



# Response to the Boundary Committee's consultation on the draft proposals for unitary government in Norfolk and Suffolk

September 2008



## 1. INTRODUCTION

1.1 Suffolk Coastal District Council wishes to express its deep concerns with the Boundary Committee's draft proposals for unitary local government in Norfolk and Suffolk. We have detailed our concerns in this document and these cover three broad areas:

(a) The process for establishing and consulting on the proposals against the Secretary of State's five key criteria for unitary government has been unsatisfactory because:

- (i) There has been no demonstrable evidence for the need for unitary government in Suffolk;
- (ii) The timetable for establishing the proposals and the consequent consultation process has been rushed and has not fully engaged with the communities that it will affect;
- (iii) There are significant doubts about the validity of many of the assumptions that support the submitted financial cases for the proposals;
- (iv) We are concerned that the County Council was nominated lead authority for the creation of both the Rural Suffolk and One Suffolk financial cases.

(b) The proposals for the creation of North Haven and Rural Suffolk unitary authorities are ill-considered and do not reflect local ambitions or needs. Further, we offer no support for the secondary proposal of a One Suffolk unitary Council;

(c) We strongly believe that an East Suffolk, Ipswich and West Suffolk better serves the ambitions of our local communities, offering local accountability and regional influence.

## 2. REVIEW PROCESS

2.1 Prior to the announcement of the review there was no clamour for change in our county, and to date we cannot see from our experience that there is any sense of a unanimous call or any urgency to disband the current two-tier system and impose a new unitary style of government.

2.2 We remain unconvinced that the introduction of unitary government is either the best way to bring about increased efficiencies across our county, or that it will deliver a more accountable style of local government that has increased community engagement.

2.3 In our view, certainly in Suffolk Coastal, efficiencies were already being delivered and we fear that the momentum of delivering better services and even better value will be lost as any new body concentrates on the creation of a culture and structure of an amalgamated authority.

2.4 The timing of the review has been unfortunate as it came at a time when an increased spirit of partnership working was growing across our county, with all councils seeking to work together to provide better more efficient services and deliver budget savings.

2.5 This new spirit had been fostered by the Suffolk Pathfinder project but co-operation has largely been sidelined as the energies and attentions of all Suffolk's councils have been largely concentrated on fulfilling the time-consuming requirements of the review.

2.6 The impact of partnerships should not be underestimated – they have delivered substantial benefits in both the quality of service we provide and the cost of delivery. The recent insurance partnership saw four councils including Suffolk Coastal establish substantial savings, while other Suffolk Coastal partnerships include a shared Chief Executive with Waveney, joint working on audit, legal and building control, and innovative service management initiatives covering theatre, leisure and refuse/recycling/cleansing/parks services that have delivered both efficiencies and improved services. Work continues on developing further partnerships including working with East Coast local authorities to develop a co-ordinated approach to vitally important coast and estuary protection and management. In addition, the shared Chief Executive with Waveney is helping to facilitate the development of shared services between both authorities, with Audit and Planning the first two priority areas.

2.7 Our point is that the primary driving force for the introduction of unitary government appears to be that of potential savings, but this Council was already recognised by the Government as being one of the national leaders for delivering efficiencies and value for money.

### **Timetable**

2.8 Another major initial concern that we must raise is that of the timetable of the review, which we appreciate is one that was not set by the BCE but set for them by the Secretary of State - although accepted and agreed by the BCE.

2.9 In simple terms we find it unacceptable that the face of local government for the next 30 years of this county may be determined by a consultation exercise that was

rushed through over a matter of weeks during the summer, based on concepts that had to be created within 28 days. As a result of this flawed process, there is a real danger that the desired outcomes and aspirations of the local government review will not be delivered. There is a significant risk of not achieving improved services, greater efficiency or community empowerment. This is a totally inappropriate way to re-structure multi-million pound services that are critical to the well-being of local communities.

2.10 We are concerned that during this limited period expectations shifted from general concepts to a requirement for detailed submissions.

2.11 The tight timescale to produce the financial cases meant programme board meetings were too brief and too few to allow full debate and engagement by all participants with the process – too much work had to be done away from the scrutiny and involvement of the cross-authority member and officer groups.

## **Consultation**

2.12 The options proposed have not attracted wide-spread public support and the feedback we have received locally is that the areas covered by proposed authorities do not have any real joint identity or related challenges and opportunities. This is unsurprising given that the North Haven and Rural Suffolk options were not initially championed by majority view locally.

2.13 The consultation process with local residents, groups and businesses has been limited and rushed. Councillors were excluded from consultation, unable to put forward the views of their communities. Many town and parish councils still feel ill-informed, despite the best efforts of district councils to communicate the process. We believe this process has not been inclusive, and that the Boundary Committee has failed to understand local views.

2.14 Consultation meetings were for invitees only, and not open to all citizens. Some were cancelled at short notice. The confusion over meetings on the 12 September illustrates this rushed approach.

2.15 We find it unacceptable that the financial cases and final supporting documentation that support one of the five key criteria (affordability) have not been made available for general consumption until a week before the consultation deadline. In fact the financial cases were still not available on the Boundary Committee web-site on the day of the consultation deadline. This has meant it has been impossible for anyone to fully consider the proposals against the five criteria set out by the Secretary of State.

