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Borough Council of
**King's Lynn &
West Norfolk**



Chief Executive
Ray Harding

Archie Gall
Director
The Electoral Commission
Trevelyan House
Great Peter Street
London SW1P 2HW

26 September 2008

Dear Mr Gall

Boundary Committee Review of Norfolk and Suffolk – Draft Proposals

Please find enclosed this council's response to the above report. We have prepared this response jointly with four other district councils as our concerns with the way you have gone about your task and the conclusions you have drawn are shared.

In preparing our response we have consulted with a wide range of local organisations, groups and people in the west of the county to make sure that our response was founded on local opinion.

This is a responsibility that this Council, as the directly elected body covering the West of Norfolk, takes seriously. Our corporate aims include promoting and leading West Norfolk, and we see ourselves as the guardian of the high quality of life enjoyed by those who live here, work here or visit.

We see nothing in your proposals that will safeguard this quality of life for local people. Instead, we have heard nothing but concern for the future development and prosperity of this part of Norfolk.

These concerns centre around four areas:

1. There was no consultation in the West of the County. Your proposal was drawn up following consultation in the east of county only. Presumably as you felt that there was an imperative that you had to answer the 'Lowestoft/Waveney' question. What you failed to do was to consider the impact of your conclusions on the rest of the county.

Regrettably it is now abundantly clear that they simply do not work for the west of the County and this has engendered a significant level of concern and indeed anger amongst businesses, Parish Councils and local residents.



INVESTOR IN PEOPLE

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Chief Executive – **Ray Harding** Deputy Chief Executive – **David Thomason**

2. There is no business case for change. In any other endeavour an organisation would look at the costs and benefits of change as compared to existing arrangements before recommending changes that will create a great deal of upheaval and cost a very great deal of money.
3. As there is not business case for change, there is no detail on which to consult with local people. To borrow an analogy from the Leader of Breckland, it's like being asked to pick a car from a showroom knowing only what it looks like cosmetically, without knowing what sort of performance you might get out of it, what it costs to buy and what its longer-term running costs are. Anyone supporting change through this process is doing so based on headlines and hearsay alone.
4. The intellectual basis on which these conclusions are founded is extremely weak. Despite your mantra through this process of requiring clear evidence from us, which we provided, you appear to have ignored it in reaching your conclusions. Your proposals are simply solutions looking for a problem – as local people have said to us, time and time again, 'if it ain't broke, don't try and fix it'.

Major decisions relating to something as important as the future of local government in this country, a key foundation of our national representative democracy, should not be made in this way.

All the evidence we have shows the proposals do not work for the whole of Norfolk - collectively, the five councils contend that they don't work across any of the county! As this change is not wanted by local people nor supported by third-party evidence, we ask you to advise the Secretary of State that, following consultation and review, you conclude that the unitary patterns of Local Government that you put forward in your report do not work in a county the size and nature of Norfolk.

Yours sincerely



Nick Daubney
Leader

Ray Harding
Chief Executive

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Mr. A. Gall,
Director,
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Your Ref:
Our Ref: TL/MH
Contact: Tim Leader
Direct Dial: 01362 656263
Date: 26th September 2008

Dear Archie,

Proposed Structural Review of Local Government in Norfolk

Please find herewith copy of the representations of Breckland District Council to the Boundary Committee which are being made jointly with Broadland District Council, Borough of Kings Lynn and West Norfolk, North Norfolk District Council and South Norfolk District Council.

Yours sincerely

TIMOTHY LEADER
Deputy Chief Executive and Monitoring Officer

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26 September 2008

Mr M Caller, CBE
Chair
The Boundary Committee for England
Trevelyan House
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Dear Mr Caller

This letter is written on behalf of Broadland District Council and was approved by the Council at its meeting on 16 September 2008.

As you are aware, the Council's firmly held position is that the three-tier system of local government has served and continues to serve Broadland residents extremely well and for that matter the rest of the county. This Council has demonstrated that the current system is capable of improvement and that it can be further improved in terms of service quality, breadth of service delivery and value for money. Many of the Norfolk authorities have already made the commitment to turn this aspiration into reality through the production of a business case showing how it can be done and the improvements and savings that can be leveraged.

Before making specific comments on the 3 options the Boundary Committee have so far tendered for consultation the Council would like to pose some fundamental questions and also describe what is at risk. The Secretary of State, the Boundary Committee and those proposing this change should be able to answer positively the following questions and issues to the public's satisfaction:

1. What is the rationale for change? As a principle it is unwanted in Norfolk for the main reason we have articulated above.
2. If such a change is forced through against, we believe, the majority views of the people living in Norfolk where would the new authority's (or authorities') primary focus be? Experience from other such re-structuring would suggest that this would be primarily internal rather than external for a number of years immediately after any change. This leads us to conclude that this would result in a worse overall performance, which would be to many customers' detriment. It would also negate the substantial work that has been done to enhance both service delivery and the image of local government in both Broadland and Norfolk as a whole.
3. With the current economic problems effort should be directed to ensuring communities are regenerated, jobs created and housing provided. We believe that this community priority will also suffer in what is a crucial time in not just Norfolk and Suffolk but the whole of the country. We have no doubt that financial and other resources will be wasted on this extra bureaucracy and transitional costs at the expense of 'community value' work.
4. There are many excellent local examples of sub regional working, for example the results achieved through the Greater Norwich Housing Partnership, which could be

lost to the ultimate detriment of the people who should benefit from them. Is that a risk that should be taken in the context of what we have commented on in 3 above? We would strongly argue that there is a strength from partnership working between local authorities that a single council cannot replicate.

5. The current districts in Norfolk and Suffolk are at different stages in planning for future growth through their Core Strategies with Broadland, Norwich and South Norfolk already producing a joint Core Strategy. All this could potentially be undermined and leave a development management policy vacuum in the county. With the Government stating that if the policy is not in place on time a solution will be forced on the area; this is a risk that should not be taken.
6. Can smaller unitary authorities or those arbitrarily put together, particularly those already beset by financial failings and inadequacies, have the capacity and leverage to manage not just future major growth and the required high levels of new infrastructure but also improve services in a cost effective manner for the benefit of their customers? We do not believe that they can.
7. Those authorities in the “first wave” of transition to unitary status are already feeling the effect of savings being overstated and costs being understated. Northumberland particularly has had that sort of adverse publicity and is already seeing an alleged future £55m “black hole” in its financial projections. Can that be a sensible way to manage change? It gives us no confidence in this process.

Any proposal for unitary local government puts current service delivery at serious risk. For the residents of Broadland that means:-

1. Topped *The Times Best Council to Work For 2008* list in the category of ‘Work Home balance’ and came third overall in the competition (up from 8th in 2007)
2. Only Council to be in the top 10 for Council Tax and Business Rate collection. Finalist in the IRRV Revenues Team of the Year
3. Recycling performance of about 49%, which will put us in at least the top 20, if not the top ten with lowest quartile costs.
4. Our planning performance has gained us just under £2min Planning Delivery Grant.
5. Sickness absence in 2007/08 at 5.47 per employee pa., which should put us in the top 10 Councils.
6. Winner of green apple and liv.com awards.
7. First council in Eastern Region to be awarded Member Development Charter.
8. Use of Resources Score of 3.
9. A high performing council with two thirds of its performance indicators being above the median.
10. Partnership benefits, including an innovative new partnership with the Health & Safety Executive to improve safety in the workplace.

All of this achieved with the second lowest spend per head of any English District and, I believe, the lowest asset base of any UK Council. Broadland residents are likely to have their Council Tax increased through “equalisation” in any of your proposals. Put simply they risk worse services at a higher council tax – not a prospect that convinces them that change

would be for the better.

I hope this helps you understand our stance.

There are a small minority of Councillors who, in principle, support unitary local government. Nonetheless, this Council is unanimous in its view that the three proposals you have put forward are flawed. I will explain below the reasons why we believe that to be the case.

I will deal with each proposal in turn and in no particular order.

The Wedge

- We understand the points that you make about linking the coastal area around Great Yarmouth and Lowestoft. The existing two District Councils and their respective County Councils work closely on regenerating those two communities, which reinforces your view. However, we cannot see any value in linking the coastal area with Norwich. It seems to us that any support for this is politically motivated to try to maintain a Labour toe-hold in this area.
- There is a 20 mile gap between Great Yarmouth and Norwich. Much of that gap is rural in character. We have no doubt that this new Unitary would concentrate its resources into the three urban areas and the rural areas would, as a consequence, be neglected. This would lead to resentment and could reduce community cohesion and would certainly reduce access to services to residents in those rural areas.
- Your proposal extends to the Greater Norwich boundary as proposed by the City Council. We believe that the boundary is too tightly drawn to cover the growth areas around the City. This will inevitably lead to partnership working being required from the two unitary councils being part of this proposal and that is already in place through the Greater Norwich Development Partnership. Whilst the aim of something new should be the same this will give rise to issues of primacy and self-interest in such a situation.
- Great Yarmouth, Waveney and Norwich City Councils are all currently on Use of Resources scores of 1 and all have severe financial pressures and inadequacies. With three Councils having a Use of Resources score of 1 forming the major parts of a new Unitary there is no doubt that these issues will leak into the new Council. We therefore see no likelihood that the important value for money criterion would be met and that should have a major influence on your judgement on the viability of this option.
- The area outside of the Wedge is large and has a complex pattern of settlements. The largest settlement would be King's Lynn on the very edge of the Unitary that would make for interesting political dynamics. There is no obvious centre or focal point to which residents could easily relate. Would this remaining element have the capacity to deliver and improve services as well as dealing with the future housing and economic growth? We say a categorical no.
- We have reservations that the Wedge Authority would be able to generate savings from current district-based services as there would be great pressure not to lose jobs from each of the three deprived areas. We don't believe that assets could be easily rationalised for the same reason. The same applies to the residual unitary authority for the rest of the county.
- Disaggregation of Norfolk and Suffolk County Council services will undoubtedly add to costs and has the very real serious risk of gaps appearing in service. Some of those

services for vulnerable people can literally have a life or death consequence if they are not properly organised and resourced. This applies to the “wedge” and the residual unitary authority for the rest of the county.

- Experience elsewhere shows that specialist services will need to be provided across the two proposed unitary councils. Once again this presents problems in terms of capacity and quality of service delivery as well as creating poor value for money.

Doughnut

- The City Council’s arguments in support of the greater Norwich part of the doughnut are contradictory. For example, they suggest that it would be right and proper for the Great Norwich unitary council to control the growth of housing and jobs in the area yet they exclude a number of areas that are in the current LDF consultation and are being earmarked for growth. We have no doubt they have constrained the areas they have included in Greater Norwich for political reasons. They seem to us to be trying to engineer a council with no overall control resulting in potentially damaging long term consequences for its residents if no clear leadership ensues.
- The unitary Council outside of Greater Norwich has no coherence whatsoever. There are major settlements, all of which are on the extreme edges of that authority – King’s Lynn, Cromer, Great Yarmouth, Diss, Thetford and Lowestoft.
- We do not believe that the Greater Norwich Unitary will have the capacity or influence regionally to deliver the significant infrastructure needed to deliver the jobs and housing growth in the next 10-25 years. We have particular concerns about the Norwich Northern Distributor Road. With the doughnut on constrained boundaries it will require both Unitary Councils to give this road their top priority. Some of the areas of major future growth will fall across the two unitaries and the long term delivery of new homes, jobs and infrastructure could be prejudiced.
- There is no doubt that “County” services will need to be disaggregated and that is of major concern. This will heighten the risks, at least in the short-term, of service failure, which could lead to catastrophic consequences, e.g. in Children’s Services with looked after and other vulnerable children. It has taken time to recover from past problems and making a structural change could undo all this good work. To take that path defies logic, sense and reason.
- The doughnut will throw up significant issues to be dealt with where there is already partnership working between South Norfolk, Norwich City and Broadland Councils. This is both at a strategic level on planning, housing and economic development or service delivery with, for example CNC Building Control Partnership. We are not convinced that the costs of these changes have been reflected in the thinking behind the financial workbooks. However, more importantly this option would set back the work on the joint core strategy at the very time growth needs to be well planned. Authorities will become disengaged from strategic priorities to focus on the creation of new structures leading to a detrimental impact for residents and the quality of leadership being reduced at a time it is most needed.
- Given the Government’s requirement to repay transitional costs within five years and the issues, such as low levels of educational attainment, crime and disorder, economic deprivation that will be priorities for the new Council, there is every likelihood that discretionary services would be reduced or cease altogether. Even more worrying is the significant risk that such a pay back period will not even be met with disastrous consequences for local residents. Either way it will be the residents in the authority’s area that will suffer.

- We understand that the Norwich Connect project, about which the Audit Commission has reservations about its value for money, has been the cornerstone of the City Council's case for savings. We assume it will be again. This is of grave concern. We also wonder whether the costs of terminating this contract should be taken into account, if the Audit Commission is correct in their views.
- Similarly, the County Council has instigated a £79m PFI project to upgrade schools. There will be legal costs to reassign this deal, which need to be taken into account. Also, there needs to be a full evaluation of where the annual charges will fall, if it is to be the Greater Norwich Unitary then it will have a huge financial impact. We mention the PFI project and Norwich Connect as significant and high profile illustrations of the contractual issues and costs that two unitary options pose and question whether this level of impact and additional costs have been fully and properly considered.
- We believe that any Unitary Council needs a critical mass of staff and financial resources to succeed. In our view, any unitary council ought to have a population of at least 350,000. The Greater Norwich part of the doughnut will fall short of that even after the planned growth for the area.

Single Unitary

- We met with a large number of Broadland's Town and Parish Councils on 16 July 2008. They have grave reservations about the proposed Community Partnership Boards (CPB) and the Area arrangements. They see District Councils being replaced by two other tiers of governance. They have described the CPBs as unelected quangos, for which they do not see the purpose. The larger Town and Parish Councils see their functions being taken over the CPBs and the smaller ones see themselves being swamped by the larger Councils with little opportunity for them to be heard. They see the fact that there would be representatives of unelected bodies such as the NHS and Police, who naturally will present a 'one' issue view without the moral authority of being elected as a complete anathema to 'Local' government. They would rather the Unitary Council deals direct with them. What is being proposed are artificially constructed bodies that may turn out to be unworkable and with no longevity beyond an initial period as a sop to underpin the county's proposal for local engagement.
- They have told us that the County Council has a poor record of engagement with Town and Parish Councils and, thus, they are sceptical about this proposed new arrangement. In the past the County Council has operated Area Committees. The one in Broadland was not successful and was abandoned which so aptly illustrates the comment above.
- It would appear to us that seven District Councils are largely being replaced by five areas. We see no rationale for this change and would ask you to look extremely closely at the levels of savings being put forward. In our view these must be very limited given the above and the cost of the Community Partnership Boards. We have seen the criticisms of the DCLG's review of costs by Chisholm and Leach. "A Botched Business. The Damaging Process of Re-organising Local Government" - Michael Chisholm and Steve Leach. We are sure that you will do a far more rigorous review that will test all the assumptions made and the risks involved.
- Whilst there is an argument that large authorities are the only ones that deliver significant savings, we have serious reservations about this position. The experience of structural change is that it tends to over promise and under deliver and diverts energy and focus from improvement. Savings are not always accurately stated because they ignore offsetting costs or are optimistically calculated. Similarly costs

are often understated or glossed over. A single unitary, especially in a large county such as Norfolk, and with the added dimension of Lowestoft, will have a tendency to become remote and distant from its customers and perform badly in true local engagement. As costs become tight there will inevitably be a move to centralise functions, which will reinforce the remoteness of the organisation.

General Points about all 3 Options

- All of the proposals will undo much of the partnership working and the relationships that have been built up over the last five years or so. In particular, we have concerns for the significant housing and jobs growth in the County failing to be delivered or delivered inappropriately as the LDF processes around the County will be either delayed or have to be restarted. We believe there is a grave risk that targets that have been set for us by Central Government will not be delivered thus impacting on the ultimate sustainability of the area as a whole.
- We believe strongly that the likely number of councillors in each of these options will be far too few to provide the current level of service to constituents and to fulfill council roles. The great body of research that has been carried out in the last few years shows very clearly that the public refer most of their problems to their district councillor and much less so to their county councillor yet the proposals have a ratio of electors to councillors more in line with current county council numbers. Larger electoral areas make it much more difficult for people who don't stand on a party ticket to mount and be able to afford a good standard of electoral campaign, which cannot be good for democracy. This runs contrary to everything central government is saying about local representation and would be a democratic deficit that would do nothing to enhance the reputation of local government.
- The addition of Lowestoft and its northern parishes has added an extra layer of cost and complexity. We would suggest that this will add costs to other public sector organisations such as the Police and NHS. We are concerned that the immediate impact and costs will not be reflected in the costing model. We have no doubt that in the medium-term your proposal for Lowestoft will trigger another costly and distracting NHS re-organisation, which again ought to be factored into the financial equation.
- Similarly, Suffolk County Council and Norfolk County Council will have different funding formulae for schools and different eligibility thresholds for services. It is unlikely that any new Council will be able to afford to fund the most advantageous threshold or schools funding formula so some people will lose out.

Enhancing the present structures

We note Paul Rowsell's letter of 13 August 2008 that it is permissible to bring into the debate a comparison of the existing two-tier system (actually three-tier) with the unitary proposals (see paragraph 22 of his letter). We have always believed that this should be the position.

We know that the current arrangements are not perfect or close to it. That is why we have been working to improve our own performance and that of others through partnership working. That journey has started and is on-going. We also know from work done locally, review of support services and experience in other parts of the country that costs can be driven out of the current system by collaborative working. We are up for that and so are most of the other Councils in Norfolk. So what's to be gained by enhancing the status quo?

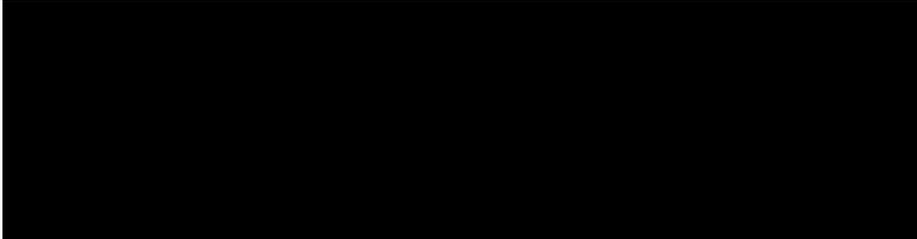
1. Better service delivery across all of Norfolk. There are Councils in Norfolk that have top quartile performance in most areas of service delivery.
2. Lower cost service delivery.

We can achieve this without many of the major transition costs that a full-scale restructuring

will bring, e.g. re-branding, pay harmonisation etc. This is a far less risky approach. We have said this to the Secretary of State when the City Council responded to the original invitation back in 2006. We are encouraged to look at risk all the time these days. We believe that it is fundamental to look at this issue in terms of risk. If you compare enhanced status quo with any of your proposals we cannot see you coming to any other conclusion than that enhanced status quo is the lower risk option that will deliver the majority, if not all, the benefits that are claimed for unitary local government.

