

## **Appendix 1**

### **Key points proposed to form the basis of the Council's responses to proposals submitted by other Councils in Cumbria.**

**Introduction** – It is proposed that the points in the following tables, together with information in the Council's full proposal, be used as the basis to develop a series of full responses by the Chief Executive in consultation with the Leader for submission to Government by 19<sup>th</sup> April 2021.

**Overall approach** - It is recommended that the Council submit a separate consultation response to each of the **three proposals** submitted by other Councils for local government reorganisation in Cumbria. These responses will be produced to answer the **6 questions** in the Government's consultation.

The responses will also provide commentary on the proposals with regard to how far they meet the Government's 3 criteria.

1. Whether the proposal is likely to improve local government and service delivery across the area of the proposal, giving greater value for money, generating savings, providing stronger strategic and local leadership, and which are more sustainable structures;
2. Whether the proposal commands a good deal of local support as assessed in the round overall across the whole area of the proposal;
3. Whether the area of each unitary authority is a credible geography consisting of one or more existing local government areas with an aggregate population which is either within the range 300,000 to 600,000, or such other figure that, having regard to the circumstances of the authority, including local identity and geography, could be considered substantial.

**Further**, it is recommended that the Council submits additional commentary on **The Bay and North Cumbria** proposal based on the points identified in Appendix 2.

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<b>Proposal: One Cumbria</b> Cumbria County Council has submitted a single county unitary proposal to replace existing councils in Cumbria.	
Question	Commentary
<p><b>1. Is the proposal likely to improve local government and service delivery across each area?</b></p>	<p><b>Most benefits claimed are generic to unitary local government, and underplays the value of local services and the way services are organised today, in particular the NHS</b></p> <ul style="list-style-type: none"> <li>• One Cumbria appears to follow the lead of the County Council Network who have consistently argued for bigger councils with community concerns addressed through local committees.</li> <li>• It overlooks the reality of public services today which increasingly require collaboration and co-operation between public agencies, the voluntary sector and communities.</li> <li>• By comparison, The Bay will be a more collaborative and progressive council that works with partners and communities to get things done working as one system.</li> </ul> <p><b>Financial stability and savings resulting from the proposal are questionable if staffing cuts are not delivered</b></p> <ul style="list-style-type: none"> <li>• The value and cost of change need to be effective and sustainable.</li> <li>• Primary focus on cutting expenditure through staff reduction and reducing procurement costs.</li> <li>• A "Reorganisation now, transformation later" approach with uncertainty whether transformation will follow or that savings will be reinvested in improving services. The scale of anticipated savings are questionable.</li> </ul> <p><b>The implementation of the proposal will lead to significantly less local democratic representation and accountability with less than 100 councillors</b></p> <ul style="list-style-type: none"> <li>• Any move to unitary local government will reduce the total number of councillors across the area and will mean each represents a council responsible for all council services.</li> <li>• Boundary commission guidance would need to be followed and in One Cumbria this means the number of councillors reduces to less than one hundred, which risks being unsustainable. The time and case load commitments for councillors will be challenging with significant travel distances to participate fully in democracy.</li> <li>• The Bay and North Cumbria would substantially resolve that problem and bring councillors closer to the people they represent.</li> </ul>
<p><b>2. If services will be delivered on a different geographic footprint to currently, or through some form of joint arrangements, is this likely to improve those services?</b></p>	<p><b>The proposal presents a minimal degree of change in what would be done in localities as it is focused primarily on efficiency.</b></p> <ul style="list-style-type: none"> <li>• Top down approach, based on what the new unitary would be prepared to devolve.</li> <li>• No compelling narrative of change. Risks prioritising creating one council over issues and priorities of communities. Change needs to be about more than the internal efficiency of a council.</li> <li>• A huge unitary representing very different areas that would need to rely on delivering differently in each area. Commitments to locality working recognise this need to be closer to the communities and responsive to elected members.</li> </ul>