2.16 We are also concerned that the issue of what exactly is being consulted on has been unclear throughout the process. Many Town and Parish Councils have indicated to us that they believe they have had a simple choice of deciding between the two proposals presented to them by the Boundary Committee, rather than a chance to have their say on how they see the future of local government in Suffolk. Therefore, whilst many organisations have preferences for alternative concepts not presented by BCE or improving the current structure of local government, many of the responses to the Boundary Committee have indicated a preference for one of other of the BCE proposed concepts as the lesser of two evils.

2.17 Town and parish councils in our district have told us they do not see any reason for change and would prefer developments to the existing local government structure, building on existing work to create an enhanced two-tier model. However,

the structure of the consultation has meant they have not felt able to share these wishes with the Boundary Committee.

2.18 It is a fundamental flaw of this process that everyone involved has only ever been talking in terms of 'concepts' but with limited facts or evidence to validate proposals. There needs to be another two or three months built into the process to allow more detailed consideration of the future structure of local government in Suffolk. Traditionally, we would spend longer considering a proposal for a small housing development, with far greater local engagement than has taken place during this important process.

2.19 To date, the public, our communities, our stakeholders, have only had a partial picture because of the time constraints of the review. Only two models were put forward for public consultation by the Boundary Commission; this consultation process should have set all proposals before the public to ensure the real views of citizens were considered. We fear that the flawed nature of the review, the lack of time to consult properly, to judge and consider the options, to adequately challenge the assumptions behind the financial cases, will result in a flawed conclusion.

### **Affordability criterion**

2.20 Councillors and Officers from Suffolk Coastal have been engaged with the development of the BCE preferred proposal and secondary option and their associated financial cases, offering our assistance wherever possible. However, we have many concerns relating to the process and many of the assumptions that have been used.

2.21 Whilst we have been involved with the Programme Boards and Project Groups which have been set up to assist the development of the financial cases, there has been a lack of robust and stable statistical and financial information to support any decisions on key assumptions. Information within the financial cases was frequently changing, often without reference to or contrary to, the views of the Programme Boards. Despite the Programme Boards being politically balanced and containing Councillors from all affected local authorities, no voting took place on the decisions made. We are therefore unable to support the financial cases and the assumptions these are based upon and we are highly concerned at the validity and precision of the figures presented and the rigour in decision making.

2.22 There is little evidence within the financial case or the supporting documents for the proposals of how the dis-aggregation of district services will be managed and whether in-depth consideration of the cost of amalgamating services has been made.

2.23 We are very concerned that key services will be disrupted during any transition resulting in reduced quality for the recipients of these services.

2.24 We are concerned that the initial requirement to demonstrate the proposals were affordable degenerated into a competition to show the greatest savings.

2.25 The development of separate financial cases to support the BCE proposals within an unrealistic timeframe has led to a number of significant discrepancies. Financial cases have been based on a large number of unsubstantiated assumptions. Within the joint risk register created by the Section 151 officers the following key risks have been identified:

- (a) Discrepancy between totals, many of which are unexplained and / or based on unsubstantiated assumptions

- (b) Savings may be overstated.
- (c) Concerns in projected savings in key services including Waste, Education, Social Services, Highways and Revenues and Benefits
- (d) Concerns relating to assumptions on Property disposal, Insurance costs and Procurement costs.
- (e) Significant concerns that potential efficiency savings are reliant on the existing County Council 'Securing the Future' programme which would have been delivered irrespective of any structural change and that any new savings may be double-counted or based on unsubstantiated assumptions.
- (f) The margin of error for the current business cases means that affordability cannot be guaranteed.
- (g) Transition costs across the three financial cases are inconsistent and may have been understated.

2.26 The late request, without any extension to the consultation deadline, of two additional financial cases to include Lowestoft within proposals has placed an increased burden on the Section 151 Officers to produce financial cases to meet an arbitrary deadline rather than produce fully considered and reasoned proposals. Although we are pleased the Boundary Committee for England (BCE) has reacted quickly to public outcry at the idea of moving Lowestoft out of Suffolk, such changes may indicate a lack of rigour in the decision-making process.

### **Lead Authorities**

2.27 We believe that the process has meant that Suffolk County Council has been placed in an unfair position of being nominated lead authority for the development of both the Rural financial case and the financial case for a single Suffolk authority. Throughout the entire process Suffolk County Council have been proponents of a single Suffolk unitary authority, and against any alternative solution. Therefore to ask them to develop a financial case for a proposal they do not agree with has led to a conflict of interests.

2.28 Another fundamental flaw in the consultation process is that there has been no-one acting as a champion for the Rural Suffolk option. Because no-one had suggested a Rural Suffolk there was no-one naturally in a position to take on the role of explaining or promoting it, therefore allowing other proposals to be more prominent leading to a lack of reasoned discussion of local government structures in Suffolk. Indeed, many observers have assumed that as Suffolk County Council were the lead authority for the Rural Suffolk option they were also the 'champions' for this option – this has patently not been the case.

2.29 We want a local government structure for Suffolk that will continue to deliver our residents the better services and the better value for money that they both deserve and have come to expect. We also want a model of local government for Suffolk that is close to communities, accessible, local in its focus and delivery and democratically robust.

