



Millom Without Parish Council

Clerk: Mrs Lesley Cooper

Chair: Mr David Savage

Low Marshside
Underhill
Millom
Cumbria
LA18 5HA

Tel:01229775492

Email:millomwithoutparishcouncil@outlook.com

Website: millomwithoutparishcouncil.com

Viclee

Green Hill Road

The Green

Millom

Cumbria

LA18 5AZ

Tel:01229770310

Email: savaged62@gmail.com

7th April 21

Dear Sir/Madam,

Re: Consultation – Cumbria Unitary Council(s)

1. Respondent Details:

- Name – David Savage
- Responding on Behalf – Millom Without Parish Council – within the scope of the Cumbrian Area
- Role – Chair of Parish Council
- Email – Savaged62@gmail.com
- Approved by Parish Council (Reference Minute XXXXXX)

2. Context of Millom Without Parish

The Parish of Millom Without is located in the southwest of Cumbria, forming the southernmost part of the borough of Copeland. The Parish straddles the boundary of the Lake District National Park and is designated to be within the setting of the National Park.

The community lives within a picturesque landscape which comprises pastoral farmland, open fell and salt marshes along the northern banks of the Duddon Estuary. Our main centres of population for the nine-hundred or so residents are the

villages and hamlets of The Green, The Hill, Dunningwell, School Ellis, Lady Hall and Hallthwaites.

The Parish Council currently have three Authorities to engage with:

- Copeland Borough Council
- Cumbria County Council
- Lake District National Park

The Parish welcomes the opportunity to comment on the proposal to reduce one layer of Local Government.

Approach to Consultation Submission

The Parish Council will address its comments to the relevant options which include the footprint of Millom Without Parish Council and will focus its attention on the following proposed options:

- Two Unitary Councils - Allerdale and Copeland (West / East Model)
- Unitary – Cumbria County Council – “One Cumbria”

The questions addressed in this submission relate to those highlighted in the on-line survey with additional comments not covered by the scope of the survey.

3. Response to Questions

Key Question	Two Unitary Councils – proposed by Allerdale and Copeland	Unitary – Cumbria County Council
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?	<ul style="list-style-type: none">• Population Test - As a small Parish Council, situated on the outer edge of South Copeland, this model does not offer the scalability to generate the savings. For instance, the Allerdale / Copeland Unitary Authority will cover a population of ~ 167K, and this new Authority does not pass the “acid test” of a Unitary council which generally supports a population of around 300 – 600K, as per HMG guidance on Unitary Councils.• Questionable Savings - It is difficult to	<ul style="list-style-type: none">• Meet the Population Test - The scope of One Cumbria will also meet the HM Govt population “acid test”, with the existing population of nearly 500,000K. This will provide a degree of scale to maximise buying power and support minimal operating costs.• Deliver Savings - The scope of change to accommodate the

	<p>see how this new combined Authority will generate sufficient savings to credibly improve services and provide the necessary strategic and local leadership to make a noticeable difference. This option offers incremental changes, but through greater scale as offered by One Cumbria, we are more likely to see transformational improvement to services through aggregation of scale.</p> <ul style="list-style-type: none"> • Loss of Talent - The dilution of skilled resources spread across two unitary authorities has the potential to dilute job size and see the loss of key talent in supporting Cumbrian services. The ability to attract and retain quality talent will be sub-optimal in adopting two unitary authorities. 	<p>new singular operating model will deliver enhanced savings over the other options</p> <ul style="list-style-type: none"> • Transition and Resilience - Reduced implementation costs with existing “One Cumbria” structures already in place will deliver a smoother transition and retain the resilience within the existing arrangements • “One Voice” - The strategic leadership of Cumbria will be secured for the County with one voice representing the needs of Cumbrian Residents, and thus avoid competing messages and needs being communicated to HMG.
<p>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.</p>	<ul style="list-style-type: none"> • Concern for Critical Services - We remain concerned that sensitive and critical services such as Children Services will be exposed to further challenge. This has the potential to impact on sustainable and resilient provision, particularly during transition which will bring disruption to such sensitive services. • Unwanted Complexity - The two unitary model offered by for example the Allerdale and Copeland offer, may create the same boundary issues and complexity which is currently delivered by the existing three tier model of local government for Cumbria. Such arbitrary cross unitary border issues in key areas to deliver services as transport and highways will lead to discussions on competing priorities. This has the potential to leave communities, such as 	<ul style="list-style-type: none"> • Secured Services - The continuity of sensitive services such as Children and Adult Social care will be secured through one unitary council for Cumbria. The current landscape of Health Service provision is already a complex model with four Health Trusts operating across the Cumbrian Landscape. • Better placed to meet the challenge of integrating Health and Social Care - The work underway to see greater integration of health and social care arrangements, aligns more smoothly to the One Cumbria model and thus mitigates against further sub-