We hope that this letter is useful for your deliberations.

Yours sincerely



Simon Woodbridge
Leader of the Council



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26 September 2008

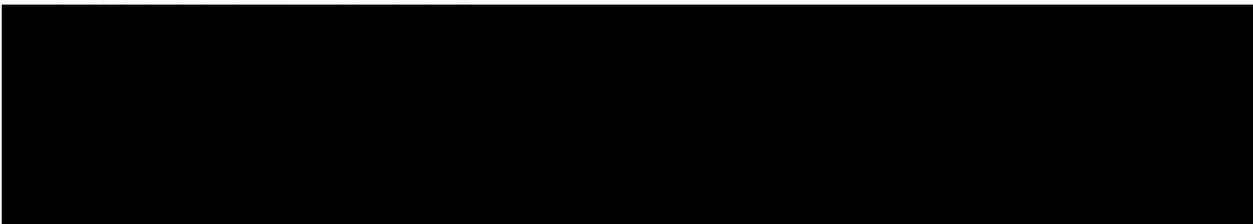
Mr A Gall
Director
Boundary Committee for England
Trevelyan House
Great Peter Street
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Dear Mr Gall

Proposed Structural Review of Local Government in Norfolk

Please find attached copy of the representations of North Norfolk District Council to the Boundary Committee which are being made jointly with Broadland District Council, Borough of Kings Lynn and West Norfolk, South Norfolk District Council and Breckland District Council.

Yours sincerely



Cllr VIRGINIA GAY
LEADER -
NORTH NORFOLK DISTRICT COUNCIL

Cllr ANGIE TILLET

Review Manager
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25 September 2008

Dear Sirs

**Draft Proposals for Unitary Local Government in Norfolk and Suffolk –
Response to Consultation from South Norfolk Council**

I am pleased to provide this letter and accompanying material as our formal response to your consultation.

You will see that the attached response document has been prepared by five of the Norfolk district councils working together. It sets out quite clearly and concisely why the case for change has not been made and reiterates that the existing arrangements for county and district councils working together, through improved shared services, should be retained and considered by your review, a contention that will be examined by the Judicial Review process.

The Council met on Monday 22nd September to debate fully the options before us, and concluded that none of the three would best serve the people and communities of South Norfolk.

The Council resolution passed is as follows:

- 1. This Council strongly opposes the need for the Boundary Committee review of arrangements in Norfolk and the procedure adopted by the Committee. The existing two-tier structure works well for the task of responding to the needs of Norfolk residents. Retaining the enhanced two tier structure should have been included as an option.*
- 2. Any further efficiencies would be better achieved and local democracy and accountability better secured by enhanced joint working between existing authorities*
- 3. The territorial integrity of the counties of Norfolk and Suffolk should be preserved.*
- 4. Any final proposal, which involves a structural change to the existing arrangements, should not be implemented without first being put, by the Government, to a vote of the people of Norfolk.*

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5. Given the absence of sufficient detail for realistic consideration of the proposals for the systems and structures beneath the proposed unitary authorities and for the devolution of functions within those structures, even within the Boundary Committee's own parameters, the opportunities for meaningful consultation have been insufficient. Accordingly, the Council calls for an extension to the consultation period to make good this shortfall in the Boundary Committee's arrangements.

We see no merit in any of the three options presented when compared with the enhanced two tier arrangements that we are working on anyway. It is interesting for us to note that your own review team felt likewise.

I hope you will note particularly our demand for further time for consultation until such time as details of the neighbourhood arrangements are known. The Council believes that the public and local agencies have not had sufficient information, to make informed judgements on what local governance will look like and where, how and by whom local people will be governed. And of course without knowing how we might be governed how can anyone have any assurance on the costs and savings?

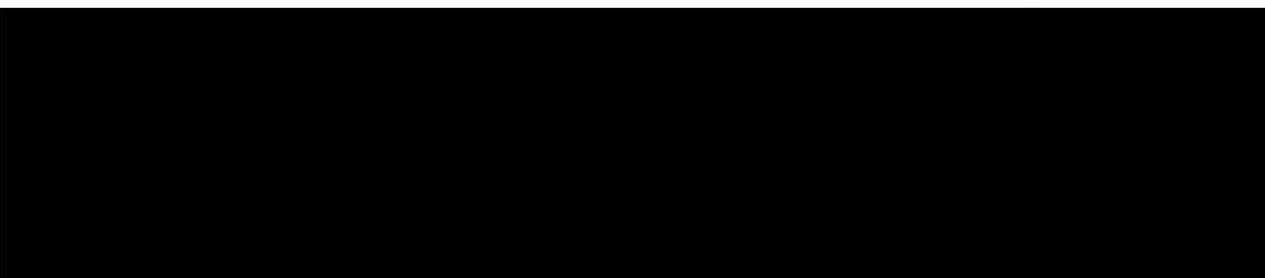
Frankly, until this is known, the consultation process thus far can be only described as incomplete at best and in any event should not be completed until residents and business have had a chance to comment on exactly what is proposed in respect of at least the neighbourhood arrangements and the consequent additional costs.

South Norfolk is a CPA Excellent authority, and only in the last week was awarded a top ten place in The Times list of Best Councils to work for. It is difficult to see how any benefit might be accrued by any local resident or business from a change. The creation of large monolithic suppliers of local council services in Norfolk can hardly be the step change in local governance envisaged in the White Paper, where extending democracy is a key principle. And without providing the evidential base for your decision, notwithstanding that you demanded it from those submitting concepts, the proposals before us lack credibility and rigour, which is unacceptable for a constitutional change such as that proposed.

We will be writing in similar terms to the Secretary of State during the next round of consultation, to make her aware of the strong views held by the people of South Norfolk. Of course, in the meantime the Judicial Review will test the correctness of the Committee's deliberations and the basis upon which you were invited to give advice, advice, I note, you are not bound to give.

I am sure you will consider carefully the views expressed in this letter and in the reports attached, and I look forward to hearing from you in due course.

Yours sincerely



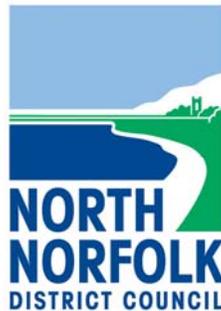
John Fuller
Leader of the Council

Andy Radford
Acting Chief Executive

Norfolk District Councils

Boundary Committee Consultation Response Document

September 2008



Borough Council of
King's Lynn &
West Norfolk



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SECTION 1 – EXECUTIVE SUMMARY

“It is clear that there is overwhelming support for the retention of the existing two-tier structure of county and district councils. Taking this into account, and considering all the other evidence in the light of the statutory criteria, we are recommending no change to the present structure of local government in the area... the manner in which any given structure is managed is probably as important as the structure itself... In particular we would like to see more management authority and responsibility devolved to local communities...”

Sir John Banham letter to Secretary of State, 15th December 1994

It is the contention of the five signatory councils to this report (Breckland Council, Broadland District Council, King’s Lynn and West Norfolk Borough Council, North Norfolk District Council and South Norfolk Council) that the statement above – first expressed some fifteen years ago – remains as true today as it was then.

The Boundary Committee’s proposals for Norfolk are high risk for the almost one million people who live and work in Norfolk, for hundreds of local communities, for the Boundary Committee and its ability to command respect in its future work, and for the Government at this time of economic uncertainty.

These are also high cost proposals that run counter to any logical interpretation of how Norfolk works, how people live their lives, how communities interact and how services can be efficiently and effectively delivered across the county.

They are based on consultation with “stakeholders” rather than consultation with the local people who will ultimately pay for any change. This consultation was based on ‘concepts’, on flawed data unsupported by clear analysis and with no time for consultees to adequately consider the costs of change.

With so little detail to examine in the proposal, detail that is not binding on any transition or new authority, we have had little time to constructively respond.

We do not believe these proposals work across an area the size of Norfolk. We contend that they represent at best a ‘fudge’.

The consultation undertaken by the five signatory districts (and that undertaken by the Boundary Committee) shows a widespread feeling that we should continue on our existing performance journey without the disruption of re-organisation.

We are currently delivering improvements together, increasingly discharging the principles of ‘place-shaper’ as well as providers of quality services. We believe we can continue to deliver these improvements, working together, to improve local places and improve services, benefiting local people *without* the need for this high cost, high risk, highly disruptive, unnecessary and unwanted review.

In summary, our key arguments against the Boundary Committee's draft alternative proposal are that the options reported on the 7th July are:

- **high risk – and an avoidable risk at that**
- **bad for democracy – reducing the number of directly elected councillors by nearly three-quarters**
- **bad for the economy and economic regeneration of our places, in a time of global economic uncertainty**
- **bad for council tax payers, the very people who will pay the cost of change have not been actively consulted on these proposals and haven't asked for them**
- **bad for local services, increased remoteness of decision-making and commissioning taking services further away from the people who rely on them¹**
- **bad for communities who rely on local champions to ensure that places develop in a way that suits local needs**

¹ In the absence of any detail within the Boundary Committee report we are reliant on published County Council work to date

SECTION 2 – INTRODUCTION

“...structural reform should not become a diversion for the other reforms suggested here – and past experience shows us that it can absorb huge amounts of energy to relatively little effect.”

Mulgan, G and Bury, F (2006) ‘Local Government and the case for double devolution’, in ‘Double Devolution’ Ed Geoff Mulgan & Fran Bury, the Smith Institute

The District Councils presenting this joint paper to the Boundary Committee believe the service improvements it is claimed would be delivered by unitary status in Norfolk would be better delivered by improved two-tier working.

We believe the key tests for any unitary status proposals are:

- Do the proposals involve high risk?
- Do the proposals give proper consideration to any decent viable alternatives?
- Do the proposals enhance democracy?
- Do the proposals support the local economy?
- Do the proposals deliver a fair deal for local taxpayers?
- Do the proposals deliver improved services?
- Do the proposals strengthen communities?

On this basis we must oppose the Boundary Committee’s proposals because they fail all of the tests above. Not only do they fail our own tests for unitary local government but they fail by some distance to meet the five criteria set out by the government. These are detailed elsewhere in this document as are the arguments on which we base this conclusion.

In our submission the Boundary Committee’s draft proposals for unitary local government in Norfolk (and Suffolk) and the assumptions and arguments which underpin them are fundamentally flawed for a number of reasons.

As the attached report from Prof. Steve Leach indicates (see appendices)

- The draft proposals have been developed in isolation from a consideration of relevant government policy and without reference to their compatibility with the structure of local government in the remainder of England (see for example ‘Communities in Control’).
- There are a number of major inconsistencies between the draft proposals and the decisions made by DCLG in November 2007 regarding the 16 proposals for unitary status considered at that time.
- The basis upon which the draft proposals have been made is far from clear. No serious attempt is made to compare viable options or to justify key assertions made. The draft proposals report is virtually evidence-free.
- There is a failure to adequately recognise the speculative nature of the submissions made by Norfolk County Council and Norwich City Council, and to recognise the impossibility of ensuring the implementation of the proposals involved in all three options

- The concept of 'neighbourhood empowerment' is accorded a degree of vagueness and imprecision which precludes a realistic assessment of the feasibility of its achievement in the various options identified.
- There is no attempt to compare the merits of any of the unitary options recommended with the potential of an improved two-tier system of local government to deliver the required objectives/criteria.

If the Boundary Committee's proposals were to be approved...

- The largest county-based unitary authority outside Birmingham would be established, with a population greatly in excess of any of the unitary counties introduced following the DCLG's 2007 exercise. A unitary Norfolk runs counter to the Secretary of State's decision regarding Cheshire (population size 680,000). The decision letter on Cheshire contained the following significant passage, ***"The Secretary of State took the view that a single unitary authority would be too big, and there were risks that the authority would be seen as remote by local people and hence less able to deliver neighbourhood empowerment."*** If Cheshire is perceived as being 'too big' to deliver neighbourhood empowerment, does this conclusion not apply more so to Norfolk?
- The 'preferred option' would challenge the appropriateness of the group of unitary authorities around Bristol, Middlesbrough and Kingston-upon-Hull. The logical implication would be the return of Avon, Cleveland and Humberside as unitary authorities, a proposition which is not likely to appeal to the current (or any other) government.
- In addition to this, both the 'Wedge' and 'Donut' alternatives are so light on detail as to be little more than lines on a map. They both appear to represent a 'fudge', a solution to a problem that hasn't been clearly defined and that attempts to answer a question about the east of the county and Norwich to the expense of the rural majority of the county. Can anyone think of anything that links Diss with Holt and Hunstanton? The rest of the county, in each example, is no more than an afterthought.
- The implications for the number of elected councillors would be devastating. The 'preferred options' for Norfolk would imply a 70% cut in the number of local councillors. Apply this kind of reduction more generally and there would be an outcome totally out-of-line with the government's commitment to enhanced/strengthened roles for local councillors.

It is also important to note that we have not been able to subject the Boundary Committee's proposals to the level of scrutiny they deserve or the level of scrutiny we would have wished to subject them to. This is because, as both the Secretary of State and the Boundary Committee concede, any sensible assessment of draft proposals requires an understanding of sufficient information about the assumptions and arrangements that underlie any proposals. Proposals can only be understood as a package comprising a "structure", "service and financial assumptions" and "arrangements".

It is further expressly acknowledged that the assessment of affordability turns on an understanding of such matters. But the Boundary Committee asserts that in publishing its draft proposals it is unnecessary for the Committee to trouble itself with such matters. Instead, the approach that is taken is that the development of underlying assumptions and arrangements can be left to consultees. The result of this approach is to defeat any meaningful consultation because Norfolk authorities have not been provided with even basic information about the "package".

Assumptions and arrangements obviously bear on affordability and value for money and without this information we are unable to give a fully informed or completely meaningful response to the Committee.

Furthermore the Boundary Committee has consistently argued that it is not permitted to consider the current two-tier scheme of local government or to compare it with any proposed unitary structure. This position has consistently informed the Committee's approach. We believe this approach to be wrong and it is certainly not what Norfolk tax payers would expect. We would argue the Boundary Committee has discretion in this matter rather than a duty to make a unitary proposal to the Secretary of State. We believe the Boundary Committee has not fully appreciated this.

SECTION 3 – OUR COUNCILS’ CONCLUSIONS

Do we need more risk in uncertain times?

“It is argued that reorganising local government, particularly in two-tier shire areas, can provide greater efficiency and improve accountability... The past experience of reorganisation in this country provides a warning about the risks of poorly executed change, and shows that it is by no means a panacea...”

Sir Michael Lyons (2007) ‘Lyons Inquiry into Local Government – Final Report’ TSO, Exec Summary Para 70

It is our contention that the Boundary Committee’s draft proposals (the main proposal and the two further proposals in which the Boundary Committee has said it sees merit) are untried and untested.

There is a high level of risk that none of the proposals will work well for a significant proportion of Norfolk’s residents and businesses. As has been clearly stated in the past any pattern of local government that worked for 80% of the population but not for the remaining 20% would be a failure. It is our contention that the Boundary Committee’s draft proposals would not work for 80% or anything like 80% of the county. Stakeholders from the west of the County – both at the Boundary Committees own listening events and at the focus groups we have held – have insisted that none of the proposals will work for them.

It is also important to note that the district councils in rural Norfolk have a track record of service improvement without “above inflation” council tax increases. We doubt that any new unitary authority could match that level of performance.

Furthermore, there is a risk that the new unitary authority would do as Durham and Northumberland have done... tear up key elements of the proposals and cut back services in order to balance the books.

In addition there are various further risks associated with the Boundary Committee’s draft proposals. There is:

- The risk that high start up costs will not be recovered
- The risk that key staff will be lost during the process
- The risk of loss of focus on service improvement, housing growth and major regeneration and economic development
- The risk that important community projects will lose momentum
- The risk that major ICT changes will over run in cost and time especially as the budget for such changes is small and the timescale for change is unrealistic
- The risk that the assumptions made by Norfolk County Council officers will prove to be greatly over optimistic concerning the deliverability and realism of savings which appear to primarily come from the reduction of District Council staffing levels where the County Council has minimal knowledge
- The risk that vulnerable people – particularly children – will ‘fall though the net’ during the changeover/ disaggregation process

- The risk that citizens will become totally disengaged from a remote council with so few frontline councillors across such a large area
- The risk that the draft proposals for devolution and local structures are unlikely to be affordable and will not deliver stated outcomes due to an evident lack of real understanding of local issues and needs and the complexity of community development.

There is also a risk associated with the remapping of existing locality structures such as local strategic partnerships and local area partnerships which will be completely repackaged according to the NCC proposal. This will fragment current working arrangements and networks, destroy existing close working relationships and jeopardise the significant momentum gained around community engagement and local community projects.

Over all our concern is that the Boundary Committee's draft proposals are clearly bad for Norfolk and represent a backward step for local government in the county.

We have a viable, low risk alternative

“District council’s have an essential role in place-shaping. They lead on many of the services which are essential to delivering the strategic priorities in the county-wide LAA, including housing, planning and leisure services. They are also essential for building strong links with local people, neighbourhoods and parish councils.”

Local Government White Paper ‘Strong & Prosperous Communities’ (2006)
Chapter 5, Para 5.52

There is a clear and viable, low risk alternative to the Boundary Committee’s proposals and the committee has the power to recommend this alternative – the continuation of the current two-tier system of local government – if it cannot identify one or more options which meet the five criteria.

To justify a major constitutional change of this nature, a more appropriate test would be a requirement to **demonstrate** that one (or more) unitary options achieve the five criteria **more effectively** (on balance) than the existing two-tier system. That is the test which the Boundary Committee should apply if its recommendations are to have real credibility.

Our critique of the three options referred to by the Boundary Committee (see appendices) indicates that the current system is already effectively delivering on this agenda and, given the opportunity, could achieve even more through savings / service improvements / neighbourhood empowerment etc *without* the risk posed by restructuring.

We agree with the Lincolnshire two-tier pathfinders: “In principle, two-tier local government is a more appropriate model of government for a large county area such as Lincolnshire than a unitary model. It recognises and reflects the principle of subsidiarity: that is, that decisions should be taken at the level closest to the people most directly affected by them and believes that two-tier working in a county as diverse as Lincolnshire delivers more effectively on this principle”.

Two-tier working builds on the best of what we are already collectively doing rather than wiping this away and replacing it with something new. We propose to continue to work collaboratively to:

- engage with local people within their communities
- develop and deploy a joined-up approach to achieve seamless service delivery
- offer a ‘one stop’ approach to customer services
- simplify and rationalise the way in which services are delivered
- realise efficiency savings to provide opportunities for service transformation

These aims are being met by building on the very real strengths of the two-tier system in a way that virtually eliminates the risks associated with structural change. Professor Leach summarises the advantages of two-tier working as:

- A better alignment with the different levels of community identity than any single unitary option could provide.
- A recognition that different spatial scales are appropriate for different services and functions and that accountability for such functions is best served by directly-elected authorities (e.g. development control is much more appropriately handled at district than county level, whilst highway planning clearly needs a larger (county-level) area).
- A more realistic capacity for neighbourhood empowerment which is best led and managed at a district level (with county input where relevant).
- A more community-relevant capacity for strong accountable local leadership with strategic leadership focused at the county scale.

