

NORTH AND MID WALES ASSOCIATION OF LOCAL COUNCILS

BOUNDARY COMMISSION RESPONSE CHART - 1

NO	QUESTION	LLANDUDNO	WELSHPOOL	ABERGELE	CAERWYS
1	<i>The combining of Town and Community Councils either by clustering or enlarging by a numerical method. Is a set number of electorate in each Council area + or – 5%</i>	<i>A simple mathematical formula will not work where there are larger Town Councils which have a population of more than the suggested 12,500, unless they are exempt from the proposal. If these Councils are split into smaller units the effect will be to have more Town Councils. Combining rural communities to create 'common councils' could be affected geographical and cultural differences, creating local difficulties in providing a common service.</i>	<i>The various Town and Community Councils across Montgomeryshire are very different, some semi-urban and some very rural. Numbers do not work as the only guideline and there needs to be flexibility in the approach of combining or enlarging such communities.</i>	For the Abergele area the wards of Gele, Pentre Mawr, Pensarn, and Llanddulas. Numerical Method, based on historic boundary 1935 – 1983. Population 11,987	In rural community council areas any change to boundaries based upon numbers of electorate/population would be impracticable due to a resultant increase in size of geographic areas. With any proposed reduction in the number of town/community councils there would be an associated and significant loss of councillors. In turn, this would result in the increase of workloads and time for councillors due to the reduction of their numbers. It should also be borne in mind that at town and community council level a town/community councillor's job is an unpaid position. The impact of increased workloads and time required to be spent on council work would impinge on domestic life and work and discourage people when considering standing as a councillor at election time. This is also a potential deterrent when attempting to encourage persons from the younger generation to participate in local government. The practicalities of canvassing in enlarged rural community areas based upon an electorate/ population of 12,500 (+ or -5%) would also be a prohibitive task.
2	<i>The combining of Town and Community Councils by joining together wards rather than areas.</i>	<i>This again takes a simplistic view of combinations. Where town wards are combined with adjacent rural wards, there could be a clash of aspirations.</i>	<i>The joining of wards together as a general principle is accepted. However, cultures and local ties need to be considered when combining wards.</i>	The wards of Abergele, Llanddulas, Betws yn Rhos, Llanfairtalheuan. Historically these were wards joined together forming the old Abergele area till 1983. Population 13,050	Only appropriate if in close proximity to each other and the ward councillors are retained rather than reduced. Consideration must be given to preventing loss of affinity with a community/place when amalgamating wards from other communities with larger councils.

3	<i>The effect on Council Tax of the new Councils – ie Councils with a higher tax may see it fall and those with a lower tax see it rise.</i>	<i>The precept could be levelled out to the detriment of the rural communities. Perhaps there could be a formula which could address this situation.</i>	<i>The smaller Councils will see their Council Tax rise and the larger Councils will see theirs reduce under a single Common Council. However, there is an argument that if Local Councils are to delivery more services (that have traditionally been provided by the Principle Councils) that at the present time they are getting services at the cost of the larger Communities.</i>	It will probably be inevitable that the smaller Community Councils will see an increase in their precept and the larger councils will see a decrease, based on the capacity of the new council, but the Communities will/do access the services of the area and this would need to be funded.	This is an issue that will have to be dealt with great care as it has the ability to generate friction amongst the electorate and will have to be resolved in an atmosphere of openness and transparency. Perhaps re-banding of properties across all of Wales would need to be considered?
4	<i>The representation on the new Councils. 2/3 of the existing Council seats may disappear once Councils are combined or enlarged.</i>	<i>There could be difficulties if duties are introduced in place of powers as the reduced membership will increase the workload on fewer people.</i>	<i>The representation on larger Councils will be less per electorate. There will need to be provision for local forums so that the Councillors relationship with the public is maintained.</i>	It is probably inevitable that there would be a decrease in the number of councillors in order for the Council to be of a manageable size and individual councillors will be responsible for a greater number of the population.	Any significant loss of town/community council seats would be detrimental due to the electorate relating to local people they know and trust to represent them. There would be the potential for people to feel disenfranchised by being unable to relate to a person not known to them and having no local knowledge or aware of local issues.
5	<i>Any issues with combining a Town with smaller Communities around it.</i>	<i>See 4 above. It could also cause resentment with the smaller communities feeling left out of grant schemes, yet paying more tax.</i>	<i>The issues surrounding combining larger and smaller communities not only revolve around levelling of Council Tax but also the need to ensure each local centre has attention.</i>	A loss of its Welsh identity for the small welsh speaking council if it is joined with a mainly English speaking wards, this can occur in areas where they have a high population of retirement to an area or migration.	Has the potential for larger councils to dominate smaller councils amalgamated with them in addition for councils to become more politicised and having to follow party lines.
6	<i>Any issues around what duties might be passed onto the new Councils which are only powers at this time.</i>	<i>In Llandudno's Council case, Conway Council are already off-loading various powers owing to funding issues. We have a choice as to whether we take them or not. If extra duties are passed to Town Councils with reduced members, it will increase the burden on them There would be extra work for Clerks and their staff. Clerks would have to have a wider range of qualifications and/or have specialist staff.</i>	<i>There needs to be clarity as to the duties of any new Common Councils. If there are to be more duties (which were formally with the Principle Authority) then the reserves and funding for that service should also be passed to the new Common Council.</i>	Town Councils must be mindful that they ensure that they have the power to take over any facilities offered from the County Council and that Legal, Financial; Health & Safety matters are considered.	Lack of experience within small community councils who, when amalgamated, would have to take on duties necessitating in employing full time staff and finding funding for duties previously undertaken by principal councils. Such funding will be difficult to obtain as a result of the continuing erosion of services and facilities provided by principal authorities due to financial cut backs.