### 3. THE BCE DRAFT PROPOSALS

- 3.1 We have linked our concerns to the key criteria put forward by the Secretary of State for Communities and Local Government :
- (a) Broad cross section of support (future unitary structures must be supported by a broad cross section of partners and stakeholders);
  - (b) Strategic leadership (future unitary local government structures must provide strong, effective and accountable strategic leadership);
  - (c) Value for money and equity on public services (future unitary local government structures must deliver value for money and equity on public services);
  - (d) Neighbourhood empowerment (future unitary local government structures must deliver genuine opportunities for neighbourhood flexibility and empowerment);
  - (e) Affordability

#### **NORTH HAVEN AND RURAL SUFFOLK**

##### **We do not support the proposal for a North Haven and Rural Suffolk concept**

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

3.2 There is not a broad cross section of support for this proposal. Our knowledge, based on submissions to the BCE published on its website, submissions sent to us, and feedback from our Town and Parish Councils, is that, if anything, the public response has been uniformly negative.

#### **NORTH HAVEN**

##### **Strategic Leadership**

##### **Economic issues**

3.3 Ipswich is an aspiring city with a far more established long-term relationship with Colchester via the Haven Gateway Partnership, with both sharing an 'eastern regional city' sub-regional economic agenda.

3.4 Any examination of Ipswich and Felixstowe will reveal their differences rather than their similarities. Felixstowe is a resort for which tourism is still a key part of its economic life and its future. It is also home to the busiest port in the UK and one of the busiest in the world and dwarfs the Ipswich docks. Most of the businesses and industries associated with or supporting the Port are based in or around Felixstowe and not in the Ipswich area as has been previously incorrectly suggested. The only other economic similarities suggested between Ipswich and Felixstowe has been the travel to work patterns. However, analysis of the travel to work figures show very limited numbers of people commuting between the towns (Ipswich residents make up only 13% of Felixstowe's workforce, and Felixstowe residents are less than 2.5% of the Ipswich workforce).

3.5 While Ipswich and Felixstowe are part of the Haven Gateway sub-region, so is quite a considerable part of South East Suffolk and indeed much of north Essex, and the reality is that the economic drivers and issues facing the two are radically different. As previously stated, Ipswich has a far stronger relationship with Colchester, as identified through Regional Cities East. Both are key historic centres facing key challenges different to those faced by coastal resorts and require reinvention of significant areas within the towns. Both have identified a specific and related skills shortage and have sought to address these issues through joint arrangements with Essex University, University of East Anglia and the Suffolk College to create the new University Campus Suffolk.

3.6 The focus in Felixstowe is to regenerate its resort and town centre, and to take full advantage of the opportunities created by the plans to expand the port. The two towns have very different demographic profiles, and different retail offerings. Felixstowe is a separate and independent community. Its ambitions are markedly different from Ipswich's aspirations to become a regional city and the socio-economic challenges it is addressing.

### **Community issues**

3.7 There are no shared priorities between 'urban' Ipswich and the rural areas outside the town.

3.8 There is clearly strong feedback from the Town and Parish Councils who feel threatened by the expansion of Ipswich and being marginalised between Ipswich and Felixstowe. Their fears can be summarised in terms of the priorities of their largely rural communities being lost in a new council which will be inevitably focussed on urban and economic issues, a loss of identity for their communities, and a perceived threat of potential housing and other development of their areas as the inevitable need for growth of Ipswich would lead to their areas becoming part of the town's 'urban sprawl'.

3.9 The evidence of surveys from those in the Kesgrave and Martlesham areas show that their communities are not as focussed on Ipswich as has been assumed by the Boundary Committee, and their normal life patterns are far more orientated towards the neighbouring towns of Woodbridge or Felixstowe than the town of Ipswich. A glance at the community strategies for the two areas would highlight, for example, that Ipswich quite rightly places a major importance on addressing 'deprivation and inequality in neighbourhoods'. While there are issues of deprivation and inequality in some wards, the issues to be faced are radically different from those facing the urban area of Ipswich, and which are again different from those facing Felixstowe. However these communities do feel part of East Suffolk and consider they have an empathy with other coastal towns and communities and share their concerns, challenges and outlook.

3.10 We do not agree that the responsibility for the management of the Suffolk coast should be split over three different unitary councils, each covering huge geographical areas, who may not all prioritise coastal and estuary defence as high as those in the affected areas would expect and demand.

### **Neighbourhood Empowerment**

3.11 We agree that the involvement of local communities in local decision-making is fundamental in ensuring that local priorities are understood and addressed. We already engage with towns and parishes, and residents, on processes such as our budget. However, we regret that the process has not permitted the full engagement

of town and parish councils, other community groups and residents in discussions relating to neighbourhood arrangements.

3.12 The proposals for local engagement and governance are unclear and require further analysis and consultation.

3.13 The role of the district councillor has been underestimated in all three proposals. A Councillor in the proposed structures could be accountable to up to 15 parishes in rural areas, with a significant increase in workload across a very broad range of services. This is likely to mean a reduced capacity for local councillors to get engaged with and address the issues that matter most locally.

3.14 The number of decisions to be made across many of the statutory functions, such as development control and licensing, in addition to the introduction of Neighbourhood Forums / Community Boards means that the workload for any Councillor is likely to be significant and therefore the issue of attracting new Councillors will be complex and challenging.