These opportunities build on the principles published in the Lyons report, where he identifies the following principles of effective two-tier working, principles that Norfolk’s councils are already working towards:

- A shared agenda across councils in both tiers but with room for preservation of local identities and differing priorities
- A common understanding of respective roles and responsibilities without ‘turf wars’
- Strong leadership of place, at different levels, with different partners taking the lead at different times
- A sense of accountability which accepts shared responsibility, without any blame culture, with the ability to make difficult decisions and tough choices, for example about resource allocation
- Governance and service provision designed to support effective external partnerships, with issues being discussed at the right tier
- Easily accessible service provision which is fully transparent to users and utilises shared, locality-based access channels, and
- Efficient operations in both front and back office, avoiding duplication and accepting that savings may accrue in a different tier to where the action (and even initial investment) is undertaken

It is clear from this that improvements to the existing arrangements meet the key criteria against which unitary proposals are tested

- **Strengthens strategic leadership** – particularly through place-related democratic leadership that identifies and tackles local needs, co-ordinating actions through Local Strategic Partnerships.
- **Improves neighbourhood empowerment** – with local councillors and residents feeding local knowledge into local councils, who in turn engage with local people to co-ordinate a response with other organisations to tackle local issues.
- **Are affordable** – incurring minimal additional costs, let alone the estimated £18m transition costs for the proposed single county unitary council. (It is also important to note at this point that we believe the figure of £18m is a gross underestimate of the true transition costs.)
- **Have a broad cross-section of support** – the majority opinion of those consulted was to retain existing arrangements.
- **Deliver Value for Money and equity** – by delivering cost-efficient services that meet local needs without resorting to universal services.

Two-tier working is a system that works yet can still be improved. In addition, continuing to refine the two-tier arrangements undermines two arguments fundamental to the Boundary Committee's proposals:

1. The need to re-create the administrative equivalent of district councils to provide the bureaucratic processes and safeguards that will try to balance competing demands and calls for resources across a county the size of Norfolk. Why would anyone want to replace seven district councils with five area committees and over 20 community partnership boards? Each of these would require resourcing, including officer support at both administrative and strategic levels. The latter is particularly important as the ability to manage a delicate political interface between the needs of a geographical area and the corporate direction of the organisation requires some high-level skills. There is no indication in the preliminary financial information that the costs of implementing these structures is adequately accounted for.

2. Not only do these structures recreate existing arrangements, but they are not based on any existing neighbourhood geographies. Currently each district operates sub-district partnerships, under the district LSP, and based on areas that reflect local communities. In many cases these mirror the police's safer neighbourhood areas. Within these structures, contacts, relationships, local knowledge and joint-working cultures are developed. It is because of this that local service improvements and successes in tackling some of the really tough issues are achieved at this very local level. The proposals are all structurally-based and take no account of the fact that successfully tackling important local issues requires people working together. This wealth of experience, good-will and knowledge would be unnecessarily lost through the proposed restructure, a loss that can be avoided by continuing to improve existing arrangements.

In addition, it is important to note the progress made in each district area by councils developing their partnership arrangements. This has provided a focus for the work of a range of locally-based or locally-organised organisations. It is difficult to see how organisations such as the Hospital in King's Lynn, the College of West Anglia or Paston College, will have a voice in these new arrangements. They are certainly not going to be able to resource attendance at half a dozen community boards. But the success of partnership working locally means that in effect council's are operating as a 'virtual unitary' already.

“I agree with the government that improved working is also needed in two-tier areas. And that authorities in these areas need to aspire to operate as ‘virtual’ unitaries...”

Sir Michael Lyons (2007) ‘Lyons Enquiry into Local Government – Final Report’ TSO, Exec Summary Para 71

Many of the key challenges for the areas outside Norwich and Great Yarmouth are effectively ignored in the Boundary Committee report. The impact of climate change and rising sea levels, coastal erosion and fluvial flooding, the geographic scale and character of the rural part of the county, skills shortages, migrant workers, community cohesion, and rural deprivation are largely glossed over or ignored altogether. The silence on these issues reflects the reality of the authors of the original proposals who are wedded to an out dated paradigm of local government as providers of statutory services rather than the dynamic enabling organisation attuned to its local issues and geared up to lead, orchestrate and convene that is essential to the delivery of effective strategic leadership. The models proposed are not in tune with the perspectives and spirit of the Lyons review or the thrust of Government policy.

It is simply not clear how this function will be delivered by a single council or even two councils of the nature proposed by the Boundary Committee. And yet Norfolk’s existing councils already have a track record of success in shaping local places for the future.

“There are significant opportunities to improve the quality & efficiency of services by joint working – either between some of the 388 councils in England, with other local service bodies, or at a regional or national level. We want all local authorities to unlock these potential benefits by delivering more services in collaboration with each other, with other local public service providers and with the private or third sector.”

Local Government White Paper (2006) ‘Strong & Prosperous Communities’ Chapter 7, Para 7.20

The government itself continues to see improved two-tier working as a viable option – the two-tier pilots prove this. In Lincolnshire they have found the particular value of the two-tier system is that it provides a much greater level of local representativeness and accountability than would be possible through a unitary solution based on a large geographic area such as Lincolnshire. Any comparative evaluation of two-tier and unitary models should recognise the importance of democratic vitality.

The Minister for Local Government has recently written in positive terms about progress made in the DCLG 'improved two-tier' pathfinder schemes. The Lincolnshire example provides a particular encouraging indication of what can be achieved by a county and seven districts working together, in a county area with many similarities to Norfolk including an expanding city at its centre, surrounded by a series of largely rural district councils.

So, is there a case for change?

Citizen panel research in Norfolk shows people are currently satisfied with their local district councils. Across the five districts, average satisfaction levels have improved from 56% to 61%. This compares very favourably with satisfaction levels for the County Council. (BVPI 3 – Satisfaction with the Council, change over three year period 2003/04 & 2006/07)

The two-tier system has great strengths and benefits that are highly valued by its citizens and businesses across Norfolk. The clumsy attempts to create 'area committees' and community partnership boards illustrate clearly the need to overcome the fundamental problem created by the sheer size of Norfolk. Norfolk County Council's proposals are an attempt to solve a 'problem' that doesn't exist. There is a much more effective, elegant and cost free way of improving local government in Norfolk and that is to retain and improve the current two-tier system of local government.

SECTION 4 – EVALUATION AGAINST THE SECRETARY OF STATE’S CRITERIA

Criteria 1 – Strong, effective and accountable leadership

“Report after report has affirmed the importance of strong local leadership for building well governed places and creating social cohesion”

Ten Principles of Place, Robert Hill, wiring in ‘The Politics of Place’, Leadership Centre for Local Government

To think that changing the structure of local government will, of itself, lead to stronger leadership is based on wishful thinking rather than evidence. To deliver effective leadership local government structures need to:

- Reflect the economic geography of their area
- Be built upon the distinctiveness of a coherent location
- Have strength and scale to make an impact on the regional and national stage without being so large and diverse that they lack focus and impact locally
- Have a culture and ethos that is dynamic, cross cutting and forward thinking

All three of the draft proposals for Norfolk promoted (or referred to) by the Boundary Committee fail on all counts.

Bad for the economy

“Having considered all this material, it is clear to the secretary of State that the economic realities of an area are a significant factor in strategic leadership”

Secretary of State’s decision letter to Cheshire Council, 18 December 2007

The Boundary Committee’s draft proposal creates a unitary authority which fails to reflect the economic geography of Norfolk. It creates an authority which seeks to incorporate two entirely distinct and competing sub regions. One based on Norwich in the east and the second based on King’s Lynn in the West.

The reality of the two separate sub regions is recognised and reflected in both the Regional Economic Strategy (EEDA) and the Regional Spatial Strategy (EERA). There is little to connect these two sub regions, and there are minimal interdependencies between them and their respective networks of market towns. A structure built upon such a fundamentally unsound basis will inevitably fail to deliver growth and regeneration.

These problems are compounded by the approach taken in Norfolk County Council's proposal document.

- It is overwhelmingly 'Norwich centric' providing for a Norwich Development Board, a major economic body with a very significant budget
- There is no recognition of the need for equivalent arrangements proposed for King's Lynn or Thetford. This approach must be to the detriment of the Kings Lynn sub region.
- It is based upon the entirely incorrect premises repeated a number of times in both the County Council's proposal documents and the Boundary Committee's report that 'Norwich is the economic driver for the whole of Norfolk. This is simply wrong.
- It shows no recognition of the key sectors in the economy beyond the Norwich sub region
- The business community in the west of the County has unanimously condemned this proposal fearing that the Kings Lynn sub-region will be marginalised and down-graded.

The 'Donut' and the 'Wedge' proposals both compound the serious problems identified above by splitting the Norwich economic sub region. These models fly in the face of all current economic thinking concerning the vital role of the 'City Region'.

In order to overcome these self created problems the two authorities would inevitably need to set up bureaucratic 'multi area agreements' in order to try to reconnect Norwich to its economic hinterland.

The proposals both leave the 'remainder Norfolk' authorities with huge geographical area which have no economic coherence or rationale, and which run the risk of marginalising towns and villages in the east of the county.

By its own conservative estimate the County Council admits that unitary status proposals will result in 530 jobs being lost. This will have a significant effect on the local economy.

As the Secretary of State herself said in December 2007, "the more an authority's area matches that economic reality, the more likely that it will be effective in providing the strategic leadership necessary to create prosperity". None of the Boundary Committee's draft proposals even come close to matching Norfolk's economic reality; as a consequence they will inevitably be bad news for Norfolk's economy.

Strategic leadership

Strategic leadership works most effectively where it is built on the distinctiveness, opportunities and strengths of an area. The Boundary Committee report and the underlying concept documents (where they exist at all) do not formulate solid proposals about how the real issues facing Norfolk residents outside of Norwich and Great Yarmouth will be addressed. Passing reference is made to some – but by no means all – of the issues. However, none of the proposed unitary authorities have robust plans to tackle key local issues or offer solutions that that would deliver greater success than that delivered by the County Council and the Districts to date.

The draft proposals fail to build on the distinctiveness, opportunities, strengths and challenges in Norfolk's communities and sub regions. There is little reference to the role and potential of the County's market towns in relation to the Norwich growth agenda. There is no reference to the potential of and issues faced by the County's seaside resorts, scant mention of the sub regional role of King's Lynn and its growth agenda nor of the issues faced by Thetford and its growth agenda, and nothing at all about the rural isolation and economic marginalisation of the fen villages in the west. Each of these areas currently receives and will continue to need tailored, localised solutions to ensure the economic prosperity of Norfolk in the future.

The proposals all seek to incorporate the town of Lowestoft into Norfolk. This is in defiance of the traditions and identity of the people of Lowestoft who strongly identify with Suffolk not Norfolk. This demonstrates all too clearly the insensitive, theoretical, indeed ham fisted approach taken by the Boundary Committee throughout this process.

The 'Donut' and the 'Wedge' proposals are entirely focused upon the needs and aspiration of Norwich, Great Yarmouth and Lowestoft and give no thought or consideration to the rest of Norfolk. As a result – under these proposals – the huge remainder of Norfolk authorities have no identity, coherence or logic.

Scale is important in delivering effective strategic leadership

“While we take no view as to the optimum size of unitary authorities, a county unitary with a population of approximately 800,000 and a large geographical area represents challenges to effective strategic leadership and neighbourhood empowerment”...

BCFE(08)14 'Update on Preliminary considerations for Norfolk structural review' Report to 21st May BC meeting

Norfolk is simply much too big in geographical and population terms. The largest county to be awarded unitary status to date is Cornwall (population: 524,000). In several other counties of similar size, concern has been expressed by DCLG about the risk of such authorities being seen as 'remote' by local citizens. In North Yorkshire, the Secretary of State noted that “due to the large geographic areas involved, there are concerns that a county-wide unitary authority may have difficulties effectively representing its electorate and would be seen as remote by most of its citizens.”

Norfolk would become the largest authority in Britain (in terms of population) after Birmingham. In Cumbria – which has a smaller population than Norfolk but is a similar geographical size – the Secretary of State also recognised that, “due to the large geographic area involved, there are concerns that a county-wide unitary authority may have difficulties effectively representing its electorates.” The Secretary of State also noted that Cumbria would not be capable of providing effective strategic leadership.

With over 900,000 residents Norfolk has twice the population of the sovereign state of Luxembourg and with dimensions of 40 miles from north to south and 70 miles from east to west Norfolk covers an area of over half a million hectares, more than twice the size of Luxembourg.

Norfolk is a county with tremendous economic, social and geographical diversity and complexity. It is faced with a bewildering range of very different and distinct challenges and issues including...

- Urban development in Kings Lynn, Thetford, Norwich
- A declining seaside resort in Great Yarmouth
- The needs of market towns to compete and thrive
- The growth agenda for Norwich, Broadland, South Norfolk, Kings Lynn and Thetford
- Rural economy issues
- Environmental issues and the need to reduce our carbon footprint
- Coastal erosion and fluvial flooding
- Low skill levels and a general skill shortage
- An ageing population
- Poor transport links

This complexity and diversity would present enormous challenges to a single local authority. It would be very difficult to effectively drive forward a comprehensive, focused, place shaping agenda or to overcome the serious economic obstacles faced by Norfolk's many communities. Under the current two-tier system this diversity and complexity is addressed through the locality leadership provided by the Borough and District councils which would be lost under any of the unitary proposals.

Changing the structure will not deliver stronger leadership

“I believe that local government needs to have the dynamics of far reaching reform and new challenges. To work in collaboration, to reflect the realities of housing markets, travel to work areas, supply chain relations and infrastructure needs”

John Healy, Local Government minister, speech to IPPR Conference, 15 May 2008

The Boundary Committee draft proposals provide no confidence that an authority will be established which offers a step change in style or approach to that prevailing in the county council. The proposed structure appears to seek to merely “bolt on” district services to the existing structure.

The current two-tier system as we have demonstrated earlier in this report provides strong and appropriate leadership for the higher level strategic issues at the county level; place and community leadership at the district levels and local/neighbourhood leadership at the town and parish level.

The Boundary Committee's draft proposals attempt to compensate for and replicate the role of the district councils through the creation of area committees, area lead members, and community partnership boards. This approach would actually significantly increase both the distance and the number of layers between the elected leadership and the local resident. This is simply not sensible or accountable leadership.

There is nothing in the Boundary Committee's proposals that gives confidence that vital areas of performance including poor levels of educational attainment (particularly in the west of the county and in some urban areas) will achieve the improvement needed. If anything, launching into a massive and expensive reorganisation of local government has the potential to greatly reduce the focus on service improvement.

Conclusion

The 'Wedge' and the 'Donut' options give so little consideration as to how they might operate in the greater part of Norfolk that there can be little hope that they have anything to offer the majority of Norfolk's citizens.

All three proposals contain such fundamental and basic weaknesses that they will inevitably fail to deliver strong, effective and accountable, strategic leadership to the citizens and communities of Norfolk.

- They fail to reflect the economic reality of the County
- They fail to build on the distinctiveness of the County
- They will fail to deliver the dynamic, cross cutting and forward thinking culture needed
- They propose councils that would be too big, too remote, too complex and too diverse to achieve focused and accountable leadership.

Criteria 2 – Neighbourhood empowerment

“Without local democracy, there is no democracy”

Hazel Blears MP, Secretary of State for Communities and Local Government,
Speech to LGA Conference, ‘Local Democracy in the Twenty-First Century’
3rd July 2008

The County Council’s proposals are highly bureaucratic involving the creation of five scrutiny areas and 21 Community Partnership Boards in addition to Town and Parish Councils and the unitary authority itself. This will increase red tape dramatically.

In an interview with the Local Government Chronicle (24 July 2008) the Chair of the Boundary Committee was asked about concerns that local community boards enjoyed no statutory status or powers and could be modified, neutered or even abolished by a future unitary administration. Mr Caller dismisses this concern saying, “Any new unitary coming in takes its own decisions. I cannot set binding requirements, but if a leadership makes promises on neighbourhood engagement and then fails to deliver, no doubt the electorate will reflect on that.”

The policy objective of improved neighbourhood empowerment underlies much of the content of the recent White Paper (Communities in Control: Real People Real Power) and is reflected in one of the criteria the Boundary Committee is required to address. However, it is clear that the level of localism which the White Paper wishes to facilitate involves much smaller sub-units than the 36,000 population Community Partnership Boards (CPBs) proposed by the county council. It is important that the recommendations made by the Boundary Committee ensure that the development of this localist policy stream is facilitated. It is highly questionable whether a unitary authority of the size and scale proposed could develop effective structures and processes for operating at the required local/neighbourhood level.

The proposals are also bad for the cohesiveness of our communities. Norfolk has experienced significant challenges to local cohesion recently which require a place-sensitive response between all parties involved. The role of existing district councils in being the ‘eyes and ears’ of their communities should not be underestimated. We simply do not see how an organisation of the size proposed would be able to put in place systems that would harness local knowledge and generate and execute a timely and appropriate intervention. The districts currently provide this first line of defence in our communities.

Bad for democracy

“It is my long held belief that local government is the point at which people can best connect with politics. That local democracy is central to strong communities. That local involvement and trust in people is how we make public services respond to people’s needs.”

John Healy, speech to LGA Annual Conference, 2nd July 2008

The 2006 White Paper emphasised the importance of the role of local representative ‘front line’ councillors. They are referred to in the White Paper as ‘the bedrock of local democracy’. The Boundary Committee’s preferred option for Norfolk envisages a reduction in the number of councillors from 406 to a maximum of 120 (and quite possibly fewer) – a 70% decrease. Recent research suggests that the average amount of time councillors spend on their duties has nearly doubled from 52 hours a month in the mid-1960s to 95 hours a month in 2006. Even if the overall workload were not to increase the implication is that each councillor in a unitary Norfolk would be spending 320 hours a month – or 75 hours a week - on council business.

Each councillor in the new proposed unitary authority will represent many thousands of constituents and will certainly not know their constituents in the way that they do now.

Much power will reside in the hands of very few people who could live more than 60 miles from the areas they are making decisions about. The governance structures proposed do not engage imaginatively with residents’ perspectives beyond bland statements of intent such as wanting to ‘break down the barriers between ordinary folk and public services’.

Almost all of the references to community governance are framed within the context of public services and what they can or cannot do for communities. Rarely is mention made of what communities can do for themselves as contributors when they play the part of a full partner, demonstrating a failure to understand the concept of community governance at a meaningful level. The proposals cannot therefore be seen to address the neighbourhood empowerment criteria.

Creating a more participatory democracy requires a healthy representative democracy at local level. The Boundary Committee’s proposals would involve a ratio of citizen to councillor of almost 7600 to 1. This would be highest in England and would be unworkable without a substantial number of paid support officers.

“It is at the local level, in the places where people live, that they have much of their personal contact with public services and most opportunity to share in their governance. Place still plays a significant part in most people’s identity and, even in a more mobile age, many people who move do so within a small geographical area. Experiments can be piloted locally, fitted to a recognition and celebration of the fact that places differ profoundly from each other. So, linking people more securely and confidently with the governance of their own communities at a local level is a key part of the wider governance infrastructure of which local government is an integral part.”

