

## 1. ANNEX TWO: Consultation Questions - response by 11<sup>th</sup> April

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### SECTION 2

Consultation Question 1. (Para 2.2.1):  
The Welsh Government believes that it appropriate to consider 'tests' to frame thinking around regional working.

a) Do you think the 'tests' set out are helpful in guiding thinking?

ALTHOUGH HELPFUL TESTS THE RESPONDANT IS OF THE VIEW THAT SERVICES SHOULD BE DELIVERED EITHER REGIONALLY OR VIA COUNTY COUNCILS AS A WHOLE AND NOT IN PARTS OR FOR DIFFERENT SERVICE DELIVERY.

b) Are there other tests or considerations that might also be used?

THOSE IDENTIFIED ARE ADEQUATE.

Consultation Question 2. (Para 2.3.35):  
In this White Paper the Welsh Government has set out a number of areas which it believes should be required to be delivered on a regional basis.

a) Do you agree that these areas should be delivered regionally?

IF SERVICES ARE TO BE DELIVERED IN REGIONS THEY SHOULD BE THE SAME FOR EACH SERVICE (FOR TO COMPLICATED AS PROPOSED.

IF THERE ARE TO BE REGIONS WHY IS THERE A NEED TO RETAIN COUNTY COUNCILS.

IT APPEARS THIS IS JUST ANOTHER EXPENSIVE LEVEL OF GOVERNMENT IN A COUNTY OF ONLY 3 MILLION PEOPLE. (LESS THAN BIRMINGHAM)

b) What practical considerations should we consider in taking these proposals forward?

ANY NEW ARRANGEMENTS SHOULD BE SIMPLE FOR THE PUBLIC TO UNDERSTAND.

CONSIDERATION SHOULD ALSO BE GIVEN TO ENSURING THAT LINES OF COMMUNICATION ARE CLEAR FOR EACH SERVICE DELIVERY.

c) What other 'ancillary' powers would be required to ensure the effective exercise of the functions exercised regionally?

NO COMMENT.

Consultation Question 3. (Para 2.3.43):  
In this White Paper the Welsh Government has set out a number of areas which it believes could also be delivered on a regional basis.

a) Do you think that Local Authorities should also be required to work regionally to deliver these functions?

**EITHER THERE SHOULD BE REGIONS OR COUNTIES – NOT BOTH**

b) Are there any other practical considerations we should be aware of?

**THE PRACTICAL CONSIDERATIONS ARE AROUND DELIVERY AND HOW EFFECTIVE IT WOULD BE UNDER THE NEW ARRANGEMENTS.**

**AT PRESENT A LOT OF THE SERVICES ARE NOT WORKING WELL AND WORKING RELATIONSHIPS BETWEEN COUNTIES AND LOCAL COUNCILS IS OFTEN STRESSED.**

Consultation Question 4. (Para 2.3.43):  
Are there any other functions that would benefit from a systematic approach to regional working?

**THERE IS ONLY A BENEFIT IF THERE ARE REGIONS OR COUNTIES. BOTH WILL ONLY CAUSE CONFUSION. THE LARGER THE AUTHORITY THE LESS EFFECTIVE THEY APPEAR TO BE.**

Consultation Question 5. (Para 2.3.43):  
Welsh Government believes that, subject to engagement with local government and other partners, there should be flexibility to enable Welsh Ministers to mandate additional functions to be undertaken regionally.

Do you agree or disagree? Why?

**THERE IS ONLY A BENEFIT IF THERE ARE REGIONS OR COUNTIES. BOTH WILL ONLY CAUSE CONFUSION. THE LARGER THE AUTHORITY THE LESS EFFECTIVE THEY APPEAR TO BE.**

**ANY BENEFITS IDENTIFIED ON PAPER FOR ANYTHING DIFFERENT WILL NOT (IN OUR VIEW) WORK AND WILL MAKE LOCAL GOVERNMENT EVEN MORE UNWEILDY.**

Consultation Question 6. (Para 2.3.44):  
The Welsh Government believes that the new arrangements should not prevent Local Authorities using their existing powers to undertake additional functions regionally.

Do you agree or disagree? Why?

**THERE IS ONLY A BENEFIT IF THERE ARE REGIONS OR COUNTIES. BOTH WILL ONLY CAUSE CONFUSION. THE LARGER THE AUTHORITY THE LESS EFFECTIVE THEY APPEAR TO BE**

Consultation Question 7. (Para 2.4.16):

The Welsh Government believes that some back office and transactional services ought to be organised and delivered regionally or nationally.

