



APSE response - Local Government Outcomes Framework consultation

To: All APSE contacts, England

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1 Introduction

On 3 July 2025, the Ministry of Housing, Communities and Local Government (MHCLG), launched a consultation on the Local Government Outcomes Framework (LGOF). The framework aims to be a new approach to outcome-based accountability for councils in England designed to empower councils as place leaders. The framework sets 15 outcomes, that Government expects to work with local authorities on, to deliver key national priorities for local people and communities. These will be underpinned by outcome metrics drawing from existing data sources to show how progress will be measured.

In responding to this consultation, APSE considered the views of our member councils in England, including responses drawn from discussions with our on-line webinar hosted on 4 May 2025, which was attended by over 100 councillors and officers from our member councils. As a representative body of our member local councils, we have not endeavoured to answer every point raised in the consultation but to cover the main themes on behalf of our membership.

2 Advantages of the new framework

APSE welcomes the following aspects of the framework:

1. We agree that the focus of the framework should be on outcomes as the starting point.
2. We agree that streamlining reporting requirements and reducing unnecessary burdens on local authorities is a positive approach.
3. We support MHCLG 's recognition of the pressure on local government in terms of resources, reorganisation and devolution and are therefore avoiding introducing a resource-intensive framework with new data collection requirements.
4. We agree that a new framework to provide a level of assurance should align with existing data sets and shouldn't recreate traditional approaches such as the old National Indicator suite by the Audit Commission.
5. We welcome MHCLG's wider consultation with local authorities prior to introducing a new framework.
6. We agree with MHCLG that local authorities have their own local priorities which may not necessarily align to these high-level outcomes.

3 Points for consideration

APSE believe that the following considerations need to be made with the new framework:

1. Achieving the outcomes in the framework are dependent on the actions taken by multiple public bodies including the police, NHS, fire authorities as well as other layers of local government such as Town and Parish Councils. The outcomes therefore are dependent on performance across the public sector. For instance, community safety depends on the effectiveness of the police force in a locality whereas the health and wellbeing outcome is affected by health services. The cause and effect of interventions can't be directly attributable to the local authority alone. In addition, some interventions will naturally take time (sometimes generations) to show the real impact.
2. A suggestion would be to change the name from 'Local Government Outcome Framework' to 'Local Area Outcome Framework'. It might move the focus away from

local government, reflecting the range of other partners/bodies who have a significant impact on many of the metrics. NHS are also introducing an outcome framework; there may be an opportunity to come together potentially on shared population outcomes.

3. Performance needs to be contextualised against local factors such as deprivation, population, type of authority (urban/rural). For instance, if an area is a densely populated, inner city deprived area, this is more likely to have higher levels of smoking and air pollution which will impact on health outcomes. Flexibility needs to be brought into the framework to account for these differences. APSE performance networks use a 'key driver' model to allocate local authorities into family groups with comparable peers, which consider local factors such as demography to avoid unfair comparisons and to contextualise the data sets.
4. Budgetary pressures on local authorities are well evidenced and the level of 'inputs' possible to achieve the 'outputs' and resultant 'outcomes' will need to be considered as without resources, outcomes are limited.
5. There needs to be some narrative around the results; for instance, some outcomes are dependent on political decisions or investment ability.
6. There are concerns raised by APSE member councils as to whether there an expectation on local government for constant monitoring and active performance management between reporting cycles. Similarly they have raised questions as to what systems local authorities will be expected to use to collate this data and incorporate this into their current performance management frameworks. APSE and its' member councils would appreciate clarity on these questions.
7. There is a disparity between the outcome measures and output measures in some of the priorities. This may be because MHCLG is mindful of minimising data collection requirements, however, for example, within the 'Neighbourhoods' priority, the output measures do not inform all of the outcome measures and are not comprehensive enough. There is a danger that a narrow focus on certain outputs may result in specific outcomes not receiving the focus they deserve.
8. The value of collating and benchmarking data is to use this as a tool for sharing best practice. Will the framework be supported by the ability for local authorities to drill into the data and identify good practice and innovation? Data collection needs to be supported by evidence on how to transform local services to achieve better outcomes for communities through active learning sets.
9. It would be useful to have further explanation about how the framework will be used, by whom and what is it seeking to achieve.
10. The framework needs to work with and complement existing data resources such as those provided by APSE performance networks.

11. Other measures should be considered for integration into the framework such as the 'Marmot' health measures, 'Better connected for health and social care' and the UN 'Sustainability Development Goals' (known as SDGs).

The next sections include feedback on individual priority outcomes.

4 Every child achieving and thriving

- A key role for local authorities in supporting children and young people to achieve and thrive in school is the provision of food and nutrition through school meals and breakfast clubs. Free meal uptake and breakfast club uptake is already collected by local authorities in England and would be a useful output measure.
- Provision of swimming tuition and free swimming to children is a key role by the local authority, and part of the national curriculum, and to improve health and wellbeing as well as to ensure safety. This should be considered as an output measure to feed into this outcome.