7	<p><i>Any issues around culture or links between communities which maybe combined or enlarged.</i></p>	<p><i>Where the new Council covers a large area, (to make up the 12,500 population suggested) there could be some distance between boundaries and communities. It would be necessary to ensure that the cultural/attitude differences are addressed at the outset to ensure amicable working and socialisation across the Council area. Care must be taken about the positioning of the administrative centre, which may not be geographically central.</i></p>	<p><i>The issues of culture and links between Communities include:</i></p> <ul style="list-style-type: none"> <i>i) Welsh Language (border towns are more English then rural towns)</i> <i>ii) Common interests.</i> 	<p>Language and Culture of an area would and should be considered.</p>	<p>The main issue would be further dilution of the Welsh language/culture as an outcome of amalgamation of town and community councils located nearest to the national border and would pose the greatest threat. Welsh speaking councillors in these areas are in the minority and any reduction would be a great loss both to the language and local communities.</p>
8	<p><i>Any other views or issues you wish to pass on.</i></p>		<p><i>The remaining issues that need to be considered are:</i></p> <ul style="list-style-type: none"> <i>i) The need for suitably qualified Town Clerks (not just CILCA but management experience)</i> <i>ii) Funding for any new services including reserves.</i> <i>iii) Governance.</i> <i>iv) On transfer of services taking on Principle Council Staff on the generous terms and conditions is not affordable to a Local Council if they are to deliver services within a reasonable cost plan.</i> 	<p>In order to be a council with competence, all Councils will require having a qualified Clerk. Assets of the Councils would need to be retained by the local committee.</p>	<p>Any proposal resulting in the reduction of town and community councils and their councillors is not sustainable and will result in the erosion of democratic representation at the bottom tier of local government.</p>