	<p>Millom Without becoming “collateral damage” in the two unitary council operating model, with no route to resolution on local issues.</p> <ul style="list-style-type: none"> • No Real Consensus Among the District Councils. The Parish Council are also concerned that the Allerdale and Copeland model which includes Carlisle City Council is not one which has a clear consensus with the proposed Partner Authorities. This has the real potential to bring an unwilling partner into a structure which they feel does not meet their strategic objectives. All two unitary models face this reality and does not provide a coherent and stable platform in which to launch a new operating model for Cumbria. • Lack of strategic oversight to address the Aging Population of Cumbria - Cumbria has a growing demographic with nearly 25% of the population over the age of 65. This growing demand needs strategic oversight to bring a number of partner agencies to work collaboratively. Millom Without PC has a growing aged population in a remote rural setting – getting this issue working for residents is critical without any unintended disruption to front line services. • Complex Health Service Landscape for Cumbria -This County is served by four Health Trusts (2 acute and 2 mental health). This landscape is already a complex arrangement and any further division of across two principle authorities will be challenging and there must be a question of whether there are sufficient qualified resources to support such an approach. 	<p>division and consequential complexity offered by the two unitary councils’ model.</p>
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<p>Q3. Is the councils' proposal also likely to impact local public services delivered by others, such as police, fire and rescue, and health services?</p>	<ul style="list-style-type: none"> • Duplication means more costs and complexity - It is evident that the two unitary model will need to create structures, capabilities and capacity to deliver the services currently provided by Cumbria County Council. This will have an impact during the significant transition to the new arrangements and may attract unknown costs which will then lead to Resident Community Tax • Lack of Risk Mitigation - The scale of change and underlying risks in this transition are not defined to understand how they will be mitigated by the Allerdale and Copeland offer 	<ul style="list-style-type: none"> • Reduced Implementation Risks and Costs - There will of course be some impact during the transitional phase. However existing structures will provide a good starting point to map across to the one unitary model and so reducing implementation risks and the associated costs.
<p>Q4. Do you support the proposal from the councils?</p>	<ul style="list-style-type: none"> • No. This model is not supported because: <ul style="list-style-type: none"> ○ It does not deliver improved service standards and generate costs savings to address the current economic backdrop and impending challenge to public services. ○ Creates more complexity and dilutes the "strategic voice" of Cumbria with an economy valued at £12 billion per annum. ○ The two unitary authorities are likely to create confusion and leave us in the same situation with a lack of clear accountability for Cumbria as a whole. ○ All two unitary authority models have no agreed consensus in their proposals, which sets up a challenging environment to deliver on the strategic intentions of the two unitary operating model. 	<ul style="list-style-type: none"> • Yes. This model is supported because: <ul style="list-style-type: none"> ○ Has the potential to drive real cost savings which will be significant within an increasingly challenged public expenditure rounds. ○ We retain one strategic voice for Cumbria and be the "right vehicle" to support HMG Levelling Up agenda, as part of the economic growth and Covid-19 recovery. ○ We avoid dilution of services, talent and ensure administrative borders do not create barriers to delivery. ○ Residents are likely to experience a more

	<ul style="list-style-type: none"> ○ The approach of a two unitary model will have the greatest impact on Residents during the transitions and the un-funded implementation costs which will need to be financed by the Community Charge. 	<p>seamless implementation to the new structures required by one Unitary Council.</p>
Q5. Do the unitary councils proposed by the councils represent a credible geography?	<ul style="list-style-type: none"> • No. The proposed geography of a west/east split does not create sufficient scale of population as set out by HMG Guidance for a unitary council. • This proposal is also of concern in creating a potential barrier to the Cumbrian Economy and creating two sub-economies. Nuclear (West) and Visitor Economy / Rural (East). This approach will be divisive in seeing the whole Cumbrian Economy and failing to represent a “cohesive conversation” with HMG Departments which support the Cumbrian Economy. 	<ul style="list-style-type: none"> • Yes. The geography will secure the border of Cumbria without any further dilution. • The scale of population for this option will meet HMG requirements and the One Cumbria will represent the whole economic footprint for Cumbria
Q6. Do you have any other comments with regards to the proposed reorganisation of local government in each area?	<ul style="list-style-type: none"> • Please comments below 	<ul style="list-style-type: none"> • Please see comments below

The final comments which we feel are generic to both submissions are key issues from the perspective of a small Parish Council:

- **Empowered Communities** - As small Parish Council with relatively limited resources and capacity, we believe that arrangements for community governance and empowerment should be flexible to allow for variations in capacity and aspirations amongst town and parish councils. Communities should be free to choose the nature and extent of their involvement.
- **Influencing Decisions** – This Parish Council is proud of its development and implementation of its local Community Plan. We firmly believe that the principal authority should actively engage in the preparation of community plans and establish protocols which enable them to

influence policy decisions and initiate actions. In particular, there needs to be arrangements that enable all aspects of a parish plan to influence community strategies and local development frameworks. This also needs effective engagement of Authority Staff and resources to provide “wrap around” to the delivery of local aspirations.

- **Capacity and Capabilities of Parish Councils** -There remain differences in capacity and capability across the parish sector which will need to be taken into account if empowerment of communities through town and parish councils is to be a reality across the county. There needs to be recognition of how the new unitary authority will support Parish Councils, particularly in upskilling and creating appropriate locally based partnerships.
- **No Loss of Local Identity** – Small Parish Councils such as Millom Without do not wish to lose their identity through amalgamation with other Parish or Town Councils. We do have an operating model which brings all Local Parish Councils together with other third-party organisations to develop plans and actions that cover the South Copeland footprint. We see the value in such locality models and we feel whichever model is adopted, such arrangements should be on the table for discussion and further development.

We hope you take the above comments into account in making your determination for Cumbria.

Yours sincerely,

David Savage
Chair – Millom Without Parish Council