5 Neighbourhoods

- Local councils have a pivotal role as the democratically elected body to ensure local well-being. However, the role of other public bodies such as the police force needs to be assessed in terms of local outcomes including people feeling safe.
- The measures focus on community / cultural facilities including libraries but do not include the fundamental role of other community facilities such as local leisure centres. A useful metric would be usage of leisure centres per household which is measured by Sport England through the Moving Communities programme in collaboration with APSE.
- Satisfaction with the local area as a place to live is influenced by environmental issues such as levels of litter, detritus, dog fouling, etc. A key role of local authorities is to maintain the cleanliness of streets which is defined in the Environmental Protection Act 1990 and the Clean Neighbourhoods and Environment Act 2005. Public satisfaction with this can be measured through surveys, however, it is important to balance perception data with the reality of the actual cleanliness of areas. Defra reported on this through the national litter dashboard for England and sourced data from APSE on this, whereby the data is collected from local authorities through an inspection app called [Land Audit Management System \(LAMS\)](#). The value of this app-based collection tool is that it can also attract community activity in monitoring and reporting litter and detritus, and support volunteering efforts in local environmental quality.
- Other environmental issues should be considered as part of this measure and the impact they have on local perceptions, including the number of abandoned vehicles and graffiti removal.
- Local authorities have a dual role in tackling environmental issues; enforcement and

education to encourage behaviour change by the public (for instance in dropping litter) and therefore, education campaigns could be considered as part of this priority outcome.

- Fly tipping – there are concerns amongst APSE members about subjectivity in the definition of fly tipping, so this will need to be clarified. Environmental issues vary locally; expectations of fly tipping in one local authority can be completely different to another due to demographic factors and waste disposal policies and therefore, a focus on the wider environmental issues would be a more balanced approach.
- The provision of street lighting influences perceptions of safety and therefore metrics on the provision or public satisfaction with street lighting should be considered within this outcome.
- Access to green spaces is marked on the draft metrics as a place holder and therefore not finalised yet. APSE collect relevant measures such as the hectares of public open space per 1,000 head of population, as well as local authority and community playgrounds provision which could be considered as measures which are commonly collected by local authorities in England. Such measures are also cross-cutting to the health and wellbeing of local communities.
- We have received feedback from APSE members that for several of the measures in this priority outcome, the Community Life Survey is quoted as the source, but this currently isn't segmented nor are the results available at a local authority level.
- For anti-social behaviour (ASB), there will be a variance in local authority service offers. The police will hold data on ASB incidents locally but the local authority's role in preventative actions such as the provision of local social facilities (e.g. Sports and Physical Activities) should be reflected in the measures.

6 Environment, circular economy and climate change

- The priority outcome is titled 'Environment, Circular Economy and Climate Change', however it doesn't include any metrics relating to climate change mitigation. With most local authorities having a net zero target and the Government's own target for 2050, the lack of focus on decarbonisation represents a missed opportunity to support local authorities to embed climate change across their organisation.
- Local authorities are working to reduce both their corporate and area wide emissions, metrics on scope 1 and 2 emissions would be beneficial, as well as wide work of local authorities around retrofit work, carbon savings, renewable energy generation and efforts to tackle fuel poverty.
- The 'Proportion of homes rates EPC C and above' is included in the housing section, however, linking this to decarbonisation efforts and fuel poverty would further promote local climate action.
- As one of the Government's missions being to 'Make Britain a Clean Energy Superpower' it is surprising to see that climate change mitigation is largely absent from the Local Government Outcomes Framework.

- The waste measures should be focused on reducing residual waste in addition to increasing recycling to reflect the aims to reduce waste overall. The reduction in residual waste will also be critical to cost-liabilities on councils working towards the Emissions Trading Scheme (ETS) and therefore is a key factor, should ETS continue to be pursued, impacting local authority finances.
- While Circular Economy is in the title, as with Climate Change, the only way this is captured appears a bit of an afterthought in the 'reuse' mention within the Percentage of total household waste sent for recycling/compost/reuse.
- A separate reuse metric would better capture and give credit to those authorities that are working to promote the circular economy, above and beyond recycling.
- This could be captured through tonnages of items at recycling centres (HWRCs) or LA-operated reuse shops sent for Reuse/Repair/donated to charity - rather than recycling or disposal.
- Local authorities are at different stages of collecting food waste (with varying dates when this has been implemented with the deadline being March 2026) so this would need to be considered by the framework. However, we note that some authorities have requested extensions/transitional arrangements to delay their food waste collection introduction, so there is some potential for the food waste metric to encourage expedition of that process amongst those, and for those that already collect food waste, work to ensure as many households (including communal properties, which are more challenging) are served by a food waste collection service.
- Levels of waste and the ability to reduce emissions are affected by geography (coastal authority/woodlands), demographics and type of authority (urban / rural / deprivation / housing types), so the framework needs to allow for this and for the data to be contextualised when interpreting the results.
- Biodiversity is marked on the draft metrics as a place holder and therefore not finalised yet. APSE collect relevant measures such as the Total amount of area (in hectares) covered by ongoing and new BNG projects per hectare of land which could be considered.
- Flood protection is marked on the draft metrics as a place holder and therefore not yet finalised. APSE collect relevant measures such as the % change in flooding incidents resulting from highway surface water issues and the number of road drainage schemes which could be considered.