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	<ul style="list-style-type: none"> <li>Parishes would have significantly less influence than the districts do today. They would be one of over 200 trying to have a voice.</li> <li>This contrasts with the bottom up model of The Bay, which will change how things are done by working with people and partners together to make the changes they want to see.</li> </ul>
<b>3. Is the proposal likely to impact local public services delivered by others, such as police, fire and rescue, and health services</b>	<p><b>Improving outcomes could follow reorganisation but is not a purpose for it. This could be considered an inward looking reorganisation which would delay rather than drive reform.</b></p> <ul style="list-style-type: none"> <li>Housing and planning don't operate in a single market stretching from Barrow to Carlisle.</li> <li>Transport and highways don't stop at the boundaries of Cumbria today and wouldn't stop at the boundaries of new unitaries in the future as claimed.</li> <li>Effective care and well-being involve an increasingly closer integration of council and local health services. NHS services are aligned on a North Cumbria and the North and a South Cumbria and Lancashire basis and wouldn't align with the One Cumbria footprint.</li> <li>Skills and education need to relate to jobs and industries of the future and build on real functioning economic areas. We need to be looking at the global and national relationships.</li> <li>One Cumbria is lacking as it looks first to internal structures and securing control, rather than building relationships and partnerships.</li> <li>The current Fire and Rescue Authority and Service would remain, which may not realise improvements which could result from a move to a new arrangement for Fire and Rescue Authority and service.</li> </ul>
<b>4. Do the unitary councils proposed by the councils represent a credible geography?</b>	<p><b>The unitary size by area and by population would make it one of the biggest in England, physically remote from those it serves</b></p> <ul style="list-style-type: none"> <li>A single unitary model would make it the 5th largest council in England. A big council covering a massive area.</li> <li>The geography of the Cumbria region is dramatically different to other areas due to the physical impact of the Cumbrian mountains in the centre.</li> <li>Significant risk and challenge to optimise and deliver services effectively over such a geography. Proposal relies on local areas that are effectively the same as the current districts though without accountability.</li> </ul> <p><b>The vital importance of economic geography is overlooked</b></p> <ul style="list-style-type: none"> <li>There is no one functioning economic area for Cumbria. Connections to wider region and market areas are generally either north &amp; north east or south facing.</li> <li>The Bay has focus around Morecambe Bay – 96% of people live and work in the area. North Cumbria the connections are over the wider Borderlands region with Carlisle at its heart.</li> <li>One Cumbria would continue to have to choose between these areas of focus for its strategic input and investment.</li> </ul> <p><b>Cumbria is a challenging geography for local administration that was only created in 1974</b></p> <ul style="list-style-type: none"> <li>Not a historic county but was created by the 1974 reorganisation. There were alternative proposals to create a council along the lines of the Bay at that time based on the comprehensive Redcliffe-Maude report in 1969.</li> </ul>

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	<ul style="list-style-type: none"> <li>• Need to reflect how the area functions today. The NHS recognises this, any single Cumbria body would need to work with two health systems.</li> <li>• One Cumbria would continue the challenges of a current administrative model for local government for a geography that only works because it is a two tier area.</li> <li>• The Bay will maintain Cumbria as an identity (as it will Lancashire) as identity is about place, not councils.</li> </ul>
<b>5. Do you have any other comments with regards to the proposed reorganisation?</b>	<p><b>The proposal only more recently presented the results of an opinion poll conducted by the County Council.</b></p> <ul style="list-style-type: none"> <li>• This poll suggests 46% of the 1000 respondents supported the One Cumbria proposal, and quotes higher percentages in Copeland (53%) and Carlisle (54%). South Lakeland and Barrow percentages are not similarly provided.</li> <li>• The poll did not present alternative options to One Cumbria.</li> <li>• The Bay and North Cumbria deliver the same advantages of unitary local government – and has demonstrated significantly stronger public support , with 60% of opinion poll respondents supporting the Bay and 31% the proposal of Cumbria County Council.</li> </ul> <p><b>Devolution would not be possible on the government preferred model of combined authorities</b></p> <ul style="list-style-type: none"> <li>• Only one devolution deal exists to a single local authority, Cornwall. All others are to combinations of authorities.</li> <li>• The Investment Fund in the Cornwall model is around £240 a head. In combined authorities it is typically around £600-700.</li> <li>• A single county unitary will weakens future case for devolution to a combined authority.</li> <li>• Need to consider the best approach that works for the whole region. Choices made now will affect our ability to secure future resources for all parts of the region</li> </ul>
<b>6. Do you support the proposal from the councils?</b>	<p><b>The proposal is not supported</b></p>