Which services do you believe could best be organised and delivered these ways?

**IN OUR VIEW IT IS ALL OR NOTHING. EITHER IT ALL GOES REGIONAL OR IT STAYS AT COUNTY COUNCIL LEVEL.**

Consultation Question 8. (Para 2.4.16):

The Welsh Government believes that overcoming data sharing issues is key to taking forward greater regional working of back office functions.

a) What legislative obstacles have made progress on sharing services difficult?

**SHARING SERVICES IS DIFFICULT – LARGER WORKING ARRANGEMENTS HAVE NOT PROVED SUCCESSFUL TO DATE – IN FACT THEY MAKE THINGS LESS EFFICIENT AND OUT OF TOUCH WITH THOSE LIVING IN THE AREAS THEY SERVE.**

b) How have they been or could they be overcome?

**THERE IS ONLY A BENEFIT IF THERE ARE REGIONS OR COUNTIES. BOTH WILL ONLY CAUSE CONFUSION.**

c) What challenges does data sharing pose?

**SECURITY AND PRIVACY ARE TWO ISSUES, HOWEVER WITH TECHNOLOGY TODAY THIS SHOULD NOT BE INSURMOUNTABLE.**

Consultation Question 9. (Para 2.4.16):

The Welsh Government believes sharing more back office functions would be helpful. There are a number of options:

- Enable the NHS Wales Shared Service Partnership for providing services to local government (and others)
- Establish a similar model to provide back office services to local government (and others).
- Establish an alternative model to provide back office services to local government (and others).

a) Which do you believe would be most appropriate to best support regional working? Why?

**THERE IS CONCERN THAT SYSTEMS ARE NOT COMPATIBLE WITH EACH OTHER, AS HAS BEEN THE CASE IN MANY INSTANCES TO DATE.**

**WHERE PEOPLES HEALTH IS CONCERNED THIS A DANGER IN OUR VIEW.**

b) What other alternative models could work effectively and what steps could the Welsh Ministers take to enable or encourage local government-led alternative models to be implemented?

**LOCAL DELIVERY IS BEST AT ALL LEVELS.**

**WE WOULD SUGGEST THAT WELSH GOVERNMENT DEALS WITH OVERALL SERVICES AND THAT LOCAL COUNCILS RETURN TO THE 1974 BOROUGH BASIS FOR DELIVERY LOCALLY.**

Consultation Question 10. (Para 2.4.21):

The Welsh Government believes that joint understanding and planning of public sector assets is essential to maximize their impact and that this requires regional mapping of estates assets and future intentions .

a) How can this joint governance and decision making best be achieved?

**LOCAL KNOWLEDGE IS EVERYTHING. IT SHOULD NOT BE DIFFICULT FOR COUNCILS THROUGH TERRIER SHEETS TO IDENTIFY ASSETS. HOWEVER THERE ARE COUNCILS WHO DO NOT HAVE ADEQUATE RECORDS.**

b) Is the larger economic footprint the right one?

**LARGE IS NOT BEAUTIFUL. ANYTHING WHICH TAKES AWAY LOCALISM IS NOT WELCOMED.**

Consultation Question 11. (Para 2.5.16):

The Welsh Government believes a strengthened joint committee (a 'Joint Governance Committee') offers an appropriate governance model for regionally delivered services and intends to set out a framework for local government to use to deliver this.

a) What should the democratic accountability and scrutiny arrangements be for such a model?

**THERE SHOULD BE ONE AUTHORITY BELOW WELSH GOVERNMENT NOT TWO. EITHER THE REGIONS OR THE COUNTY COUNCILS. THE ELECTORATE SHOULD VOTE DIRECTLY MEMBERST TO THEIR SEATS.**

b) Should each participating Local Authority have equal voting rights or should they be weighted in some way?

**AN APPOINTMENTS TO SUCH JOINT COMMITTEES SHOULD BE VIA ELECTION ON A NUMBER OF ELECTORATE BASIS.**

Consultation Question 12. (Para 2.6.5):

The Welsh Government believes that in order to put in place arrangements which reduce complexity for Authorities and their partners the position for Bridgend needs to be considered. Although Bridgend is fundamentally concerned in this, other partners including other Local Authorities and the Local Health Boards also have valid interests. We are therefore seeking views on how best to address the issues set out here.