7 Transport and local infrastructure

- Local authorities do not have responsibility for motorways or trunk roads; this is the responsibility of the National Highways. Also, in London, Transport for London manages the buses rather than local authorities, this is also the case in some Combined Authority areas such as Greater Manchester (Bee Network).
- The state of the roads in England measured in the framework by the % roads that should be considered for maintenance could be balanced with a public perception

measure on satisfaction with the road network.

- In the interests of promoting Active Travel, the framework should also include measures on cycle routes and pavements as an alternative to roads and public transport.
- There were some concerns that the transport metric didn't cover wider transport decarbonisation measures such as electrification or low carbon alternatives (e.g. hybrid) in vehicle fleet or electric/low carbon vehicle take-up amongst the population.
- To ensure varying sizes of districts are accounted for, metrics on public transport should be calculated as rates per population rather than absolute numbers
- Proportion of population with proximity to a regular public transport service (bus/tram/train) within 500m is a reasonable indicator and is one of the SDGs. This is broader than the slightly narrower 'public transport connectivity score to key services' as it wouldn't cover transport between friends and family or leisure purposes. The SDG metric considers walkability to public transport.
- Some way to capture and give credit to multi-modal trips should be considered, as many are promoting use of transport hubs/park and rides, etc to reduce car usage if it is not possible to eliminate it.
- On EV transition, the only metric is Public EV charging devices per 100,000 population.
- This doesn't measure actual EV usage and there could be a district where many people have driveways and home chargers and wouldn't need or have many public EV points. Public EV chargers are often in town centres or car parks, and less so on roadsides, so districts that do not have as many 'destinations' may not by default have as many.
- Having more EV public chargers isn't always inclusive, as they can be significantly more expensive per kwh compared to home or off-peak public charging.

8 APSE comment

Further considerations included in APSE's response to this consultation are that there may be limitations for some local authorities in introducing new performance management systems or carrying out extensive public consultation exercises due to resource issues and this needs to be considered within the proposals. The commitment by MHCLG not to introduce new data collection requirements beyond existing sources nor new reporting requirements is welcomed by APSE. In terms of using existing data sources like '[APSE Performance Networks](#)', members were keen to ask whether other data collected at a local authority level beyond the metrics within the framework can be used to bolster and support the framework and therefore is there any flexibility in reporting data which reflects local priorities?

APSE has requested a meeting with MHCLG to discuss how tools such as APSE performance networks can be used voluntarily by local authorities to inform the new framework. Set up to support the development of the statutory duty of 'Best Value', APSE Performance Networks

has been engaged in benchmarking frontline service performance, across the UK, for over 27 years. The service offers robust and well-established processes to collect, validate and report on data. The model meets industry standards in data and benchmarking by ensuring data assessment and analysis is based on consistency, reliability and effective systems of error checking. Benchmarking takes place with over 120 local authorities in England, collecting annual performance data and using well-established reporting processes to produce comparative reports. The model is reliable and trusted by local government as a source of performance data and is updated each year through working groups comprised of local authority representatives delivering local services to local communities. Given the benchmarking model was established in response to the introduction of Best Value, and one of the stated purposes of the LGOF is to monitor the Best Value Duty the consultation established by MHCLG provides an opportunity to revisit the value of this benchmarking service.

Concerns were raised by APSE member local councils as to how often the measures contained in the new framework will be reviewed and revised. As MHCLG have acknowledged that this is mainly annual data collection, hence will there be an opportunity to revise the measures annually due to changing priorities? Key to data accuracy will be comprehensive guidance to inform what should be included/excluded in the measures and robust validation of the data. APSE have comprehensive validation processes which have offered to share with MHCLG.

A final question which was posed in APSE's response is what role technologies such as AI will have in collecting intelligence for the framework both now and as the Government's AI and digital transformation policy is rolled out.

Debbie Johns

Head of performance networks

djohns@apse.org.uk

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Association for Public Service Excellence
3rd floor,
Trafford House,
Chester Road, Manchester M32 0RS.
telephone: 0161 772 1810
web: www.apse.org.uk

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