



Successful leadership
from a global city on
a compact scale

1. Introduction

- 1.1. This document is the City of York Council's response to the consultation on the reorganisation of local government in North Yorkshire, which is being undertaken on behalf of the Secretary of State for Housing, Communities and Local Government. City of York Council is responding to both the East/West and the North Yorkshire proposals, using the consultation questions as the structure of the response.
- 1.2. This response builds upon the previous submission of evidence, attached to this submission and available here: <https://www.york.gov.uk/council/devolution-unitarisation/3?documentId=1971&categoryId=20003>, on which the City of York Council continues to rely as part of its consultation response:

In Summary

In respect of the **East/West** proposal, City of York Council **does not support** the proposal. We consider that the Government's criteria have not been met on the basis of:

- An unrecognised and illogical geography with no identity
- Failure to achieve greatest value for money
- Untested and unconvincing service improvement plans
- A high level of disruption to partner organisations
- A lack of local support.

In respect of the **North Yorkshire single unitary** proposal, City of York Council **supports** the proposal. We consider that it provides a strong model which meets the Government's criteria on the basis of:

- A clear and recognised geography with a strong identity
- The highest levels of efficiency and savings
- A strong foundation for service improvement, building upon the established York and North Yorkshire relationship and the strength of existing delivery on the same footprint
- Minimal disruption to upper-tier services
- A strong level of local support.

2. The East/West Proposal

Q1. Is the councils' proposal likely to improve local government and service delivery across each area? Specifically, is it likely to improve council services, give greater value for money, generate savings, provide stronger strategic and local leadership, and create more sustainable structures?

- 2.1. City of York Council considers that the East/West model would detrimentally impact local government and service delivery in York, and that it is not the best solution for the other North Yorkshire district areas.

Council Services

- 2.2. A full explanation of the likely impact of the East/West model on services is set out in the answer to Question 2, below. In summary, we have no confidence that the East/West proposal would improve service delivery. The proposal itself does no more than describe generic service approaches with little explanation of why these are appropriate, how they constitute better alternatives for the specific geographies proposed, or how improvement would be achieved whilst dealing with the significant disruption the model requires. It recognises the quality of existing services rather than providing strong models of service improvement, and suggests only that it seeks to minimise disruption to those existing services (in circumstances where the inevitable consequence of the model would be to maximise such disruption).

Savings

- 2.3. Whilst the East/West split may generate some savings, those savings would not accrue from or to York or its residents; as an existing

unitary authority, City of York has already used its established unitary structure to achieve efficiency savings, and the dividend from that organisational model is already ‘baked-in’ to York’s sound and sustainable financial position. For this reason, the model provides overall levels of savings that are considerably lower than those provided by the alternative North Yorkshire proposal. Comparison of the two models, based on North Yorkshire/PwC figures, suggests that over 5 years the East/West model would give rise to £98m less in savings than the North Yorkshire model. (If the District’s figures are used in comparison, of the difference is even greater, at £126.6m.)

- 2.4. The overall economies of scale across an expanded East authority might generate some limited efficiencies but, given the important differences between York’s compact urban setting and the more separated rural and coastal communities in the rest of the area, such efficiencies are likely to be smaller than they would be if services were organised across a more homogenous geography. The ongoing need for discrete approaches to service delivery across such a diverse area would inevitably reduce the scope of savings that could realistically be achieved.
- 2.5. In addition, the East/West model also fails to take advantage of the potential for consolidating the delivery of services across the geographically similar areas of North Yorkshire.

Value for Money

- 2.6. Robust and thorough financial management, as well as efficiencies arising from the previous local government reorganisation in 1996, has led to Council Tax levels in York being £110 lower than the average for North Yorkshire council areas (at the Band ‘D’ rate). The proposal asserts that setting Council Tax for the entire new Eastern unitary authority at the lower York rate would result in a decrease of only £3.6m p.a. (<1%) in income. However, there is no explanation of how this figure has been arrived at and, despite attempts to replicate these figures, we have been unable to identify any sensible assumptions which could support or evidence it. On the contrary, analysis carried out with

North Yorkshire County Council indicates that setting council tax at that level would in fact result in a reduction of £17.7m p.a. in income (7.4%), which would have a significant financial impact on the new East authority. Such a reduction in income would absorb most of the predicted savings, with the only benefit being a reduction in levels of council tax for residents in areas outside York.

- 2.7. If tax levels were harmonised at a higher level, this would result in a tax increase for York residents, at the same time as services would be refocussed away from the city. This would be unfair to York's residents, and it would be very difficult to defend.
- 2.8. If value for money lies in striking an appropriate balance between cost and quality of service delivery, the East/West model would not result in better value for money for York. Given that York is already a low spending authority (with amongst the lowest core spending power of existing unitary authorities), the proposal provides little evidence of how service delivery would be improved (it simply relies on generic models of delivery), and we believe that the value for money arguments are not convincing.
- 2.9. Across the whole of the East and West footprint, we likewise see little evidence that there will be an improvement in service delivery as compared with the comprehensive proposals from North Yorkshire County Council, which build upon existing strengths rather than disrupting them. The overall level of saving would be less in the East/West model, and the transition costs likely to be higher as a result of significantly more disruption. For these reasons, City of York considers that the model would provide poorer value for money than the alternative North Yorkshire proposal, both during transition and over the longer term.

Strong Strategic and Local Leadership

- 2.10. Ultimately, the leadership will only be strong if it relates to a clearly identifiable place. The arbitrary geography of the East/West model provides little connection between leadership, identity and place.