ALL GOVERNMENT METHODS ARE BECOMING FAR TO COMPLICATED AND THIS HAS LED TO A BREAKDOWN OF SERVICE DELIVERY. IT ALL NEEDS TO BE SIMPLIFIED. ON PAPER THE BRIDGEND MODEL WORKS, IN PRACTISE IT IS COMPLICATED AND HAS HAD LIMITED SUCCESS.

Consultation Question 13. (Para 2.7.9):

The Welsh Government believes that 'Option3: A framework and a Footprint' is the most appropriate model for future regional working.

a) What are your thoughts on the proposed mandatory economic development footprint for 'Joint Governance Committees'?

ECONOMIIC DELIVERY CAN BE ACHIEVED BY WITH REGIONAL WORKING OR COUNTY COUNCIL WORKING BUT NOT THROUGH A COMBINATION OF BOTH. THERE IS A LACK OF BUSINESS UNDERSTANDING WITHIN THE WORKINGS OF AUTHORITIES REGARDING ECONOMIC DEVELOPMENT.

b) How could a framework approach for sub-regional working in other services areas operate in practice?

THIS MAKES IT EVEN WORSE. THE VIEW HELD BY THE RESPONDANT IS THAT EITHER REGIONS OR COUNTY COUNCILS MIGHT WORK, SUB REGIONS MAKE IT EVEN MORE COMPLICATED THAN IT NEEDS TO BE. IT HAS BEEN PROVEN THAT THE MORE COMPLICATED THINGS ARE MADE THE LESS EFFECTIVE THEY ARE.

c) Is it appropriate for there to be flexibility for regional working to cross economic development boundaries in exceptional circumstances? Which circumstances would they be?

NO – THE REGIONS SHOULD BE DEVELOPED AS SPECIFIC AREAS AND NOT DIFFERENT AREAS FOR DIFFERENT SERVICES.

d) How should the governance arrangements at the mandatory economic development 'Joint Governance Committees' have oversight of sub regional working?

WE DO NOT AGREE WITH SUB REGIONAL WORKING.

Consultation Question 14. (Para 2.7.9):

The Welsh Government are seeking views on the appropriateness of seeking powers to create a Combined Authority, in particular, comments on what minimum expectations there should be in considering the appropriateness of creating a Combined Authority would be welcomed.

**ANY APPROPRIATENESS OF COMBINING AUTHORITIES SHOULD BE MADE BY THE AUTHORITIES NOT BY WELSH GOVERNMENT.**

Consultation Question 15. (Para 2.8.7):

The Welsh Government believes that a mandatory financial framework should be developed to ensure the expenditure of each 'Joint Governance Committee' is met through pooled contributions from the constituent Local Authorities.

a) Should the expenditure of 'Joint Governance Committees' be met by constituent Local Authorities, in proportions to be agreed locally, to ensure the most flexible approach?

**THE COUNCIL TAX AND BUSINESS RATE PAYER WOULD FEEL THAT ANY MORE MONEY SPENT ON ADMINISTRATION IS UNACCEPTABLE.**

**THERE IS A BETTER CHANCE OF IMPROVED SERVICES AT LESS COST IF THINGS ARE MADE SIMPLE – THE COMPLICATED WAY THINGS ARE APPROACHED AT PRESENT, AND AS PROPOSED, IS NOT LIKELY TO BRING IMPROVEMENTS OR ANY COST BENEFITS.**

b) Should the framework provide for a default position if local agreement cannot be reached, and how such a process might be triggered?

**THIS QUESTION ALMOST ADMITS THAT WHAT IS PROPOSED DOES NOT HAVE MUCH CHANCE OF WORKING. WITH SERVICE DELIVERY BEING EITHER REGIONAL OR COUNTY LEAD (NOT BOTH) THEN THIS WOULD NOT APPLY.**

c) What further considerations might relate to, or need to be included in, a financial framework?

**NONE.**

Consultation Question 16. (Para 2.10.7):

The Welsh Government believes that to support organisations to move to a more consistent and regional approach to delivering services it will be necessary to issue statutory guidance where there is an identified need.

Do you agree or disagree? If you agree, what types of advice, guidance and support on leadership and workforce matters might lead to greater local, regional and national consistency?

**GUIDANCE TO GIVE CONSISTANCY IS ESSENTIAL.  
SIMPLE METHODS OF MANAGEMENT ARE NEEDED WITH LESS  
COMPLICATED SYSTEMS WHICH DO NOT LEAD TO BETTER DELIVERY.**

Consultation Question 17. (Para 2.11.4):

The Welsh Government believes it would be helpful if Public Services Boards could collaborate or merge across Local Health Board Boundaries.

