



# Response to the Boundary Committee for England's advice on unitary government in Suffolk

Response to the Secretary of State - January 2010



## **Executive summary**

Suffolk Coastal District Council cannot support the Boundary Committee for England's (BCE) proposals for unitary local government in Suffolk proposed in December 2009. Their proposals were:

- A county unitary authority
- A two unitary pattern comprising Ipswich & Felixstowe and Rural Suffolk

Our key concerns are:

### **Strategic leadership**

- Suffolk is too geographically large and demographically divided to be suited to either of the BCE's recommendations, which are fatally flawed because of the BCE's failure to create a stand-alone Ipswich that could meet its specific set of needs which are unique within Suffolk.
- Councillors will be remote, there will be diseconomies of scale, extra layers of management are introduced and power centralised in the hands of officers. One large Suffolk unitary would be responsible for a population comparable to an urban unitary like Birmingham, but cover a massive rural area that takes two hours to cross.

### **Affordability**

- The impact of the economic downturn and the success of delivering council efficiencies mean that there is no financial evidence on which to justify introducing unitary councils in Suffolk – to do so would be a leap in the dark because of the BCE's failure to seek or provide up to date and independently checked financial information.

### **Broad cross-section of support**

- There is no proven support among the communities of Suffolk for the BCE's proposals and the BCE has consistently failed to engage with those communities or the majority of those councils that represent their views.

### **Value for money and equity in public services**

- Perhaps because of this aversion to listening to local communities and their democratically elected representatives, the BCE has delivered proposals which will centralise decision-making among a corporate cabal of officers, place barriers between councillors and their communities, and exclude town and parish councils, businesses, community and voluntary organisations, and individual residents from being engaged with identifying need and establishing priorities in their communities.
- Local needs will not be met: the proposed Community Boards will not work, town and parish councils have been overlooked.

### **Neighbourhood flexibility and empowerment**

- The proposals will not meet government's ambitions for accountable services, devolved decision-making, community engagement, improved frontline services.

It is symbolic of this flawed and apparently half-hearted review by the BCE that having been empowered to find a way to deliver a solution to the needs of Ipswich, it has proposed creating one of the country's largest unitary councils, backed up with an alternative that virtually no-one had ever dreamt of and which in the case of Rural Suffolk no-one ever supported or championed.

## **Response using the Secretary of State’s criteria**

We believe that the BCE has failed to deliver the original outcomes requested by the Secretary of State or followed the criteria set out within either the original or additional supporting guidance.

### **Provide strong, effective and accountable strategic leadership**

The one whole unitary Suffolk proposal will not meet the criteria of “shortening the distance between the governors and the governed”. Strategic leadership must be accessible, visible and influential. Effective leadership must understand local issues and be an advocate for the area.

Councillors would be more remote from their communities in the proposed Rural or one whole Suffolk options as the geographical area is too large:

- The previous Secretary of State wisely rejected proposals for whole county unitaries in the previous round of local government restructures because they would be too remote, and not reflect perceived differences within a county (such as the county unitary for Cheshire, which would have had a population of 680,000 – less than the population of Suffolk). The Boundary Committee divided Bedfordshire into unitaries covering populations of 155,000 and 250,000 to better meet the Secretary of State’s requirements.
- In rural areas for the proposed unitaries, a councillor might be expected to cover 300km<sup>2</sup>, working with over 20 town and parish councils (and expected to attend each of their monthly meetings).
- It takes two hours to travel from Southwold in coastal Suffolk across to Newmarket in the Greater Cambridge area, while London is a mere hour and twenty minutes from Ipswich.

Councillors will be less accessible to residents as each will represent many more people:

- By 2031, Suffolk will have almost a million inhabitants. Only the metropolitan authorities of Birmingham and Leeds would have greater populations than any of the three whole county unitaries the Boundary Committee proposes to create.
- The large wards present a potential risk for the councillor’s capacity to be properly engaged with their electoral community. The interim model for one giant Suffolk would have one councillor per 10,000 residents. In 2031, under the one giant Suffolk unitary council option, a councillor would be expected to represent an average of 7,500 people. Even using 2007 population figures, a Rural Suffolk councillor would represent 4,500 citizens. Currently the ratio of councillors to population in Suffolk is approximately 1:1,800. In our proposed model, East Suffolk councillors would represent c3,000 people each, in line with the Boundary Committee’s proposals for 2009 unitaries.
- The reduced number of councillors will mean that councillors are less democratically accountable.
- Citizens will not, as required, be able to have confidence that their democratic representatives understand local needs.