- 2.11. The Districts' proposal would dilute York's existing strong strategic and local leadership. Any change to York's boundaries to include rural and coastal areas would either increase the cost to residents, or stretch services further, making it harder to meet York's own unique challenges. Significant investment is already in place or committed for the city - £112.2m to progress [York Central](#), £14.5m to upgrade [York Station](#) frontage, and £45m for the [Castle Gateway](#), for example. The East/West proposal would also disturb the existing excellent relationships that the City of York Council has with partners such as West Yorkshire Combined Authority, York & North Yorkshire LEP and NHS organisations, and it would undermine future collaboration, funding and investment opportunities.
- 2.12. Further, North Yorkshire County Council already operates successful, efficient key services across a rural and coastal geography, the importance of those services reflected in the fact that they constitute 80% of local authority spend across the county footprint. The East/West proposal would undermine the overall capacity of these services to achieve the scale necessary for efficient service delivery across a rural area, and is out of step with the emerging direction of travel for partner organisations, particularly in respect of NHS delivery and reform.
- 2.13. The City of York Council and North Yorkshire County Council already have a proven track record of effective joint working through a long-standing and embedded relationship, reflected in the 'strategic partnership' that both Councils have committed to. This relationship provides a firm foundation for further development of mutually beneficial collaboration and it bring advantages to all parts of the County and City council areas. The East/West proposal would undermine the sound foundations on which the existing arrangements are built, creating an unacceptably high risk to already well-regarded and high performing services across both North Yorkshire and York. It would be a risky strategy to adopt a proposal that would undoubtedly lead to disruption of key services for the most vulnerable residents during the critical time when the focus should be on the recovery from Covid.

Sustainable Structures

- 2.14. Structurally, the East/West proposal is not as sustainable as the North Yorkshire proposal. It operates on an unrecognisable geography, lacks clarity around Council Tax harmonisation and reinvestment of savings, and proposes generic service models without reference to the real operational context of the area. As a result, this proposal would not be better than the status quo, much less the alternative proposal. The absence of any real connection between the administrative functions of the two proposed new councils and the identity of the places they represent would undermine stability, and it is difficult to see how the two proposed new authorities would be able to promote such a diversity of places in any coherent way.
- 2.15. The East/West proposal as a whole is based on the idea that they would create a balance, largely in population terms, that is necessary to support the smooth working of a future Mayoral Combined Authority (MCA). However, the idea that all authorities must be of an equal size for an MCA to function effectively is demonstrably untrue. A York and North Yorkshire Combined Authority consisting of a new North Yorkshire Unitary Authority and City of York Council would have a population ratio of around 2.88:1. This is similar to the ratios between the largest and smallest authorities in Tees Valley (2.76:1) and Greater Manchester (2.85:1) and significantly lower (i.e. more equal) than that in West Yorkshire (3.77:1) and West Midlands (5.11:1).
- 2.16. Population is, of course, only one measure of scale. York currently contributes a third of the sub-region's GVA, and this proportion is expected to increase as a result of significant redevelopment work in the city, including York Central (forecast to create around £1bn GVA uplift in the York and North Yorkshire area). York is clearly the main economic centre of the sub-region and it is plain that it would be influential in any future MCA.
- 2.17. In light of the fact that all existing councils agree that the potential for a future MCA is important when it comes the discharge of strategic responsibilities, it is surprising that the East/West proposal does not distinguish between responsibilities for operational service delivery and

strategic planning. For example, housing delivery is said to be a challenge in York, and it is suggested that merging York with surrounding districts would create additional space to support York's housing needs. If housing delivery were simply a numbers game within local authority boundaries, this would make sense. However, this is a gross over-simplification. It is more realistic, and will be more effective, for strategic housing plans to be considered at a broader sub-regional level, irrespective of local authority boundaries. The East/West model is not necessary to achieve this and, indeed, the proposal does not appear to recognise this.

Summary

- 2.18. Overall, City of York considers that the argument that the East/West proposal would provide improved local government is not convincing. There is a lack of clarity as to the financial impacts (particularly upon York residents), the proposal would undermine existing strong leadership, there is no proper explanation of mooted service improvements, and there would be a lower level of savings in comparison to the other proposal.

Q2. Where it is proposed that 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? Such services may for example be children's services, waste collection and disposal, adult health and social care, planning, and transport.

- 2.19. Overall, beyond a general notion of the improvements that a unitary model could provide, the East/West proposal does not explain why the specific geography proposed would be best placed to deliver improved services. We consider that, in this respect, the East/West proposal merely makes the case for unitary government in the abstract, rather than supporting the specific concept of an East/West model.
- 2.20. As a general point, the models of delivery described are generic and could apply anywhere. For example, the proposals for people services

are no more than a summary of what is already broadly happening in York (and, we believe, in North Yorkshire). At the most basic level the East/West proposal fails to explain why the specific East/West model suggested is required to achieve the outcomes described. In fact, given the significant disruption that the model would impose upon existing services, we believe the proposal is more likely to hinder service improvement.

- 2.21. Inevitably, the East/West proposal has higher set up costs than simpler alternatives and would involve the dissolution of outstanding and critical services, especially for children, young people and adult social care, in York and North Yorkshire. Indeed, all the functions currently being delivered by City of York Council would need to be split up, reshaped and restructured. This is a high risk approach. York is a compact urban area where services could continue to be delivered effectively without the unhelpful distraction of a wholesale restructuring and realignment to a different and illogical geographic context.
- 2.22. The East/West proposal particularly focuses on adult social care, children's services and public health, as it rightly sees these as critical high impact services which are most at risk in any restructure of local government. They are, however, areas that both the County and City councils already have a good record of delivering, and the approaches proposed (as set out in the "*Delivery of People's Services under 'East & West'*" document) simply reflect the way these services are currently delivered in York, or indeed, in many upper tier authorities.

Children's services

- 2.23. The proposals suggests that there are certain contextual challenges or areas of performance that the East/West model will address. However, the only argument advanced in this respect is one which relies on the greater scale at which children's services would be delivered.
- 2.24. In particular, there are several references to York being on an improvement journey. This is correct. However, the premise of the proposal appears to be that this improvement can be enhanced by

implementing a slightly revised model on a new footprint. The underlying premise would appear to be that it is possible to take a best practice model from elsewhere and implement it quickly and with minimal disruption across an entirely new geographic footprint. However, this premise ignores the specific context of York. Further, the negative disruptive impact of creating two new children's services departments would far exceed any potential positive impact of sharing best practice, particularly as such sharing already takes place through existing well-established regional improvement structures.