‘Representing the Future’ The Report of the Councillors’ Commission (DCLG) December 2007

We argue that Norfolk County Council’s analysis is very confusing when one of the government’s stated reasons for unitary status is to reduce confusion and complexity. The approach shows no understanding of the issues in a large rural area. A new unitary leadership is not necessarily going to be the same as the outgoing county council leadership and would not, therefore, be bound by previous commitments. It is clear, therefore, that any proposals at this stage are just words uttered to meet a “criteria” with no real impact or meaning.

Criteria 3 – Affordability

“One of the main rationales for centralisation was the claim that there are economies of scale in service delivery. Surprisingly, however, there is no evidence for economies of scale in the main services that have been centralised, and the only detailed analyses that have been done show very few, if any, economies of scale above the very smallest district councils.”

Mulgan, G and Bury, F (2006) ‘Local Government and the case for double devolution’, in ‘Double Devolution’ Ed Geoff Mulgan & Fran Bury, The Smith Institute

We have very serious reservations concerning the available financial estimates. The financial information relating to the Boundary Committee’s three proposals was only made available to us on 15th September 2008. Furthermore the information and assumptions on the Norwich, Lowestoft, and Great Yarmouth authority have been produced by Norfolk County Council without input from Great Yarmouth Borough Council, the authority that has been leading on this model.

The assumptions made for the ‘rest of Norfolk’ unitary for the ‘Wedge’ and ‘Donut’ models appear to be a relatively crude scaling back of the single county financial projections.

In light of the complexity and importance of the proposals presented we are not prepared to make premature comments on the figures and will therefore make no comment until we have had adequate time to fully assess the assumptions which lie behind the figures and to robustly test and examine the headline figures presented to us.

Our initial impression is that the scale of the savings appears to be overstated and the costs of transition are under estimated. We believe there is a serious risk that the proposals may jeopardise the financial stability of future service delivery.

In particular, we have concerns over the two other options published by the Boundary Committee. These can be summarised as follows:

The ‘Wedge’

- We doubt that the Wedge Authority would be able to generate savings from current district-based services as there would be great pressure not to lose jobs from each of the three deprived areas. We do not believe that assets could be easily rationalised. The same applies to the residual unitary authority for the rest of the county.
- Given the Government’s requirement to repay transitional costs within five years and the issues, such as low levels of educational attainment, crime and disorder, economic deprivation that will be priorities for the new Council, there is every likelihood that discretionary services would be reduced or cease altogether.

The 'Donut'

- The 'Rest of Norfolk' Council would be larger than any existing unitary council anywhere in England with a sparse population leading to high service delivery costs.
- Given the Government's requirement to repay transitional costs within five years and the issues, such as low levels of educational attainment, crime and disorder, economic deprivation that will be priorities for the new Council, there is every likelihood that discretionary services would be reduced or cease altogether.

In general terms we feel the financial assumptions have many shortcomings for example the apparent lack of understanding of existing budgetary pressures and constraints within district councils, the ongoing requirement to meet efficiency targets, the possible double counting of efficiency gains and a complete under-estimate of the costs and resourcing requirements to deliver the localisation agenda.

Criteria 4 – Broad cross section of support

“...we could not recommend (to the Secretary of State) something that might be really good for one area, but not for the whole county. Any pattern that worked really well for 80% of the population but not for the other 20% would have been a failure”

LGC Interview with Max Caller, Chair, Boundary Committee, 24th July 2008

The Boundary Committee has presented proposals for consultation, the preferred proposal, together with the proposals widely referred to as the ‘Wedge’ and the ‘Donut’. None of these proposals have attracted a significant level, or broad cross section, of support.

The Boundary Committee’s own consultation has been quite deliberately restrictive and limited. Furthermore, the entire consultation exercise has been conducted without the consultees having available to them verified financial information concerning the Boundary Committee’s draft proposals. In our view this consultation process has been fundamentally flawed.

It is abundantly clear there is little support across Norfolk for any of the unitary proposals considered by the Boundary Committee. Consequently we urge the Committee to make a clear and unequivocal decision that it is unable to recommend any unitary authority option for Norfolk.

The district councils in Norfolk have conducted their own qualitative research locally involving key opinion formers, including business leaders, voluntary organisations, Town and Parish Councils, professional bodies and sector specific groups.

The key messages articulated by these groups are summarised below.

Reaction to the single county unitary (plus Lowestoft)...

Focus group participants were:

- Consistently opposed to this model
- Regarded it almost universally as too big and too remote
- Bemused that there is no rational or business case to justify the proposed upheaval
- Very concerned about the impact of the transition period whilst change is made on service delivery and key economic regeneration projects
- Consistent in strongly articulating their preference for the two tier system
- Concerned at the likely trend towards centralisation in Norwich and subsequent neglect of rural issues
- Angry (particularly the business community) that the proposals fail to reflect the economic (and social) realities of Norfolk

Reaction to the 'Donut'...

Focus group participants were:

- Overwhelmingly opposed to this model
- Concerned that the Council for the rest of Norfolk retains all the disadvantages of the single county unitary but with a lower population base
- Concerned (especially the business community) that this model fails to reflect the economic reality of Norfolk
- Consistent in seeing this model as too big and too remote
- Unconvinced of the need for change

In addition there was very strong opposition from residents of those areas identified for incorporation into Greater Norwich.

The 'Wedge'...

Focus group participants were:

- Generally of the view that this model was unbalanced with one large centre of population at the extreme western edge
- Concerned that the council for the rest of Norfolk was lacking in coherence, vision and focus
- Of the view that the 'Wedge' was a 'fix' for poorly performing councils
- Of the view that the remainder of Norfolk council was still too big and too remote with no natural administrative centre
- Concerned (especially the business community) that this model fails to reflect the economic reality of Norfolk
- Concerned that resources would be focused on the 'Wedge' authority at the expense of the rest of Norfolk

It is clear from these responses that there is a strong and consistently held view across rural Norfolk that none of the unitary options are considered acceptable and that all are felt to be inferior to the current two-tier arrangements.

Responses posted on the Boundary Committee website

We have analysed the responses posted onto the Boundary Committee website up to 18 September 2008. These are summarised in the tables below. It is clear that while there is no broad cross section of support for any of the options tabled by the Boundary Committee there is a broad cross section of support for the existing two-tier local government arrangements.

| Overall totals | Responses | % of total |
|---------------------------|------------------|-------------------|
| Pro two-tier working | 366 | 57.6 |
| Pro single county unitary | 126 | 19.8 |
| Pro 'Wedge' | 9 | 1.4 |
| Pro 'Donut' | 40 | 6.3 |
| Pro East / West | 26 | 4.1 |
| Pro Norwich City | 10 | 1.6 |
| Pro other | 58 | 9.1 |
| TOTAL | 635 | 100.0 |

| Categorisation | Responses | % of total |
|-----------------------|------------------|-------------------|
| Local Organisations | 17 | 2.7 |
| Residents | 230 | 36.2 |
| Online | 361 | 56.9 |
| Political Groups | 3 | 0.5 |
| Parish/Town Councils | 24 | 3.8 |
| TOTAL | 635 | 100.0 |

With less than one in five respondents supporting the Boundary Committee's draft proposal and three times as many people supporting two-tier working (an option that was not even put to them!) it would simply be untrue to suggest there is any sense of broad cross sectional support.

Political opposition to the Boundary Committee's draft proposals

While Norfolk County Council is the proponent of the Boundary Committee's preferred draft proposal, the council has, nonetheless, made its preference for the existing two-tier arrangements clear. At its Council meeting on 15 September 2008 members voted overwhelmingly to pass the following resolution by 42 votes to 20.

- 1. The County strongly opposes the need for the Boundary Committee review of arrangements in Norfolk and the procedure adopted. The existing two and three tier structure is entirely adequate for the task of responding to the needs of Norfolk residents. Retaining the status quo should have been included as an option.**
- 2. Any further efficiency would be better achieved and local democracy & accountability better preserved by joint working between the existing authorities on the basis of the Norfolk shared services model.**
- 3. The territorial integrity of the counties of Norfolk & Suffolk should be preserved.**

4. Any final proposal which involves a change to the status quo should not be implemented without being put to a vote by the government for people of Norfolk.
5. Of the options put forward by the Boundary Committee we believe the single county option (without Lowestoft) to be preferable for the reasons set out in the report but this does not detract from our main contention that no change is necessary.

All of the eight District Councils in Norfolk plus Waveney are uniformly opposed to the Boundary Committee's preferred draft proposal with just one council supporting the 'Wedge' and one the 'Donut'. Seven of the eight Councils have expressed a clear preference for the status quo.

Norfolk's Town & Parish Councils are almost uniformly opposed to the three proposed models:

| Parish & Town Councils | |
|-----------------------------------|-----------|
| Pro status quo | 17 |
| Pro single county unitary | 2 |
| Pro wedge | 0 |
| Pro donut | 0 |
| Pro East / West | 1 |
| Pro Norwich City | 0 |
| Pro other | 4 |
| TOTAL | 24 |

All of Norfolk Members of Parliament are opposed to the single county unitary proposal preferred by the Boundary Committee and an overwhelming majority are also opposed to both the 'Wedge' and the 'Donut' proposals.

Conclusion

None of the Boundary Committee's proposals have a broad cross section of support and consequently should be rejected.

In 1994 Sir John Banham said, "It is clear that there is overwhelming support for the retention of the existing two-tier structure of county and district councils." Nothing has changed since then. It is clear that today there is still overwhelming support for the retention of the existing two-tier structure of county and district councils.

Put simply there is no clamour for change in Norfolk and no need for change.

Criteria 5 – Value for money

“In the 1960’s and 1970s local government was reorganised in a way that gave priority to the alleged efficiency gains of operating on a larger scale. Strategic local government did not emerge but rather larger units, more susceptible to control by managers and professionals, were created. Moreover, in the creation of larger units, local government lost touch with people’s felt sense of community”

Prof Gerry Stoker (2006) ‘New Roles & Structures for Local Government’, in ‘Double Devolution’ Ed Geoff Mulgan & Fran Bury, the Smith Institute

The proposals are bad for council tax payers

By effectively working together Norfolk’s district councils and county council already have lower costs per head of population and per household than unitary authorities with an equivalent population and rural/urban mix. The waste collection and disposal service is a good example. Waste collection is currently dealt with by seven District Councils and waste disposal is dealt with by the County Council. But on both a “per head” and “per household” basis costs are actually below those of equivalent unitary authorities.

It is not clear how the new unitary authority proposes to prioritise spending between different areas but what little guidance is contained in the County Council’s proposal suggests that resources will be directed into the current Norwich City area. In addition we believe the county council has underestimated the real transition costs as has happened with other unitary authorities notably Northumberland.

The County Council claims there will be a number of savings but these are simply “guesstimates”. Savings are seen as flowing primarily from the removal of duplication at district council level. But, of course, over 80% of local government services by value are delivered by the county. We are bound to ask... if the County Council has found a way of making dramatic savings why not make them right now. After all, the county controls the lion’s share of the budget.

In addition the district councils are considerably leaner than county and have a better record at controlling costs and keeping down council tax. Even if there were some short term savings the prevailing culture at Norfolk County Council would see a rapid erosion of such savings as their addiction to the maximum permitted annual council tax increase would be unlikely to change.

Furthermore the proposed Norfolk County Council structure for the new authority is not transformational but instead based on a ‘bolt on’ approach to the council’s current structure.

With five Area Communities, 21 Community Partnership Boards, PAs, and case workers for over-stretched councillors etc. etc. costs are bound to rise inexorably.

The proposals are bad for services

“The past experience of reorganisation in this country provides a warning about the risks of poorly executed change, and shows that it is by no means a panacea”

Sir Michael Lyons (2007) ‘Lyons Inquiry into Local Government – Final Report’ TSO, Exec Summary Para 70

These proposals will involve severe service disruption. They will involve a “levelling down” of local services. For example, West Norfolk will lose its weekly bin service if this service is standardised as is suggested in the single County proposal. Services will not be tailored to local needs or delivered locally, particularly discretionary services. Local initiatives will come under inevitable threat. Voluntary sector funding will face stringent cuts. All this in a county with more people aged over 60 than any other age group, where 20% of the local population is aged over 65 and 10% is aged over 75. Many of these people are in special need of local services.

“The size and rurality of the county pose significant challenges to the County Council for transport and service delivery”

Corporate Peer Review – Visit to Norfolk County Council (May 2007) IDeA [para 12]

The current differences in the nature and levels of services provided by different districts reflects the preferences of local people and awareness of and sensitivity to local issues. The responsiveness of districts to those preferences both in terms of the nature and level of service and the level of council tax they are willing to pay is an important element of local governance and service delivery in an area the size of Norfolk.

“Overall, international comparisons against a range of measures including competitiveness, improved public services and participation in local democracy suggest that centralised governance is often associated with poorer performance and decentralisation with better performance.”

Young Foundation (2006) ‘Neighbourhood Involvement in Public Service Delivery’

SECTION 5 – SUMMARY & CONCLUSIONS

“Whilst this reorganisation process is ours, the proposals are not. All the proposals for change are yours, which makes this local government reorganisation and restructuring different from previous ones. It’s not imposed by the government, it’s proposed by councils.”

John Healey, Speaking at an IDeA Seminar, September 2007, before imposing the process on seven Norfolk Councils that didn’t ask for it

We contend that the reasoning behind the Boundary Committee’s preferred option – a unitary Norfolk with Lowestoft added – is fundamentally flawed for several reasons:

- It ignores the implications of other relevant elements of government policy – notably neighbourhood empowerment, place shaping, and the advocacy of enhanced roles for councillors – all of which should have been taken into account
- It ignores the implications of the government’s response to the bids for unitary status made in the 2006-2008 period – in particular the basis for its rejection of the bids from North Yorkshire, Cheshire and Cumbria – and its acceptance of the bid from Bedford
- It seeks to justify the ‘unitary Norfolk’ proposal on the grounds that the influence of Norwich extends well beyond the City’s proposed boundaries and encompasses the whole of Norfolk and beyond. It offers no evidence to justify this assertion, which is in fact contradicted by journey-to-work evidence and other data
- The argument that an authority the size of the unitary Norfolk plus Lowestoft can incorporate a significant degree of devolution to local communities is unconvincing, and does not constitute an adequate response to the government’s localism agenda as set out in the recently-published White Paper
- It fails to explain or justify why the preferred option for Norfolk is so fundamentally different from the preferred option for Suffolk
- It makes no attempt to assess the preferred options against the potential benefits of an improved two-tier system in Norfolk
- We believe that the intellectual rigour which might reasonably be expected to support important constitutional change is frankly absent from the Boundary Committee’s draft proposals for Norfolk. Specifically there is:
 - A notable absence of any material on affordability and ‘value for money’ which renders a meaningful comparative evaluation of options impossible
 - A perception of Norfolk as a de facto Greater Norwich, which is asserted rather than demonstrated through the use of relevant evidence
 - A failure to justify the different ‘preferred options’ for Norfolk and Suffolk
 - An almost total reliance on the speculative submission from Norfolk County Council, with scant regard for the demonstrable limitations of credibility in this submission
 - An inability to identify and critically evaluate the feasibility of introducing genuine ‘neighbourhood empowerment’ in a large diverse county area

- The current proposals in the Boundary Committee's report would, if implemented, set a precedent for a local government structure in the shire areas with profound differences from the current system elsewhere in England. There would be a vast reduction in the number of councillors. A large number of local communities with strong identities would lose any form of democratic identity. If replicated across the country we would be moving even further away from the local government structures which exist throughout Europe. This would be a change of profound constitutional significance which cannot be allowed to develop without a much fuller consideration of the implications than is provided by the Boundary Committee's current approach.
- We believe that the two alternative proposals referred to by the Boundary Committee are also fatally flawed, as explained in the appendices to this report.

The conclusion we draw is that the Boundary Committee should not feel obliged to recommend a unitary option given that such an option would not be a demonstrable improvement on an improved two-tier system in Norfolk. The Boundary Committee's contention that "the status-quo would only result if we were unable to identify any unitary pattern that meets the criteria on the Secretary of State's guidance" is unnecessarily restrictive.

In summary, our key arguments against the Boundary Committee's draft alternative proposal are that the options reported on the 7th July are:

- **high risk (and an avoidable risk)**
- **bad for democracy – reducing the number of directly elected councillors by nearly three-quarters**
- **bad for the economy and economic regeneration of our places, in a time of global economic uncertainty**
- **bad for council tax payers, the very people who will pay the cost of change have not been actively consulted on these proposals and haven't asked for them**
- **bad for local services, increased remoteness of decision-making and commissioning taking services further away from the people who rely on them²**
- **bad for communities who rely on local champions to ensure that places develop in a way that suits local needs**

² In the absence of any detail within the Boundary Committee report we are reliant on published County Council work to date

Appendix One

The Boundary Committee Draft Proposals for Unitary Local Government in Norfolk

A Critical Analysis

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Introduction

The Boundary Committee's draft proposals for unitary local government in Norfolk (and Suffolk) and the assumptions and arguments which underpin them are fundamentally flawed for a number of reasons, summarised below and subsequently elaborated in the remainder of this report.

- The draft proposals are developed **in isolation from a consideration of relevant government policy** (beyond the narrow remit provided in its brief) and without **reference to their compatibility with the structure of local government in the remainder of England**.
- There are a number of **major inconsistencies between the draft proposals and the decisions made by DCLG** regarding the 16 proposals for unitary status (November 2007) and the justification made for them.
- The **intellectual basis for the draft proposals is weak**. No serious attempt is made to compare viable options, or to justify key assertions made, on the basis of evidence. The report is virtually evidence-free.
- There is a **failure to adequately recognise the speculative nature of the submissions made by interested parties** (particularly the submission from Norfolk CC) and to recognise the impossibility of ensuring the implementation of the proposals involved.
- The concept of '**neighbourhood empowerment**' is dealt with a degree of **vagueness and imprecision which precludes a realistic assessment of the feasibility of its achievement** in the various options identified.
- There is no attempt to **compare** the merits of any of **the unitary** options recommended **with the potential of an improved two-tier system** to deliver the five objectives/criteria identified.

In conclusion the draft proposals and the way they have been justified **do not provide an adequate or acceptable basis for the public consultation process which is currently in progress**, nor for any recommendation which is subsequently made by the Boundary Committee.

The justification for these conclusions is set out in subsequent sections of this critique. The first section identifies key aspects of the policy context of the Boundary Committee's brief which have been ignored or marginalised. The second section summarises the conclusions reached by DCLG (and the justifications for them) in their November 2007 decisions letters, which are relevant to the Norfolk context. The third section highlights the inconsistencies and lack of crucial evidence in the Boundary Committee's 'Draft Proposals' report. The fourth and fifth sections single out and discuss two particular areas of concern in this draft report; the BCs reliance on the submission provided by Norfolk CC (which is itself subject to a critical analysis) and the unconvincing way in which 'neighbourhood empowerment' is defined and evaluated. In the sixth section the lack of any comparative evaluation of unitary structure with an (improved) two-tier system is identified and challenged. Finally there is a short conclusions section which summarises the main shortcomings of the 'draft proposals' report and the process which has underpinned it.

