). We have also introduced innovative approaches to reducing our 'on-costs' such as a move to a pool car scheme to reduce mileage costs by £100k per annum. We have transformed our approach to staff development and engagement to ensure our workforce is fully engaged, innovative and proud to deliver for the citizens of the Vale of Glamorgan. And unlike another public bodies, directly answerable to the Welsh Government, this has been cost neutral and delivered internally by our own workforce, for our own workforce. 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**

The Council is supportive of the appropriate use of emergency powers to amalgamate authorities in serious difficulties, but does not envisage this situation ever applying to the Vale of Glamorgan Council.

Further information is provided in the response to the consultation questions which

follow.

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

We 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, weakened further by the Welsh Government's continued changing position.

Instead of having an academic argument over the various advantages and disadvantages of the three 'options', we should be focusing on options that could be delivered in reality. The Welsh Government has not provided any real options other than mergers and this lacks thought and recognition of working more constructively with local government to form a plan for how services could be delivered in the future.

As the Green Paper states "there are different ways in which we can arrive at larger, stronger authorities". The Paper also states that "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. The view of the Vale of Glamorgan Council is that this is arbitrary and unnecessary in all instances (and specifically our own) to meet the objectives that the Welsh Government is seeking to deliver based on the assumed objectives contained in 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, we believe there is a critical mass that has to be attained if all the functions of a unitary authority are to be delivered effectively.

Our consistently made contention is that the Vale council's size enables it to sustain that range of functions while still being responsive to local needs and maintaining local democratic accountability. We can say this with confidence as our track record indicates as such.

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.

There are practical examples where the movement away from local determination and delivery has impacted upon the ability of services to be locally responsive. One such example is in the management of Rural Community Development Funding (RDP) and other RDP schemes which has led to a dramatic slowdown in the appraisal process. Local opinion is not factored into the decision making process which has led to projects in areas of need being rejected. When the Vale of Glamorgan Council operated Axis 3 & 4 grant funding in the 2007-13 programme, projects were appraised and approved in 3 months. Taking funding in house has now led to appraisal taking as long as 19 months, with robotic and limited support for applicants. More worryingly, groups and businesses with the least capacity but most need have dropped out of the process. Welsh Government's management of funding schemes 'in house' has now led to a postcode lottery across Wales with some areas doing well and others with no projects approved. In the regional investment consultation document, Welsh Government recognises the benefit of the bottom up Leader approach. It is vital that this applies to regeneration and grant funding in future. Regional and national homogenous approaches lead to a loss of identity and local buy-in from stakeholders. It has also reduced the ability to provide effective local determination of funding and a tailored local delivery of programmes. We feel strongly that any administration economies of scale have been achieved are far outweighed by the negative impacts on businesses and communities within the Vale of Glamorgan.

There is no easy answer to the question of what is the optimum size of an organisation 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).

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 being ranked the top performing local authority in Wales for the past three years (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, 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". 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 we are 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.

This evidence supports our 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.

The Council's view on each of the proposed 'options' follows.

Option 1 – Voluntary Mergers

The Vale of Glamorgan Council does 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. However, such a proposal would now not be considered by Welsh Government due to the imposed footprint described in the Green Paper. The arguments made in 2014 by this Council were that voluntary merger would enable the two councils to take control of establishing the new organisation at a pace that was effective and manageable, based on an equality of size and similar characteristics. 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 us taking the position that a merger with any other local authority is an untenable prospect in securing the quality of services rightly expected by our citizens.

The disadvantages of uncertainty for the workforce and citizens apply to reorganisation of local government as a whole and are key factors in this 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, the Vale of Glamorgan Council does not support the idea of a voluntary merger with Cardiff Council.

Option 2 – Phased Approach

The Vale of Glamorgan Council does 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, the Vale of Glamorgan Council does not support the idea of a voluntary merger with Cardiff Council.

Option 3 – Single Comprehensive Merger Programme

The Vale of Glamorgan Council does 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.

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, the Vale of Glamorgan Council does not support the idea of a voluntary merger with Cardiff Council.

d) 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. The environment is very different than 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 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.

Our 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.

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

This is a peculiar question as the proposals contained in the Green Paper are Welsh Government's and it is the view of this Council that prior to publication, 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 our 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, as would be the case with a merged Vale of Glamorgan and Cardiff.

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'.

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?

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.

The Council agrees that 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.