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<b>Proposal: East and West unitaries –</b> Submitted by Allerdale and Copeland Councils <b>Barrow, South Lakeland and Eden areas would form a new 'East Cumbria' unitary</b>	
Question	Commentary
1. Is the proposal likely to improve local government and service delivery across each area?	<p><b>The unitary size and population is below the range set out in the statutory guidance</b></p> <ul style="list-style-type: none"> <li>• Neither council would meet a population range of between 300,000 and 600,000.</li> <li>• The rationale for smaller population level but would need to be specifically justified. It raises questions of viability for the councils.</li> <li>• The Bay and North Cumbria provide all of the benefits of a two unitary. solution and are compliant with the population range of the Secretary of State's guidance.</li> <li>• Smaller populations over large areas raises viability concerns.</li> </ul> <p><b>Confused democratic representation and accountability</b></p> <ul style="list-style-type: none"> <li>• As presented, the East/West (and North/South) case depends on an additional new strategic authority operating Cumbria wide</li> <li>• With a focus on strategic services, this additional authority works against the clarity brought by unitary authorities</li> <li>• The Bay and North Cumbria would be viable and of sufficient scale to deliver strategic services themselves. Both would be free to ensure they focused on the needs of their communities, whilst still free to collaborate where it makes sense to do so.</li> </ul>
2. If services will be delivered on a different geographic footprint to currently, or through some form of joint arrangements, is this likely to improve those services?	<p><b>A district not unitary focus which may not realise an ambition for change</b></p> <ul style="list-style-type: none"> <li>• Dependence on a strategic combined authority reflects district not unitary thinking. Creating this to deliver many services may risk limiting the ambition of the new unitaries.</li> <li>• No clear ambition for reform such as alignment with health or creating new growth. It focusses on reorganisation of local councils.</li> <li>• The Bay and North Cumbria proposal is an opportunity to both areas to have a more ambitious agenda for change, reflecting their distinct priorities and opportunities, better than we can deliver today.</li> </ul>
3. Rks againstIs the proposal likely to impact local public services delivered by others, such as police, fire and rescue, and health services	<p><b>The proposal does not take the opportunity to substantially align council boundaries with those of NHS services</b></p> <ul style="list-style-type: none"> <li>• Care and well-being involve closer integration of council and local health services. NHS services are aligned on a North Cumbria and the North and a South Cumbria and Lancashire basis. Each council would need to work with two health systems.</li> </ul> <p><b>The proposal requires a new arrangement for a combined Fire and Rescue Authority.</b></p> <ul style="list-style-type: none"> <li>• We agree that a sustainable model for the delivery of Fire and Rescue is achievable which serves two unitary councils.</li> </ul>

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<p><b>4. Do the unitary councils proposed by the councils represent a credible geography?</b></p>	<p><b>Questionable geographies which the councils involved could not agree</b></p> <ul style="list-style-type: none"> <li>• The East and West unitary proposal does not reflect or take account of the strong economic geography and functioning economic area of The Bay and is likely to significantly undermine benefits that could be achieved building on Bay wide strengths.</li> <li>• The options considered have created geographies which do not reflect how places work in practice. East and West Cumbria unitaries do not appear to relate to communities in South Cumbria and do not reflect strong existing links with Lancaster.</li> <li>• Barrow and South Lakeland are existing strong partners, already grouped together for existing services delivered in Cumbria but also with Lancaster. The Joint Committee of Lancaster, Barrow and South Lakeland reflects our shared economic geography.</li> <li>• Extending collaboration to Eden is not as beneficial as building on the strong links between Lancaster and South Cumbria. Eden has greater economic, service and community connection to Carlisle and the North East.</li> <li>• East and West unitaries do not maximise the shared benefits around the Bay from the sea ports, offshore wind and gas.</li> <li>• The four Northern districts have not agreed a single preferred solution for their two unitary model. The Bay and North Cumbria would provide that solution and is more viable but was not considered by the four Northern district councils.</li> </ul> <p><b>No clear narrative for East and West Unitaries</b></p> <ul style="list-style-type: none"> <li>• The proposal claims unitaries built around communities in the East and West are the best way, whilst the proposal for a North and South unitary model claims it is the best way. A compelling narrative is not provided although support for a two unitary approach is clear.</li> <li>• The Bay has a clear rationale for why it should be created that works on multiple levels. It also works for North Cumbria.</li> </ul> <p><b>The economic case looks inwards not outward to the wider economy</b></p> <ul style="list-style-type: none"> <li>• Our economic future of this area depends on connections to the wider economy and our growth potential.</li> <li>• Our links to the south and Lancaster are reflected in the Morecambe Bay economy and our growth and prosperity plans. Links to the North have been recognised through the Borderlands deal covering the wider north of England and south of Scotland. Links West have long been recognised as an energy coast built around the area's energy specialisms.</li> <li>• Our economy depends on valuing these connections and looking outward to the wider north and regional potential.</li> <li>• The Bay and North Cumbria will enable us to play to our respective strengths, and to collaborate together and with others for regional success</li> </ul>
<p><b>5. Do you have any other comments with regards to the</b></p>	<p><b>Evidence of local support is limited to the principle for two unitaries</b></p> <ul style="list-style-type: none"> <li>• The evidence of support – mainly from rural communities – reinforces the support for the principle not the specific proposals of these councils.</li> </ul>

