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Ref J18144

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Dear Peter

As the Leader of Wiltshire Council – a position I have held since its formation almost 10 years ago – my overriding vision and guiding principle has been, and continues to be, that creating strong communities is the single most important thing we can do.

To achieve this, I am of the view that Wiltshire Council needs to have 99 members and our submission provides the evidence for this.

While comparisons will inevitably be made with the size of other councils, I passionately believe Wiltshire and its communities are truly unique, and any reduction in council size would adversely impact upon the dynamism and strength of our communities.

Wiltshire is like no other area – the way we govern and provide community leadership in our county is very different from anywhere else and comparisons with other areas are unhelpful and not appropriate.

Wiltshire is a strongly member led authority, working in a very different way from most other councils. Our members are all expected to play a role in leading the council, developing policy and in community leadership. Nowhere is this better demonstrated than in our Community Area Boards which have executive power, they are not just community forums.

I believe very strongly that this should not be a numbers game and that the emphasis on size is simply wrong.

While our size is understandably important, the focus should instead be on continuing the robust legacy we have created through our community structure.

Wiltshire is all about place, and about communities – our diverse, dynamic, and energetic communities have been empowered to do what is best for their residents, delivering local solutions and local services.

We implemented a community area model in 2009 when the unitary council was formed to ensure a localised model of leadership, engagement, empowerment and local decision making.

Our 18 community area boards engage with our 20 local communities, parish councils, partner organisations and volunteers to take decisions based on evidence and shared knowledge particular to their local area.

Each of these community areas is unique based on their history and their makeup. The importance of preserving them is fundamental to their future resilience. These local communities know their communities best and through the leadership model this will continue to be achieved.

Salisbury, Chippenham, Trowbridge, Devizes, Bradford on Avon – to name just five of our communities – are all places which are steeped in their own historic backgrounds. They all have their own identity. They all have their own communities. They don't see themselves as being the same, neither do I, and neither should you.

One size does not fit all and these separate community areas are very much part of the DNA of Wiltshire.

Our model is a model that works, it has built community resilience and to evidence this you only have to look at the recent nerve agent incidents in the south of the county.

Since worldwide headlines were generated following the appalling Novichok incident on the 4 March, the community in Salisbury has displayed remarkable spirit and rallied around to support their city.

This did not happen by chance – a strong community had already been created and is well-established. It had excellent business networks and close-knit community groups who supported each other, identified what they needed to do and got on with doing it. Although there is a long way to go, Salisbury is on the way to recovery – and to be truthful, this would not have been the case if it did not already have a strong community infrastructure, with well-connected networks and a sense of place, pride and identity.

The recovery has undoubtedly suffered a setback with the most recent, tragic Novichok incident which has impacted upon Amesbury – which while geographically close to Salisbury, is a separate town with its very own sense of identity. But you would not feel there had been a set back by meeting with and talking to local people, as I have done. Amesbury, like Salisbury, is bouncing back – the town council, business community, and residents have regrouped and looked at what's needed to help them recover and rebuild. That is real community leadership.

Put simply, these two communities were ready to cope with the most shocking things imaginable because of the work that had been put in to making those communities strong.

Communities are what makes Wiltshire the thriving county that it is and to change this would, I believe, have a negative impact upon our residents and on the services provided locally.

We consider a council size of 99 is the most appropriate to enable us to provide effective and convenient local government within Wiltshire, and to preserve our separate identities and sense of place and to have the capacity for good and strong community leadership. Any reduction would cause these communities to suffer.

I was very concerned to note in your last letter to us that you asked us to justify our position with regard to our effectiveness while Cornwall is operating with 87 Members. I would point

out to you that Cornwall is currently operating effectively with 123 Members and will not start to operate with 87 Members until after the 2021 election as a result of a decision by the Local Government Boundary Commission for England. We have no idea if that will be effective and Members in Cornwall have expressed severe concerns to me that they will find it extremely difficult to provide effective government at that number of Members.

I believe it is a real shame that the Local Government Boundary Commission for England sees the electoral review as being about numbers, rather than what is right for individual places. What is right for one part of the country, will not be right for Wiltshire. Wiltshire is about communities and these must be preserved.

Yours sincerely

A handwritten signature in blue ink that reads "Scott of Bybrook".

**Baroness Scott of Bybrook OBE**  
**Leader of Wiltshire Council**

## **Supplementary Information Requested by the Local Government Boundary Commission**

### **1. How the Council's proposal provides an effective balance between strategic decisions and operational management.**

The Council's proposal finds the best balance for efficient strategic decision making and operational delivery - ensuring that communities can have their say throughout.