The quality of decision-making will suffer:

- The remoteness of councillors will have an adverse impact on issues such as development control, one of the most important services provided by local councils which involves through its consultation and involvement more residents than anything else. The Boundary Committee's proposals would inevitably isolate residents away from those making the decisions that have an immediate impact on their quality of life. More decisions would be made by officers or by councillors remote from the development area. Our proposal would ensure local decisions would continue to ensure that local knowledge and experience was taken on board.
- The proposed one whole Suffolk unitary authority will inevitably result in more key decisions being taken centrally. More decisions will be made by officers, than councillors, even if councillors become full-time. This would also be the case for the Rural Suffolk option. Our proposal would ensure councillors represent their communities on issues that matter.
- The proposed large unitaries create a disconnection between councillors and communities. Councillors who are remote from their electorate are more likely to make ill-informed decisions based on the reports or recommendations of centralised officers and will struggle to fulfil their community duties.

Councillors will have less time to focus on the needs of their ward as all the proposed structures have cabinet and committee roles that would account for more than 75% of councillors.

In addition to their responsibilities to their residents, to third tier councils, to decision-making, to scrutiny and regulatory work, to partnerships, and casework, councillors will also be expected to attend Community Boards. This great workload will make it difficult to recruit candidates representative of Suffolk's diverse communities.

Little consideration has been given to the role of a councillor outside of the normal council workload. For example, all authorities make appointments to outside bodies (regional and local charities, voluntary sector, regional and local projects), to which councillors devote a considerable amount of time. Whilst accepting the potential for rationalisation of councillor involvement or a coordinated approach to disparate groups, it is likely that many of these groups will lose vital support or access to local decision-making due to the reduced availability of councillor's time.

The proposed system for one whole unitary Suffolk will make the executive more remote from the communities it is meant to serve as Community Boards and Public Sector Villages will introduce additional layers between the electorate and the Cabinet.

Suffolk Coastal councillors are already involved in the regeneration partnership Felixstowe Futures, and the innovative Integrated Coastal Zone Management initiative. Key local partnerships like this that are tackling important local issues will lack resource and focus in a countywide, inland-looking Rural or one whole Suffolk unitary. Our proposal, which keeps Felixstowe in a coastal unitary including similar tourist towns such as Aldeburgh and Southwold as well as similar regenerating towns such as Lowestoft, ensures coastal issues are a priority.

## Affordability

We do not believe that (as required) the Secretary of State can share the Boundary Committee’s view that either proposal will generate savings against the existing system due to the reliability of the financial work-books.

- The financial work-books are now over two years old and finances and assumptions are now over three years old.
- Councillor and Section 151 Officers from across the county raised a number of significant concerns with the financial assumptions which have not been addressed.
- The Boundary Committee has itself described the workbooks as a “notional exercise”, so the workbooks should be given little weight.
- The national and local financial situation has changed dramatically since the workbooks were originally produced – with savings achieved, reserves affected and income decreased – with no revisions to reflect these significant changes:
  - Impact of recession – increased demand on services (school places, social care, benefits, homelessness),
  - Impact of recession – drop in income (car parking, land charges, planning and building control, arrears),
  - Impact of future funding from Government – spending growth will be reduced,
  - Property prices have fallen which reduces the value of assets and will also reduce the income from any sale of assets (if assets can be sold) which will increase costs,
  - Reserves have changed dramatically as councils have managed two budgets since the workbooks were produced. Reserves have also been affected by Icelandic bank collapse, e.g.: £1.1m of Ipswich Borough Council’s reserves are still held,
  - All Suffolk authorities have made significant savings whilst constructing the two budgets that have passed since the financial workbooks were formulated.
- The planned savings budgeted in the workbooks are unrealistic as many efficiencies are already being made across Suffolk’s councils.