- 2.25. The other key assumption is that the merging of York's services with the outstanding services of North Yorkshire would result in service improvement across the two new authorities. There are two reasons why this is a flawed assumption. Firstly, North Yorkshire's current services would no longer exist, having been split in half across East and West authorities. The retention of performance despite this split is by no means guaranteed, particularly in view of the fact that it would lose NYCC's current scale of service, which is important across the wide rural geography. In particular, it is very difficult to see how it would be possible to generate additional capacity within the services during such a transition.
- 2.26. Secondly, it assumes the models which are appropriate across the NYCC geography are instantly applicable and effective within York's context, and that York has not previously considered adopting the same approach. This is an incorrect assumption. York has different patterns of need and different challenges, and already works closely with neighbouring authorities through regional Association of Directors of Children's Services peer networks. It is, therefore, unclear why the implementation of what purports to be a different model (but which in fact seems similar to what is currently in place) on a different footprint would drive improvement any faster than York's existing programme.
- 2.27. Despite the proposals highlighting some past perceived shortcomings in York, the current context is that York's performance has already improved rapidly and significantly, with a stable team and an embedded new practice model. This is recognised by peer views and the DfE, and disruption to that improvement journey at this point would be detrimental. The likelihood of staff being lost would be high, as staff

want to be part of the York team, supported through the well-established social work academy programme which has been externally validated.

Adult Social Care

- 2.28. The proposal recognises many of the existing strengths of the social care approach in York and North Yorkshire, yet the “opportunities” outlined within it are generic and in many ways simply reflect what is already happening within York and North Yorkshire.
- 2.29. There is one critical area where the proposed geography would be positively detrimental to progress. As part of the response to the ‘Integration and Innovation: working together to improve health and social care for all’ white paper, the City of York Council has recently announced the development of a York Health and Care Alliance within the Humber, Coast and Vale Integrated Care System. This work will accelerate the integration and joint strategic leadership of health and care services on a York footprint, which is consistent with the national policy of aligning health services with logical local geographies of service delivery based on place. Were an East/West model to be implemented, each new authority would have to have at least two, and possibly more, local health and care alliances. Rather than simplifying the health and care system, this would create additional complexity for both health and local authority organisations.
- 2.30. Unsurprisingly, health leaders across the region have objected to the suggestion of this disruption at such a crucial time for the entire system.

“We regard the retention of City of York Council as a requirement for the alignment and streamlining we need in order to more readily break down boundaries between health and care and simplify joined up working.”

Simon Morritt Chief Executive, York Teaching Hospital NHS
Foundation Trust

Phil Mettam Accountable Officer, NHS Vale of York Clinical
Commissioning Group

Public Health

- 2.31. The proposal suggests the creation of single public health function across what would be the two new separate unitary authorities. At a time when Public Health teams in both York and North Yorkshire have led the Covid-19 response, balancing a high degree of local knowledge (for example, to establish effective local test and trace) with strong collaboration at the LRF level, this would be unnecessarily disruptive.
- 2.32. A recent [LGA Outbreak Management Peer Challenge](#) stated that “The leadership of the Public Health Team (PHT) has been exemplary, and is widely recognised across both the council and its stakeholders.” The report outlined the significant strength in partnership working and engagement with communities. Given the most significantly testing circumstances imaginable, the Public Health function in York proved itself to be highly capable. The justification, therefore, of disrupting both York’s and North Yorkshire’s Public Health teams is unclear.
- 2.33. In any event, if it were desirable to create a single public health team across York and North Yorkshire, it would be perfectly possible to do so if there were York and North Yorkshire unitary authorities – it is not dependent on an East/West model. Indeed, even if such a team were created under the East/West model, it would be likely to operate on the basis of York and North Yorkshire localities, mirroring the geography of developing health systems.

Transport

- 2.34. The District Councils’ proposals suggest that an East authority would be a logical footprint on the basis that the A64 is the key transport corridor. Whilst we accept that this might be true for Scarborough, Ryedale and Selby, York’s connectivity is far more complex. In the case of York, the connections to the north-east, west and south, along the A59 and A19 corridors are equally important. The evidence base set

out in the KPMG report (pp102, 103) reflects this more complex picture and does not support the more insular view of two separate geographies dominated by key routes.

- 2.35. Further, the East/West proposal does not address the position of York as a rail-hub, or York's the Park and Ride network. As a result it fails to link road and rail so as to drive multimodal travel within and beyond the region.
- 2.36. In reality, key transport links do not respect, and will always cross, local authority boundaries, and they do not justify a particular local authority geography. Instead, it is more sensible to consider strategic transport planning on a wider sub-regional basis, which would be enhanced through a Combined Authority.

Planning and Housing Delivery

- 2.37. The argument that York would be better placed to deliver housing numbers if it had a larger geographical area might, at a superficial level, appear attractive. However, this characterises housing delivery as a numbers game constrained by local authority boundaries, whereas simply changing the geography does not address the multiplicity of challenges involved. Indeed, combining the planning and delivery challenges of a compact urban area with those of a broader rural area could well make delivery of a Local Plan more difficult.
- 2.38. We consider that a better, and more strategic, approach is to consider housing at a sub-regional level, potentially through a Combined Authority with strategic spatial plans. This would allow the wider social and economic need to be considered in the round, rather than being limited by local authority boundaries.

Q3. Is the councils' proposal also likely to impact local public services delivered by others, such as police, fire and rescue, and health services?

- 2.39. Yes. The East/West model would have a significant impact on public services, particularly those carried out in partnership. The impact can be considered both in terms of initial disruption and in terms of the longer term strategic and operational fit between the authorities and the regional structures of public service organisations.
- 2.40. The East/West model would create the greatest possible initial disruption to the existing effective partnership arrangements. Every council, every service, every Service Level Agreement and arrangement across the sub-region would need to be changed or replaced. At best, this would create significant work. At worst, it would jeopardise the joint delivery of outcomes for residents, and mean that any rebuilding would involve starting from scratch. NHS organisations, the Police and Fire and Rescue, Universities and the community voluntary sector have all expressed concern about the level of disruption at this time, when recovery from the Covid-19 pandemic should be the priority. The stability of the current arrangements and the durability and resilience of the relationship between the councils and partners is of paramount importance. There is broad recognition that the removal of this link would be detrimental to the future of the city and its partner institutions.
- 2.41. As well as the direct costs of the transition to the local authorities, the unidentified and unacknowledged associated costs of service disruption to key strategic partners should also be considered in assessing savings and value for money.
- 2.42. In the longer term, the East/West model would have a negative impact on the delivery of some key services that are delivered in partnership, for example, in respect of the following:

Health

- 2.43. The combined response of local authorities and NHS organisations to the pandemic has been an exemplar of collective action based on a robust framework for future collaboration and development. The recent LGA Outbreak Management Peer challenge explicitly recognised the quality and strength of partnership working in York. Under the East/West proposals, these existing and robustly-embedded working relationships would need to be re-established at all levels across a different footprint. In addition, an East/West geography relates less well to the structures and arrangements of health partners. In this context, the direction of travel towards local Health and Care Alliances and the emerging strategic commissioning model for health services across York and North Yorkshire is particularly relevant. This identifies York and North Yorkshire as key geographical units, underpinning the overall sense of place. An East/West model would halt the emerging alignment of health agencies and local authorities, which is unlikely to be resolved given the unrecognised nature of an East/West split amongst health organisations.