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<b>proposed reorganisation?</b>	<p>Within the survey as part of this evidence, there were only seven responses from people in Barrow, which cannot be considered representative.</p> <ul style="list-style-type: none"> <li>Local support needs to be evidenced for organising on an East / West basis compared to other choices.</li> <li>The Bay proposals showed strong support for our specific proposals around creating a council supporting an area where 96% of people live and work.</li> </ul> <p><b>Proposals defer to Government to decide what is best for their communities</b></p> <ul style="list-style-type: none"> <li>The proposal does not make a clear claim to the ideal option and is willing to let the government consultation determine the outcome.</li> <li>By presenting this proposal, together with the North/South proposal, the options are identical apart from the alignment of districts, these proposals have withdrawn from making a clear proposal for change.</li> </ul> <p><b>Devolution potential will not be enhanced by a combined authority which is focused on supporting existing functions</b></p> <ul style="list-style-type: none"> <li>A Combined Authority focused on the delivery of strategic services within an existing Cumbria county footprint is unlikely to strengthen influence at a national level.</li> <li>The success of Combined Authorities, and the Government's preferred approach, have been bringing together authorities to operate across strategic agendas that go beyond the existing authorities' boundaries.</li> <li>Only Cornwall has a single authority devolution deal. Their investment fund is around £250 a head compared to £600-700 a head elsewhere.</li> <li>Relying on a Mayoral Combined Authority to make reorganisation models work will reduce our potential for devolution and correspondingly, the potential of future generations.</li> </ul>
<b>6. Do you support the proposal from the councils?</b>	<b>The proposal is not supported</b>

<b>Proposal: North and South unitaries</b> Carlisle and Eden Councils have submitted this proposal for two unitaries within Cumbria aligned North and South. <b>Under this proposal the Barrow, South Lakeland and Copeland areas would form a 'South Cumbria' unitary</b>	
Point	Commentary
<b>1. Is the proposal likely to improve local government and service delivery across each area?</b>	<p><b>The unitary size and population is below the range set out in the statutory guidance</b></p> <ul style="list-style-type: none"> <li>Neither council would meet a population range of between 300,000 and 600,000.</li> <li>The rationale for a smaller population level but would need to be specifically justified. It raises questions of viability for the councils.</li> </ul>

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	<ul style="list-style-type: none"> <li>The Bay and North Cumbria provide all of the benefits of a two unitary solution and are compliant with the tests of the Secretary of State's guidance.</li> <li>Smaller populations over large areas raises viability concerns.</li> </ul> <p><b>Confused democratic representation and accountability</b></p> <ul style="list-style-type: none"> <li>As presented, the North/South (and East/West) case depends on an additional new strategic authority operating Cumbria wide.</li> <li>With a focus on strategic services this additional authority works against the clarity brought by unitary authorities.</li> <li>The Bay and North Cumbria would be viable and of sufficient scale to deliver strategic services themselves. Both would be free to ensure they focused on the needs of their communities, whilst still free to collaborate where it makes sense to do so.</li> </ul>
<p>2. <b>If services will be delivered on a different geographic footprint to currently, or through some form of joint arrangements, is this likely to improve those services?</b></p>	<p><b>A district not unitary focus with limited ambition for change</b></p> <ul style="list-style-type: none"> <li>Dependence on a strategic combined authority reflects district not unitary thinking. Creating this to deliver many services risks limiting the ambition of the new unitaries.</li> <li>No clear ambition for reform such as alignment with health or creating new growth. It focusses on reorganisation of local councils.</li> <li>The Bay and North Cumbria is an opportunity to both areas to have a more ambitious agenda for change, reflecting their distinct priorities and opportunities, better than we can deliver today.</li> <li>In the Bay, the thinking is like a unitary – we propose to co-create with our partners and communities new approaches that are better than we can deliver today as part of district and county structures.</li> </ul>
<p>3. <b>Is the proposal likely to impact local public services delivered by others, such as police, fire and rescue, and health services</b></p>	<p><b>The proposal does not take the opportunity to substantially align council boundaries with those of NHS services</b></p> <ul style="list-style-type: none"> <li>Care and well-being involve closer integration of council and local health services. NHS services are aligned on a North Cumbria and the North and a South Cumbria and Lancashire basis. Each council would need to work with two health systems.</li> </ul> <p><b>The proposal requires a new arrangement for a combined Fire and Rescue Authority.</b></p> <ul style="list-style-type: none"> <li>A sustainable model for the delivery of Fire and Rescue is achievable which serves two unitary councils.</li> </ul>
<p>4. <b>Do the unitary councils proposed by the councils represent a credible geography?</b></p>	<p><b>Questionable geographies which the councils involved could not agree</b></p> <ul style="list-style-type: none"> <li>The North and South unitary proposal does not reflect or take account of strong economic geography and functioning economic areas including The Bay and is likely to preclude the significant benefits that could be achieved by building on Bay wide strengths.</li> <li>The options considered have created geographies which do not reflect how places work in practice or historic identity. Copeland has intrinsic</li> </ul>