Lack of consideration of relevant context

The brief provided to the BC by DCLG ('Request to the Boundary Committee to Advise') is the logical starting point for any evaluation of alternative options. However the brief is a relative narrow one, in two important respects:

- It does not discuss the compatibility (or otherwise) with the existing local government structure in England of any proposals the BC might make, for the three counties it has been asked to review.
- It does not identify certain relevant aspects of government policy which have a clear relevance to local government structure

In our view, these are important considerations which we would expect a professional formulation and comparative review of options to take into account. There is as yet no evidence that this has happened.

The Local Government Map of England

The current territorial structure of local government in England is a mess. It contains a host of inconsistencies, resulting from a series of ill-advised government interventions (the ultimately abortive organic change initiative in 1978; the abolition of the GLC and metropolitan county councils in 1986; the outcome of the Banham and Cooksey Commission (1996-97); and the recent DCLG 'unitary authorities' initiative (2007)).

All these initiatives were partial reorganisations, and demonstrated scant regard for the wider and longer-term implications of the proposals which were made for local government structure in England. The Boundary Committee have the opportunity to learn from these shortcomings, and consider the broader implications of its proposals.

In so far as there is an identifiable trend in these initiatives, it can be characterised as a 'drift towards unitary authorities'. But this has been a partial and disjointed process, with at no stage a clear acceptance by any government (or commission) that unitary local government is the best option, nor any decisive evidence produced to demonstrate that this is so. For example:

- In 1994-95, the Banham Committee having considered a wide range of evidence (including public opinion and community identity) concluded that a

change to unitary structures could not be justified in 34 of the 39 counties it reviewed. A total of only 30 new unitary authorities were created as a result of this process.

- In 2000, the Labour government re-introduced a Greater London authority (the GLA), and in doing so, a two-tier system of local government in London. It would not appear, therefore, that ‘public confusion’ or ‘multiple levels of leadership’ were seen as serious impediments to this eminently sensible policy initiative.
- The 2006 White Paper and the 2007 Local Government Act, whilst falling short of recommending the re-introduction of the six metropolitan counties, clearly recognised the need for strategic leadership and joint action in these areas. In fact the logical conclusion to be drawn from the analysis in the White Paper was that metropolitan-wide authorities (similar to the GLA) would be beneficial.
- The 2006 initiative (following the White Paper) which invited bids for unitary options also invited bids for improved two-tier arrangements. This demonstrates that the government is (or was then) open-minded about the respective merits of unitary and two-tier systems.

The conclusion we would draw is that the BC should not feel obliged to recommend a unitary option, unless it is convinced that such an option would be a demonstrable improvement on an (improved) two-tier system in Norfolk. The BC’s position that ‘the status-quo would only result if we were unable to identify any unitary pattern that meets the criteria on the Secretary of State’s guidance’ (p 9) is unnecessarily restrictive. Given the vagueness of the criteria, and the subjectivity inherent in applying them it would be surprising if the BC were unable to identify one or more such ‘unitary patterns’. A much more rigorous test in the light of the uncertainty around the respective merits of unitary and two-tier systems would be a requirement to demonstrate that the option(s) identified are on balance likely to prove superior to the status-quo (this issue is re-visited in Section (6)).

In relation to the existing local government map of England, the BC should seriously consider the future implications of the proposals it is making. If the BC’s preferred option were to be implemented, then....

- Norwich would become the only sizeable city in England not to have its own democratic identity and hence a major influence on its own future. The unitary status enjoyed by places such as Torbay, Slough, Thurrock, Bracknell Forest and Rutland would be totally incongruous if Norwich (as it exists or on extended boundaries) were not to enjoy equivalent status.
- The largest county-based unitary authority outside Birmingham would be established, with a population greatly in excess of any of the unitary counties introduced following the DCLG's 2007 exercise. If a unitary Norfolk is a good idea, why not a unitary Lancashire, Hampshire, Essex or Kent?
- The 'preferred option' would raise issues about the viability of a range of existing counties where the main city or town operates as a unitary authority within a wider two-tier system. If the de facto boundary of Greater Norwich is Norfolk, it is not at all unlikely that a similar conclusion would apply to Leicester/Leicestershire, Nottingham/Nottinghamshire and Stoke-on-Trent/Staffordshire.
- It would certainly challenge the appropriateness of the group of unitary authorities around Bristol, Middlesbrough and Kingston-upon-Hull. The logical implication would be the return (in some form) of Avon, Cleveland and Humberside respectively as unitary authorities, a proposition which is not likely to appeal to the current (or any?) government!
- The implications for the number of elected councillors in England would be devastating. The 'preferred options' for Norfolk would imply a 70% cut in Norfolk. Apply this kind of reduction more generally and there is an outcome totally out-of-line with the government's commitment to enhanced/strengthened roles for local councillors, especially those at the front line (see below for further discussion of this point).

The general point is that the preferred options in Norfolk (and Devon) would have a profoundly destabilising influence on the local government map of England. It would heap inconsistency upon inconsistency. It is difficult to believe that the government would welcome this kind of outcome. But it would follow logically from the 'preferred options' currently on the table.

Government policy context

There are three features of government policy which, whilst not necessarily referred to explicitly in the brief provided to the BC, have a clear relevance for the process of developing options, and which should therefore be explicitly addressed by the BC.

An enhanced role for local councillors

The 2006 White Paper emphasised the importance of the role of local representative 'front line' councillors. They are referred to as 'the bedrock of local democracy'. The White Paper (and the 2007 Local Government Act which implemented it) sought to strengthen and widen their role in a range of different ways including (local) community leadership and advocacy and involvement in a strengthened overview and scrutiny system. The average amount of time councillors spend on their duties has nearly doubled from 52 hours a month (1964, Maud Committee) to 95 hours a month in 2006 (IdeA/LGA/LEAR 2007) – and that was before the 'strengthened role' provisions came in.

The 'preferred option' for Norfolk envisages a reduction in the number of councillors from 406 to 120 (Norfolk CC submission) – a 70% decrease. The resulting ratio of electors to councillors would be much higher than in any existing or planned unitary authority. Even if the overall workload were not to increase (despite the expectations involved in the 2007 Act) the implication is that the workload demands on councillors in a unitary Norfolk would be formidable.

The White Paper also includes a commendable objective to improve the representativeness of the overall body of councillors in England to give a more balanced age/sex/ethnicity profile. In the jostling for nomination amongst existing councillors for the greatly reduced number of positions, it is likely to be the experienced councillors, who are well-established within their local parties, that win out in any competition with younger less experienced would-be candidates.

The importance of place-shaping

In the otherwise unjustly-neglected report by Sir Michael Lyons (National prosperity, local choice and civic engagement, 2006) one concept has been adopted and widely-used by the government – that of 'place shaping'. The BC report also makes several references to it. It is an idea with continuing relevance on the policy agenda.

As a close reading of Sir Michael's report demonstrates, the idea of place-shaping has a much greater potential if it is applied to places which have real meaning for local residents. MORI research over the years has shown that the strongest levels of community identity are with villages, neighbourhoods and towns rather than local authority areas of county or district scale.

The impact of the BC's preferred option in Norfolk would be eliminate at a stroke a number of local authorities which are centred on 'real places' and which have a legitimate lead role in place-shaping, in particular Norwich, Great Yarmouth and Kings Lynn. The prospect of a large county such as Norfolk taking the lead in the 'place shaping' of Norfolk, Great Yarmouth and Kings Lynn seems wholly incompatible with the spirit of the concept place-shaping.

The importance of neighbourhood empowerment and civic engagement

This policy objective underlies much of the content of the recent White Paper (Communities in Control: Real People Real Power) and is reflected in one of the criteria the BC is required to incorporate. However it is clear that the level of localism which the White Paper wishes to facilitate involves much smaller sub-units than the 36,000 population Community Partnership Boards (CPBs) proposed by the county council. It is important that the recommendations made by the BC ensure that the development of this localist policy stream is facilitated. It is highly questionable whether a unitary authority of the size and scale proposed could develop effective structures and processes for operating at the required local/neighbourhood level. (See Section 5). The proposals in the White Paper are aimed at extending the rights and powers of local people to influence the future of their own localities. The proposals for a unitary county appear to pull in the opposite direction – there would be less local accountability and less democratic representation.*

The various points made in the section about the wider implications of the BCs proposals for local government structure in England, and the importance of reflecting government priorities (even where they have not been highlighted in the BC's brief) illustrate the importance of the Committee understanding and taking into account this wider context. There is still time for it to do so.

* The Community Partnership Boards proposed by Norfolk CC would not be democratically representative

Inconsistency of BC draft proposals with November 2007 DCLG decisions

The criteria which DCLG applied to the 26 bids for unitary status which they received in March 2007 are almost identical to those set out in the brief provided by the Department to the Boundary Committee, in relation to its work in Norfolk, Suffolk and Devon ('Request to Boundary Committee to Advise' February 2008). It might therefore be anticipated that the Boundary Committee would pay due regard to the conclusions reached by DCLG, in this earlier process of applying the same criteria.

There is in fact no evidence that Boundary Committee (BC) have done so. In particular, there is no indication in the draft proposals that it is aware of the DCLG's reservations about large unitary authorities, the hypothetical nature and/or complexity of the devolution arrangements proposed in some cases, nor the economic diversity perceived in some of the county areas involved. There is surely an onus on the BC to compare its proposals, and the justifications for them, with the earlier judgements made by DCLG. It may reach different conclusions, but it would certainly need to justify them, if it did so.

Set down below are the conclusions reached by DCLG in July 2007 which have relevance to Norfolk.

Size Issues

The largest county awarded unitary status by DCLG was Cornwall (524,000). In several other counties of equivalent (or greater) size, concern was expressed by the DCLG about the possibility of unitary authorities of this size – particularly where they were also of large scale geographically – being seen as 'remote' by their citizens.

In North Yorkshire, the Secretary of State 'was aware that due to the large geographic areas involved, there are concerns that a county-wide unitary authority may have difficulties effectively representing its electorate and would be seen as remote by most of its citizens' (decision letter 25 July 2007).

In addition...

'The neighbourhood arrangements that are being proposed to mitigate the effects of size are so complicated – operating at a number of spatial levels – that there is a risk that they will prove unworkable' (ibid).

North Yorkshire's population (580,000) is significantly less than that of the preferred option in Norfolk (868,000). Its geographic area is smaller, but comparable in scale (803 hectares c.f. 537 hectares). The complexity of the devolution arrangements proposed by Norfolk CC are certainly no less than those proposed by North Yorkshire CC (see Appendix B of the Norfolk CC submission).

For the two reasons set out above, North Yorkshire was judged not to meet the criterion of 'neighbourhood flexibility and empowerment'. Yet in the draft proposals for Norfolk, there has been no consideration of such potential problems.

In Cumbria CC (population 495,000; area 681,000 hectares) the Secretary of State also recognised 'that, due to the large geographic area involved, there are concerns that a county-wide unitary authority may have difficulties effectively representing its electorates'. (Decision letter, July 25 2007). Of particular significance is her view that Cumbria would not be capable of providing effective strategic leadership.

'She notes that Cumbria is unique geographically, and that East/West links are very poor. She recognises that significant differences in history and economy between the coastal parts of the county, the rural southern area and the northern part of the county' (ibid).

With a few minor adjustments, she could have been writing about Norfolk! The Cumbria bid was deemed not to meet the criterion of 'strong, effective and accountable strategic leadership', for the reasons set out above. Again, the BC's draft proposals for Norfolk demonstrate no awareness that there is even an issue to consider, in circumstances which are distinctly similar to Cumbria.

In turning down the bid for unitary Cheshire (population size 680,000) in favour of an East/West split, the Secretary of State's decision letter contained the following significant passages:

‘The Secretary of State took the view that a single unitary authority would be too big, and there were risks that the authority would be seen as remote by local people and hence less able to deliver neighbourhood empowerment’.

‘She also noted that a single unitary authority would not reflect the economic reality that many consultees perceive splits Cheshire between East and West, and hence be less able to provide strategic leadership’.

Her views on the neighbourhood arrangements proposed by the county are of particular relevance in the Norfolk context.

‘The Secretary of State has considered carefully the information you have put forward about your neighbourhood arrangements. She accepts that what is proposed is imaginative and interesting, but considers that these proposals are largely theoretical. She notes this contrasts with the proposed neighbourhood arrangements in the two unitary options, which builds on current experience developed by district councils on the ground’

If Cheshire was perceived as being ‘too big’ to deliver neighbourhood empowerment, does this conclusion not apply more so to Norfolk? Are the concerns about the economic diversity of Cheshire not equally relevant to Norfolk? And the ‘theoretical nature’ of Norfolk CC devolution proposals are equally apparent as in the Cheshire case. There is no track record of devolution to local communities by Norfolk CC. The District Councils have a much more impressive track record in this respect implementing neighbourhood charters in Kings Lynn, devolving budgets to community partnerships and running neighbourhood management schemes.

In summary, the unitary bids from Cheshire, Cumbria and North Yorkshire – all with significantly smaller populations than Norfolk – were rejected on the grounds of size, remoteness, economic diversity and the complexity (or theoretical nature) of their devolution proposals, leading to perceptions that the criteria of strategic leadership and/or neighbourhood empowerment could not be met. The BC should explain why the same conclusions are not appropriate for a much bigger county (in population terms), with similar characteristics to the three whose bids were rejected. The need for such a

justification in these circumstances, is equally applicable to the two other (two unitary) options identified for consultation, both of which include large unitary county-based authorities (in one case (pattern B) significantly larger than any unitary county so far established in the other (pattern A) of equivalent size to the largest designated unitary county).

The intellectual limitations of the case set out in the draft proposals

The intellectual rigour which one might reasonably expect from a body charged with recommending an important constitutional change is worryingly absent in the way in which the draft proposals in Norfolk have been developed and justified. The following major shortcomings can be identified.

- No justification for short-listing certain of the proposals submitted, but not others, a shortcoming linked to
-the omission, at this crucial stage of any material on affordability and 'value for money' which renders a meaningful comparative evaluation of options (including the options which are discounted at this stage) impossible.
- A perception of Norfolk as a de facto Greater Norwich, which is asserted rather than demonstrated through the use of relevant evidence.
- A failure to justify the different 'preferred options' for Norfolk and Suffolk.
- A failure to explain the illogicalities of proposing one county unitary as the preferred option in Norfolk (with two as 'alternative patterns'), whilst two unitary authorities are the preferred option in Suffolk (with one as an alternative pattern).
- An over-reliance on the submission of Norfolk CC, with scant awareness of the limitations of credibility in submissions from interested parties.
- An inability to identify and critically evaluate the feasibility of introducing genuine 'neighbourhood empowerment' in a large diverse county area.

The final two issues are dealt with in the following sections. In this section the first five issues are discussed, together with a range of more detailed shortcomings in the proposals document.

The process of short-listing and the omission of key criteria

The BC received seven proposals – or ‘concepts’ as it called them – which are summarised on p 23-6 of the Draft Proposals document.* The number of unitary authorities proposed varied from one to four. Only one included Waveney/Lowestoft. The others covered the existing county of Norfolk.

None of the proposals was, on the face of it, incompatible with the BC’s guidelines or with recent decisions on unitary authorities made by DCLG. As the BC acknowledges (p 9) ‘size is not a factor that appears in the Secretary of State’s guidance to us’. It goes on to add ‘we have no fixed view about the optimum size of the unitary authority. The DCLG designated two unitary authorities in Bedfordshire of 153,000 and 241,000 respectively. The average size of authorities in the ‘four unitary’ proposals in Norfolk is between 205,000 and 235,000 (depending on the option). The average size of the unitary authorities proposed in the City/Coastal/Rural proposal is 265,000, which is a figure close to the population of Northumberland, Shropshire and West Cheshire. There is clearly no basis for excluding any of the options presented on the basis of the size of the authorities proposed.

Yet in Norfolk - - and indeed in Devon – the BC’s preferred options have been for unitary authorities of a size and scale unprecedented elsewhere in England. A unitary Norfolk (plus Lowestoft) would have a population of 868,000, second only to Birmingham, and which, with the rate of growth anticipated, would approach Birmingham’s population in the medium term. (A unitary Devon would have a population of 704,000).

It is by no means clear how the BC has reached this position. Indeed one of the major shortcomings of the prioritisation process is that very little is recorded about the arguments set out by the authorities submitting proposals, apart from those from Norfolk CC, which are referred to copiously.

* There were a handful of other options identified (pp 26-27), which were not further considered.

The March 2007 DCLG decision letters, which allowed 16 proposals to proceed to consultation whilst eliminating a further 10, whatever their limitations, did at least evaluate each proposal against the five criteria identified, and thus provided a rationale for the selection process which could be assessed by those seeking to understand the outcomes. No such process is carried out by the BC in Norfolk. Any choice between alternative proposals in a process embracing five criteria will necessarily involve a trade off between the perceived capacity of the alternatives to meet the criteria (for example witness the contortions involved in the DCLG's justification of its preference for an East/West split in Cheshire rather than a unitary county). The BC's Norfolk report does not provide a parallel basis for an external assessment of the logic behind its preferences. Having listed the seven options (pp 23-6) the preferred option (and the two alternatives) are identified and discussed on pp 39-45 with hardly a shred of comparative evaluation (vis-à-vis the other four options). There is no way in which a detached observer can understand why any of the options were sidelined, or why the 'wedge' was dreamed up.

It would in any event have been difficult for the BC to carry out an evaluation of the type undertaken by DCLG in 2007, because of its bizarre omission of any application of the affordability/value-for-money criteria to the seven options at this stage. Indeed given the lack of any significant evidence of patterns of support, the prioritisation process hinges on the BC's views about strategic leadership and neighbourhood empowerment capacity, where in neither case are its arguments remotely convincing.

Yet one wonders if the BC has already formed a judgement about 'value for money', irrespective of its omission from the current analysis. The LGC interview with the Committee chair includes the following quote:

'It's very easy to say these are super-size councils, but this is not about that. It is about the mix offered of strategic leadership and neighbourhood engagement, and **the potential for better value for money**'. (LGC 24 July 2008 p 16 – our emphasis).

Of particular concern in this connection is the heavy reliance on the discussion on pp 39-45 on the arguments put forward by Norfolk CC, and the total omission of arguments put forward by other authorities. This problem is discussed further in Section 4.

To summarise, the process whereby the BC have identified a preferred option and two alternatives, and eliminated all the others has been partial, unsystematic and opaque. It provides a totally unacceptable basis for a major constitutional change of this nature.

Debatable characterisation of Greater Norwich

One valid basis (amongst others) for the designation of unitary authorities is the identification and definition of city regions. Strategic planning is facilitated in circumstances where there is an identifiable local economy and a focused pattern of journeys to work, shopping and recreation within the area concerned. It was a concern that cities such as Norwich, Ipswich and Exeter **on their existing boundaries** did not reflect the real extent of the city regions associated with such places that motivated DCLG to ask to BC to consider (inter alia) an extended definition of such cities as a basis for unitary authority designation.