NORTH AND MID WALES ASSOCIATION OF LOCAL COUNCILS

BOUNDARY COMMISSION RESPONSE CHART - 2

NO	QUESTION	LLANFAIR CAEREINION	MENAI BRIDGE	HAYWARDEN	BANGOR
1	<i>The combining of Town and Community Councils either by clustering or enlarging by a numerical method. Is a set number of electorate in each Council area + or – 5%</i>	<i>The proposal would create too larger areas which would be diverse in their needs to effectively administered.</i>	<i>We would favour clustering with reference to existing socio-geographical relationships, e.g. Town Councils and neighbouring community councils that to some extent already constitute a “catchment” for schools, libraries, shops, etc.</i>	<p>Firstly there is a difference with “Towns” and “Communities” both in relation to the governance and civic arrangements and town centre management etc. There is also a massive divide between rural and urban communities.</p> <p>In principle, the merging of outlying communities/villages with larger towns would seem practical (based on electorate size) but the capacity of the Town Clerks will be severely pressured and the community identities of the surrounding villages will inevitably be lost and subsumed under the principle “town” and the urban/rural divide.</p> <p>Some Community Councils already operate on a collaborative basis. For instance, the Clerk to Broughton and Bretton Community Council is also the Clerk to Hawarden Community Council and has a Service Legal Agreement for a joint maintenance service for play areas, street lighting and open spaces etc. with a further neighbouring Council. This arrangement works well and could be mirrored!</p>	<p>No reduction.</p> <p>Enlarging using only electorate not population.</p> <p>Increase of 5% + is acceptable</p>
2	<i>The combining of Town and Community Councils by joining together wards rather than areas.</i>	<i>The above concerns apply to this item.</i>	<i>It would be a neat arrangement if such clusters of T & C could be coterminous with Principal Council wards but if these are to change to reflect a reduction in the number of unitary authorities that might prove untenable in practice.</i>	<p>As above but with added political differences; these mergers could result in social deprivation imbalances which could be detrimental to each community.</p>	<p>This is preferable as wards can be merged easily and can have more affinity than complete areas.</p>

3	<p><i>The effect on Council Tax of the new Councils – ie Councils with a higher tax may see it fall and those with a lower tax see it rise.</i></p>	<p><i>This would create inequality in Council Tax levels.</i></p>	<p><i>If there were to be “winners and losers” then the challenge for new Councils would be to deal with potential cross-subsidy so that different communities do not feel unfairly treated. It is noted that current precepting can already reflect all kinds of local idiosyncrasies and historical overhang from the 1974 LG reorganisation. A key factor could be what the statutory duties of new Councils might turn out to be. A reinvention of quasi UDCs with wide statutory duties and powers would one thing: an amalgamation (on the current basis of permissive “powers”) between, say, a town with a large estate inherited from 1974 to maintain, and surrounding small CCs with little to precept for quite another.</i></p>	<p>This is inevitable. Welsh Government should be encouraged to provide financial assistance where this is the case; it would not be “fair” for the local communities to bear the cost of this, particularly in the early years!</p>	<p>Yes this is acceptable equalising costs, as City rates are higher at present given the additional service provision</p>
4	<p><i>The representation on the new Councils. 2/3 of the existing Council seats may disappear once Councils are combined or enlarged.</i></p>	<p><i>The new Councils will create too much work for Councillors and Staff and democracy would be undermined.</i></p>	<p><i>Like most others in North West Wales our Council currently has a very weak democratic mandate. The last contested election was in 1982 and with one exception our Members are co-opted or elected unopposed and the relationship between Members and their ostensible electorates therefore rather tenuous. A reduction in the number of seats available could stimulate better democratic engagement - especially if different communities in the new Council areas were keen to ensure that their voices was heard (see 3 above). Members for expanded Council areas would need to come to the role perhaps with a different mind-set and expectations of the scale of the commitment involved than might be the case in many types of Council at present. Thus, ultimately raw numbers may not be the real issue: we have 15 Members but still sometimes struggle to meet quorum requirements.</i></p>	<p>This is stating the obvious and inevitable; again loss of local community identity will be the issue here. Currently Community Councillors are personally “known” within their wards and easily approachable. This is likely to be lost with any merger of larger areas in whatever form.</p>	<p>Inevitable that there will be loss of seats many in rural or low populated areas. Higher populated areas will lose less</p>
5	<p><i>Any issues with combining a Town with smaller Communities around it.</i></p>	<p><i>The needs of such diverse communities would not be met.</i></p>	<p>See 3 above.</p>	<p>As in 1 above.</p>	<p>No - this is a likely effect of the review.</p>

