



The Right Honourable The Secretary of State for  
Communities and Local Government

Unitary Structures Team  
Department for Communities and Local Government  
Zone 3/J1  
Eland House  
Bressenden Place  
London SW1 E 5DU

Please ask for: Ray Herring  
Direct Dial: (01728) 746337  
E-mail address: ray.herring  
@Suffolkcoastal.gov.uk

Dear Secretary of State,

## **LOCAL GOVERNMENT REVIEW OF SUFFOLK**

Thank you for the opportunity to respond to the proposals for the restructure of local government in Suffolk as put forward by the Boundary Committee for England in December 2009.

The proposals from the Boundary Committee fail to meet the needs and ambitions of the diverse Suffolk communities. We are committed to ensuring that these communities receive high quality and cost effective services that meet their needs and are shaped by them. We want to develop a system of local government for Suffolk that looks ahead to meet the challenges of the future, not one that is rooted in the issues of the past.

We have enclosed with this letter two documents. The first "*Response to the Boundary Committee for England's advice on unitary government in Suffolk*" provides a detailed response to our concerns on the December proposals.

The second document "*Proposals for the future shape of local government in Suffolk*" outlines our proposals for unitary local government – East Suffolk, West Suffolk and Ipswich. The document also acknowledges the difficulties of implementing unitary local government at this time, and provides assurances to the Secretary of State of our current innovative model and progress towards a "super district".

In summary of our concerns, we cannot support either of the proposals put forward by the Boundary Committee because:

### ***The proposed governance arrangements are seriously flawed:***

**Failure to deliver democratic accountability** – the current proposals would mean one councillor per 10,000 people, which in a rural context is democratically unsustainable.

**Minimal engagement with local communities** – the size of the proposed authorities will adversely affect the ability to engage with local communities on local issues.

**Decisions will not be made by elected representatives and instead will be determined remotely from the communities affected** – the small numbers of councillors compared to the workload of the proposed authorities will result in a restricted input by elected representatives, and greater reliance on delegation to officers. This is contradictory to the need to engage communities, and their representatives, in shaping the services they rely upon.

**Reduced engagement with Town and Parish Councils, the voluntary sector and local community groups** – there is no recognition by the Boundary Committee of the important role of these authorities and locally important groups in delivering vital local projects.

**Councillors will not be as accessible to local communities** – the workload of councillors will restrict their opportunity to get involved with local issues and projects

**Organisational effectiveness** – the propensity towards diseconomies of scale and unnecessary bureaucracy will be much greater, given the size of the organisations proposed.

**Neighbourhood engagement will be bureaucratic and costly** – the introduction of new community boards and locality managers will overlap with the roles of Town and Parish Councils, increasing complexity and causing further diseconomies of scale.

**Accessibility** to democratic processes and decision making will be adversely affected under these proposals.

***The proposed structures do not reflect the needs and ambitions of the distinct communities of Suffolk:***

**A single Suffolk unitary** will be too remote from the communities it is meant to represent, leading to local needs not being either recognised or addressed.

**Rural Suffolk / Ipswich and Felixstowe** – the Boundary Committee has created structures for communities that do not exist – West Suffolk and East Suffolk have a different focus to one another, whilst joining Ipswich, a major urban area with aspirations to be a city, with a coastal town such as Felixstowe is a solution that has little local support.

***The proposals fail to recognise the different communities of interest across Suffolk:***

**East Suffolk, West Suffolk and Ipswich** – all have differing needs and aspirations which have been continually promoted and explained by local authorities, organisations and communities, and yet have been consistently ignored by the Boundary Committee without explanation. East Suffolk is a coastal area, with a strong and genuine sense of place and community; this needs to be acknowledged by the democratic structures that support it.

***It has not been proven that the proposals are affordable:***

- The financial workbooks are based on financial data over three years old.
- There were, and are, significant concerns over many of the assumptions made.
- The financial position of all Suffolk authorities has changed significantly since the workbooks were created – with savings achieved, reserves affected, and income radically altered as a result of the recession.
- It is impossible to rely on the workbooks – a point highlighted by the Boundary Committees' own financial advisors who state that the financial analysis needs to be re-visited.

***There is not a broad cross section of support for the Boundary Committee's proposals:***

- The Boundary Committee have failed to properly engage with local communities on all proposals and have ignored a large percentage of responses. We are aware that many respondents were frustrated at the proposals that they had to comment upon, and wanted to refer to other models.

After analysing the proposals in detail, and applying them to the local context, it is evident that they do not meet the expectations of the five criteria which are fundamental to this review.

Given the current economic climate and the acknowledged pressures on all public expenditure, we would urge the Secretary of State to consider whether now is the right time for a complex upheaval in local government, which is bound to involve significant restructuring costs and the diversion of resources and expenditure away from key services when they are most required by many of the most vulnerable members of the community.

That's not to say we stand still - we accept that local government in Suffolk needs to change both quickly and radically. However, any change needs to reflect the needs of the people and communities of East Suffolk, West Suffolk and Ipswich. We, alongside our partners in the West of the county, have consistently promoted the clear benefits of this model to the Boundary Committee, only to be continually ignored without a clear explanation of why.

Suffolk Coastal and Waveney are part way through a journey to develop a "super district" to reflect the shared ambitions of the people of East Suffolk and plans are in place to replicate this in the west of the county. This approach will enable services that are tailored to reflect the needs of the communities of the two existing districts whilst delivering substantial savings. Alongside this, we are engaging with the County Council to identify more effective ways of working, whilst engaging with all local partners to make Total Place a reality.

This innovative approach will continue at a pace to ensure that the people of East Suffolk receive a high quality of service, and value for money, in a way that they can influence and engage with.

Yours sincerely



Ray Herring  
Leader, Suffolk Coastal District Council