The philosophy behind the Council's "local first" approach is to provide the sort of unitary authority that the people of Wiltshire wanted. The basic principle of councillors setting strategy and policy through full Council and Cabinet (aligned to the Business Plan) - with senior officers managing implementation is clear - but this is only a starting point.

Communities are consulted on proposals for new strategies and policies through their local councillors and area boards and their views reported and taken into account before final decisions are made. Feedback is given and communities monitor the effectiveness of delivery through their area boards. This ensures that if something is not working well councillors get to hear about it.

Our major partners such as the NHS, Wiltshire Police, Fire Service and other key 3<sup>rd</sup> sector partners have also embraced this "local first" way of working and have shaped their organisations to reflect this. It is therefore essential to have the area boards which are based on clearly identifiable communities integrated into the Council's governance arrangements and to have a sufficient number of councillors to allow them to operate efficiently and effectively. Any reduction in numbers puts this at significant risk.

The influence of communities is the bedrock of effective strategic decision making in Wiltshire. There are important roles for executive councillors (Cabinet members and Portfolio holders) to lead and drive this approach, and be seen to do so. The public in Wiltshire expect this level of transparency and accountability and a sufficient number of councillors are needed to achieve it effectively. To recognise the importance placed on these governance arrangements, corporate services and communities are specifically designated in the responsibilities of two of the Cabinet members. In addition to the implementation of new or revised strategies and policies, service delivery is the professional responsibility of officers. However, there is a strong, supportive team approach between executive councillors and officers to ensure services are the best they can be and are responsive to changing community requirements. At a more formal

level there is robust public reporting and commentary of service performance and risk by officers to the Cabinet.

The benefits and strength of this open approach to decision-making and operational management are clearly evident' in the "critical friend" challenge exercised by non-executive councillors, co-opted members and stakeholders in the Council's overview and scrutiny arrangements. Many of the decisions by Cabinet and Council are taken through scrutiny in the first instance. Detailed review is undertaken using expert input with open reporting of findings and recommendations. Those executive members and directors with responsibility for the matter under review attend in person to answer pertinent questions. This is seen and accepted as legitimate, constructive, lay challenge of the decision-makers. This attaches real credibility to the final decision in the eyes of the public. Again the overview and scrutiny function needs a structure with a sufficient number of councillors to do justice the principles of good scrutiny. Overview and scrutiny is regarded a vital component of effective governance. A reduced number of non-executive councillors runs the risk of devaluing this important statutory function.

The Council's corporate governance arrangements have been independently evaluated and its member-led approach and strong and effective relationship between the political and corporate leadership were recognised as a real asset.

Democratic input and influence by the communities of Wiltshire through our "local first" approach requires full weight to be given to it when assessing the effectiveness of our governance, scrutiny arrangements and representational structures.

Reducing the number of councillors and altering the current balance of decision-making could take us back to a more traditional set-up and risk creating a democratic deficit with inherent risks to member oversight.

As noted by the Leader of the Council, Baroness Scott of Bybrook OBE:

*It is our clear and evidenced view that our success to date as a Council has been achieved with powerful political leadership and strong community representation enhancing the power of managerial leadership to deliver. As such, we believe the current arrangements balance strategic and operational management effectively.*

## **2. To fully understand scrutiny members' role in policy development and, if there is one, why portfolio holders are needed.**

It is widely understood in local government that the overview part of the overview and scrutiny function covers the non-executive role in policy development. This mainly comes in the form of an invitation from the executive to support the development or revision of corporate or service policy in response to changes in legislation, central government direction or local initiative. This invitation can come early in the process allowing overview and scrutiny to take a lead in formulating the policy detail or later by testing the options and proposals of the work done by the executive and officers ahead of any decision. In both instances the terms of reference and approach are mutually agreed between the executive and overview and scrutiny. This often leads to the establishment of an ad hoc single topic task group reporting to the parent select committee, with recommendations going back to the executive. These recommendations are taken into account by the executive.

However, this important scrutiny work is not sufficient in itself - Wiltshire believes in meaningful engagement with its communities and stakeholders before decisions are made. It is the executive (and not non-executive members through overview and scrutiny) that leads the process of engagement through initial consultation, representation of views and response prior to final decision. This consultation can take the form of surveys, petitions, events, correspondence and answering questions but - most significantly in Wiltshire - through receiving feedback from area boards. This requires enough executive capacity to do so effectively.