The Council is committed to the regional agenda and has been at the forefront of some significant advances in this regard, notably City Deal (supported through a secondment of a senior officer as well as leading on the development of proposals for the Regional Transport Authority), the education improvement consortium, regional adoption service (we host the service), Shared Regulatory Services (we host the service), integrated health/social care (including joint posts, an integrated locality management structure, first point of contact community resource service, integrated discharge service and integrated mental health teams). Regional services are in place with Cardiff Council where it was determined that they would be of benefit or where new funding has enabled such arrangements. The position continues to develop, however, we now already have a regional safeguarding unit, a regional emergency duty team, a joint equipment store, an integrated autism service a regional mental health team for older people, an integrated family support team and a regional training unit operating with Cardiff Council.

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. This Council supports 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 unhelpful in this regard.

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. It also represents a pre-occupation with form rather than function and performance. Indeed, 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 impose the footprint of the Vale of Glamorgan and Cardiff merging, it is highly likely that other footprints would continue to emerge in any case, although the ability to service and support further collaborations will be impeded by reduced capacity and an over-emphasis on ‘merger issues’. In this regard, the pre-occupation on mergers is extremely likely to deflect attention away from on-going collaborative approaches and result in a scaling back of activity on important collaborations due to lack of capacity and distraction.

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

The factors being used by Welsh Government describe precisely the argument this Council 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. This describes the Vale of Glamorgan Council as it is currently constituted and there is therefore 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, the Council cannot support the proposals to merge with Cardiff Council or any other authority.

For example, one factor is that ‘new authority areas relate to and take account of their communities’. We already relate to and take account of our communities because we are close to them and are investing in them. As described above, the nature of the area and our communities in the Vale of Glamorgan are inherently different to those of the Capital City. It is our working relationship with communities and community based organisations that has allowed us (and them) to be successful in establishing 5 community libraries, as opposed to closing the facilities. Such an approach would have been far more difficult, if not impossible, if the Council was significantly larger and more remote from the communities which it serves. The same

can be said of other locally delivered services such as community transport, events, play schemes and community regeneration initiatives. We also have excellent working relationships with the voluntary sector and this is as a direct result of our scale and direct relationship with the voluntary sector. Such a relationship would be in jeopardy, if the Council was to be merged with another.

The Green Paper suggests that 'ensuring democratic accountability is maintained' should be a factor for consideration and the council agrees. However, the Paper does not provide detail of the composition of representation of the Vale of Glamorgan area in any new merged council and as such, it is entirely likely that the voice of communities within the Vale of Glamorgan would become diluted by the proposals as set out.

The creation of 'sufficient scale to empower any new authority to protect public services' is a vital consideration and one which local government is fully supportive of. The council has outlined above, below, and constantly, its position in terms of the balance required between scale and local responsiveness. In summary, the size of the Vale as an area is sufficient to deliver the capacity and capability required to be Wales' top performing local authority, with the right balance of locally and collaboratively delivered services. We do not shy away from delivering services at the most local of levels (e.g. community libraries, community transport, play services and events) but also the most strategic services as is the case with City Deal, health and social care and School Improvement. This has been the Council's strategy since the Simpson report and the Corporate Management Team, Cabinet and Scrutiny Committee regularly review strategic collaborations (and any potential future opportunities) as part of planning service delivery.

The consideration of 'placing local government in a position of strength and sustainability for the future' is of utmost importance. It is the belief of this council that a more flexible approach to the application of this factor is required. Strength and sustainability does not need to come from rigid and costly restructuring of all councils. It can be delivered more iteratively and responsively across local government in Wales, including some reorganisation where appropriate and supported, but always in conjunction with strong and truly local government working in partnership with others where it makes sense to do so.

The drive to minimise disruption to front line services through any change is clearly supported. However, adopting a policy of mandated, restrictive reorganisation of the scale contained in the Green Paper will have clear impacts on front line service delivery through uncertainty within the workforce and by distracting elected members and managers from core business.

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

The council can only meaningfully comment on the proposals directly affecting the Vale of Glamorgan and the proposed merger with Cardiff Council for this question. As described throughout our response, we do not consider that a re-drawing of administrative boundaries will lead to better services for our citizens.

Welsh Government's regional 'footprint' may be appropriate in some respects, and the Council is working with Cardiff on many projects, but it should not be the basis for all joint working activity. Still less should it be the basis of a new council. The keynote is one of flexibility and the ability to make the optimum arrangements for the delivery of a service. A single approach that affects all services does not reflect the existing or future needs of our citizens.

There are practical considerations, too. Where the size of any councils merging are similar, a new Council is more likely to adopt best practice from whichever of its predecessor councils demonstrates it. Where a single large council dominates, there is a significant risk that the practice that is adopted is the one carried out by the majority from the dominant council and this quite frequently will not be the most efficient means of delivery.