## **RURAL SUFFOLK**

### **Strategic leadership**

3.15 A Rural Suffolk authority would have difficulty addressing the widely differing and competing priorities it faces. Certainly this Council is very concerned that Rural Suffolk will struggle to properly or adequately represent the widely different communities in the east and west of its catchment area. That inbuilt flaw of significantly different communities will seriously undermine the ability of the Rural Suffolk to ever present a strong united case on a regional or national stage.

3.16 There are a lack of identifiable common interests between the communities in the East of Suffolk and the West of Suffolk, with the different areas having their own sense of identity and their own specific priorities. The issue of coastal and estuary management matters little to those in the west, while tourism and also second home owners is also far more important to the eastern communities. Cambridge is socio-economic centre of the west, but its significance to the communities in the east is negligible.

3.17 We are also concerned that a Rural Suffolk will have insufficient capacity to deal with future challenges, such as the future development of nuclear energy in the area. This may be adversely impacted both by the lack of capacity within a Rural Suffolk already having to address a large geographic and diverse area, as well as its lack of influence at a national stage.

### **Neighbourhood Empowerment**

3.18 The size of the proposed rural Suffolk authority makes genuine engagement at a neighbourhood level difficult. For example, the proposal has only 16 boards across the entire rural Suffolk area (excluding Lowestoft).

3.19 We have concerns about the commitment to engagement – the number and borders of Community Boards (Rural Suffolk) are to be defined by the new unitary authority, not communities. Democratic accountability may be lost – for example, Community Boards can agree targets for their area. Budgets controlled by local councillors may not be subject to scrutiny.

3.20 The Community Boards may cause confusion to local residents and conflict with democratically-elected town and parish councils. The Rural Suffolk proposal suggests a Community Board for Lowestoft may have devolved powers, while in rural areas (where parishes often lack capacity) these powers would be available to town or parish councils. This contrasts with the North Haven proposal, where areas with strong town councils (such as Felixstowe) will be supported to take on additional powers or run Neighbourhood Forums themselves, with rural parishes able to cluster together.

3.21 Rural Suffolk's Community Boards will be unelected, will not be democratically accountable, and may include head teachers and other officers from the unitary authority, but they will be controlling budgets from the unitary authority for their area. Such interests would have to be declared and addressed by democratically-elected members.

## **ONE SUFFOLK**

### **We are opposed to the alternative proposal of a One Suffolk unitary council**

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

3.22 Many Town and Parish Councils have indicated to us that they believe they have had a simple choice of deciding between the two proposals presented to them by the Boundary Committee, rather than a chance to have their say on what how they see the future of local government in Suffolk. Therefore, whilst many organisations have preferences for alternative concepts not presented by BCE or improving the current structure of local government, many of the responses to the Boundary Committee have indicated a preference for one of other of the BCE proposed concepts as the lesser of two evils.

3.23 Town and parish councils in our district have told us they do not see any reason for change and would prefer developments to the existing local government structure, building on existing work to create an enhanced two-tier model. However, the structure of the consultation has meant they have not felt able to share these wishes with the Boundary Committee.

#### **Strategic leadership**

3.24 A 'One Suffolk' authority will not be able to support and deliver against the wide range of challenges and opportunities in such a large and diverse area.

3.25 With or without Lowestoft, it would be covering too many people across too large an area to be able to effectively represent and serve the differing priorities of all its communities within the historic county of Suffolk. If a unitary structure is to be implemented, then it should be structured around three councils. The needs and priorities of Ipswich are significantly different from nearly all the rest of Suffolk, a fact which has been the trigger for Ipswich's regular attempts to gain unitary status. At the same time, there are clearly different challenges to be addressed in both East and West Suffolk.

3.26 All experience shows that there comes a point beyond which economies of scale are outweighed by remoteness, unaccountability and consequently lower performance and public satisfaction. Dis-economies of scale are created as the sheer size of the organisation requires extra layers of management. If unitary government is to be introduced, then the BCE is to be applauded for recognising that a single

county-wide authority is not the answer, but to serve the communities of Suffolk best it should be into three not two.

3.27 A county wide unitary authority will be remote and unresponsive to local needs.

3.28 Creating one giant council for Suffolk will be a backward step for local democracy and local involvement/community engagement. We have outlined above our concerns that the distinct communities that make up Suffolk will find it harder than ever to make their voice heard and to ensure that their priorities are those of a new giant council. The proposed number of councillors will mean there is, on average, roughly one Councillor per 5,500 Suffolk citizens. Councillors will become more remote from their localities and will have difficulty in representing the views of their constituents, particularly given the extremely broad range of combined county and district services.

3.29 Planning applications remain one of the most important issues affecting local residents but the proposed system of dealing with them will be more remote than is currently the case. There will significant issues in agreeing and enforcing a common planning policy that is appropriate across the whole of Suffolk. It is likely that the majority of councillors could be spending most of their time dealing with planning applications, rather than the best practice approach of having a few trained and experienced local councillors who are able to offer a consistent and well-judged approach.