Police, Fire and Rescue

- 2.44. The District Councils' proposals put forward no persuasive evidence that the East/West model would improve on the existing coterminous footprint that North Yorkshire Police enjoys with North Yorkshire and York. The policing challenges of largely-urban York and largely-rural North Yorkshire are different and, whatever local authority structures are in place, we would expect to see the continuation of a York Police Commander. This would put the policing structures out of alignment with an East/West model, losing the 1:1 relationship and the creating the likelihood that a single policing area would cover more than one authority, or that one authority would cover multiple policing areas. This would not be beneficial, either operationally or strategically.
- 2.45. A similar rationale applies to the Fire and Rescue Service. Whilst the removal of two tier structures would obviate the need to organise at a District Council level, the East/West option misses an opportunity to

allow North Yorkshire Fire & Rescue to realise the benefits of continuing simplified relationships under a single unitary geography.

- 2.46. We note that the initial proposal had to be amended after it incorrectly claimed that the Police and Fire and Rescue services supported the East/West model, when in fact the relevant organisations merely expressed support for the principle of unitary structures. We understand both organisations have clarified their position with MHCLG and will be responding to this consultation.

Voluntary and Community Sector

- 2.47. We have particular concerns about the impact of an East/West model on the Voluntary and Community Sector. Organisations in this sector are essential, but have been hard hit by the Covid pandemic, and they require stability to rebuild. Changing direct financial relationships with councils would give rise to significant concerns, as would the administrative overheads of re-bidding for funding or the novation of contracts. For many such small organisations this would be hugely problematic.
- 2.48. The relationships between these organisations and council officers, which are so important in many resident-facing services, would be disrupted and would put at risk support which, while vital to community wellbeing, lacks the resilience to deal easily with bureaucratic change.

Q4. Do you support the proposal from the councils?

- 2.49. No. We strongly oppose the East/West proposals. City of York's [Full Council](#) has twice voted overwhelmingly against York being merged with surrounding districts, and supports the opposing North Yorkshire proposal.
- 2.50. As York is already a successful and efficiently run unitary authority, and there is no advantage in adopting the proposed East/West model, which would fundamentally alter York's geographic footprint. Adopting

the Districts' proposals would not only confer little improvement, but would put at risk a range of crucial projects, causing significant service disruption and creating anxiety. On the other hand, we support the proposition from the County Council for a single North Yorkshire unitary authority, which would work alongside City of York Council in a partnership which retains each of our separate, unique identities and economic geographies.

- 2.51. The council's position reflects the feedback we have had from residents. Polling of York residents shows that only 8% support the East/West model whilst there is strong citizen support for the County's approach. 70% of York residents polled expressed a preference for York to retain its status as an independent council working closely with a single new North Yorkshire council. Furthermore, when asked how strongly they feel a connection to the geographies of the two options, a connection to the 'City of York' area was expressed much more strongly than a connection to the 'Eastern part of North Yorkshire': a large majority (83%) of all respondents said that they feel a 'very strong' or 'fairly strong' connection to the 'City of York' (<https://www.york.gov.uk/downloads/file/6242/telephone-survey-report>).
- 2.52. The District Councils have undertaken an online survey which asked for views on the two models proposed. There are significant concerns about the way in which this survey was framed and presented, to the extent that we do not believe the results can be considered an accurate assessment of opinion. Even considering the methodological shortcomings, however, the Districts' own survey identified a majority (54%) of York's residents being in favour of York remaining a unitary on the existing footprint alongside a new North Yorkshire unitary council.
- 2.53. Across the city's partnership network, the case for retaining the current status of City of York has significant support. Reasons include the stability of the current arrangements and the durability and resilience of the relationship between the Council and its partners, particularly at a critical time of great concern to many organisations. There is widespread recognition that the removal of this link would be detrimental to the future of the city and its partner institutions.

“We already sit in uncertain economic times and changes to the existing structure of York as an authority have the potential to create unnecessary uncertainty as we seek to make further investment around the City.”

Max Reeves Director, Helmsley Group

- 2.54. A public petition, launched by a wide range of city partners including city councillors, the York Central MP and colleagues from the health, education and business sectors, argues that York is best served by a Council based on its current boundaries. The petition can be found here: www.change.org/webbackyork. It has already received over 3,250 signatures, with comments highlighting why the retention of York on its current footing is so important to the local population.

Q5. Do the unitary councils proposed by the councils represent a credible geography?

- 2.55. No. Taking a wide range of factors into consideration, the East/West model reflects an arbitrary and artificial geography lacking a coherent rationale. It reflects neither the natural geography of the region nor a functioning economic geography. Indeed, referring to the proposed new councils as simply ‘East’ and ‘West’ underlines the lack of any identifiable sense of place or distinctiveness which might set them apart. The model fails to maximise the affinity and strength of North Yorkshire’s rural and coastal areas, separating them and undermining the opportunity to create a rural powerhouse.

Economic Geography

- 2.56. There is no single functional economic geography across the whole of North Yorkshire, and the East/West proposal itself accepts that the region has multiple functional economic geographies and has an overlap with other functional economic areas centred in other regions, particularly Leeds and West Yorkshire. The split proposed by the districts is driven by the geography of existing council boundaries and population size, rather than by substantive factors.

- 2.57. York has effective links to a range of key economic partnerships, in particular the York & North Yorkshire LEP, and it has strong economic links to West Yorkshire as well as the North Yorkshire hinterland. York remains a non-constituent member of the West Yorkshire Combined Authority (WYCA) and journey-to-work patterns show stronger links to Leeds than to any other single destination. It is not clear whether it would be possible for a new East authority to become a non-constituent member of WYCA, potentially removing the strategic link between WYCA and to York. York is outward-looking in all directions and must stay connected to surrounding economies to the North, East, South and West. There is no value, but great risk, in grouping York into a previously unrecognised East area which fails to represent the full picture of York's economic links.
- 2.58. Overall, an East footprint would not represent a coherent and existing functional economic geography. We also believe that to limit a proposed East authority to such a geography risks detrimental impacts on the very important links between both York and Selby and the Leeds City Region, and to Harrogate, which would be separated in a new West authority.