The responsibilities of a large unitary council are vast and to have an effective and integrated overview scrutiny function requires sufficient non-executive councillors organised in a meaningful way. However, it is the executive that owns the whole process of policy development as overview and scrutiny powers are limited to making recommendations. The Cabinet is restricted to a maximum of 10 by law so in order for it to provide executive leadership at all levels in an organisation of Wiltshire's size and complexity it requires support. In reality this can only come from within the Administration in order to have consistency. These councillors are recognised through a single portfolio status to develop policy working closely with services and extending executive frontline visibility to the public, communities, stakeholders, partners and contractors. This is regularly done at face to face meetings and attendance at local, regional and national events. This vital supplementary executive visibility and knowledge provided by the portfolio-holders then feeds back as input to the overview and scrutiny function.

Cabinet Members already work, on average, over 50 hours per week on council business. Without portfolio holders this would rise to over 70 hours per week, which is not sustainable.

The use of portfolio holders (or their equivalents) to support Cabinet Members reinforces the member-led nature of the authority and is now common in many other authorities.

This important, frontline, executive role cannot simply be added to the overview and scrutiny function. Overlooking the unique role played by portfolio holders, and the distinct role of the overview and scrutiny function, would run the risk of distancing the executive from the voices of our communities and stakeholders. This would make the current strong, effective and respected engagement in policy development in Wiltshire all the poorer.

**3. In relation to the planning function, why such a large number of Councillors need to be involved in decision making on a very small proportion of the total number of planning applications which the Council receives.**

The Council disagrees with this assertion.

Wiltshire is the third largest planning authority in the country. Across the calendar years 2010-2017 an average of 195 items per year were considered by the planning committees - a considerable number by any measure. National statistics for the past year show that in England an average of 5-6% of planning applications are determined by councillors. Given Wiltshire is a larger planning authority, a figure of 4% being determined by councillors in no way indicates 'a very small proportion' of planning applications are considered by councillors, compared to other authorities - nor is the actual number low.

Five planning committees is the most suitable number for a council area the size of Wiltshire, processing the number of applications that it does. Excessively long meetings lead to bad decisions, and even with an average of 38 minutes per application (including public participation, which is critical to public confidence in the planning system) one in five planning meetings are over three hours long, some nearly six hours long. Fewer committees to consider the applications would mean longer meetings and poorer decision making. At present, 123 hours per year is spent considering applications across five committees and reducing the number of committees would increase the workloads of the remaining committees to an unreasonable amount.

Additionally, given the extreme importance of planning matters to residents, and that committee decisions by their nature will be on more controversial matters, effective decision making requires that those decisions be made by people with local knowledge and experience, which would not be the case with fewer committees. It already takes almost an hour to travel from the furthest parts of the county to the nearest area administrative hub.

In addition, the number of councillors involved in those decisions is not unusual or unreasonable either. Many genuine comparator authorities like Cornwall and County Durham have four committees, but those committees have more councillors than those in Wiltshire. Particularly for large unitary authorities which do not share any planning responsibilities with other authorities, councillor numbers of around 50% of the total number of councillors is normal for the planning function. The current structure in Wiltshire is effective and a local first approach to decision making requires such a number to be effective, particularly given the high volume of work being undertaken.

#### **4. Why a minimum of four Councillors is needed for an Area Board to operate effectively.**

The Council has devolved local decision-making to communities and empowered its 18 area boards to tackle local issues. The area boards are the foundations upon which the Council's work with communities is built. The boards are now part of the organisation's culture - part of its DNA – they are highly visible and firmly focused on addressing issues identified by their local communities.

The Council has transferred funding and functions to the area boards. Part, though certainly not all, of that approach involves the delegation of executive authority to the Area Boards, in particular the delegation of significant grant funding, local transport schemes and devolution of youth funding. Devolution involves local people in decisions that affect them, levers social capital into shared priorities, makes public funding work harder and go further, reduces duplication, integrates public service delivery and it improves services, outcomes and impact. Devolution works and it makes good business sense.

The Area Boards also use their democratic legitimacy, devolved resources, collaborative influence and their community workers to facilitate action across these and other local priorities. Every £1 awarded by the Area Boards to support community projects levers the equivalent of £6 of external funding, turning £1.3m devolved public funding into £7.5m of community investment in 2017/18. The leveraging of social capital through the area boards has supported the 11000 volunteers who invest

significantly in Wiltshire's rural communities, and enabled the Council to focus savings into vital areas such as adult social care and looked after children, mitigating the impact of budget reductions.