3.30 The role of a Councillor will be extremely challenging addressing, council strategy and policy, locality needs, and statutory functions. They could be expected to be involved in a considerable range of different committees and initiatives including:

- (a) Development Control Committees
- (b) Licensing Committees
- (c) Community Boards
- (d) Scrutiny Committees
- (e) Cabinet
- (f) Task Groups
- (g) Suffolk Strategic Partnership / Local Strategic Partnerships
- (h) Parish Council meetings
- (i) Councillor surgeries
- (j) Scrutiny of other sectors – Police, Health, DWP etc.
- (k) Engage with service providers

3.31 The proposed One Suffolk council will inevitably result in more key decisions being taken centrally and we fear more than ever it will be increasingly by officers, rather than councillors who decide, to the detriment of the democratic process and local influence. At a time when both local and central government is committed to community engagement it is a matter of serious concern to us that the giant Suffolk proposal will introduce far more central control.

3.32 This centralising of power will make it harder for local communities to raise their local concerns and get their particular needs addressed. Their local councillor will be covering a larger area and bigger electorate than before, and even if they can engage with their local councillor it will be difficult for their elected representative to get those priorities and needs heard. Local government in Suffolk will quite simply no longer be local.

### **Neighbourhood empowerment**

3.33 The size of the proposed authority makes genuine engagement at a neighbourhood level difficult. For example, the proposal has only 22 Community Boards across the whole of Suffolk (including Lowestoft). Each board could be covering a third of a district.

3.34 We are concerned about the level of commitment to engagement – the number and borders of Community Boards are to be defined by the new unitary authority, not communities. Budgets controlled by local councillors may not be subject to scrutiny. Democratic accountability may be lost – for example, Community Boards can agree targets and funding for their area.

3.35 The Community Boards may cause confusion to local residents and conflict with democratically-elected town and parish councils. The One Suffolk proposal suggests a Community Board for Lowestoft may have devolved powers, while in rural areas (where parishes often lack capacity) these powers would be available to town or parish councils.

3.36 Community Boards will be unelected and will not be democratically accountable. They may include head teachers and other employees of the unitary authority (and other public bodies), who would be controlling budgets from the unitary authority for their area. Such interests would have to be declared by democratically-elected members.

3.37 Lowestoft and Ipswich would have an Area Portfolio Holder, but there would be no equivalent for the remaining areas of Suffolk, preventing rural areas (which would already have limited access to the authority, as offices will be based in the major urban areas) from having a voice at a strategic level.

3.38 The urban, coastal and rural areas that make up Suffolk do not have enough common interests and concerns.

3.39 We have stated earlier in our response the key differences between East and West Suffolk when considering the Rural Suffolk proposal. In addition, the driving force for this review of local government was the ongoing demand by Ipswich to become a stand-alone council because of its different priorities from the rest of the county, and the Secretary of State's recognition of those differences. We have placed on record above that there are clear differences between the aspiring city of Ipswich and that of Felixstowe and also the rural areas between the two towns. We fully understand Ipswich's aspirations to become a unitary authority and if there has been a weakness in local government in Suffolk in recent years then it has been the failure to differentiate the needs of Ipswich against those of the rest of the county.

### **Affordability / value for money**

3.40 A One Suffolk authority will have to introduce additional layers of management and bureaucracy in an attempt to address locality issues and the standards set by the existing district model. This will affect ongoing value for money.

3.41 The One Suffolk model fails to recognise the extra layers of management that will have to be built in to support locality arrangements, if they are to meet the challenges that have been set. These new arrangements have the potential to cause unnecessary confusion for the service user.

3.42 The financial case for Unitary Suffolk was not shared with Chief Financial Officers until 5.40pm 12th September. This has prevented detailed scrutiny. Throughout the process late adjustments have been made, without explanation - members and officers have not been able to scrutinise them. As just one example, changed figures relating to Corporate Support and Community Boards have not been reviewed because they were received so late.

3.43 Savings for the rural unitary appear too low when compared to figures for whole Suffolk and North Haven.

3.44 Proposed savings from district budgets may be excessive and not reflect existing work between districts to achieve efficiencies.

## **LOWESTOFT**

### **Lowestoft must remain within the Suffolk local government structure**

3.45 We are opposed to removing Lowestoft from the local government structure in Suffolk. This applies equally to both BCE proposals, and to any alternative proposals.

3.46 There is no justification at all to moving Lowestoft into the control of Norfolk unless the people of that town support it, and there is no suggestion that we are aware of that there is anything other than a torrent of requests that Lowestoft should remain part of Suffolk. While Lowestoft may have some northern links, future challenges and opportunities will grow and strengthen its focus southwards. In our view it should not just remain part of Suffolk but if unitary government is introduced it should be part of an East Suffolk council that also includes Felixstowe. The development of the low-carbon energy sector ranging from Sizewell to Lowestoft is of national significance and to split these across two different authorities would represent a missed opportunity.

3.47 Suffolk Constabulary have expressed concerns relating to the proposed annexing of Lowestoft and the impact this may have on policing within the historic county of Suffolk.

## 4. OUR PROPOSAL

4.1 "Suffolk is a diverse county made up of a mosaic of different places. There are densely populated urban areas like Ipswich, Lowestoft and Bury St Edmunds, thriving market towns, small villages and rural communities. Each of these communities has its own identity, concerns and issues. Needs, opportunities and challenges vary greatly across the county." (quoted from Suffolk County Council)

4.2 The optimal solution for local government in Suffolk would be to create three unitary authorities, East Suffolk, Ipswich and West Suffolk. All three Councils would offer genuine value for money, be locally based with local priorities, and be big enough to have a voice nationally and small enough to give local people a real say.