Population Size

- 2.59. To support the inclusion of York in the proposed East authority, the Districts' proposals make multiple references to the notion that the existing York unitary authority lies outside the range of an optimum population size of between 300,000 and 600,000. However, the criteria set by Government are more nuanced, allowing for the different characteristics of places to be factored in, such that population sizes outside this range can be appropriate. It is also clear that the Government's criteria apply only to new unitary authorities, where an economy of scale is necessary to overcome the disruption and costs of unitarisation. Were it to be a mandatory fixed population range, all but 14 of the existing unitary councils in England would be judged too small. Accordingly, the East/West proposal's heavy reliance on the blunt metric of population size is misplaced. With 210,000 residents, City of York Council is the median average size of unitary authority in England;

so, on size alone, the retention of its current geography is a comfortable fit within the population range of unitary councils.

A future Combined Authority

- 2.60. We do not accept the argument that councils within a successful future Combined Authority must be balanced in scale and type. As noted in the response to Q1, the size differential between York City Council and a North Yorkshire Unitary Council would be similar to or smaller than many existing and successful Combined Authorities. There is a strong argument that a diversity of authorities is a healthy characteristic at a Combined Authority level, with reduced likelihood of competition for the same identity, status and funding opportunities. On this basis, East and West authorities might be too similar to create a real identity or to avoid conflicting/overlapping priorities.
- 2.61. There is no evidence to support the argument that different population sizes will result in a Combined Authority suffering a power imbalance. Most Combined Authorities have diverse authorities with a one member, one vote system (and appropriate safeguards). We would suggest that the dynamics of a Combined Authority are best addressed through its governance arrangements rather than the structural reform of constituent councils.

Natural Geography

- 2.62. The very real differences between York and the wider County geographic setting is a crucial factor in the present context. York is largely an urban and sub-urban location and is therefore quite a different setting to its immediate neighbouring authorities. There are significant differences in community size, population density, and urban/rural character between the major settlements of York, Selby, Malton and Scarborough, as well as the towns of Whitby, Filey, Helmsley, Pickering, Kirbymoorside, Stamford Bridge, Tadcaster and Sherburn-in-Elmet. City of York Council has a 25 year history of successfully delivering services to its residents, with high satisfaction and the lowest council tax level in the area. The County Council

already has a strong track record in the local delivery of effective and efficient services to residents across a largely sparsely-populated rural and coastal area, services that represent 80% of total local council spend across the footprint. The disparate challenges facing York and those rural and coastal communities require different solutions.

- 2.63. Whilst services in York have been designed to work efficiently and effectively within a compact urban setting, it is clear that much of the success of North Yorkshire County Council's services is down to the scale upon which that Council operates. Scale is critical in the delivery of services across a large rural geography. By splitting the geography in half, the economies of scale would be reduced without any identifiable gain.

Democratic representation

- 2.64. The proposal fails to recognise that York is already a unitary authority and is already appropriately represented. Many of the benefits stated, such as simplification of democratic structures, do not apply to the city. For York, a key factor is the number of councillors. The proposal describes how an East council based upon the same ratio to which York currently works would require 104 elected members. If there were to be fewer councillors, York would see a dilution of democratic representation. If, instead, the York ratio was agreed, York residents would see their 47 councillors outnumbered by 57 other representatives, leading to an inevitable loss of focus on the unique challenges and opportunities in York. The proposal itself states that a very large authority could result in "a higher number of Councillors to represent the electorate, which leads to Councillors struggling to have their voice heard amongst many".
- 2.65. However, this model of representation would not benefit York. A proposal which, at best, provides no democratic benefit or, at worst, weakens democratic representation for 45% of the proposed East authority's population would not satisfy the requirement to improve local government in the area.

Identity

- 2.66. Whilst the identity of a place is a less tangible indicator of credible geography, it is important because it should reflect a recognised relationship between an authority and the population it serves. Both York and North Yorkshire are clearly recognised brands, with distinct and recognisable identities nationally and internationally. The loss of the connection between these places and their councils through the East/West model would be detrimental to the sense of place.
- 2.67. Following its Roman and Viking history, York received its charter over 800 years ago, in 1212, when King John allowed York's citizens, rather than the Sheriff, to collect and pay the annual tax to the Crown, to hold their own courts and to appoint a mayor. Since then, the connection between the city and its council has been constant and strong. Whilst the proposal suggests York could retain its Lord Mayor as a "ceremonial position", this fails to recognise the role the Lord Mayor has in York. As the second highest ranking Lord Mayor in the country, the Lord Mayor of York chairs our council. This would clearly no longer be possible across a new East geography, representing a degradation of the connection between the city and its representative council.
- 2.68. Moreover, an East authority would have limited capacity properly to focus on the promotion of the city, whose international status is a key asset. Any new identity that might emerge in relation to the East council would be an administrative or corporate identity, not a place-based one, and therefore it would be unlikely to engender any emotional connection with residents. No obvious connection between the city and council would be visible to visitors, businesses or potential investors. Similarly, the loss of a representative North Yorkshire council would waste the significant identity associated with the wider geography. We see these factors as disadvantages not just in terms of the way that residents would connect to the authority, but also because they would weaken the ability of authorities to promote their areas, seek investment and engage other outside interests.
- 2.69. The lack of a name for either authority encapsulates this issue. The fact that no names have been agreed suggests a lack of consensus between

the District Councils. If the proponents of a model cannot propose something so intrinsically linked to identity as the name, there can be little confidence that the proposed authorities and their geographical footprint would have any real identity.

Q6. Do you have any other comments with regards to the proposed reorganisation of local government in each area?