Part 3 Section B Paragraph 4.17 of the Wiltshire Council Constitution provides that in order to be quorate a minimum of three voting members are required for an Area Board meeting, in keeping with the rules for other committees of the Council.

If Area Boards were expected to operate with a total of only three Councillors however, there is a high risk that Boards will be unable to undertake formal decision making in many instances. Attendance at Area Boards by Councillors in the municipal year 2017/18 was 90% across an average of approximately 6 meetings per Area Board per year, a very high amount, but this could still lead to 2-3 meetings per Council term for a three-member Area Board potentially being inquorate and unable to make decisions. Councillors will inevitably have pecuniary or other interests which prevent them from voting upon specific items and so in practical terms will become inquorate many times during the year.

Taking into account that the community areas in Wiltshire are not arbitrary administrative constructs but historically and academically identified distinct areas, complex substitution arrangements to ensure quoracy would undermine the entire principle of local Councillors taking local decisions, and diminish the effectiveness of the Area Boards for the Council and its partners as well as in the eyes of the public. As noted in paragraph 31 of the initial submission the LGA were extremely positive about the present arrangements, and that it was a sound basis for the further support of place based delivery of services.

The Area Boards were identified following an exhaustive analysis of many factors: historic settlement patterns and civil boundaries, travel to work areas, shopping patterns, transport links, school and GP catchments, geology and more. The areas were established in 1997 and were legitimised through the comprehensive public consultation undertaken in 2008. Since that time they have been incorporated into service delivery and performance monitoring by the public agencies in Wiltshire. Changes to the Area Boards would have a fundamental impact on the nature of local governance in Wiltshire, and is therefore highly relevant in any Electoral Review. Any proposed outcome would need to evidence a model which could provide the same quality of efficient and effective governance at local level.

## **5. Why a smaller council size would compromise the Council's ability to discharge its duties and represent the people of Wiltshire.**

An effective Council cannot be operating at a bare minimum of necessary resources without significant risk. This would allow no level of contingency for increases in workload, sickness or other absences that would no doubt occur. The initial submissions of the Council have demonstrated with the proposal of 99 that the 'breaking' limit is close to that point, and therefore a proposal of 99 should be accepted as it is at that point at which it is assured that the Council can maintain and continue to improve its effectiveness in being a community driven and member-led authority - regarded highly nationally for its innovation, efficiency and inclusiveness.

As a purely academic exercise, several key trigger points are highlighted below to demonstrate the impact of reduction in council size on specific areas. However, in reality the impact would resonate throughout all aspects of democratic governance and would compromise the ability of the Council to fulfil its duties effectively.

- At a council size of 98, community areas would not be represented most efficiently due to additional work arising from population changes.
- At a council size of 93, while non-area board committees would be able to operate, at this point it would be likely that the council would not be able to maintain all of its community area boards.
- At a council size of 92 it is considered that non-area board committees would be operating at the very limit and would not allow for any capacity for contingencies. Moreover, community areas would not be appropriately represented or efficiently governed as insufficient area boards could be established at a level which ensures efficient and effective decision making. Losing the heart of community governance in such a way would in our view be unacceptable.
- At a Council size of 82 committees such as those for planning and scrutiny would function much less effectively, councillor workloads would become unreasonably onerous, particularly in relation to the discharge of executive functions, and community areas would not be appropriately represented or efficiently governed across a significant part of the county.
- Council sizes of 79 or lower would result in a committee structure wholly unable to cope with the full range of responsibilities, communities would have inadequate representation and effective

governance would be seriously compromised. The Council, and partners, would at great time and cost for no benefit have to restructure all its governance arrangements.

Therefore, bearing in mind the equal weighting to be given to the necessary criteria, at a Council size of less than 99 there would be severe impacts to community identity and to effective and convenient local government, especially in relation to local decision making and democracy. Conversely, there is no evidence to support the view that a reduction in Council size would result in more effective and convenient governance.

Further supporting information on the above points is included in the attached Annex.

## Annex - Additional Information

### 1. Committee Places

A council with such a large geographical area and population requires a sufficient number of councillors on each committee to be effective and democratically representative. The smallest standing committee with council-wide functions has 9 councillors and is regarded as a minimum level for operating effectively. However, many other committees will not operate effectively at such a number due to the nature and level of work required and the need to ensure that there is a sufficient pool of members (including substitutes) with relevant experience to draw on to populate sub-committees appropriately.