In its justification for the identification of Norfolk (plus Lowestoft) as its preferred option, the BC makes the following argument:

‘The evidence available to us suggests that the economic social and cultural reach of the city extends far beyond its immediate border, in some cases to the coast, the county boundary and beyond’. (p40)

At a superficial level this assertion may well be true – Norwich is the only major city in northern part of East Anglia, and it might be expected that residents of Thetford, Kings Lynn and Wells-next-to-the-Sea would pay the occasional visit to Norwich for shopping or recreational purposes. But as a justification for recommending what would be the second largest unitary authority in England in population terms (and nearly 70% larger than any of the county-based authorities designated in November 2008) it is totally inadequate.

Given the huge significance of the change that is being proposed, it is bizarre (and unacceptable) that the BC does not include in its report a proper detailed analysis of the evidence which it considered justified its preferred option. There is in fact a good deal of evidence which would suggest that the BC has not begun to do justice to the complexity of socio-economic identities and movement pattern in Norfolk.*

* See for example the LGA report (September 2008) the Regional Spatial Strategy etc.

Journey to Work Patterns

An analysis of journey-to-work patterns, which one would expect to be seen as the most important single indicator of the extent to which the boundaries of Greater Norwich and Norfolk do or do not coincide, is illuminating. As Table 1 shows only two of the Norfolk districts – Broadland and South Norfolk export large numbers of employees to the City of Norwich (42% and 31% of their working populations respectively). All the other districts have a high degree of self-sufficiency in place of residence/place of work terms, ranging from 71.5% in Breckland to 94% in Kings Lynn and West Norfolk. The percentage of residents living in these districts but working in Norwich ranges from 1% (Kings Lynn and West Norfolk) to 10% (North Norfolk). How this evidence squares with the ‘Greater Norwich is equivalent to Norfolk’ hypothesis is difficult to understand!

Table 1
Travel to work Patterns (within Norfolk)

| District | Total Working within District | % | Total working outside District | % | Total working in Norwich | % |
|---------------------------|--------------------------------------|-----------|---------------------------------------|-----------|---------------------------------|-----------|
| Breckland | 35,762 | 71.5 | 14,226 | 28.5 | 4,574 | 9 |
| Broadland | 24,441 | 44 | 31,196 | 56 | 23,602 | 42 |
| Great Yarmouth | 28,727 | 86 | 4,706 | 14 | 2,133 | 6 |
| Kings Lynn & West Norfolk | 47,942 | 94 | 3,213 | 6 | 561 | 1 |
| North Norfolk | 30,317 | 76 | 9,520 | 24 | 3,994 | 10 |
| Norwich | 38,806 | 76 | 12,267 | 24 | 38,806 | 76 |
| South Norfolk | 26,013 | 56.5 | 20,095 | 43.5 | 14,456 | 31 |
| TOTAL | 232,000 | 71 | 96,000 | 29 | 88,300 | 27 |

The most recent attempt to define UK City Regions, based on a statistical analysis carried out by Michael Coombes (University of Newcastle) demonstrates clearly that Kings Lynn and West Norfolk is not part of a Greater Norwich City Region, but rather is part of a City Region focused on Peterborough (see Building a New Britain: An Alternative Approach to devolution and local governance in the UK: City Region Campaign 1996).*

* See also the sub-regional map in the recent LGA report (September 2008)

Diversity of local economies

The local economies of places outside the Greater Norwich area (as identified in the Norwich Growth Point Plan) are largely independent of Greater Norwich. The BC itself recognises the distinctive local economies of Great Yarmouth (and indeed Lowestoft). A parallel distinctiveness is apparent (inter alia) in the North Norfolk coastal towns, Kings Lynn, Thetford and Diss.

A further questionable argument (or assumption) in the BC report is that it is somehow beneficial in economic regeneration terms for an authority with a distinctive economy (e.g. Great Yarmouth) to be linked with a separate authority (in this case, Norfolk or (on the two unitary pattern A model) Norwich) with a different local economy. No evidence is provided for this assumption, and the countervailing argument – that Great Yarmouth itself is best equipped to sort out its own economic future (an outcome to which it has already made substantial progress) is equally persuasive – if not more so. Why should one expect a predominantly rural county such as Norfolk to give a particular priority to a declining seaside resort/fishing town which constitutes only a small proportion of its overall population? And why, under the 'wedge model (Greater Norwich/Great Yarmouth/Lowestoft) would Great Yarmouth (or indeed Lowestoft) necessarily benefit from inclusion in an authority dominated by Greater Norwich. The precedents are not encouraging. The failure of Lancaster City Council to address the problems of the declining seaside resort of Morecombe led in the 1990's to the formation of the Morecombe Bay Independents, a party which actually formed a minority administration during that decade. Nor has the juxtaposition of Bootle, Formby/Maghull and Southport in the MB of Sefton been a stimulus to economic recovery in Bootle, nor to strong and effective leadership.

Community identity

It may well be that there is in Norfolk an ‘historic identity’ and (to a degree) a set of ‘contemporary social and economic relationships’ (p 40). The same point could be made regarding Cheshire and Bedfordshire, but was viewed by DCLG as less important than other considerations. Again there is a worrying lack of evidence underpinning the BC’s judgement. If ‘community identity’ is seen as important – which in our view it should be – then where is the evidence that it is stronger in relation to Norfolk than it is to sub-areas within it (this issue is discussed in greater detail in Section 4).

The irrelevance of recent performance assessment

At two points in the key analytical section of the Norfolk report (pp 39-49) reference is made to the recent performance of authorities involved in making bids.

‘We acknowledge that the CCs present performance and capacity to deliver effective services can only provide a broad indicator of the future performance of a county-wide unitary authority. However we note that it already carries out many of the large-scale local authority functions and **received a three-star rating from the Audit Commission in its CPA** (our emphasis) (p 43)

On the other hand

‘However we note that the Audit Commissions opinions in respect of the financial year 2006/07 for both Great Yarmouth BC and Norwich City Councils, and has **also expressed a number of concerns relating to financial management at each authority.** (our emphasis) (p 45)

Are we to conclude that recent performance indicators of the type noted in the above quotations, have formed part of the BC’s comparative evaluation of options process? If so the inclusion of this type of material is wholly inappropriate. Councils CPA assessments can change over time, sometimes spectacularly. Councils lose stars and gain them. Failing authorities transform themselves North Shropshire moved from poor to excellent over a period of 2-3 years! In any event the CAA process will be different from the CPA. Current performance has no place in an exercise of this nature and the BC should make this clear.

In addition the point made on p 7 and 42 that council services account for some 80% of local government expenditure in the County is misleading. Roughly half of the budget of all county councils is 'passported' to schools, with very little discretion in how the budgets should be deployed. It would be more realistic to assert that two thirds of local government expenditure (excluding schools budgets) is the responsibility of the county council and one third of the district councils. This expenditure balance provides a significantly different perspective than the 80/20 split. In any event, it is hard to see the relevance of the point that is being made. Are we to imply that there is a 'de facto' case for large unitary counties across the country because of their alleged dominance of local government expenditure in their areas?

Differences and similarities between Norfolk and Suffolk

The preferred option for Norfolk is one in which the democratic identity of the City of Norwich disappears. In contrast, in the county of Suffolk the preferred option is one which retains the City of Ipswich (and extends it to incorporate the port of Felixstowe) and envisages a second unitary authority for the remainder of Suffolk.

How is this major difference in the respective recommendation justified? The answer is not particularly convincing! It is asserted (rather than demonstrated).

'we are not at this point persuaded that Ipswich is fundamental to the economic development of Suffolk as a whole ...we do not consider that Ipswich acts as the same economic driver for the rest of the county as is the case with some other county towns (e.g. Norwich in Norfolk).(p 52).

To justify what follows from this perception, the BC surely has to produce some concrete comparative evidence about journey-to-work patterns linking Greater Norwich and the rest of Norfolk and the patterns linking Greater Ipswich with the rest of Suffolk respectively.

There is a further inconsistency. The case for linking Ipswich with Felixstowe in a unitary authority is apparently stronger than the case for linking Norwich with Great Yarmouth (and maybe Lowestoft also) in a unitary authority. But little evidence is presented as to why the first linkage has a greater significance than the second link. Again the point is asserted rather than demonstrated, viz

‘we acknowledge the economic importance of Ipswich to the surrounding areas, in particular the nearby port town of Felixstowe we consider that the planned future growth within this sub-region will benefit by having an authority uniting two of the principal towns of the sub-region’. (pp 52-3).

The viability of the remainder of Suffolk as a predominantly rural unitary authority is apparently less problematical than the prospect of ‘the remainder of Norfolk’ being designated in a similar way. Yet on the face of it, the cases seem very similar in nature. However we are bound to add that, in our view, if the sphere of influence of Norwich is defined on the basis of the proposed boundaries for Greater Norwich as it is in the two unitary pattern B option, then the case for a large unitary county, (previously linked to the need to respond to the reality of the **wider** definition of Greater Norwich) is totally undermined, and the need to reconsider other unitary models for the county area becomes paramount.

Critique of the case presented by Norfolk CC

As was the case with the 2006-08 DCLG – led unitary initiative, a key component of the process is a ‘bidding system’. Local authorities have the opportunity to present proposals (or ‘concepts’ in this case). The BC then reviews the strengths and weaknesses of these concepts, and identifies a preferred option (or options).

The partisan nature of local authority submission

Inevitably what the BC will receive in these circumstances are ‘partisan’ submissions from ‘interested parties’, which present their cases in the best possible light. Appropriate metaphors include ‘beauty contests’ or ‘sales pitches’ from consultants (or property developers). Rosy pictures are painted of the way local government would work under the proposed new arrangements. Public confusion will be swept away, strong effective leadership will emerge, democracy will be enhanced, and large amounts of money will be saved.

It is of course perfectly understandable that local authorities whose futures are at stake will make submissions of this nature. However for a process whose starting point is a bidding system of this nature to have any kind of credibility, it is essential that the adjudicatory body (in this case the BC) should be able to draw on independent sources of evidence about the issues raised (and claims made) in the submission documents. For example if an authority makes assertions about the extent of the sphere of influence of a town or city, it is important that the BC is in a position to evaluate this claim using (inter alia) relevant journey-to-work evidence (see Section 3).

In other words, there is a balance to be sought between a ‘**reactive**’ mode of operation on the part of the BC (how convincing do we find the different submissions?) and a **proactive** mode (‘what information do we need to unearth or commission to help us make an informed decision?’). A proactive perspective may of course lead to BC to identify proposals that differ from those submitted by any of the local authorities involved.

A strong proactive ‘research’ element in the process is particularly important in a situation, where the resources available to the different authorities making bids vary so markedly. A county council such as Norfolk is in a position to devote considerably more

time and expertise to developing submission than smaller district councils such as North Norfolk or Breckland. This phenomenon was apparent in the recent DCLG-led process, and may have something to do with the fact that in seven of the areas in which unitary government was initiated, five of the successful proposals were for unitary counties.

In Norfolk the submission presented by the county council (April 2008) was 285 pp in length (including appendices). Its 'response to questions' document (May 2008) was nearly 100 pp long.* It could be argued that this degree of detail goes way beyond what was implied by the BC's request for the submission of 'broad concepts for unitary structure for the county'.

This imbalance would be less significant, if it were clear that the BC were able to submit the Norfolk CC bid to effective critical scrutiny, and to develop a credible evidence base which would permit to carry out an effective **comparative** evaluation. Unfortunately, neither of these conditions appear to have been met. The crucial section of the 'Draft Proposals' report which develops and justifies the preferred option relies almost wholly on the content of the Norfolk CC submission. Numerous references are made to 'county council concept'; none are made to any of the other concepts submitted by other authorities which might present an alternative view of the merits of a unitary county. Much of what the CC has claimed appears to have been 'taken on trust'. The BC does seek 'further information' about specific aspects of the CC's concept, but this kind of request is very different from a genuine evidence-based critical appraisal.

The impossibility of enforcing implementation

The second major problem with a decision process which is largely reactive to the bids which are submitted is that there is, as the BC acknowledges, no guarantee that the successful bidder will actually implement the proposals set out in the submission. Nor is it a reasonable requirement that they should do so. The new authority (or authorities) whatever form it takes, will indeed be a new (rather than a successor) authority.

* Despite the fact that the Boundary Committee asked proposers to limit their submissions to 30 pages, in each case.

The preferred option (for example) might be based on the existing county, but it would take in new areas (Lowestoft) and have new responsibilities (housing, planning etc). It will be a 'new authority', constituted through new elections, not a redefined variant of the existing county council.

It follows that it is unrealistic to expect the new authority to feel obliged to implement the proposals of a now defunct predecessor authority. This conclusion is recognised in the DCLG's guidance to the BC, the BC's own report (p 17) and in published comments made by its Chair. Responding to the point that the 'local boards' proposed by Norfolk (and other counties) could be modified, neutered or even abolished by a future unitary administration, he dismisses this concern in the following terms.

'any new authority coming in takes its own decisions. I (sic) cannot set binding requirements, but if a leadership makes promises on neighbourhood engagement and then fails to deliver, no doubt the electorate will reflect on that'. (LGS 24 July 2008 p 16)

This is indeed 'cloud-cuckoo land'. When was a local election last decided by the failure of an administration to implement a commitment to a particular form of devolved decision-making arrangements? The outcome of local elections are rarely (if ever?) determined by such issues. In so far as local issues do make a difference, it is invariably in relation to substantive policy decisions which directly affect local people.

The reality is that to make judgements about the superiority of one submission as opposed to others, on the basis of a set of proposals for devolution (or indeed executive government and leadership) which there is no guarantee that the new authority will adopt, and no means of requiring to do so is a totally indefensible way of making such decisions. Yet the proposals made by Norfolk CC have already had a huge influence on the BCs thinking. This totally unsatisfactory state of affairs only confirms the point made earlier about the over-emphasis of the BC on a reactive mode of analysis, as opposed to the carrying out (or commissioning) of a tranche of independent evidence, which would enable it to transcend the self-serving and ultimately unenforceable propaganda of 'interested parties'.

Alternative scenarios for frontline councillors and ‘Norwich cabinet members’

Nowhere is the ‘best scenario’ nature of the CC’s case more blatantly illustrated than in the two illustrations included in the submission – the first focused on the Norwich Cabinet Member (p 4) and the second on the ‘frontline councillor’ (p 15). These illustrations have presumably contributed to the BCs positive view of the devolution arrangements proposed by the CC. Set out below are two very different, but equally plausible scenarios of how these two mechanisms might operate in reality.

Scenario (1) : The frontline Councillor

The frontline councillor for a rural division is also the cabinet member for transportation in the new county-based unitary authority. Because of the demands of his cabinet role, he has much less time available to play his frontline councillor role. The disparity of commitment he displays to this role soon becomes apparent to key activists from his area within the Community Partnership Board, who note the greater involvement and commitment of other councillors on the Board (none of whom are cabinet members) to their locality-based activities. In particular, the cabinet member finds it hard to attend the meetings of the 12 parish councils within his patch, a fact which causes increasing resentment amongst the parish councillors concerned. Nor does he have time to contribute to the development of parish plans.

Within the cabinet, in response to an unfavourable grant settlement, it is recognised that major savings have to be achieved during the next financial year. As part of a package of cuts, aimed, inter alia, at protecting the education budget, it is agreed the subsidies to bus companies which currently operate services in the more rural parts of the county should be reduced. The impact on the division represented by the cabinet member for transportation is considerable. Local people organise a petition to ‘save our local bus services’ and contact their local member to seek his support. He replies that he cannot do so. The decision to cut rural bus services has been made by the cabinet to ensure that other higher priority services can be protected, and that as a cabinet member bound by collective responsibilities, he is bound to support the decision. It is, he says, ‘in the best interests of the county as a whole’.

Local people are outraged, not least because there is no local councillor they can turn to, to promote their cause. The chair of the most active parish council in the area comments to the local press 'if the district council was still in existence, our local councillor would have spoken out for us and helped us fight our case'. Local people increasingly disregard their 'frontline councillor' in issues of local representation and advocacy, and at the next election he is heavily defeated by an independent member sympathetic to the cause of restoring local bus services.

Scenario 2: The Norwich Cabinet Member

Although the new Norfolk County Unitary authority is heavily Conservative-dominated, the group of councillors returned from the City of Norwich (defined on existing boundaries) is not. The largest group is Labour with the Greens a close second, and with Conservatives holding only two seats in the city.

Recognising the major challenge of incorporating a group of disenchanting Norwich-based councillors into the new unitary authority, the leader, despite some pressure from his closest associates to do otherwise, honours the commitment made in the Norfolk CC bid document to allow the cabinet member for Norwich to be elected by a 'majority of his/her Norwich councillor colleagues'. This group of councillors elects a Labour member to carry out this role – the only Labour councillor on an otherwise Conservative-dominated cabinet.

The cabinet member for Norwich finds it difficult working with a group of cabinet colleagues whose priorities he does not share, and in particular the requirement that he abides by the 'collective responsibility' principle involved. Tensions within the cabinet intensify over the preparation of the first budget for which the new council is responsible. The cabinet member for Norwich feels that the particular urban problems and needs of the city are not recognised by the other cabinet members all of whom represent areas in the more rural parts of the county. He feels that the allocation of resources between Norwich and the remainder of the new authority is unfair. Internal disputes come to a head over the imaginative proposals for devolution within Norwich, which the cabinet member has developed with a group of

his city-based councillor colleagues. The leader and the cabinet member with responsibility for resources consider the proposals too ambitious and (in particular) too expensive. Their preference is for a much more limited system of community forums, costing a mere 20% of the Norwich councillors' favoured option.

When the proposal from the cabinet member for Norwich is rejected in cabinet, he resigns his post, and institutes a press conference, which is attended by all his Norwich colleagues, to explain why he has done so and which results in widespread coverage in the local media. The leader then approaches one of the two Conservative councillors from Norwich inviting him to become the 'cabinet member for Norwich'. He refuses, on the grounds that he sympathises with the view of the ex-cabinet member that 'Norwich is not getting its fair share'. The leader then appoints a Conservative councillor from Thetford as the 'cabinet member for Norwich'. The Norwich councillors refuse to work with her. The council becomes increasingly internally divided between a rural-based Conservative majority and an angry and disenchanting all-party group from Norwich.

It could (and no doubt will) be argued that these two scenarios are totally hypothetical. Indeed they are – but no more so than the two scenarios presented in the county council's submission, which assume an unproblematic implementation of a set of political management arrangements, and totally ignore the role which party politics invariably plays in the way in which such structures are interpreted. Indeed, one of the fundamental shortcomings of the County Council's case (and the BC's response to it) is its political naivety. The introduction of new structures is treated as if it were a **managerial** restructuring. As everyone who works in local government knows, the reality is very different. Party politics can and often does distort the operation of officer-inspired structures, and it is quite proper (in principle) that it should do so.

Community identity and place-shaping

The Norfolk CC submission also claims that evidence of community identity strengthens the argument for a unitary county.