- 2.70. Local Government Reorganisation (LGR) is being considered in York and North Yorkshire alongside the need to progress devolution. It is self-evident that the high level of disruption caused by an East/West model would hinder, rather than promote, the swift achievement of devolution. Without any continuity in the authorities involved, devolution would have to wait until after LGR was complete, even assuming that the new authorities were to continue to support it. Conversely, if York were to continue as a unitary council, both it and North Yorkshire County Council could work towards the establishment of a combined authority at the same time as working towards the restructure of the two-tier areas.
- 2.71. As a result, the proposed East/West model does not serve the current ambitions of the region to accelerate plans to attract investment, stimulate economic growth and provide a sound platform to fulfil the government's levelling up ambitions through devolution.
- 2.72. There is no need to restructure upper-tier functions, which currently work well on a York and North Yorkshire footprint, in order to achieve the Government's aims. These functions, particularly people services, are critical to Covid-recovery and there is no evidence to suggest these would be better-run on an alternative footprint. At the very least, such a model would be untried and risky and, (at best) the very limited potential benefits would not outweigh the disadvantages.
- 2.73. We accept that Districts would see some benefits under this proposal. But these are largely related to unitarisation in general, rather than to an East/West model per se. For York as an existing unitary, there would have to be a significant strategic advantage in this model for it to be beneficial, and there is no evidence of such advantage. On the

contrary, there are significant risks and obvious disadvantages in terms of identity, service delivery, democratic representation, council tax levels and partnership working. Any model which would have such a detrimental impact upon 45% of the proposed new authority's population is, we believe, inappropriate as a proposal.

- 2.74. There is an underlying assumption that the proposed new East/West unitary councils would inevitably be able to implement best practice and establish an organisational culture that is better than that of their predecessors with no outflow of staff as a result of the re-organisation. This ignores the potential effects of senior staff 'churn' and it blithely assumes that change would lead to a 'modern, progressive working culture' without any teething problems.
- 2.75. The focus on creating two "balanced" authorities is at the expense of logical service delivery structures and democratic representation. Many priority areas are cursorily addressed with little more superficial statements that challenges will be addressed and realised. However, this is outside the control of those making the proposal. Future elected representatives and changed officer structures will determine this – the assertions are not inherently linked to or embedded within the proposal on the table. It is easy to make sweeping and unsubstantiated claims as to future performance, but statements such as "we will use our experience to..." suggest a view that this is a pitch to take over the running of the area rather than a proposed model of a democratically-led structure.
- 2.76. Further, there has been extremely limited, and little more than perfunctory, engagement with City of York Council and North Yorkshire County Council about the development of the East/West proposal and the selection of the shortlist of possible options. There is no clarity as to why the East/West model was chosen above the other shortlisted options; the North/South model, for example, is referenced then entirely ignored. Without such clarity, the assertion "East and West is Best" is entirely unsubstantiated.

3. The North Yorkshire Single Unitary Council Proposal

Q1. Is the councils' proposal likely to improve local government and service delivery across each area? Specifically, is it likely to improve council services, give greater value for money, generate savings, provide stronger strategic and local leadership, and create more sustainable structures?

3.1. Yes. The proposal strongly reflects the strengths of existing service delivery in the area, particularly the upper-tier services, but also ensures that mechanisms will be put in place to ensure that local delivery of the district functions will benefit from economies of scale, local knowledge and reduced duplication.

Improving Services

3.2. This proposal builds on a strong starting point for the delivery of upper-tier services. High performing services are already delivered efficiently and effectively on the North Yorkshire footprint, and there is every chance that they will be further improved by operating the previous district functions on the same footprint. The services previously split between 8 organisations will be improved by the consistent leadership of those functions within a single unitary authority, whilst the proposals for area committees will ensure that accountability at a local level is maintained.

3.3. We are enthusiastic about the significant opportunities that the County proposal will bring as a result of much closer collaboration between the two unitary councils of North Yorkshire and the City of York. There is scope for delivering service improvement as well as generating savings through the adoption of the York and North Yorkshire Strategic Partnership. Service improvement can be delivered across both North Yorkshire and York without the need for the fundamental service reconfiguration that the East/West proposal requires.

- 3.4. There is already a proven track record of effective joint working and a long standing and embedded relationship that will provide the foundation to further develop mutually beneficial collaboration. Existing examples of joint working include the establishment of Veritau (internal audit and fraud management services), acting as joint shareholders in Yorwaste (waste management), and being partners in the public/private partnership of the Allerton Park Waste Recovery Plant. We also already share management of adult education services and a shared Health and Safety service, along with other specialised services such as Trading Standards and bridges.
- 3.5. The combined experience of both councils will enable them to drive further collaboration at a strategic level, particularly in emergency response management, strategic planning and housing and working with the Integrated Care System. Recent experience of operating jointly in the Local Resilience Forum in the context of emergencies (Covid 19 and flooding) has highlighted the real opportunities that exist to develop collective work on public health support, emergency planning and flood management. The two councils will be able to work alongside a future Mayoral Combined Authority to identify housing opportunities at both delivery and strategic planning level. The two councils can also work effectively across health and care systems to exploit the transformational opportunities created by the Humber Coast and Vale Integrated Care System and other developments in the health sector, thereby getting the best value for its residents.

Value for Money and Savings

- 3.6. Within a large rural area, critical mass and scale are essential to ensure consistent and efficient service delivery. As a result, it is inevitable that the level of savings identified in this proposal are significant and greater than those of the alternative proposal. Given the likelihood of continuing high quality service delivery alongside this potential for savings, the value money argument for this proposal is particularly strong.

- 3.7. Similarly, within York, the continuity of a unitary authority which has amongst the lowest council tax rates of any unitary, and a low core spending power, suggests ongoing value for money. York residents enjoy, through robust and thorough financial management exercised over many years, Council Tax levels that are £110 lower than the current average of North Yorkshire councils (at the Band 'D' rate).
- 3.8. The County proposals are clear and more transparent, and they are based on more realistic assumptions about the proposal's financial sustainability and the savings that would accrue from the restructuring of services on a single unitary footprint.

Sustainable structures

- 3.9. A unitary council based on a recognised geography with a clear identity provides a strong foundation for a local government structure. The proposal provides for the delivery of services on a local level whilst having the scale necessary to remain sustainable. The financial modelling suggests this proposal would respond to the future demand challenges far better than the East/West model.
- 3.10. The ability of the new authority to work alongside City of York Council at strategic level in a new Mayoral Combined Authority and through a strategic partnership to support operational collaboration indicates that all parts of the area will benefit from a simplified structure. Such a relationship will incentivise the two authorities to support the other in a mutually beneficial way. Conversely, an East/West model is likely to put those two similar new authorities in direct competition through the similarity of need.
- 3.11. This North Yorkshire unitary model, which builds on existing strengths rather than disrupting them, will deliver robust and viable services, and will reflect the ambitions for the county and allow a speedier negotiation of a devolution deal for York and North Yorkshire.