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	<p>economic, service and community connection to Allerdale, Carlisle and the North East. South Cumbria has strong existing links with Lancaster.</p> <ul style="list-style-type: none"> <li>• Road transportation links from South Cumbria to Copeland are challenging and involve lengthy (distance and time) journeys through what would be North Cumbria.</li> <li>• The Joint Committee of Lancaster, Barrow and South Lakeland reflects our shared economic geography.</li> <li>• A North /South unitary does not maximise the shared benefits around the Bay from the sea ports, offshore wind and gas.</li> <li>• It is noted that the four districts could not agree a single preferred solution for their two unitary model. The Bay and North Cumbria would provide that solution and is more viable but was not considered by the four district councils.</li> </ul> <p><b>The economic case looks inwards not outward to the wider economy</b></p> <ul style="list-style-type: none"> <li>• Our economic future of this area depends on connections to the wider economy and our growth potential.</li> <li>• Our links to the south and Lancaster are reflected in the Morecambe Bay economy and our growth and prosperity plans. Links to the North have been recognised through the Borderlands deal covering the wider north of England and south of Scotland. Links West have long been recognised as an energy coast built around the area's energy specialisms.</li> <li>• Our economy depends on valuing these connections and looking outward to the wider north and regional potential.</li> <li>• The Bay and North Cumbria will enable us to play to our respective strengths, and to collaborate together and with others for regional success.</li> </ul> <p><b>No clear narrative for North and South Unitaries</b></p> <ul style="list-style-type: none"> <li>• The proposal claims unitaries built around communities in the North and South are the best way, whilst the proposal for an East and West unitary model claims it is the best way. A compelling narrative is not provided although support for a two unitary approach is clear.</li> <li>• The Bay has a clear rationale for why it should be created that works on multiple levels. It also works for North Cumbria.</li> </ul>
<p><b>5. Do you have any other comments with regards to the proposed reorganisation?</b></p>	<p><b>Evidence of local support is limited to the principle for two unitaries</b></p> <ul style="list-style-type: none"> <li>• The evidence of support – mainly from rural communities – reinforces the support for the principle not the specific proposals of these councils. Within the survey as part of this evidence, there were only seven responses from people in Barrow, which cannot be considered representative.</li> <li>• Local support needs to be evidenced for organising on an East / West basis compared to other choices.</li> <li>• The Bay proposals showed strong support for our specific proposals around creating a council supporting an area where 96% of people live and work.</li> </ul>

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	<p><b>Proposals defer to Government to decide what is best for their communities</b></p> <ul style="list-style-type: none"><li>• The proposal does not make a clear claim to the ideal option and is willing to let the government consultation determine the outcome.</li><li>• By presenting this proposal, together with the North/South proposal, the options are identical apart from the alignment of districts, these proposals have withdrawn from making a clear proposal for change.</li></ul> <p><b>Devolution potential will not be enhanced by a combined authority which is focused on supporting existing functions</b></p> <ul style="list-style-type: none"><li>• A Combined Authority focused on the delivery of existing county services within an existing county footprint is unlikely to strengthen our influence at a national level.</li><li>• The success of Combined Authorities, and the Government's preferred approach, have been bringing together authorities to operate across strategic agendas that go beyond the existing authorities' boundaries.</li><li>• Only Cornwall has a single authority devolution deal. Their investment fund is around £250 a head compared to £600-700 a head elsewhere.</li><li>• Relying on a Combined Authority to make reorganisation models work will reduce our potential for devolution and correspondingly, the potential of future generations.</li></ul>
<b>6. Do you support the proposal from the councils?</b>	<b>This proposal is not supported</b>