### **THE CASE FOR AN EAST SUFFOLK UNITARY COUNCIL**

4.3 At the core of the East Suffolk proposal is the reality of range of communities with shared goals and aims that are markedly different from the rest of Suffolk. The elements that define the communities which constitute East Suffolk also make East Suffolk so markedly different from the aspiring city of Ipswich with its urban challenges and perspective, and the Cambridge-orientated west of Suffolk.

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

4.4 Suffolk Coastal has not had the opportunity to develop a full business case. Despite this, our East, West and Ipswich proposal has been well-received by residents who recognise the need to address local East Suffolk priorities. Responses in support have been received directly by the Boundary Commission, and via our website, as well as verbally from town and parish councils and citizens. We regret that all proposals were not made part of the public consultation set up by the BCE, meaning the consultation has not reflected the real wishes of Suffolk's residents.

#### **Strategic Leadership**

Despite the highest ratings of satisfaction in Suffolk (and some of the highest in the country) regarding quality of life, there are significant issues facing our district. A new East Suffolk unitary authority will focus on the following key priorities:

**To support the development of the internationally important port at Felixstowe, associated industries and to address the issues if the existing transport infrastructure**

4.5 The multi-million pound expansion of the internationally important Port at Felixstowe is a critical economic programme that has not just local, but regional, national and international consequences. Our long-standing involvement and experience of this key development puts an East Suffolk unitary authority in the best position to support the expansion of the Port and growth of the associated industries that need to meet the increased success-generated demands of the Port. The programme requires significant engagement with the local authority to deliver the radical improvements needed to the existing transport infrastructure and to implement enhancements to the local education and training provision to meet the skills requirements of existing and emerging industries, thus meeting local business needs.

**We will fully support the vitally important regeneration of the coastal towns of Lowestoft and Felixstowe as economic centres and tourist destinations, while addressing the issues of deprivation, health, educational attainment and housing.**

4.6 The two primary towns in an East Suffolk area face very pressing and comparable challenges. Lowestoft and Felixstowe share an agenda for resort management, regeneration, and social cohesion. They are key employment locations for their local areas with the majority of their work-force living within the towns. Both expect significant business growth and investment over the next fifteen years. Key industries include manufacturing, transportation and the emerging low-carbon energy sector in Lowestoft.

4.7 Both towns have wards that face issues of deprivation, and Lowestoft in particular has significant issues with teenage pregnancy, smoking and low exercise levels. There are issues with education attainment and a need to address low skill levels in both areas. Significant housing growth is expected by 2021 with 3,500 new homes in Lowestoft and 1,700 in Felixstowe. The transport infrastructure for both towns is inadequate and requires urgent attention.

4.8 An East Suffolk authority will have the capacity to take a co-ordinated approach to addressing these key challenges using the whole breadth of its services from education through to planning, adult care through to housing, working with key public sector bodies such as the PCT and Police and creating a framework which enables local communities and businesses to be fully engaged in the delivery of local priorities.

**To support the expansion of regional centres of excellence across industries in the East Suffolk area building on the existing technology and emerging low-carbon energy sectors**

4.9 East Suffolk is a hub for innovative and cutting edge industries with significant further expansion expected in the future. BT has the largest centre of ICT research in Europe at Martlesham, with supporting technology and knowledge based businesses on the surrounding innovation park. Orbis Energy in Lowestoft will be a worldwide centre of excellence for offshore renewable energy – wind, wave and tidal technologies – supported with academic expertise to support new and existing small to medium size businesses. This will form part of the low-carbon energy ‘power corridor’ along with the nuclear power facility at Sizewell.

4.10 An East Suffolk unitary authority will work closely to foster and develop these industries by supporting the local skills base to meet local needs, whilst ensuring the businesses involved play a full and important role in the communities they support.

**To ensure that demographic changes in the East Suffolk area, in particular the aging population are tackled through the coordinated provision of care services and housing**

4.11 East Suffolk has a significant aging population which provides current and future challenges for many areas of a unitary authority. We will ensure that there is coordinated provision of care services and housing for all, although prioritising the issue of our increasing aging population. It is vital that there is community involvement and ownership of the future development of these services so that they

are aware and informed of the resource and priority decisions that will have to be made. An East Suffolk authority will work with our communities and our community organisations to agree and identify the level of support and how it can be provided. It is a challenge that we believe that together we can provide the better joined up services that our aging residents expect and deserve.

4.12 On social care generally we recognise the need to address the growing demand for personalised care for adults, and we will work closely with our partners in the health services to deliver improvements. The support has to be there to help people remain in their own communities. The joined up approach will encompass housing, and will seek to make more effective use of housing so that it will be easier for people to move into larger or smaller homes depending on their evolving needs. We also recognise the challenge of still having a largely rural area and the importance of making our services as accessible as possible to all and we will work with all our partners, particularly tapping into our excellent network of town and parish councils, to identify and deliver as wide a range of services in all parts of our communities.