Q2. Where it is proposed that 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? Such services may for example be children's services, waste collection and disposal, adult health and social care, planning, and transport.

- 3.12. Yes. The continuity of delivery of upper-tier services on the same footprints is likely to result in service improvement. Incorporating district-level services into the same operating footprint creates the potential for more joined-up services, less duplication, and greater economies of scale and consistencies in delivery.

Improved service provision

- 3.13. Because York will retain its footprint under this proposal, there will be opportunities to create efficiencies and improve service provision through collaboration between the two councils. This would benefit residents across the entire footprint. For example, shared service development could include combining revenues and benefit functions and back office functions, such as legal services and HR support. Where achievable these would contribute to the delivery of substantial wider savings across North Yorkshire as well as efficiency savings in York and the provision of more effective services to residents. For those services where York has experience, such as high performing revenues and benefits functions, the continuity of City of York Council would allow for knowledge sharing and peer support in order to assist with the implementation of the new model.
- 3.14. At a time of significant strain on public finances and services this proposal would strike the right balance between making efficiency savings and avoiding unwanted service disruption, both in North Yorkshire and York. Whilst service delivery in York already benefits from its relatively compact urban setting, making it more efficient, there would be the prospect of further improvement through closer working and sharing of resources and models of delivery.

Avoiding unnecessary disruption to high priority/key services

- 3.15. This proposal ensures the continuity of high-performing upper-tier services on existing footprints whilst creating the potential for further improvements. The alternative East/West proposal would include the dissolution of outstanding and critical services (especially for children, young people and adult social care) in both York and North Yorkshire. Indeed, all the functions currently delivered by City of York Council would need to be split up, reshaped and restructured. This is a high risk approach, and unnecessary. Instead, a single North Yorkshire unitary would minimise the disruption to critical services, and provide the maximum opportunity for improvement.

Children's and Adults' Services

- 3.16. Given the outstanding nature of Children's Services in North Yorkshire, there would have to be an extremely compelling reason to support any change to the existing arrangements. For York, whilst some of our services are on a rapid improvement journey, that process is made easier through the stability of the neighbouring authority's services and the ongoing peer support arrangements. Disrupting these services gives rise to significant risk, without any identified benefit. It is unsurprising that the independent scrutineer of both York and North Yorkshire's Safeguarding Children Partnerships has reached the same conclusion.
- 3.17. The same is true of Adults' Services, where there are clear advantages to stability and continuity of arrangements, but no evidence that an alternative delivery footprint would provide any benefits.

District level services

- 3.18. It is apparent from authorities across the country that services such as planning, waste collection and street-level services can be delivered over a wide geography. It appears highly likely that economies of scale, reduced duplication of management and consistency of service design

across the North Yorkshire area would result in greater efficiency. The proposed arrangements for locality working and local delivery, parish and town council liaison and area committees will ensure local accountability and minimise any risk of services being remote from the communities they are supporting.

Q3. Is the councils' proposal also likely to impact local public services delivered by others, such as police, fire and rescue, and health services?

3.19. Yes, positively.

3.20. This proposal would preserve the existing partnership framework across other public services covering both North Yorkshire and York. It would provide a sound foundation for building on the prevailing relationships and working constructively to recover from the pandemic with critical stakeholders, particularly those in the health sector. The stability of current arrangements that underpin the strength and resilience of the relationship between the councils and partners is of key importance.

Health and Care

3.21. The recent White paper, 'Integration and Innovation: working together to improve health and social care for all' presents a real opportunity to improve care and support for our residents. Covid-19 has led services to work more closely together, in order to deliver timely and effective care and support. Positive changes to integrate services, which would previously have taken significant time to develop, occurred much more rapidly. The local response is to build on these successes by setting up the 'York Health and Care Alliance' which includes the Vale of York CCG; York Teaching Hospitals NHS Trust; Tees Esk and Wear Valleys NHS Trust. Having this York locality alongside a North Yorkshire locality reflects a natural split of local health economies which is best-suited to delivering innovative integration and transformation without the disturbance and uncertainty of the disaggregation of existing services.

- 3.22. Key NHS stakeholders have commented that the districts' proposals will splinter existing NHS services in two directions, which will result in duplication and additional overheads at a time when every effort should be directed to the pandemic response and capitalising on that which works. Partnership relationships would need to be re-established across a different footprint, disrupting the foundations that have been crucial to the improvement in health and care services across the whole of the sub-region. This was evident in the collective response to Covid-19.
- 3.23. We consider that this proposal will positively contribute to Government plans to support the NHS by underpinning proposals to integrate health and social care provision and to consolidate partnership working. It matches the way that the NHS is organised locally. It would facilitate the evolution of strong services that are already provided at the county level (including Children's, Adult Social Care and Public Health functions) and would allow the NHS to continue to realign and integrate services on a whole North Yorkshire geography. The single unitary model would enhance the existing robust leadership, enabling it to face the multiple socio-economic, health and dispersed service delivery challenges across a largely rural setting, whilst also allowing a clear focus on the urban and semi-urban setting of York. It would serve to bolster and intensify the existing links between the local authorities and NHS partners by providing continuity, certainty and confidence and allow a shared focus on priorities to develop further.

Police, Fire & Rescue

- 3.24. The establishment of a single unitary council on the whole North Yorkshire County Council footprint would simplify the relationship by removing the second tier councils. Accordingly, this proposal aligns with the operational delivery structures for these services.

Voluntary & community sector

- 3.25. Organisations in this sector have been severely impacted by the pandemic and the single unitary model would provide the stability that is necessary for them to rebuild. This model would preserve the continuity of crucial existing financial and organisational links.

Q4. Do you support the proposal from the council?