‘Local residents have a strong sense of the county of Norfolk as the (sic) place to which they belong. This is evidenced consistently by research surveys. The results of the latest Citizens Panel survey by MORI (November 2007) confirms that this remains the case. Asked how strongly they felt they belonged to their neighbourhood, the nearest town, their district and their county, people from the 7000 strong panel identified most strongly with their neighbourhood (73%) and then with the county of Norfolk (68%)’.

The BC will no doubt wish to check the reliability of this survey, particularly given the disparity between the above results and those which emerged from the MORI survey for the Banham Commission in 1992-3*, where the level of identity which was strongly felt for neighbourhood and town greatly exceeded that felt for the county council or district council areas (which were broadly equivalent). If the BC considers community identity to be important – which in our view it should – it would do well to commission its own independent survey which explored perceptions of community identity.

Even if one were to accept the evidence from the CC MORI survey, there are two important reservations to be made. First, both this survey and the earlier Banham Commission one confirm that ‘the neighbourhood’ enjoys the highest level of ‘strong’ identity. As argued in Section 4 the Norfolk CC devolution proposals do not propose devolution to neighbourhoods, but rather to large sub-units of the county with average populations of 36,000 (there are 5 English local authorities in existence with population sizes of this magnitude!). Secondly evidence from the DoE (as it was then) – commissioned qualitative survey on community identity (Hodges and Kelly, 1992) concluded that

‘The most powerful loyalties are sometimes to wider areas....which **may have little day-to-day significance, but a good deal of historical and cultural meaning**’ (our emphasis)

* It is difficult for us to evaluate the validity of the CC’s conclusions without an opportunity to look in detail at the survey results.

As noted in Section 1 the BC's report refers from time-to-time to the importance of 'place-shaping'. A fundamental condition of effective place shaping is that the 'places' identified should have a real significance for the people who live in them. It is questionable (to say the least) whether the subsuming of a large town like Kings Lynn, which has a local economy and community identity quite separate from that of Greater Norwich, within an amorphous 'unitary Norfolk plus Lowestoft' begins to respond to the importance of the 'place shaping' agenda.

Leadership and Neighbourhood Empowerment

The BC report makes no substantive reference to the level of support, affordability, nor value for money (apart from a worrying pre-emptive and unsubstantiated throwaway comment on VFM mentioned earlier). The preferred option (and presumably the basis for discounting other options) is thus at this stage wholly dependent on the BC's views about the two remaining criteria – 'strategic leadership' and 'neighbourhood empowerment'.

The relationship between 'strategic leadership' and 'neighbourhood empowerment'

The report shows no awareness that these two criteria pull in opposite directions. Effective strategic leadership typically suggests larger rather than smaller local government units. However neighbourhood empowerment logically points in the direction of smaller rather than larger governmental units. As Chisholm and Leach (2008 p 38-9) have argued.

'If there were to be real power at the most local level, that would place limits upon the capacity to take strategic decisions, and vice versa. To a significant extent the two criteria pull in opposite directions. If there is more of the one, there is liable to be less of the other, and for this reason they cannot be treated as independent of each other. It is impossible to maximise both simultaneously because they are reciprocally constrained.

Consequently, the following assertions may be made with confidence. A small unitary authority, such as any of the four cities, has much more scope for empowering its citizens and neighbourhoods than a large one, primarily because there would be no reduction in the number of councillors. On the other hand, such an authority would have little real opportunity for Strategic leadership because so many issues relate to matters beyond the city's borders, requiring negotiations and compromises at numerous levels. Conversely, a large unitary authority, such as a county, would be better placed to 'punch its weight' at the regional and national levels and is therefore likely to be better placed to offer Strategic leadership than a small unitary council, but its very size

would make it harder to achieve genuine Neighbourhood empowerment and citizen engagement. The basic fact is that there is a trade off between the two desirable goals.

Despite this obvious dilemma, the DCLG presented the two criteria as if they were independent, to be achieved in equal measure irrespective of the size of the proposed unitary council'.

The logic of the BC's argument for a 'unitary Norfolk plus Lowestoft' (in so far as a logic can be discerned) is that strategic leadership capacity will be enhanced in an authority with these boundaries more so than in any of the other options. As discussed in Section 3, the BC would need to make a far more convincing evidence-based argument that 'unitary Norfolk plus Lowestoft' constitutes a more appropriate strategic area than any of the other options, than it manages to do on pp 40-42. But even if it were able to do so, there would remain a much greater degree of uncertainty than the BC acknowledges about the capacity of an authority, of this scale and size to deliver 'neighbourhood empowerment' in any meaningful sense of the term.

The meaning of 'neighbourhood'

First, let us be clear what the term 'neighbourhood' implies. It has previously been used by the government to characterise relatively small areas, within towns and cities, which (ideally) have a degree of perceived identity for their residents, in a way which provides a basis for action (often remedial – as in 'neighbourhood action areas', sometime participatory, as in 'neighbourhood forums'). When 'neighbourhood empowerment' re-emerged on the policy agendas during David Miliband's term of office as Secretary of State for Communities and Local Government, it was clear from his usage of the term that the above characterisation applied. Neighbourhoods were viewed as spatial areas of between 5,000 and 10,000 (a size criteria which reflects a well-established sociological use of the term).

What has been proposed in the Norfolk CC submission, and evaluated in positive terms in the BC's report (see p 42) bears no resemblance to the common conception of 'neighbourhoods'. 22 Community Partnership Boards – average size 36,000 – are proposed, including 'special arrangements' for the City of Norwich. The whole of Kings Lynn and Great Yarmouth are amongst the areas so defined. In other cases, towns with distinctive identity e.g. Holt, Sheringham and Wells – are lumped together to give the (spurious) appearance of manageability to the proposed system.

The complexity of the Norfolk CC proposal

Any viable system of neighbourhood empowerment would need to involve units much smaller than 36,000 - in the one case the individual market towns, seaside resorts and other significant settlements within Norfolk and in the other multiple sub-areas **within** the larger settlements of Norwich, Great Yarmouth and Kings Lynn (and Lowestoft. But to do so would result in a system of mind-boggling complexity, even greater than that of proposals tabled by the county council. Taking a size definition of neighbourhoods at the maximum level (10,000), a total of 80 neighbourhoods would be implied. If the 'empowerment' element of 'neighbourhood empowerment' were to be taken seriously – which should indeed be the case – we would be dealing with a devolved decision-making (and budgeting ?) system linking one unitary authority with 80 sub-units (and possibly also involving 22 'intermediate' Community Partnership Boards). The bureaucratic complexity of such a system is hugely more demanding than anything which already exists in English local government.

There are several existing examples of local authorities who have introduced imaginative schemes of devolution of decision-making to sub-units (i.e. local improvement). They all involve sub-units of considerably smaller populations than those proposed by Norfolk CC or considerably smaller numbers of them or both. Table 2 sets out brief details of some of the 'leading edge' schemes involved.*

* The comparisons made by Norfolk CC with devolution proposals made by other counties in their successful unitary status bids are not valid, because none of these schemes has yet been introduced (and one suspects that in some cases never will be!)

Table 2**Devolution schemes currently in operation**

| | No of sub areas | Average population | Degree of Delegation |
|---------------------|------------------------|---------------------------|-----------------------------|
| LB Kingston | 4 | 34,000 | HIGH |
| Rochdale MBC | 4 | 51,000 | HIGH |
| Salford MBC | 9 | 24,000 | MODERATE |
| Tameside MBC | 9 | 23,500 | MODERATE |
| South Somerset DC | 5 | 30,000 | HIGH |
| East Leigh DC | 5 | 23,000 | HIGH |
| Norfolk CC Proposal | 22* | 36,000 | LOW |
| Cumbria CC | 6 | 81,000 | HIGH |

* including Norwich

It is apparent from the above table that the complexity of the proposed Norfolk CC devolution scheme goes well beyond anything within the experience of existing local authorities. It was noted in Section 2 that the DCLG rejected the North Yorkshire unitary bid on the basis of the complexity of its devolution arrangements. The Norfolk CC

proposals are palpably more complex. The DCLG rejected the Cheshire bid on the basis of the hypothetical nature of the devolution proposals involved (and which in fact involved sub-units of a similar population size and area/scope to those proposed by Norfolk CC. It would be a big mistake if the BC were to continue to recommend a unitary authority for Norfolk CC (plus Lowestoft) on the assumption that the devolution arrangements proposed are workable. It is highly unlikely that they would be.

The inability of the CC to deliver effective neighbourhood empowerment is in fact acknowledged in Appendix B – Community Governance in Norfolk – a report commissioned by Norfolk CC (p 19).

‘One lesson from the Young Foundations analysis of neighbourhood working and community governance is about the size of the community areas required for Norfolk. The Young Foundation comment ‘where a council’s area governance structures match geographic identities and are set up to engage effectively and reciprocally with a range of services and communities, they can fulfil many if not all of the functions of community governance. **However area structures typically cluster around a few wards. This makes them less natural as forums for community engagement**’. (Our emphasis)

The CC’s reaction to this is that

‘In Norfolk it is not practical to set up small structures on a coherent county-wide basis in the short-term. **Larger areas are inevitable if progress is to be made speedily....**’

In other words the CC are acknowledging that they cannot (at least in the short-term) deliver a system of **neighbourhood empowerment** which will deliver the benefits of local commitment and engagement which the government is seeking. The best that can be offered is a series of 22 Community Partnership Boards in large chunks of the county (including a single CPD equivalent for Norwich) which do not begin to reflect units of real **local** community identity. In addition to this, the submission is noticeably vague about the powers which the CPDs will actually have. On p 18 is listed a range of largely procedural powers (e.g. ‘carry out community needs assessment’, ‘hold the council to account’, ‘oversee delivery of LAA outcomes’). When it comes to exemplifying decision-making powers (p 19), it is stated

‘They (the CPDs) may wish to extend or amend opening hours of key community facilities such as libraries, or use part or all of their community kitty to match fund and make happen valuable community initiatives...’

It would be helpful for the BC to inform itself of the range of functions devolved to area committees in places like Rochdale, Kingston-on-Thames and Cumbria. By comparison the level of devolution proposed by Norfolk is derisory.

Costs of genuine devolution

There is a further important issue. Devolved arrangements which involve a genuine empowerment for the sub-units concerned do not come cheap. Any assessment of the affordability/value-for-money of the Norfolk CC proposals must incorporate a realistic estimate of the costs involved. (see Chisholm and Leach 2008, Chapter 4). Equally any CC view about the costs involved should be critically analysed on the basis of the actual level of empowerment involved. Tokenistic schemes of devolution require much lower levels of resources than schemes of genuine devolution.

Improved Two-Tier Working as a Viable Alternative

The BC has the power to recommend the continuation of the status-quo (two-tier system of local government) if it cannot identify one or more options which meet the five criteria. As argued in Section (1) we regard this as an unhelpful test. To justify a major constitutional change of this nature, a more appropriate test would be a requirement to **demonstrate** that one (or more) unitary options achieve the five criteria **more effectively** (on balance) than the existing two-tier system. That is the test which the BC should apply if its recommendations are to have real credibility.

The government itself continues to see improved two-tier working as a viable option. The Minister for Local Government has recently written in positive terms about progress made in the DCLG 'improved two-tier' pathfinder schemes. The Lincolnshire example provides a particular encouraging indication of what can be achieved by a county and seven districts working together, in a county area with many similarities to Norfolk (an expanding city at its centre, surrounded by a series of largely rural district councils). Box 6.1 sets out the key features of the Lincolnshire pathfinder project.

Box 6.1 Key features of Lincolnshire Two-Tier Pathfinder Project

Enhancing Shared Services

In Lincolnshire all eight authorities collaborated to establish the Lincolnshire Shared Services Partnership, a 10-year vision which aims for locally determined, integrated, easily accessible public services' which are 'responsive to local voices' and 'creative in our solutions'. The overall objectives of the partnership are:

- To engage with local people within their communities
- To develop and deploy a joined-up approach to achieve seamless service delivery
- To offer a 'one stop' approach to customer services
- To simplify and rationalise the way in which services are delivered
- To realise efficiency savings to provide opportunities for service transformation

The first phase of this partnership focuses upon two complementary strands of work. First **Shared Service (horizontal integration)** component seeks to develop shared back office services in relation to training, procurement, legal services, ICT support,

property management and building control. The principal aim of this horizontal integration is to simplify and rationalise shared services, thereby delivering efficiency and effectiveness and ensuring that Lincolnshire continues to attract and retain high quality staff in these core areas. Second, the **Strategic Transformation (vertical integration)** component addresses the way in which citizens, communities and customers experience local government, by focusing upon three areas: customer feasibility studies are currently under way to establish ways of ensuring more joined up working. Customer services will seek to offer seamless and 'one stop' approaches, played out especially in relation to revenue and benefits. Street scene will focus upon the way in which neighbourhood functions such as street signage, grass-cutting, litter collection and so on, are managed and integrated, making them more responsive to local needs.

Strengthening strategic leadership

The Lincolnshire bid argues that the case for strong **individual** leadership is not proven, particularly in large diverse counties such as Lincolnshire. What is required **is effective** leadership, and collective leadership is likely in certain circumstances, to prove more effective than strong individual leadership. Leadership should be related to 'place-shaping': that is, the **places** which are meaningful to local people. There are many such places in Lincolnshire, from county level to small towns and villages.

In relation to the county level the key proposal in the pathfinder bid is the establishment of the 'leaders Group' on a collective leadership mechanism, building on a mechanism which is already in operation. This would be used to provide a strategic leadership capacity, with input into the county and districts' **LSPs**. It would also be used as a **mechanism for advocacy** in relation to external bodies (regional, national, European) whose functions impinged upon the county. At the same time, the legitimate local responsibilities of district council leaders within their area would continue to be recognised and indeed positively valued.

Neighbourhood empowerment

The approach adopted in the Lincolnshire pathfinder to enhanced community engagement and empowerment is based on experimentation and the use of pilot schemes. The challenges of neighbourhood empowerment and community engagement are complex. There are no simple solutions. The submission

incorporates a commitment to experiment with alternative, and possible complementary, approaches which are likely, in due course, through shared experience and learning, to provide a clearer and more integrated picture of the best way forward. The approach can be summarised as follows:

A programme for community development

The development of an integrated learning capacity

The further development of a series of on-going projects

The initiation of a set of 'pilot schemes' to explore other possibilities of neighbourhood engagement (including parish partnerships, sub-district area committees, neighbourhood management schemes, empowered local councillor)

The drawing together of the experience gained into a more integrated approach to neighbourhood engagement by the end of the pathfinder project

Where there is no consensus about the best way forward, there are considerable advantages in the continued existence of a number of **different** authorities. Learning capacity is much greater in these circumstances than if there were a single unitary authority.

The BC makes absolutely no reference to the possible strengths or weaknesses of the existing two-tier system (or an improved version of it) in Norfolk. There is therefore nothing we can provide by way of commentary. This is an omission which should be rectified. The two-tier system has a number of real strengths which should at the very least be 'weighed in the balance'. They include:

- A better alignment with the different levels of community identity than any single unitary option could provide.
- A recognition that different spatial scales are appropriate for different services and functions and that accountability for such functions is best served by directly-elected authorities (e.g. development control is much more appropriately handled at district than county level, whilst highway planning clearly needs a larger (county-level) area).
- A more realistic capacity for neighbourhood empowerment which is best led and managed at a district level (with county input where relevant).
- A more **community-relevant** capacity for strong accountable local leadership (with strategic leadership focused at the county scale).

Two quotes from the Lincolnshire Pathfinder bid illustrate further why it is so important that the two-tier option is brought back into the frame in Norfolk.

‘In principle, two-tier local government is a more appropriate model of government for a large county area such as Lincolnshire than a unitary model. It recognises and reflects the principle of subsidiarity: that is, that decisions should be taken at the level closest to the people most directly affected by them and believes that two-tier working in a county as diverse as Lincolnshire delivers more effectively on this principle’.

‘The Lincolnshire authorities are confident that considerable efficiency savings can be achieved by the shared services programme. However, there is a balance to be achieved between efficiency savings and the health of local democracy. The particular value of the two-tier system is that it provides a much greater level of local representativeness and accountability than would be possible through a unitary solution based on a large geographic area such as Lincolnshire. Any comparative evaluation of two-tier and unitary models should recognise the need for a balance to be struck between efficiency savings and democratic vitality’.

Conclusions

As has been demonstrated, the reasoning behind the BC's 'preferred option' – a unitary Norfolk with Lowestoft added – is fundamentally flawed for several reasons:

- (i) It is developed in isolation from the existing pattern of local government outside Norfolk (as it is in Suffolk and Devon), and would result in a series of anomalies, inconsistencies, and highly questionable precedents which would further disrupt the rationale for the existing system elsewhere in England.
- (ii) It ignores the implications of other relevant elements of government policy – notably neighbourhood empowerment, place shaping, and the advocacy of enhanced roles for councillors – which should have been taken into account.
- (iii) It ignores the implications of the government's response to the bids for unitary status made in the 2006-2008 period, in particular the basis for its rejection of the bids from North Yorkshire, Cheshire and Cumbria, and its acceptance of the bid from Bedford.
- (iv) The BC seek to justify the 'unitary Norfolk' proposal on the grounds that the influence of Norwich extends well beyond the City's proposed boundaries or Greater Norwich and encompasses the whole of Norfolk (and beyond). It offers no evidence to justify this assertion, which is in fact contradicted by journey-to-work evidence and other data.
- (v) Its arguments that an authority the size of the unitary Norfolk plus Lowestoft can incorporate a significant degree of devolution to local communities and (in particular) neighbourhoods within Norwich and the other larger towns are unconvincing, and do not begin to constitute an adequate response to the government's localism agenda as set out in the recently-published White Paper.
- (vi) It fails to explain or justify why the preferred option for Norfolk is so fundamentally different from the preferred option for Suffolk.
- (vii) It is over reliant on the submission from Norfolk CC, the partisan and speculative nature of which it fails to recognise.
- (viii) It makes no attempt to assess the preferred options against the potential benefits of an improved two-tier system in Norfolk.

These arguments also apply in principle to the two alternatives which the BC put forward – the 'doughnut' and the 'wedge', both of which would include a unitary residual county as large (or larger) in area and population and covering as great (or greater) degree of

diversity in local communities as any existing or proposed unitary authority in England and Wales. However in these options, further flaws become apparent, in particular:

- The 'doughnut' and 'wedge' options which separate Greater Norwich (and/or Great Yarmouth/Lowestoft) from the rest of the county totally undermine the case for a 'residual' unitary county outside these areas. The residual county would become an authority of considerable population size and area without a focus. It would be illogical in these circumstances not to reconsider some kind of alternative unitary configuration for the remaining area.
- The justification for the 'wedge' linking Norwich, Great Yarmouth and Lowestoft is unconvincing in economic terms and ignores the difficulties of place-shaping in an authority which links communities with different economies and identities.