The notion of a sense of place is central to our argument, and the role of councils will be crucial in giving expression to it. In the 2016/7 public opinion survey, 97% of respondents said they were "proud to live in the Vale". If councils are too big the connection with citizens and communities is lost, contrary to the apparent aims of the Green Paper. It is our contention that the Vale of Glamorgan Council should continue in its current form for that to be achieved. Even if services are planned and delivered in various ways, the link between citizens and services should be the council. Proposals for increasing the role of town and community councils are welcomed and this authority is developing arrangements in this regard as part of our transformational change programme, Reshaping Services. However, as the Green Paper itself acknowledges, a two-tier structure is not advantageous and therefore an authority which balances scale with local connection (as the Vale does) is therefore the optimum arrangement.

d) 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.

This Council made a case in 2014 for a voluntary merger with Bridgend County Borough Council and this was rejected by the Welsh Government. As such, the Council does not consider it useful to suggest any alternatives in terms of footprints as the Council's position remains that the Vale of Glamorgan should remain a unitary authority in its own right. **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.**

This Council would like to see an end to the preoccupation of harping back to the Williams Commission and that alignment with the health boundaries is some kind of

panacea to the issues and challenges facing local government. It is not.

- 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 Council supports the well-made position of the Welsh Local Government Association in this regard – that is 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.

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?

The Vale of Glamorgan Council does not support the idea of a voluntary merger with Cardiff Council and therefore this question is an academic one. Nevertheless, and in the interests of providing as full a response as possible, 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.

- 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 Vale of Glamorgan Council does not support the idea of a voluntary merger with Cardiff Council. However, if Individual Councils wish to merge voluntarily it is appropriate for the individual councils concerned to identify such a date, rather than a date being imposed.

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

The Vale of Glamorgan Council does not support the idea of a voluntary merger with Cardiff Council. The proposed process fails to recognise the option of the status quo continuing (for some councils) and therefore is entirely biased towards merger. Option 3 is considered unachievable.

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 Vale of Glamorgan Council does not support the idea of a voluntary merger with Cardiff Council.

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. The administration involved in local elections should not be underestimated and they are by far the most challenging elections to administer given the number of nominations, candidates and the statutory timetable which applies post close of nominations. For the Vale of Glamorgan alone, local elections involved appointing to 23 Wards comprising 47 elected Members and 62 Town and Community Council Wards with 269 Elected Members: in 2017 within the Vale of Glamorgan 160 nominations were received for the Vale of Glamorgan Council and 320 nominations for the Town and Community Councils.

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).

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 Vale of Glamorgan Council does not support the idea of a voluntary merger with Cardiff Council. That said, this council always welcomes 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.

However, we are confident in managing the complexity involved in local government and recognise that it is not always possible to neatly line everything up. Having the understanding, oversight and agility to respond is key. The Vale of Glamorgan Council has successfully delivered against our Corporate Plan, for example, which has straddled two political administrations.

Consultation Question 6

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

The Vale of Glamorgan Council does not support the idea of a voluntary merger with Cardiff Council. The timescales are unrealistic and unachievable given the scale of the task and the available time for implementation, factoring in an All Wales programme and appropriate consultation. As a guide, 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.

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 ability of elected members to know and be connected to their communities is a central tenet of this Council's 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 Council welcomes the proposals to enhance the connection of members to and with communities. 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.

The elected members of the Vale of Glamorgan council are able to 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.

This Council has invested significantly in supporting the 2017 cohort of 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.

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 Council believes that 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.

Consultation Question 8

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

The Council welcomes 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 Council embraces 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?

The Vale of Glamorgan Council has previously written to the Minister following a request for the views of local authorities on the additional powers that should be provided to local government (and any requirements which are onerous and should be removed). The Council’s feedback is provided again for completeness.

Welsh Library Standards. The detailed indicators included in these standards do not reflect the way the library service is now developing. In the Vale of Glamorgan the introduction of automatic unstaffed opening in addition to staffed opening hours; a development our residents have welcomed, has made indicators which relate to staffing levels in libraries redundant. The 6th framework of Welsh Library Standards 2017 – 2020 fails to recognise unstaffed opening hours, reinforcing outdated

restrictive requirements at a time when innovation such as this should be embraced. Input indicators such as the requirement to achieve 3.6 staff (full time equivalent) per 10,000 of the population are irrelevant. Service quality and outcomes should be the central focus of any performance measurement system. The growth of Community Libraries in the Vale, acting as community hubs highlights the inappropriateness of the current metrics. Working in partnership with the Council, these libraries have been highly successful in widening their service offer to more closely meet the needs of their local community whilst continuing to work within the framework of the current standards. However, certain metrics such as revenue and capital expenditure per 1,000 of the population do not recognise the important contribution these libraries make to achieving improved outcomes. Since the establishment of the first of five Community Libraries 18 months ago, they have attracted £950,000 in development funding which is being used to improve the library buildings yet, this is not recognised as the Council's capital expenditure. Once again, this demonstrates the tenuous link between the input indicators and outcomes. For these reasons we believe that the Welsh Library Standards have outlived their usefulness, are no longer fit for purpose and should be brought to an end.

