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Submission: The methodology assumes councils and councillors are best placed to assess themselves and their suitability to be reformed. This a flawed logic, particularly in light of the historical resistance that councils have to merge. Individuals and organisations seem to have little ability outside the councils own process to influence the fitness test. Surely there needs to be a facility for voices that are independent of council to put their views and perspective.

The methodology lacks a facility to take less structural criteria into consideration. There seems no facility for 'community unity' arguments to be advanced. For example as mobility has increased many people now identify within a larger region, not a small council. Local government boundaries often do more to divide a community than to unite it.