Do you agree or disagree? Why?

**AGREE BUT - CLEAR GUIDANCE WHICH GIVES CONSISTANCY IS  
ESSENTIAL.  
MERGING AUTHORITIES IS NOT ACCEPTED AS GOOD PRACTICE,  
SERVICES BEING DELIVERED LOCALLY IS BETTER PRACTICE.**

Consultation Question 18. (Para 2.11.4):

The Welsh Government believes Public Services Boards should be allowed to de-merge as well as merge. Do you agree or disagree? Why?

**DISAGREED - JUST MORE COMPLICATION.**

### SECTION 3

Consultation Question 19. (Para 3.1.7):

The Welsh Government would welcome comments on what minimum expectations there should be in considering the appropriateness of voluntary merger.

**IF LOCAL COUNCILS WISH TO MERGE THEY SHOULD BE ALLOWED TO DO  
SO. THEY KNOW THEIR AREAS BETTER THAN ANYONE AND WELSH  
GOVERNMENT SHOULD ACCEPT THEIR VIEWPOINT.**

### SECTION 4

Consultation Question 20. (Para 4.2.3):

The Welsh Government would welcome comments on any of the proposals set out previously in the draft Local Government Bill and associated consultation paper, Annex One refers.

Consultation Question 21. (Para 4.3.8):  
The Welsh Government believes that Part 1 of the Local Government (Wales) Measure 2009 should be repealed for all 'Improvement Authorities'.

Do you agree? Why?

**YES – IT WOULD BECOME OF LITTLE IMPORTANCE IF THE PROPOSALS IN THE WHITE PAPER ARE ADOPTED.**

## SECTION 5

Consultation Question 22. (Para 5.2.8):  
The Welsh Government believes there should be minimum expectations on Councillors for interacting with their local constituents.

Do you agree or disagree? If so, what should these minimum expectations be?

**AGREE - THIS IS GOOD PRACTISE. MINIMUM EXPECTATIONS SHOULD BE INFORMATION ON WEB SITES, TIME FOR PUBLIC IS ASK QUESTIONS AT ALL MEETINGS (EITHER BEFORE OR DURING)**

Consultation Question 23. (Para 5.3.2):  
The Welsh Government believes it could be helpful to make some minor changes to existing area committee legislation to increase their flexibility.

What do you believe these changes should be?

**NO COMMENT.**

Consultation Question 24. (Para 5.4.3):  
The requirement for Local Authorities to work on a regional basis will require Councillors, the Local Authority and employees to balance the responsibilities they have to their local area, with those for the larger region.

How best could this be achieved?

**FROM CURRENT OBSERVATIONS THIS IS NOT LIKELY TO HAPPEN. THIS QUESTION UNDERLINES THE SUGGESTION OF EITHER REGIONS OR COUNTIES – NOT BOTH.**

Consultation Question 25. (Para 5.5.4):  
The Welsh Government intends to make a return to a form of the committee system available to Local Authorities where it best meets local circumstances.

How would this option best work within the context of the proposals for new regional arrangements?

**THIS IS A MUCH BETTER WAY FORWARD AND IS MORE REPRESENTATIVE. THE CABINET SYSTEM MADE MOST COUNCILLORS IRRELEVANT. WHETHER A REGIONAL OR COUNTY BASED AUTHORITY IS ADOPTED, THE COMMITTEE SYSTEM IS STILL BETTER.**



Consultation Question 26. (Para 5.6.4):

The Welsh Government believes it may be appropriate to limit future designation of relevant statutory Senior Officer posts to a regional level where the functions are being delivered regionally.

Do you believe this is appropriate? Why? If so, how might this best be delivered?

**THIS SHOULD NOT BE RELEVANT – YOU DO NOT NEED MORE SENIOR OFFICERS – WITH REGIONS OR COUNTIES THIS QUESTION WOULD NOT APPLY.**

## SECTION 6

Consultation Question 27. (Para 6.1.7):

The Welsh Government believes there are things that can be done now to help build resilience and renewal in the sector in the short to medium term and would welcome comments on the list of actions at paragraph 6.1.6. Views on any other actions which could be taken are also welcomed

**THE GENERAL PRINCIPLE IS WELCOMED.**

**THE GENERAL POWER OF COMPETANCE IS WELL RECEIVED.**

**TRAINING NEEDS SHOULD BE ASSESSED BY TOWN AND COMMUNITY COUNCILS DEPENDING UPON THEIR NEEDS AND SHOULD ARRANGE THEIR OWN TRAINING WITH THE PRINCIPAL AUTHORITIES THERE TO HELP ON REQUEST.**

**THE TRAINING OFFERED BY THE PRINCIPAL AUTHORITIES IS OFTEN TOO COMPLICATED AND THAT OFFERED BY ONE VOICE WALES IS OFTEN CANCELLED.**

## SECTION 7 & General Questions

Consultation Question 28. (Para 7.1.14):

The Welsh Government is seeking initial views on all of the proposals set out in Chapter 7 on elections and voting.