**Given the concerns relating both to the financial assumptions within the original workbooks and the significant change in all Suffolk authorities financial position’s it is currently impossible to state that transition costs will be offset by savings over 5 years using existing financial data.**

Revised affordability workbooks should be produced, based on up to date financial information, so that a realistic judgement can be made on the affordability of any of the options. This will ensure that any proposal is both viable and properly costed.

The Secretary of State must, as recommended by the BCE’s Independent Financial Consultants, request confirmation on the current “financial position of constituent authorities” to address our fundamental concerns that workbook figures were based on out of date data, and that the financial position of the constituent local councils has significantly changed.

We would suggest that the Secretary of State should review all implementation estimates to ensure they are robust. If costs escalate as has occurred elsewhere, frontline services could be affected:

- In Cornwall transformation costs are now twice the estimated transition costs. The new Cornwall unitary was assessed as performing poorly by the Audit Commission, and safeguarding children was flagged red.
- Central Bedfordshire intends to cut over 100 staff and close one directorate in order to try to balance the budget and protect frontline services.

**We would urge the Secretary of State to consider, given the current economic climate and the acknowledged pressures on all public spending, whether now is the right time to be diverting resources and expenditure away from key services at a time when they are most required.**

## Broad cross section of support

There is not a broad cross section of support for either of the BCE proposals.

The Boundary Committee has focused on its preferred options, rather than engage in dialogue about the best approach for Suffolk’s communities. It displayed an upper tier county council style mentality in its approach by failing to take account of the active third tier of government in Suffolk – in Suffolk Coastal alone there are over 110 town and parish councils whose existence was largely ignored both in its initial and final reports and in its perfunctory consultation by the Boundary Committee.

The failure of the Boundary Committee to meet the requirements of the Secretary of State, and the law, has meant that its delayed recommendations has resulted in the timing and length of consultation by the Secretary of State excluding many town and parish councils from being able to debate and respond on the proposals as representatives of their communities.

There is **not** a clear appetite for unitary government in Suffolk. As our published research has shown, 94% of town and parish councils in the Suffolk Coastal district would have liked to respond on other options for local government. Town and parish councils supported a single unitary Suffolk in the belief that this was the least bad of the two options before them and that they could only respond to one of the two options.

The Boundary Committee has not properly engaged and involved members of the public:

- Boundary Committee meetings were only with businesses and stakeholder groups. Most of these meetings were to explain the process, rather than to gather views.
- The Boundary Committee’s approach limited responses as it required evidence and reasoning to support responses, which could require resources not easily available to the general public.
- Financial information was not published in a format accessible to the general public.
- The Boundary Committee did not engage directly with service users or residents – token and partial articles in a local daily newspaper is not the same as a proper consultation with residents.

The Boundary Committee has ignored opinion:

- Petitions, pro forma letters and postcards - over a thousand responses (equivalent to more than a quarter of the responses **actually** considered) - were ignored. By dismissing these views the Boundary Committee have ignored local businesses and individuals – the very groups who would be in the new authorities. This ignores the Government’s work to improve citizen involvement through recognising petitions.
- By ignoring other responses, the Boundary Committee has misrepresented general feeling. Their draft proposal did not receive the greatest level of support - if even the number 10 petition were recognised, 57% of all responses containing a unitary preference received after March 2009 supported three unitaries, with only 24% preferring the BCE’s whole Suffolk option.
- The Boundary Committee’s own consultation statistics do not show the number of responses it received where its unitary proposals were supported as a last resort, or because respondents felt they had no choice.

We ask that the Secretary of State take into account over a thousand responses, as was done for other unitary proposals across the country:

- Our survey of town and parish councils in Suffolk Coastal:
  - 94% of councils would have liked to respond on other options for local government in Suffolk;
  - 72% councils would have liked to respond to the Boundary Committee on the status quo;
  - 42% would have liked to respond on enhanced two tier;
  - 40% would have liked to respond on three unitary authorities.
- 500 postcards forwarded to the Secretary of State asking that three unitary councils be considered
- 411 signatures on the no.10 e-petition
- 28 responses submitted through our Suffolk Coastal website
- The January 2009 survey of the county's residents which showed that 60% said they preferred the option for three unitaries, compared to just 25% supporting one whole Suffolk unitary and 15% for the Boundary Committee's model of two unitary councils.