6	<i>Any issues around what duties might be passed onto the new Councils which are only powers at this time.</i>	<i>Complex new legislation may be needed to achieve this.</i>	<i>See 3 & 4 above.</i>	Depends on the extent of the changes. There is already concern from some Clerks around current capacity, knowledge and experience. Contrary to this, it would also enhance some Clerk roles!	Yes impact on finance and resources, also the ability to provide certain services due to lack of knowledge and skillsets
7	<i>Any issues around culture or links between communities which maybe combined or enlarged.</i>	<i>Being an English/Welsh border community this could lead to exclusion or discrimination of one or more of the languages and cultures.</i>	<i>See 1 above: that may express a somewhat simplistic view of how all communities currently relate but would make recognisable sense in our own situation. We would assume that councils coming together would already have addressed issues of language/culture, diversity and inclusiveness, etc. etc. in the policies and practices they are already required to have in place. Given that these should all derive from the same legal framework we think it ought to be relatively easy to reconcile them.</i>	As above, any merger seriously jeopardises the community profile both for Elected Members and the electorate; loss of community identify, social profiles, deprivation etc.	A rural/urban mix may encounter some cultural and language differences
8	<i>Any other views or issues you wish to pass on.</i>	<i>None</i>	<i>Only that we would welcome the clearest possible information about government's intentions as soon as possible!</i>	The cost of re-organisation! Full-time Clerks could be the initial focus; there are a lot of part-time Clerks for small villages so maybe any initial focus should be on these smaller areas but at the same time recognising and respecting local community identities, politics, social deprivation etc.	Bangor City Councils existing boundaries need extending to bring in the bit of the city outside including new developments straddling the borders and the hospital which falls outside the boundary. Ie Bangor hospital is not in Bangor!

NORTH AND MID WALES ASSOCIATION OF LOCAL COUNCILS

BOUNDARY COMMISSION RESPONSE CHART - 3

NO	QUESTION	LLANDRINO & ARDLEEN	LLANDYSILIO	COLWYN
1	<i>The combining of Town and Community Councils either by clustering or enlarging by a numerical method. Is a set number of electorate in each Council area + or – 5%</i>	<i>Numerical method does not work in sparsely populated rural areas</i>	<i>Numerical method does not work in sparsely populated rural areas</i>	We have seen the advantages of a ‘common council’ type of arrangement in the Bay of Colwyn Area. The Town Council was formed following the last local government re-organisation in 1996 and it covers the separately identifiable and distinct communities of Old Colwyn, Colwyn Bay, Upper Colwyn Bay and Rhos on Sea. It works because these communities are in very close proximity to each other and, although each has its own ‘centre’, they share lots in common. One of the main advantages is that we can share the administrative costs of running the Town Council across a wider area, whilst local Ward members are encouraged to work closely together for the benefit of their own and the wider community. We would not like to see clustering arrangements based purely on a numerical method (e.g. electorate numbers) – not just because we already have a much higher electorate than that being proposed, but because community identity is hugely important and a one size fits all approach should not be used. We understand the democratic importance of relatively even councillor/elector ratios within each council, but cannot see the need for a prescribed one size of council determined by electorate numbers only – there are many more important factors which need to be taken into consideration.
2	<i>The combining of Town and Community Councils by joining together wards rather than areas.</i>	<i>Better to join rural councils together rather than with the nearest town</i>	<i>Better to join rural councils together rather than with the nearest town</i>	We already have six Wards in our Town Council area and this works well. We are not sure what the difference is between combining ‘areas’ and combining ‘wards’ – presumably wards cannot/will not be split either way?
3	<i>The effect on Council Tax of the new Councils – ie Councils with a higher tax may see it fall and those with a lower tax see it rise.</i>	<i>By keeping rural councils clustered together the difference in council tax would not be as significant as if they joined with a Town Council.</i>	<i>By keeping rural councils clustered together the difference in council tax would not be as significant as if they joined with a Town Council.</i>	We note that any clustering / mergers would inevitably have an impact on the local precept. This is unavoidable. However, the £ impact is relatively low.
4	<i>The representation on the new Councils. 2/3 of the existing Council seats may disappear once Councils are combined or enlarged.</i>	<i>Allowance should be made for the rural nature of Powys and more councils allowed.</i>	<i>Allowance should be made for the rural nature of Powys and more councils allowed.</i>	We would like to see a healthy ratio of councillors to electorate maintained and representation not overly diluted, otherwise new larger councils could lose touch with the communities they are there to serve. The role of local members will be key in retaining the important role of local councils as the citizen’s voice.
5	<i>Any issues with combining a Town with smaller Communities around it.</i>	<i>Clustering needs to be done with rural councils of a similar nature and size.</i>	<i>Clustering needs to be done with rural councils of a similar nature and size.</i>	There may be some concern from the outlying villages about a loss of voice/identity, but I have seen that this can work well in the two Town Councils I have worked at. Its success depends on encouraging/allowing the elected members to have a strong voice.
6	<i>Any issues around what duties might be passed onto the new Councils which are only powers at this time.</i>	<i>Need to have sufficient financial resources first.</i>	<i>Need to have sufficient financial resources first.</i>	Duties and powers are imposed by statute and we are not aware of any new/proposed duties or powers in connection with the combining/merging of local councils, other than the possibility of a Power of General Competence (details still unknown). We will still have the same duties and powers that we have now, but we may (or may not!) choose to exercise more of our powers due to our increased capacity/capability and/or due to a continuing increase in delegation from larger Principal Authorities.