Waste Recycling. From a waste authority perspective we would like to request an amendment to Section 46 of the Environmental Protection Act 1990. The Act currently gives an authority powers to serve notice on households for the purpose of waste and recycling receptacles and it gives a Waste Disposal Authority (WDA) powers to specify the types of containers that are to be used for collections and for the purpose of waste minimising schemes. However, greater power is required to make households recycle and therefore we request an amendment that reflects this to assist WDAs achieve statutory recycling targets. Additionally, under section 47ZA there would be a requirement for additional powers for authorised officers to issue fixed penalty notices for households failing to recycle.

Automatic Number Plate Recognition (ANPR). Whilst use can be made of ANPR, this is only with barrier controls, which defeats the object. One of the reasons we would want ANPR is to reduce infrastructure costs when compared to barrier control systems. At present a Local Authority can use ANPR but only if a barrier system is in place, this is because the powers available to it under the 1994 and 2004 Acts as regards enforcement require a PCN to be issued by post.

Car Parking Revenue. Currently there are controls as to where revenue can be used and at a time when there is increasing pressure on the budgets of local authorities, we require increased flexibility in how this revenue can be utilised. The relevant statutory reference is Section 55 of the Road Traffic Regulations Act 1984.

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

The Council takes significant issue with the Welsh Government for proposing 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.

Consultation Question 9

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

The Council is supportive in 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”. The Vale of Glamorgan Council believes that 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 Green Paper also indicates that “The consolidation of local authorities would help to provide the capacity to develop innovative and flexible services capable of meeting the needs of the 21st Century”. As outlined above, in order to generate the savings indicated in the Green Paper, there would be significant job losses and this risks removing capacity rather than building it. The process of merger also has the potential to distract elected members and officers from concentrating on opportunities to reconfigure and redesign services as well as distract from progressing collaboration.

There are a number of services where it would be useful to explore shared services. The Council does not believe that these opportunities should be seen as contingent on mergers happening; rather, the external stimulus to consider these opportunities now exists as the local government funding and service provision landscape has changed markedly since early attempts at such collaborative working.

The key facets of shared transactional services should be where a common process is undertaken (notwithstanding existing local policy differences which could be harmonised with agreement of those partners of the service). The Council would consider frontline services to be out of scope and priority given to those processes/ support services which are common across local government (and perhaps the wider public sector). The Council supports Welsh Government’s ideas that digital technology can enable change and reduce the lead time to delivering new services/solutions. This has the added benefit of not necessitating physically shared services by default and a series of national, regional or sub-regional bases could be developed to overcome some of the remoteness that can be experienced with centralised shared services.

The council would consider the following services 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.

b) How might such arrangements be best developed?

In all instances, the Council does 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 to develop these arrangements. Significant energy and experience exists within local government as can be demonstrated through our award winning approach to organisational

development and staff engagement. Councils have well developed change management approaches which, if fostered positively, would be able to work constructively with Welsh Government to deliver reform.

This Council would consider it appropriate that Welsh Government work in partnership with local authorities and the WLGA to develop a shortlist of services for which shared services may be advantageous. The very useful work of the Simpson review and the current landscape of collaboration should inform the priorities for those services operated nationally, regionally or locally.

Where a national arrangement would deliver the most benefit (for example, for relatively small scale services which operate with few policy differences across the country) there would be merit in establishing these arrangements in one comprehensive move. Where a more local connection is required, or where the processing scale is greater, regional/sub-regional arrangements may be the best approach.

Consultation Question 10

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

This Council believes that the proposals as set out are attempting 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 be taken by Welsh Government. Consistency 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 for this Council rejecting the assertion within the Green Paper that powers, freedoms and flexibilities would only be made available as a 'reward' to those Councils who agree to merge, whether the benefits of doing so outweigh the costs or not.