**To provide a strategic approach to the regional and national issue of coastal and estuary management**

4.13 One of the key things that an East Suffolk unitary council will provide is a single cohesive body that has a strategic approach to the regional and national issue of coastal and estuary protection. Having an East Suffolk council that is made up of representatives from all the local communities that are affected will ensure a consistent and certainly loud voice on this issue. There is no question that East Suffolk recognises the importance of coast and estuary protection and will strongly argue the case on all possible stages to ensure that it becomes a national and not just a local priority. The potential environmental and economic impact of not taking action is best recognised by those in East Suffolk, and that is why such positive steps have already been taken, with partnerships helping deliver innovative solutions and long-term planning now underway.

**To protect and enhance the environment and character of the East Suffolk area making it attractive to residents and visitors alike**

4.14 The new authority will understand the importance of the environment to both the quality of life of East Suffolk and to its economy. A large proportion of East Suffolk is designated as an Area of Outstanding Natural Beauty and there are numerous Sites of Special Scientific Interest which requires co-ordinated approach ensuring that each of our unique areas can maintain their own identities and we intend to continue in this way, balancing the need for growth with protecting and enhancing what makes our area so special to both residents and visitors. Again more than any other part of Suffolk, East Suffolk has the experience of delivering countryside management that delivers a quality experience, and which is such an important key to the economic driver of tourism and the arts.

4.15 Whilst making East Suffolk an even better place to invest and grow, we must not lose sight of the importance of tourism to our area, with around nine per cent of all jobs currently linked to this sector in our district alone. An East Suffolk authority will recognise the importance of balancing the future growth of our area with preserving the qualities that make it so special to visitors. Whilst there are key areas of regeneration required in Felixstowe and Lowestoft, other parts of the area, such as the coastal resorts of Aldeburgh and Southwold and many market towns, want to retain their historic character and charm. However, it is vital that access to key

services is available to all and a joined up approach to localised service delivery, engaging with local communities, is essential.

4.16 The future cannot be delivered in isolation but the recent history of the communities that make up East Suffolk is one of looking outwards and welcoming change as long as it enhances our quality of life. Our goals are not just about providing better council services and better value for money but they are strategic and they have been shaped and must continue to be shaped by our partners – our communities and our business sector. With them we will strengthen our work with regional partners, a goal that will be more easily achievable as the brand of success that is East Suffolk is an attractive one, and will be easier to progress without the contradictory distractions of the different needs of the aspiring city of Ipswich or the increasingly Cambridge-focussed communities in West Suffolk. As a unitary we will be in a far better position to encourage the targeted growth of businesses, particularly small and medium sized enterprises, fostering those that meet the unmet demands of East Suffolk. The joining up of services across East Suffolk will allow us to offer a one-stop shop approach to those needing advice on issues regarding planning, or economic development, licensing, food or health safety, or trading standards, making it simpler for businesses to grow and prosper.

4.17 We are certain that it is only our East Suffolk model that would deliver the services and future that our communities want and deserve. We also believe that we would put in place the best democratic process to deliver the goals of our communities and involve our communities in shaping the future of East Suffolk.

4.18 East Suffolk is all about providing local solutions to local challenges, about having local control on local issues. To help deliver that in the most effective way we propose to have around 80 councillors, each representing around 3,000 people which given the scale and complexity of the services that the council would be delivering is the right ratio to ensure the accessibility and accountability of councillors, particularly across our more rural areas, with ward surgeries to encourage that exchange of news and concerns.

4.19 We would have a Leader / Executive model of government, with meetings held across the East Suffolk area to take our debate and decision making out to all the communities we serve.

4.20 East Suffolk would build on existing shared services such as the Chief Executive shared between Suffolk Coastal and Waveney, joint working on services such as legal and building control, and innovative service management initiatives that have delivered both efficiencies and improved services. Work would continue on developing further partnerships including working with other East Coast local authorities to develop a co-ordinated approach to vitally important coast and estuary protection and management.

4.21 We would encourage an active and vocal scrutiny function which focuses on community outcomes regardless of service provider. Community Calls for Action will ensure that local individuals, groups or communities have an opportunity to question the authority and hold it to account.

4.22 Our overall priorities would be shaped by the LSP which would of course be made up of representatives from across all sections of our community and all types of local service provider, while we would have a network of locality managers to ensure that services are being delivered both fairly and according to need across our communities.

4.23 We would take an active role in any regional partnerships including Haven Gateway to ensure that the best interests of East Suffolk are protected and the maximum resources and commitment achieved. When and where appropriate we will work with other public sector organisations and councils, whether neighbouring or not, to provide effective and efficient specialised services.

#### **Neighbourhood empowerment**

4.24 To support our democratic model, we are of course committed to greater empowerment of our communities, with for example the creation of a Lowestoft Town Council as an early target. We have previously referred to the importance we put on our town and parish councils - with nearly 800 town and parish councillors in Suffolk Coastal alone, we know the importance of role in their local communities and we are ready and willing to devolve service delivery decision making down to our town and parish councils. Because this is not a one size fits all policy statement, we also recognise that the degree of devolution is entirely dependent on how much powers the individual town and parishes want to take on, and we will build in the flexibility to take account of local wishes.

4.25 We have expressed concerns earlier in our response regarding the lack of clarity on Community Boards including their purpose, membership and accountability. However, we do acknowledge and agree that greater community involvement in local decision making and where appropriate local service delivery and that Community Boards may be the vehicle to deliver these. As an authority we would consult with all of our partners to determine an approach which ensures these Boards have a clear and visible purpose and are fully accountable.