- 3.26. Yes. We strongly favour the proposals from North Yorkshire County Council. We support the Government's desire to replace the two tier elements of local government in North Yorkshire. A single tier model would be more efficient, would be more easily understood by residents and businesses, and would support progress towards a York and North Yorkshire devolution deal. As York is already a successful and efficiently-run unitary authority, we see no advantage to be gained in adopting a new model that would fundamentally alter York's geographic footprint. Similarly, minimising disruption but achieving maximum value for money alongside the potential for service improvement provides compelling case for this proposal.

Q5. Do the unitary councils proposed by the councils represent a credible geography?

- 3.27. Taking a wide range of factors into consideration, the single unitary council proposed by North Yorkshire County Council reflects a credible geography, particularly in light of the retention of York on its current unitary footprint. It reflects the natural geography, the identity of place, and nature of the leading economic sectors. Fundamentally, it respects both the characteristics of York as a compact urban centre and North Yorkshire as a rural and coastal area with strong, evolving towns. It builds upon the strengths of these characteristics and incentivises a collaborative approach of mutual benefit which would pay dividends in a future Combined Authority arrangements. This contrasts with the East/West model which artificially homogenises two areas and sets them up in competition.

Economic geography

- 3.28. There is no single functional economic geography across the whole of North Yorkshire. York has effective links to a range of key economic partnerships, in particular the York & North Yorkshire LEP, and strong economic links to West Yorkshire as well as the North Yorkshire hinterland, as evidenced by travel to work patterns. It is clear that York has a different economy in terms of key sectors and size compared to surrounding areas. The rural districts of North Yorkshire also have much in common with each other. Whilst we do not believe it is possible to identify any structure which wholly represents the complexities of the economic geography, the split of York and North Yorkshire makes the most sense in terms of the nature of the economies and the nature of support required to support sustainable growth.

Population size and rurality

- 3.29. North Yorkshire's population can be regarded as the optimum size for a unitary authority covering a large rural, sparsely-populated area. A large geography is needed to deliver sustainable and effective services across such an area.
- 3.30. The County Council already has a strong track record in the local delivery of effective and efficient services across this fundamentally rural and coastal and sparsely-populated area, services which represent 80% of total local council spend across the footprint. It would be a disservice to residents in the Scarborough, Selby, Ryedale and York areas to disaggregate and reassemble successful services across the entire area, thereby disrupting delivery and altering existing priorities. In this respect, different solutions are required to meet the challenges faced by rural and coastal areas from those required to meet the challenges faced by York.
- 3.31. The difference in population size between North Yorkshire and York is not an obstacle to future joint success. Our record on partnership

working is a testament to that, and the Strategic Partnership Agreement provides a firm basis for fruitful collaboration in the future.

- 3.32. With 210,000 residents, City of York Council is the median average size of unitary authorities in England and so, on size alone, the retention of its current geography comfortably fits within the population range of unitary councils.

Democratic representation

- 3.33. An important benefit of the unitary model is the removal of a tier of elected representation to ensure clear accountability to residents. This particular model provides mechanisms to arrange service delivery and accountability at a more local level, in alignment with parliamentary constituencies. This is a logical and simple approach, whilst still maintaining the benefits of oversight across the North Yorkshire footprint.
- 3.34. In addition, the preservation of the long-standing and close democratic link between the York's 47 elected councillors and the city's residents will ensure the continuity of effective democratic representation in the city.

Local support

- 3.35. North Yorkshire's submission "A good deal of local support - Engagement addendum" highlights the broad range of support received from partners, the voluntary and community sector, town and parish councils and businesses. This reflects the comments received by City of York Council, which support the continuity of York as unitary in its own right.
- 3.36. The case for retaining the current status of City of York has significant support from across the partnership network in the city. The reasons for this support include the stability of the current arrangements and the durability and resilience of the relationship between the Council

and its partners, particularly at a critical time of great concern to many organisations.

- 3.37. Our own evidence suggests that there is strong citizen support for the County's approach: 70% of York residents polled expressed a preference for York to retain its status as an independent council and to work closely with a single new North Yorkshire council. Conversely, only 8% supported the East/West model. When asked how strongly they felt a connection to the geographies of the two options, respondents expressed a much stronger sense of connection with the 'City of York' than with the 'Eastern part of North Yorkshire': a large majority (83%) of all respondents said that they feel a 'very strong' or 'fairly strong' connection to the 'City of York'.
- 3.38. The District councils have undertaken an online survey which asked for views on the two models proposed. We have significant concerns about the way in which this survey was framed and presented, such that we do not believe the results can be considered an accurate assessment of opinion. However, even ignoring the methodological shortcomings, the District's own survey revealed that a majority (54%) of York's residents were in favour of York remaining a unitary on the existing footprint alongside a new North Yorkshire unitary council.
- 3.39. A public petition, launched by a wide range of city partners including the council, the York Central MP and colleagues from the health, education and business sectors, argues that York is best served by a Council based on its current boundaries. The petition can be found here: www.change.org/webackyork. It has already received over 3,250 signatures with comments highlighting why the retention of York on its current footing is so important to the local population.

Q6. Do you have any other comments with regards to the proposed reorganisation of local government in each area?

- 3.40. We believe that this model represents the most efficient and effective way of achieving the government's stated aims for local government reorganisation. It will also help accelerate plans to attract investment in order to stimulate economic growth in the region and will provide a

sound platform to more speedily deliver devolution and fulfil the government's levelling-up ambitions. The proposal reflects a recognised geography, with a clear logic as to who to talk to about what, and who is accountable for what. The importance of logical structures which naturally reflect the geographical units understood by residents cannot be overstated.

- 3.41. The proposal would allow the North Yorkshire Council and York to cement existing working relationships and would be much less disruptive than the alternative model, thereby allowing greater capacity to focus on a devolution deal. The continuity of City of York, in particular, would allow preparations for a combined authority to be initiated earlier, in parallel with the restructuring of neighbouring authorities. This is not a scenario available in an East/West implementation.
- 3.42. City of York Council is optimistic about the ability to continue the excellent working relationships between York and all neighbouring authorities through this model. The York and North Yorkshire Strategic Partnership would allow for collaboration where it makes sense, but the ability of services to concentrate on different priorities where necessary. This provides the best of both worlds – service improvement and efficiently potential, with minimal disruption.
- 3.43. We are grateful for the open and collaborative approach taken by North Yorkshire County Council in developing this proposal, in particular its recognition of the ongoing needs of York and the shared benefits of the structure proposed to all the residents of York and North Yorkshire.

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