Welsh Government could adopt consistency in its approach to the offer of support, however, the nature of this support should differ to reflect the local circumstances. **Even handed would be a better description of the approach this Council would wish to see.** This could be in the form of funding and other technical/specialist expertise to add capacity to change projects which provide a test-bed opportunity to replicate elsewhere in Wales. The Regional Collaboration Fund (which saw the development of the Regional Shared Regulatory Service) is a good example of this working in practice. In this way, those wishing to merge would be treated consistently, as would those wishing to standalone.

In terms of shared services, it is imperative that, at the outset, there is an agreement as to which services should be delivered in a consistent manner. The role of local democracy is to ensure that local services are delivered to meet local need and this

should underpin any proposals for the future of local government in Wales. This council would welcome the opportunity to have open and constructive dialogue with other authorities, organisations and Welsh Government to develop proposals without this issue being confused with total reorganisation.

As stated previously in this response, there are many examples of shared service arrangements in place which continue to meet local need whilst working on a larger footprint. The experience and knowledge gained from these needs to be drawn together and shared. The Vale of Glamorgan Council is a member of a number of different high performing arrangements and would be happy to share this experience and learning. The facilitation of this learning could be supported by Welsh Government and/or the WLGA.

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

One of 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. Articulated throughout this response is the need to provide flexibility within this arena 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 hardly consistent.

We have set out above that additional funding to support projects which are complementary with the desire to improve resilience and generate financial savings would help further the positive regional and local working that is underway. Developing national approaches (and in some cases, service delivery arms) is supported in principle, with Welsh Government support and funding being essential to take these forward.

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

The priority issue for early resolution for this Council would be for the Cabinet Secretary to announce that this consultation has led to the right decision being made – that is, that Local Government should be supported to provide high quality services in the structure which makes sense locally, and not by national dictat.

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?

As described throughout our submission, this Council takes the view that the larger the organisation is, the more disconnected it is likely to be from the communities we are here to serve. In this way, the Welsh language would be no different and the organisation would be more disconnected from this community (and all others).

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

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.

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.

Please see above.

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?

As described throughout our submission, this Council takes the view that 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.

The CRIA focuses on a positive reflection of what could happen with local authority

reorganisation. Article 12 - When adults are making decisions that affect children, children have the right to say what they think should happen, and to have their opinions taken into account.

Real positives would see a return to Children and Young People's Participation Strategies (not part of a wider participation strategy), this would be welcomed but this would also require WG retaking ownership of this agenda to help take it forward. This would involve a strengthening within WG of actively informed staff who could help rebuild this area of work.

The concept of supporting the strengthening of a voice for young people amongst the body of elected members sounds genuinely positive but would be influenced by the fine detail and what this actually means and how this could be implemented.

On a negative, the Green Paper does not note the deep impact that budget reductions have had on services for children and young people and there has been little national support beyond the Children's Commissioner to help drive the participation agenda forward for young people. This is a vital long-term consideration for the public sector and rails against the Well-being of Future Generations Act in thinking to the longer-term, working collaboratively and involving the communities we are here to serve. Developing larger, more remote services would inevitably result from reorganisation as proposed in the Green Paper. This would reduce the ability of children and young people to become involved and participate in decision making. On a local level the Vale of Glamorgan has supported and maintained an active Youth Council, a Youth Forum and various youth/pupil voice groups and councils. There is little within the document that allows for an opportunity for all these groups of young people to be brought up to date on these plans and consulted in a way that allows a more informed youth mandate to go forward, a weakness would be to use the consultation carried out some years ago.

b) 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. It would be a lost opportunity not to get an accurate and fair view of children and young people, they require information that reflects both the positive and negative positives to allow them an opportunity to construct a view in what is a complex set of hypothetical impacts/savings that may derive from any mergers.

Consultation Question 14

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

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

As described throughout our submission, this Council takes the view that 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.

b) 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.

Consultation Question 15

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

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.

In the same way, the proposals are not supported by any hard evidence. Great play is made of flexibilities and additional powers, but there is no detail or content on this issue.

In the same way, 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 and local government has significantly 'upped the pace' in this regard in recent years. The Green Paper ignores this point.

Evidence has provided that 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. We have also referred to our transformation programme, 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 we have invested time in engaging with our staff and our communities, something that would be put at significant risk as a result of the latest proposals.

It is also noteworthy that all this has been possible, despite an extremely disadvantageous settlement from Welsh Government, 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 Welsh Government funds local government to ensure more consistency and fairness to all.

The distraction, cost and upheaval involved in restructuring local government would 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 surround 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, this response has been agreed by the Council's Cabinet and has been framed following a full member briefing. It has also been scrutinised by the Council's Corporate Performance and Resources Committee. The content of the response reflects this process.