4.26 Our initial thoughts would be to consider the existing LSP model and understand whether this can be utilised more effectively. This may involve having more localised groups considering area issues and how these may be addressed. The membership of these groups will need to be reviewed to ensure that local communities are fully engaged.

4.27 Alongside these 'mini LSP' groups would be localised groups consisting of unitary and town and parish councillors able to influence and vote on local service delivery and key decisions. These groups would be accessible to the public and would consider amongst other issues the effective use of locality budgets to deliver real 'on the ground' improvements based on local knowledge and need.

#### **Value for money / affordability**

4.28 East Suffolk will deliver savings, but we should make it clear that we are not prepared to sacrifice quality for cheapness – we will strive to provide value for money services and will never let our focus slip away from ensuring greater efficiency, but we will not sacrifice the priorities of our communities or the service quality that they demand. It has been the goal of Suffolk Coastal in recent years to deliver better services and even better value, and the facts show that we have achieved that goal as recognised by the Treasury and our performance statistics. Despite increasing economic challenges, we have maintained below average council tax increases while improving services and delivering on priorities. It is against that background that we address the issue of the affordability of East Suffolk.

4.29 Our proposal makes sense as it will mean just one council being responsible for coastal management which will not only ensure that it remains a top priority but will be more cost effective. There will inevitably be a reduced senior staff headcount,

while centralised service, such as ICT, HR, payroll, communications, asset management, finance, internal audit, legal, democratic services, performance and policy, will be improved to take account of their role in helping deliver the goals of the new council. Similar services will be integrated, such as housing and care services, trading standards and environmental health, while there will be closer working between economic development and education services, with greater input from the business community, to ensure that current and future skills needs are met.

4.30 We will have in place specialised staff for our key priorities such as economic development / regeneration, coastal and estuary management, improving skills and training to meet employers' needs, and an improved care service for key groups including the elderly. As befits a new council, we will look to operate flexibly making use of existing office space, and taking full advantage of home working, and locality / field working.

4.31 We have expressed our concerns about the creation of financial cases for the BCE proposal, in particular the lack of real consultation and many unsubstantiated assumptions. This is not intended as a criticism of those engaged in the development of these financial cases, but of the unrealistic and flawed time-table placed upon them. For this reason, we are not presenting a business case for our proposal, but we reserve the right to do so prior to December 21st 2008. However, from work undertaken to date, it is clear that a three unitary proposal will meet the affordability criteria set by the Secretary of State.

### **Ipswich and West Suffolk**

4.32 We are very aware that for East Suffolk to be a viable proposal for unitary government, so too must be the proposals for Ipswich and West Suffolk. These areas have their own sense of historical and contemporary identity and are as passionate about, and committed to their local areas, as we are in East Suffolk.

4.33 It would obviously be the responsibility of those authorities to define their local vision, priorities and methods of working and engaging with their local communities, so we will not go into detail on these proposals. However, Ipswich Borough Council have made their ambitions for the town very clear in their original proposals, both during this BCE review and in previous applications for unitary status. Since our initial proposal we have reconsidered the boundaries for an Ipswich unitary, particularly from an economic perspective. As stated elsewhere in our response, we do not agree that there is a strong economic relationship between Ipswich and Felixstowe. However, we do acknowledge that there is a joint agenda between Ipswich and Colchester and have therefore adjusted our original boundaries to reflect this. We also acknowledge that during this process, some towns and wards have expressed a want to be included within Ipswich boundaries – as this is the local view we have also reflected this within our boundaries.

4.34 We are aware that Forest Heath District Council and St. Edmundsbury District Council along with Waveney District Council are providing the BCE with further details relating to a West Suffolk proposal. We fully whole-heartedly support their ambition for a unitary authority to meet their local ambitions. We note that the BCE have concerns that the proposals reflect pre 1974 boundaries, although we would respond by saying that these boundaries were there for a reason – they served local communities with their own specific challenges. We also acknowledge and to an extent share the BCE's concerns over the precise location of the East – West Boundary. We feel the best way to resolve this is to consult with local people to

understand their views and preferences and create a boundary that reflects local needs rather than impose a theoretical line on a map.

4.35 In summary, Ipswich and West Suffolk have their own specific challenges that are best addressed through focused local governance. The key challenges are:

(a) Ipswich – An Ipswich authority on a boundary that supports the ‘eastern regional city’ relationship with Colchester will be focused on its urban agenda thus addressing its economic and social needs;

- (i) It will be able to address the economic challenges of its area including the continued development of service focused industries, in particular financial services and increasing the number of new businesses within the area;
- (ii) It will be able to focus on improving education attainment, particularly in urban areas, and to support the establishment of the University Campus as a centre for regional higher education;
- (iii) It can address the pockets of deprivation in the Ipswich area, through a coordinated approach to housing, education, employment opportunities and crime prevention;
- (iv) It can concentrate on the regeneration of the centre of Ipswich, developing the location as a regional destination for shopping and cultural activities.

(b) West Suffolk – A West Suffolk authority will be in a position to build on its economic relationship with Cambridge, whilst supporting and maintaining its rural identity;

- (i) It will be able to further strengthen its relationship within the Greater Cambridge economic sub-region;
- (ii) It will be able to concentrate on supporting its network of market towns and rural hinterlands.