Full details on the level of work and composition of each committee are listed in the original submission - see in particular paragraphs 52-92.

Further explanation of the minimum requirements for each role and committee are summarised in the notes to the table below. This would be operating at the very limit and would not allow for any capacity for contingencies.

Number of Councillors	Overview and Scrutiny Management	Children's Select	Environment Select	Health Select	Strategic Planning	Northern Area Planning	Eastern Area Planning	Southern Area Planning	Western Area Planning	Licensing* <sup>1</sup>	Audit	Standards*	Staffing Policy*	Appeals*	Pensions+	Officer Appointments	Police and Crime Panel +
1																	
2																	
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	
11																	
12																	
13																	
14																	
15																	

Present total																	Total	Cllrs	
15	13	13	13	13	11	11	8	11	11	12	11	11	9	8	5	5	7	174	98
Minimum Actual Total																	Avg committee per cllr		
13	11	11	11	11	11	11	8	11	11	11	9	11	9	8	5	5	7	163	1.76 <sup>2</sup>

<sup>1</sup> \* denotes subcommittees needing to be populated. + denotes joint committee

<sup>2</sup> Including area boards equals 2.76 per councillor based on cllr survey, in line with national averages of approximately 3.

**a. Overview and Scrutiny Committees – 46 places**

The Council believes that this is the minimum number necessary to ensure that the council is able to sustain a meaningful role in policy development and scrutiny and properly discharge this important statutory function. This allows for 13 members on the Overview and Scrutiny Management Committee (including the chairs of the other 3 scrutiny select committees) to manage and oversee the overview and scrutiny work programme and 11 members for each select committee. The Council's arrangements are in keeping with other similar authorities. Any reduction below this number would create difficulties in populating the wide range of scrutiny task groups and rapid scrutiny exercises, and compromise the quality and extent of the contribution this function is able to make towards sound decision making.

**b. Planning - 52 places**

Given particularly the considerable number of planning applications that fall to be determined by councillors and the nature and extent of the Council's geography, 5 committees comprising a total of 52 places (as shown in the above table) is required to discharge this function effectively. Many councils have fewer but larger planning committees, and process fewer applications, so this Council is not out of proportion and there is no scope for reduction before effectiveness is compromised.

**c. Licensing – 11 places**

The Licensing Committee is required by law to have no fewer than 10 councillors and must have a sufficient pool of councillors to draw on to form sub-committees to hear and determine individual licensing applications and reviews. This must take account of the need to ensure that the sub-committees do not comprise councillors who are representatives of the area in which the premises in question are situated or who have a conflict of interest.

**d. Audit – 9 places**

The Audit Committee has a key role in monitoring and reviewing the effectiveness of the Council's corporate governance arrangements and should have no fewer than 9 councillors to undertake this role given the size and complexity of the Council.

**e. Standards – 11 places**

A sufficient number of councillors is required to be able to form sub-committees to determine reviews and hearings under the Council's arrangements for dealing with complaints under the Code of Conduct, and applications for dispensation from the rules on disclosable pecuniary interests. This has to take account of any conflicts of interest and ensure that a fresh sub-committee is constituted for different stages of the same matter. This cannot be achieved with fewer than 11 places.

**f. Staffing Policy – 9 places**

This is the minimum number of places that is required given the wide remit of the committee in respect of the Council's staff, and the need to form sub-committees to determine employment matters in respect of senior officers, staffing appeals and grievance appeals. Councillors must not have any conflict of interest in the matter and a fresh sub-committee is required for each stage of the process.

**g. Appeals - 8 places**

There needs to be a sufficient pool of councillors to draw on to form sub-committees to determine appeals on matters such as school appeals and discretionary rate relief.

**h. Pension Fund - 5 places**

Joint Committee with Swindon BC with an agreed proportion of places, which could not realistically be reduced further.

**i. Officer Appointments - 5 places**

This committee meets as required to appoint senior officers. Given the importance of this function it could not be reduced further.

**j. Police and Crime Panel - 7 places**

Joint Committee with Swindon BC with an agreed proportion of places in line with statutory requirements.

This gives an overall number of 163 committee places. The Council has an average of 2.76 committees per councillor, in line with the national average of around 3. Excluding area boards this reduces to 1.76 per councillor. Applying this factor to the 163 places gives 92 councillors, which is considered to be the minimum for committees operating at the limit of their effectiveness with no allowance for contingencies. It should also be noted that members of the executive (including portfolio holders) could not serve on any scrutiny committees and this needs to be taken into account when assessing the overall structure.