**VOTING IN ELECTIONS NEEDS TO BE CLEARLY UNDERSTOOD BY THE ELECTORATE – FIRST PAST THE POST IS EASY – TRANSFERABLE VOTES IS NOT.**

Consultation Question 29. (Para 7.1.14):

The Welsh Government would welcome any views on the potential financial and non-financial benefits and costs associated with the proposals in the White Paper.

**THE COSTS OF ELECTIONS ARE UNLIKELY TO BE A LOT DIFFERENT WHATEVER METHOD IS USED.**

Consultation Question 30. (Para 7.1.14):

The Welsh Language Impact Assessment published alongside the White Paper outlines the Welsh Government's view of the effect of the proposals contained in the White Paper on the opportunities for people to use the Welsh language and treating the Welsh language no less favourably than the English language. The Welsh Government seeks views on that assessment.

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

**THERE NEEDS TO BE A BALANCE WITH REGARD TO WELSH LANGUAGE. THE CULTURE IS IMPORTANT BUT TO PRINT EVERYTHING IN BOTH LANGUAGES IS COSTLY AND WASTEFUL. AUTHORITIES SHOULD BE ABLE TO ISSUE INFORMATION IN BOTH LANGUAGES IN QUANTITIES THAT ARE NEEDED TO GIVE PEOPLE CHOICE.**

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

**SEE ABOVE.**

Consultation Question 31. (Para 7.1.14):

The Children's Rights Impact Assessment published alongside the White Paper outlines the Welsh Government's view of the effect of the proposals contained in the White Paper on children and young people. The Welsh Government seeks views on that assessment.

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

**SHOULD NOT BE RELEVANT – ALL SHOULD BE TREATED EQUAL AND NOT ONE GROUP OVER ANOTHER. ALL SHOULD BE CATERED FOR – NOT SEPARATED OUT.**

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

**SHOULD NOT BE RELEVANT – ALL SHOULD BE TREATED EQUAL AND NOT ONE GROUP OVER ANOTHER.**

Consultation Question 32. (Para 7.1.14):

The Equalities Impact Assessment published alongside the White Paper outlines the Welsh Government's view of the effect of the proposals contained in the White Paper 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?

**SHOULD NOT BE RELEVANT – ALL SHOULD BE TREATED EQUAL AND NOT ONE GROUP OVER ANOTHER.**

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

SHOULD NOT BE RELEVANT – ALL SHOULD BE TREATED EQUAL AND NOT ONE GROUP OVER ANOTHER.

Consultation Question 33. (Para 7.1.14):

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

COMPLICATED – NOT SURE THAT A LOT OF WHAT IS PROPOSED WILL AID A BETTER OR MORE ECONOMICAL DELIVERY OF SERVICES.

RE-STATING THE ABOVE – THE SERVICES SHOULD BE ADMINISTERED EITHER REGIONALLY OR VIA COUNTIES – NOT BOTH.

THE CONSULTATION RESPONSE SHEET IS TYPICAL GOVERNMENT, DIFFICULT TO ANSWER THE QUESTIONS AND THE QUESTIONS ARE LEADING THE RESPONDANTS TO PARTICULAR CONCLUSIONS.

THE PROPOSALS TAKE LOCAL GOVERNMENT EVEN FURTHER AWAY FROM THE PUBLIC AND GIVE EVEN LESS CHANCE FOR LOCAL PEOPLE TO MAKE LOCAL DECISIONS FOR THEIR COMMUNITY.

THE PROCESS OF LOCAL GOVERNMENT RE-ORGANISATION HAS COST THE TAXPAYER A LOT OF MONEY TO DATE ONLY TO FIND PROPOSALS TORN UP AND IT ALL STARTS AGAIN. NOT A GOOD USE OF PUBLIC MONEY WHEN SO MANY FAMILIES ARE STRUGGLING TO KEEP THEIR HOUSEHOLDS TOGETHER FINANCIALLY ALREADY.