## **Opportunities for neighbourhood flexibility and empowerment**

The one whole Suffolk unitary and Rural Suffolk proposals will create a real democratic deficit rather than increase opportunities for neighbourhood empowerment.

### **Remoteness**

- It will be more difficult for one whole or Rural Suffolk unitary authority, covering a wide geographic area, to engage with citizens and communities. This is recognised by the Boundary Committee as a “legitimate concern”.
- The Boundary Committee proposal will make unitary government more remote from the public. The solutions it proposes show how the Committee has failed to understand Suffolk’s communities. It is unclear about the role of Public Services Villages (PSVs), which have been created to co-locate offices and achieve efficiencies. The Boundary Committee have failed to understand the function of PSVs, by suggesting that PSVs would have their own local budgets “to address issues affecting their particular parts of the county”.
- Large unitaries may work for some areas, but not here. They usually either have a large geographic area and relatively small population (e.g. Northumberland), or are densely populated cities. Suffolk has a large geographic area as well as a large and fast-growing population. This creates problems in delivering services efficiently and economically, as well as ensuring community engagement. The democratic deficit which will result from the introduction of either unitary model will be significantly worse than existing unitaries. Wiltshire, a 2009 unitary, is much smaller than Suffolk: it has only 60% of Suffolk’s population and 90% of the land area.

### **Community Boards**

- The proposed Community Boards will not improve engagement. The Boundary Committee has not paid attention to what already works in Suffolk and what has already been shown to not work. It continues to propose Community Boards to improve engagement without having bothered to revisit or update its report and consider the evidence on Community Boards in Suffolk. The pilot scheme which ended in 2009 was unsuccessful and unviable, and the team which was managing the pilots has been re-assigned.
- The 22 proposed Community Boards for the whole Suffolk unitary will place a greater burden on local government and on partners. Partners are already unable to participate fully in the existing 6 LSPs. Some stakeholders supported a Suffolk-wide unitary in the belief that a single unitary would streamline local government administration and reduce their own burden, but the Boundary Committee’s proposal would actually increase their burden.

### **Third tier government: town and parish councils**

- The Boundary Committee has failed to review the role of town and parish councils in either of its proposals. The Secretary of State should take this opportunity to revitalise their role.
- The Boundary Committee has not addressed the legitimate concerns of town and parish councils around Community Boards. The proposed Community Boards lack democratic accountability and create an additional tier of government. There

is no clear accountability for the Boards. They will also put additional demands on town and parish councillors.

- There will be less effective engagement with town and parish councils or with locality-focused community groups. A Rural Suffolk authority would have to work with over 400 town and parish councils and parish meetings, and each whole Suffolk unitary councillor may have 20 town and parish councils with which to engage.

### **Ipswich**

- Ipswich’s request to become a stand-alone council is not met by the Boundary Committee’s proposals, although this was the stated goal of the review as set by the then Secretary of State.
- The proposals will still fail to give Ipswich the power and autonomy that it clearly needs to properly tackle the range of socio-economic issues facing it. The Boundary Committee admits its whole Suffolk proposal means Ipswich could lose its “voice” and effective representation.
- The aspiring city of Ipswich is recognised to have different issues and priorities that are not shared by the rural areas or towns in the rest of the county. These will not be met by either of the Boundary Committee’s proposals, as even the Ipswich and Felixstowe proposal will mean Ipswich’s ability to address its needs will be diluted by the contrasting and contradictory needs of rural areas and Felixstowe.