**2. Area Boards**

An indicative analysis of the likely impact of reducing council sizes on the Council's Area Boards is included below as follows:

**a. 99**

While this does allow us to retain all our area boards it still involves significant changes. Marlborough Area Board will need to see the equivalent of just under half a division moved into its area from another area board (either from Royal Wootton Bassett or Devizes area boards). Pewsey will probably have to have some villages from Tidworth Area Board moved into it. Significant changes would also have to be made to Salisbury, Corsham and Chippenham area board areas. 2 area boards would still have 3 members, Pewsey and Tidworth and would need to continue with their substitution arrangements.

**b. 98**

More than half a division would need to be moved into the Marlborough Area Board to keep it at 4 members. This is not reasonable to neighbouring communities as Pewsey also needs to have 0.2 of a division moved into it at this stage. At this point we would need to reduce Marlborough to a 3 division area board which would give it the same problems with quoracy and require a substitute arrangement. The most 'similar' area board we would need to draw that substitute from would be Pewsey, which is already involved in its own substitution arrangement. Significant changes would need to be made to Salisbury, Devizes, Corsham and Chippenham. Bradford-on-Avon would require a third of a division to be moved into the community area.

**c. 96**

At this level there is an increasing problem around Bradford on Avon. That would require 0.4 of a division to be added to the community area. An area of this size can realistically only come from moving in Southwick, which looks towards Trowbridge and not Bradford-on-Avon. This would undermine community confidence in local governance. Additional problems occur in Amesbury, Southern and Southwestern Area Boards.

**d. 94**

Bradford on Avon becomes a more significant problem, needing to have half a division added to it, introducing a fundamental change to the nature of community governance in West Wiltshire. To keep Pewsey viable at this point we have to move large areas (the villages around it are small in population but large in size) into Pewsey, which would fundamentally change the nature of the Pewsey Area Board. An area board cannot operate at all with fewer than 3 councillors.

**e. 92**

Bradford-on-Avon Area Board is reduced to 3 members. This would require a substitute arrangement with a neighbouring area board to ensure quoracy. There is no neighbouring area board with which Bradford-on-Avon suitably identifies. Pewsey Area Board requires at this point a major movement of villages to keep it at 3 members.

At this size, overall, we do not consider that we could continue to operate area boards as executive bodies of Wiltshire Council and our entire structure of community engagement and governance would need to change. Given the evidence from external review of the effectiveness of the Council's Area Boards we do not feel this would be conducive to effective and convenient government. Wiltshire would lose its strong governance link to its communities.

### 3. Local Authority Comparisons<sup>3</sup>

Local Authority	Area (hectares)	Electorate	Cllrs	Cllr per Electorate	Electorate vs Wilts	Cllrs vs Wilts	Area vs Wilts	Portfolio Holders?	Scrutiny Places	Planning	Community Areas
Shropshire	319730	240,220	74	3246	65%	76%	98%	No	50	33	28
Northumberland	501302	241,878	67	3610	66%	68%	154%	No	40	24	4
Wiltshire	325534	367,686	98	3752	100%	100%	100%	Yes	54	52	18
Cornwall (present)	354619	422,460	123	3435	115%	126%	109%	No	75	60	19
Cornwall (2021 Cllrs)	354619	422,460	87	na	na	89%	109%	No	na	na	na
County Durham	222606	395,787	126	3141	108%	129%	68%	No	105	64	13

#### Notes and observations on the above table:

1. As a general point Wiltshire considers that the way it governs and provides community leadership in the county is unique, as is its physical, demographic, social and economical characteristics and, therefore, a true comparison with other councils is difficult and of limited value.
2. The reduction in Cornwall Council's size to 87 will not take effect until 2021 and therefore its impact on the effectiveness of its governance arrangements is as yet unknown and untested.
3. Wiltshire's arrangements for scrutiny and planning are not out of line with other comparators, taking into account the scale and workloads associated with these functions. Northumberland County Council, for example, has a large National Park with its own planning committee consisting of 9 members, which is separate from the 24 members who deal with planning in respect of the rest of the county.
4. Wiltshire Council sees the role of its portfolio holders as an essential element of its governance structure for the reasons set out in its submission and supplementary information. However, it is interesting to note that none of the above councils have these as part of their arrangements.

<sup>3</sup> Data on area, electorate, cllrs obtained from <http://www.lgbce.org.uk/resources/electoral-data> Data on portfolio holders, scrutiny places, planning places etc based on current arrangements from council websites