7	<i>Any issues around culture or links between communities which maybe combined or enlarged.</i>	<i>Need to consider history and culture.</i>	<i>Need to consider history and culture.</i>	We are aware that there could be an impact on use of the Welsh Language in some merged/enlarged councils which were previously Welsh first language communities and this could result in higher administrative costs due to the need for translators at meetings etc. Sensitivity to culture and identity needs to be shown when considering any mergers / clustering arrangements. However, clustering could also bring benefits by way of greater cultural understanding/appreciation. It is vitally important to involve and consult with communities about their preferred / most appropriate links.
8	<i>Any other views or issues you wish to pass on.</i>	<i>Very important to maintain the local level of democracy which would be lost if councils amalgamated.</i>	<i>Very important to maintain the local level of democracy which would be lost if councils amalgamated.</i>	

NORTH AND MID WALES ASSOCIATION OF LOCAL COUNCILS

BOUNDARY COMMISSION SUMMARY CHART

NO	QUESTION	SUMMARY
1	<i>The combining of Town and Community Councils either by clustering or enlarging by a numerical method. ie a set number of electorate in each Council area + or – 5%</i>	<i>In principle Councils are not adverse to combining or clustering with others. However, it needs to be on a local basis and not based upon a set formula. There needs to be recognition that Towns and Rural Communities have different needs and have different cultures. Such re-organisation or review should be done via local forums allowing local areas to define their own destiny whilst recognising that they need to change.</i>
2	<i>The combining of Town and Community Councils by joining together wards rather than areas.</i>	<i>There is general support for the principle of combining wards. However the issues of different needs and cultures of each ward need to be considered.</i>
3	<i>The effect on Council Tax of the new Councils – ie Councils with a higher tax may see it fall and those with a lower tax see it rise.</i>	<i>It is accepted that there will be a levelling of Council Tax. However this needs to be managed and perhaps a different formula for funding should be considered. For example funding direct from Welsh Government to the new Councils or perhaps rebanding of properties to reflect their local facilities. A lot will depend upon any increase in the duties of Town and Community Councils.</i>
4	<i>The representation on the new Councils. 2/3 of the existing Council seats may disappear once Councils are combined or enlarged.</i>	<i>There is a concern that fewer Councillors may lead to less wishing to stand for election due to the workload recognising that such Councillors are unpaid. A further concern is the ability of Clerks to cope with larger Councils with particular reference to workload.</i>
5	<i>Any issues with combining a Town with smaller Communities around it.</i>	<i>The main issues are surrounding levels of council tax, loss of identity and a smaller community being dominated by the larger community.</i>
6	<i>Any issues around what duties might be passed onto the new Councils which are only powers at this time.</i>	<i>The main issues surround ability of Clerks (knowledge and management skills) and around the ability of a Council to sustain such services taking into account reserves and cost of delivery. At present the local councils have powers but not duties which leave them able to decide what they take on or not, as the case maybe.</i>
7	<i>Any issues around culture or links between communities which maybe combined or enlarged.</i>	<i>The issues surround language (particularly where a very Welsh community is combined with a more English community). The cultural differences could be resolved with suitable legislation.</i>
8	<i>Any other views or issues you wish to pass on.</i>	<i>The word which comes out of the consultation is 'flexibility' and 'local worked up proposals' which will allow within set guidelines local decision making on a local communities future.</i>

R A Robison FRICS FILCM
Secretary.