## **Value for money and equity in public services**

The BCE proposals are unlikely to be cost effective and will not deliver equity of public services:

- The size of the proposed unitaries will create diseconomies of scale, reducing value for money. For example, the costs of the additional layers of management for the proposed PSVs (Public Sector Villages) and 22 Community Boards.
- For at least the first five years (the transition period), councils will be inward-focused. The Boundary Committee’s proposals require huge internal change management projects, demanding considerable resources to deal with over 30,000 staff in eight authorities. In Wiltshire, only 12,000 staff were affected, in five authorities.
- Introducing unitary government is about processes, not outcomes for customers. Even in Wiltshire, the proud claim of the new unitary is that residents have not noticed any change in services for bin collection, when councils should be following the Government’s call to re-organise to deliver frontline services better.
- Equity of public service has been poorly considered. The Boundary Committee acknowledges that it has not requested information from authorities on this aspect, and has instead considered access to services and service standards.
- It will be difficult for any of the proposed large unitaries to effectively engage in existing Total Place work during the years of transition. This could mean projects to address drugs and alcohol misuse in young people, to help young people not in training/work (NEETS), and to support vulnerable (high demand) families fail.

## **Single tier of local government for Ipswich**

The BCE proposals do not address the original requirement for a single tier of local government for Ipswich, which was the primary driver for the review in Suffolk:

- The Boundary Committee’s proposals do not meet the Secretary of State’s original request to look at alternatives for single tier government for Ipswich, as the two proposals focus on the whole county, not Ipswich’s special city-like needs which will continue to be submerged within either a largely rural giant county unitary or confused with the resort town and the rural areas in the Ipswich and Felixstowe option.
- The Boundary Committee has failed to understand or address the Secretary of State’s original stated requirements, despite additional guidance throughout the process.
- The Boundary Committee has recommended county-wide unitaries for Suffolk, Norfolk and Devon. This “one size fits all” approach fails to meet the Secretary of State’s requirements, weakens local democracy and engagement by making local government remote from the people, and putting decision-making in the hands of officers.

## Impact on government policy

The proposals will impact against the following government policies:

- Open, accountable public services
  - But the unitary models proposed will be less accountable as they will be more remote.
- Devolve decision-making
  - But the unitary models proposed will centralise decision-making.
- To protect frontline services
  - But proposals will direct resources towards creating the large unitaries and addressing the resulting issues, rather than focusing on customers and residents at this time of recession.
  - But services will become more remote from users and be less personalised as they have to meet the needs of over half a million residents.

To support and develop the role of the local councillor

- But councillors in a large unitary will have less involvement in day-to-day decision-making as more decisions will be made by officers.

Our East Suffolk, West Suffolk and Ipswich proposal will keep councillors involved in decision-making and in neighbourhood empowerment due to a higher ratio of councillors to electorate.

- To encourage people from a more diverse range of backgrounds to get involved in civic life
  - But the proposals will make it more difficult for under-represented groups to become councillors as the workload, number of meetings and amount of travel required increases.
  - But councillors would be committing to more than half a typical working week (27 hours or 3.6 working days is the average amount of time spent on council business per week by unitary councillors).
- To ensure value for money services
  - The proposals will require significant investment over the next five years with no independently agreed proof of savings and efficiencies being delivered.
- To take Britain out of recession into recovery and put in place the conditions for future economic success
  - Centralisation will adversely impact the economies of Suffolk’s small market towns. This impact will be particularly noticeable in the current economic climate. At the same time, the larger towns of Ipswich, Lowestoft, Felixstowe and Bury St Edmunds will struggle to get the support and attention they need as their needs will be competing against each other and those representing the rural areas. Key local economic sectors, such as tourism, the arts and agriculture will struggle to get the support they need to thrive and flourish.
- To give a stronger voice to communities to help shape the places they live and their local services
  - But this process has ignored communities who said they didn’t want large unitary government in Suffolk.

- Less than half the town and parish councils in Suffolk Coastal felt they had had good engagement with the Boundary Committee.
- 94% of town and parish councils in our district would have liked to respond on other options for local government in Suffolk.
- To let local areas set priorities and guide resources
  - But priorities and resources will be set for the whole unitary area, with only some budgets devolved.
- To reduce the amount of central prescription so that local authorities and their partners are better able to respond to local needs and demands
  - But these proposals are being prescribed by a central body. Local authorities aren't being heard.
  - But the proposals create larger, more remote organisations which will therefore be less agile in responding to local needs and demands.