The BC's task is to demonstrate that the unitary options it is considering could better achieve the five objectives (criteria) identified by the government than any alternative structures. The arguments set out in the BC's report do not begin to make a convincing argument of this nature. Compared with the work of the Banham and Cooksey Commission (1991-96) there is an almost total lack of detailed analysis of relevant evidence. The criteria of affordability and value for money are not addressed at this stage, which raises important concerns about how they will subsequently be brought into the argument. The three remaining criteria – strategic leadership, neighbourhood empowerment and stakeholder/public support – are dealt with in a sketchy fashion, relying on assertion rather than evidence. As a result of this unsatisfactory process, the agenda on which the profoundly important decision about the future of local government in Norfolk and Suffolk will be made is already shaped and constrained in a way which excludes a range of equally plausible options.

The current proposals in the BC's report would, if implemented, set a precedent for a local government structure in the shire areas with profound differences from the current system. There would be a vast reduction in the number of councillors in England. A large number of local communities with strong identities (e.g. Kings Lynn – and indeed Norwich itself in the 'preferred option') would lose any form of democratic identity. As a nation we would be moving even further away from the local government structures which exist throughout Europe, none of which would involve a system with the

characteristics that now appear to be emerging here (large scale unitary authorities, untypically high population per councillor ratios, sizeable towns (and cities) with no local democratic identity).^{*} This would be a change of profound constitutional significance which cannot be allowed to develop without a much fuller consideration of the implications than is provided by the BC's current approach.

^{*} The proposed unitary council in Norfolk would have a population twice that of Luxembourg, and 20 times its area. In Luxembourg there are **3** levels of government.

Appendix Two

Comments on the proposals for empowerment of citizens and communities in a Norfolk Unitary County

These comments are made in the light of the Boundary Committee's comments in its proposal for a Norfolk Unitary County; the Local Government and Public Involvement Act 2007 which placed the new statutory 'duty to involve' on all Best Value Authorities and the Communities in Control White paper published in July 2008; experience of supporting the further development of the neighbourhood management model being piloted by the Borough Council for Kings Lynn and West Norfolk; and the experience of developing a neighbourhood and locality planning framework for a mixed urban/rural population of 500,000 in the North of England.

The Boundary Committee specifically invited comments about the proposed 21 Community Partnership Boards: their accountability; roles and responsibilities; and the relationship between them and Parish and Town Councils.

Community Partnership Boards (CPB) - In the proposals as outlined, the 'lens' through which the policy and practice are viewed is, not surprisingly, the lens of the Local Authority and its partner public services. The governance proposals do not engage with the citizen or community perspective much beyond wanting to 'break down the barriers between 'ordinary folk 'and public services' (Norfolk County Council). The emphasis is on what the public services could manage, not what is needed for active participation and engagement.

Almost all the discussions of the Boards and community governance are framed within the context of public services, what they can or cannot do for communities. Rarely is mention made of what communities can do for themselves as contributors to building a good quality of life or the money they can lever in where there is a plan in which they are a full partner. This is a missed opportunity especially when large tracts of the County are deeply rural and public services are stretched to the limit, thereby making voluntary effort and action vital for ensuring a decent quality of life for citizens.

From research undertaken by The Young Foundation (and quoted by the County Council in its proposals for the CPBs) the following finding has been made about sizes of population that support effective community governance: 'Where a Council's area governance structures cover small populations, match geographic identities and are set up to engage effectively and reciprocally with a range of services and communities, they can fulfil many if not all of the functions of community governance. However area structures typically cluster together a few wards. This makes them less natural as forums for community engagement (while valuable for elements of service co-ordination and devolved decision-making).'

The CPB proposals for Norfolk are about 'middle ground' (between neighbourhood/village and County) working and decision-making. This level is crucial for supporting and co-ordinating the public service responses to what should be neighbourhood/village level of planning and action. In addition they would have a vital role to play in gathering up the common (and the very particular) messages from the neighbourhood/village level to inform 'area' devolved decision-making or forwarding them to inform County and Regional planning and budget setting. However this is different to central government's policy and legislation when it speaks of the duty to involve, neighbourhood working, engagement and decision-making.

There is no evidence provided that citizens, as individuals or as part of local communities with which they strongly identify, will have enhanced opportunities to influence and participate in real decision-making through the Community Partnership Boards. The representatives of citizens and communities necessarily will be small on the Boards themselves. Therefore there is a danger that people in Norfolk will be losing their current rights at least to be politically represented in real decision-making about the public resources which they provide through their taxes.

There is no evidence provided that the Community Partnership Board areas do 'chime with local people'. In the proposals made by the County this was expressed as a hope, rather than certain knowledge. If the Unitary County is confirmed as the right way forward, it would be important for some research to be undertaken to enable people to have a say in the shaping of the final areas.

Neighbourhood/Village arrangements to support empowerment and engagement

As the Boundary Committee notes: 'One of the most important challenges... would be to demonstrate that it would not be too large to deliver the empowerment of citizens and communities'. The County Council has suggested that further devolvement to parish and town councils might provide an answer.

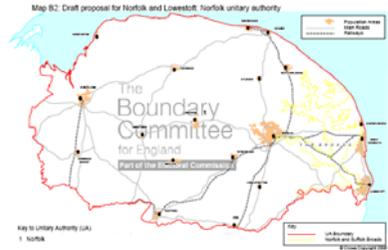
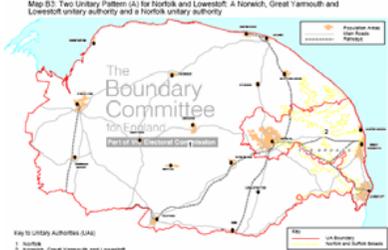
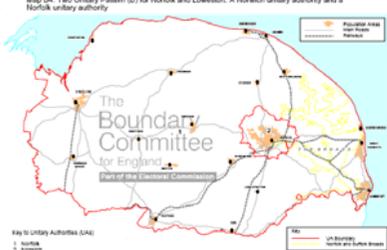
Certainly the network of 500 parish and town councils demonstrates that there is already a framework in place at the neighbourhood/village level. It also demonstrates the scale of what a unitary authority would have to relate to in terms of engagement and empowerment. At the moment only 14 of the 500 Parishes have been achieved the status of being a Quality Town Council. There are parish councils where elections are unnecessary as too few people stand for office. This does not augur well for their being able to play a leading role in citizen empowerment and engagement.

On the other hand, additional devolution could be made dependent upon the parish councils achieving the 'Quality' status. This could be the starting point for the neighbourhood/village level work. To become a 'Quality' parish council, each council is required to develop a parish plan. It is not a great leap to imagine this planning as a whole village activity, with local residents and frontline workers serving the village working to support the parish council to produce this plan. The approach has been modelled in Bradford District where Parish Councils have developed their plans with local people. In one case the Parish Council set up a specific village group to develop the plan. The Parish Council then took responsibility for the parts of the plan that they could carry out. A further outcome was that where neighbourhoods/villages were allowed to define their locality and produce their plans, they were often keen to link with neighbouring neighbourhoods/villages to develop joint responses to common issues such as youth work.

To ensure consistency and fairness across 500 councils would require an appropriate bureaucracy and professional developmental support to ensure quality participation and engagement. This would be a significant cost for such a large authority.

The risk is that for a new authority the scale of the challenge of ensuring engagement and involvement across such a large population and geography would prove so daunting that effectively in the short to medium term very little would happen other than a few pilots. People would have lost their current democratic entitlement with little or no opportunity to be involved in other ways.

Appendix Three – Critique of Options

| | Single County Unitary | 'Wedge' | 'Doughnut' |
|-----------------------|---|---|---|
| |  |  |  |
| <p>General</p> | <ul style="list-style-type: none"> • This proposal is regarded as a 'second best' option by its proponents Norfolk County Council who would prefer to retain the two tier system (Council Resolution 15/9/08) • This proposal was also regarded as second best by the Boundary Committee Officer Team "we are not persuaded on the basis of the available evidence that a single unitary authority for the whole of Norfolk would best meet the criteria" (BCFE (08) 14-21 May 08) • This proposal is not supported by any of Norfolk's seven District Councils or Waveney District Council • This proposal is underpinned by the Boundary Committee's view that Norwich provides a strong economic focus for the whole County. It does not. • This model is unprecedented in terms of its scale, the incorporation of two competing economic sub regions, plus a significant town located in a different County. Consequently this proposal represents a high degree of risk • There is no clear sense of vision or ambition about how the new authority could achieve a step change in | <ul style="list-style-type: none"> • This proposal is not backed up by a business case, therefore there are no source documents on which to base a proper or comprehensive assessment of this proposal – there are less than 500 words in the Boundary Committee's report to go on • The Boundary Committee commentary on this model in their report gives no explanation as to how the rural Norfolk Unitary would operate • There is no connection between King's Lynn as the major town in the rural Unitary and the towns and villages located in the east of the county • The rural Unitary would have a very sparse population, and therefore high service delivery costs • There is considerable uncertainty about the location of the boundaries for this model • Will create enormous upheaval, service disruption and loss of focus on service delivery as key staff leave due to uncertainty, and services are both aggregated (Norfolk) and disaggregated (Suffolk). Disruption and risk is even | <ul style="list-style-type: none"> • There is no business case or concept paper which explains how the unitary council for the remainder of Norfolk would work • There is as yet no financial information available for the unitary council for the remainder of Norfolk to enable value for money and affordability to be assessed • In their own report the Boundary Committee give little credence to this model – covered in less than 300 words • No evidence of public support for this model outside the confines of Norwich City itself • Will create enormous upheaval, service disruption and loss of focus on service delivery as key staff leave due to uncertainty, and services are both aggregated (Norfolk) and disaggregated (Suffolk). Disruption and risk even greater than single County unitary option due to the additional need to disaggregate services in Norfolk (county and district) as well as Suffolk • The experience of structural change is that it tends to over promise and under deliver and diverts energy and focus from improvement. Savings are not always |

| | Single County Unitary | 'Wedge' | 'Doughnut' |
|--|---|---|---|
| | <p>outcomes, or of an authority eager to commit to stretch itself and the aspiration of its communities</p> <ul style="list-style-type: none"> • The proposal is weak on how to gain added value by working collaboratively across internal teams or between council services and external partners. • The proposal is generic and reflects 'Norfolk the administrative entity' rather than 'Norfolk the place', its communities or its distinctive issues • The experience of structural change is that it tends to over promise and under deliver and diverts energy and focus from improvement. Savings are not always accurately stated because they ignore offsetting costs or are optimistically calculated. Similarly costs are often understated or glossed over. A single unitary, especially in a large county such as Norfolk, and with the added dimension of Lowestoft, will have a tendency to become remote and distant from its customers and perform badly in true local engagement. As costs become tight there will inevitably be a move to centralise functions, which will reinforce the remoteness of the organisation. <p>Will create enormous upheaval, service disruption and loss of focus on service delivery as key staff leave due to uncertainty, and services are both aggregated (Norfolk) and disaggregated (Suffolk). The Annual Audit and Inspection letter, March 2008 for NCC stated that – “the County is distracted by local government review.....and is not likely to be able to handle reorganisation and service improvement...”</p> | <p>greater than single County unitary option due to the additional need to disaggregate services in Norfolk (county and district) as well as Suffolk</p> <ul style="list-style-type: none"> • The wedge extends only to the Greater Norwich boundary as proposed by the City Council. This boundary is too tightly drawn to cover the growth areas around the City. This will inevitably lead to partnership working being required from the two unitary councils along similar lines to that which is already in place through the Greater Norwich Development Partnership. This will give rise to issues of primacy and self-interest. • The experience of structural change is that it tends to over promise and under deliver and diverts energy and focus from improvement. Savings are not always accurately stated because they ignore offsetting costs or are optimistically calculated. Similarly costs are often understated or glossed over. As costs become tight there will inevitably be a move to centralise functions, which will reinforce the remoteness of the organisation. • The affordability work book has apparently been based on assumptions derived from a disaggregation of the Single County model with minimal input from those who are developing this model | <p>accurately stated because they ignore offsetting costs or are optimistically calculated. Similarly costs are often understated or glossed over. As costs become tight there will inevitably be a move to centralise functions, which will reinforce the remoteness of the organisation.</p> <ul style="list-style-type: none"> • The unitary council outside of Greater Norwich has no coherence whatsoever. There are large / major settlements, all of which are on the extreme edges of that authority – King’s Lynn, Cromer, Great Yarmouth, Diss, Thetford and Lowestoft. |

| | Single County Unitary | 'Wedge' | 'Doughnut' |
|----------------------|---|---|---|
| Strategic Leadership | <ul style="list-style-type: none"> In incorporating two economic sub regions it fails to reflect the economic reality of Norfolk, notwithstanding the Secretary of States clearly expressed view that 'the more an authorities area matches the economic reality, the more likely that it will be effective in providing the strategic leadership necessary to create prosperity (Hazel Blears 18/12/07) The model proposed is based upon the concept that Norwich is the economic driver for the whole of Norfolk. This assumption is entirely wrong "... a population of 840,000 and a large geographical area presents challenges to effective strategic leadership" (Boundary Committee Officer Report 21/5/08) Too big (second largest population 840,000 of any unitary council in England behind Birmingham) Too remote (significantly larger than any existing unitary council) Strategic leadership in the face of too many diverse geographical priorities will be extremely difficult This proposal is more bureaucratic than the two tier system it seeks to replace – creating area committees <u>and</u> community partnership boards to replace the district authorities This proposal is overtly focused on the Norwich economic sub region, creating a special economic development vehicle with many 'millions of pounds of resources'. This will inevitably result in the marginalisation of the County's second economic sub region in the west | <ul style="list-style-type: none"> The 'rest of Norfolk' authority has no natural coherence, or identity. No thought has been given whatsoever to the sense of place, the needs of the communities and their future well being The model separates Norwich from much of its economic sub region Will require the establishment of a multi area agreement in order to reconnect Norwich to much of its economic sub region Will lead to tension within Norfolk/Lowestoft/Great Yarmouth authority with conflicting and very different economic and social priorities – regeneration versus growth agendas This model splits the Norwich Planning Area and the housing sub regions leading to a weaker strategic approach to these issues Does not reflect natural communities in either authority area The large geographic area and sparse population of the 'remainder county' authority would present major challenges in terms of effective strategic leadership Boundary Committee's report states "...it is not clear to us how King's Lynn's sphere of influence would be accommodated in the strategic leadership and vision for the rural Norfolk authority" As with the proposed unitary county authority, we also have concerns as to whether a 'remainder county' authority would best address the peripheral situation and socio-economic challenges | <ul style="list-style-type: none"> The 'remainder county' authority has no natural coherence, or identity. No evidence that there is a sense of place underpinning this authority or that any consideration has been given to the needs of the communities and their future well being The model separates Norwich from much of its economic sub region No evidence for the rationale or vision for the 'remainder county' authority Will require the establishment of a multi area agreement in order to reconnect Norwich to its economic sub region The two main centres of population for the 'remainder of Norfolk' unitary are located at the western (King's Lynn) and eastern (Great Yarmouth) extremities of the area some 65 miles apart There is no connection in social and economic terms between the western and eastern parts of the rest of Norfolk council Tension and conflict between the small Norwich authority and its much larger neighbour is effectively 'designed in' to this model. This will be exacerbated by differences of political control, as the two councils compete for growth and inward investment This model splits the Norwich planning area leading to a weak strategic approach to key issues such as the growth agenda The Greater Norwich proposal does not reflect a viable authority to achieve the growth agenda and political aspirations of the City Council |

| | Single County Unitary | 'Wedge' | 'Doughnut' |
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| | <p>of the County</p> <ul style="list-style-type: none"> The management model proposed, effectively 'bolting on' district services to the existing County structure will lead to a failure to deliver transformational change The thinking that permeates this proposal is unambitious, the steady state structure betrays a deeply embedded complacency that has no prospect of delivering a step change in outcomes The inclusion of a Norwich Development Board and a Cabinet Member for Norwich chosen by Norwich Councillors is ill conceived and is likely to lead to conflict as Norwich itself is likely to be dominated by councillors from a different political party to the remainder of Norfolk The proposal is not built around the distinctive opportunities, strengths and challenges within Norfolk. There is no sense of place, or the required tailored, localised solutions needed to ensure the future prosperity of its communities | <p>of Great Yarmouth</p> <ul style="list-style-type: none"> This model is not aligned with the two economic sub regions and is likely to lead to the marginalisation of peripheral areas | <ul style="list-style-type: none"> Lack of focus for the east of the County as a consequence of severing the natural retail, cultural, education, health and social centre from its hinterland Extremely challenging for a 'remainder county' authority to effectively address the peripheral situation and socio economic challenges of Great Yarmouth in the east and King's Lynn/Thetford in the west We do not believe that the Greater Norwich Unitary will have the capacity or influence regionally to deliver the significant infrastructure needed to deliver the jobs and housing growth in the next 10-25 years. We have particular concerns about the Norwich Northern Distributor Road. With the doughnut on constrained boundaries it will require both Unitary Councils to give this road their top priority. Some of the areas of major future growth will fall across the two unitaries and the long term delivery of new homes, jobs and infrastructure could be prejudiced The doughnut option would set back the work on the joint core strategy at the very time growth needs to be well planned. Authorities will become disengaged from strategic priorities to focus on the creation of new structures leading to a detrimental impact for residents and the quality of leadership being reduced at a time it is most needed The large geographic area of the 'remainder county' authority would present challenges in terms of effective strategic leadership due to its scale and population |

| | Single County Unitary | 'Wedge' | 'Doughnut' |
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| Value for Money & Equity in Public Services | <ul style="list-style-type: none"> • The proposals could jeopardise the financial stability of future service delivery by under-estimating the cost of transition and over estimating the scale of savings. As the financial case has still not been published and the “work book” was not available until a few days prior to the close of the consultation period, and has continued to change on an almost daily basis we have not yet had the opportunity to properly test the basis of the business case • This will be bureaucratic – 5 Area Committees and 21 Community Partnership Boards to replace 7 District Councils each with their own staff and budgets • This will be Norwich centric – likely to be based in Norwich; special economic development company with many millions of resources for Norwich; £104 reduction in Council Tax for Norwich residents; but no significant reduction for residents of rural Norfolk • Because the new authority will face severe financial pressures its likely response is to level services down rather than adopting more innovative practices • The financial case appears to be based on weak and under-developed proposals for service development, leaving a new authority poorly placed to address and meet the challenges and opportunities facing Norfolk • There is a very real risk that discretionary services that impact most strongly on successful place shaping (economic | <ul style="list-style-type: none"> • There is no information available whatsoever to consultees that would enable a serious attempt to be made at assessing even the potential value for money achievable through the implementation. This is a very high risk proposal. • The total lack of a worked up proposal could be disastrous in implementation terms. The financial projections produced by the County Council have been produced without reference to the assumptions which underline the proposal being prepared by Great Yarmouth Borough Council • There is a 20 mile gap between Great Yarmouth and Norwich. Much of that gap is rural in character. We have no doubt that this new Unitary would concentrate its resources into the three urban areas and the rural areas would, as a consequence, be neglected. This would lead to resentment, could reduce community cohesion and would certainly reduce access to services to residents in those rural areas. • Would create new administrative boundaries between two authorities where there are major daily population movements, for work, for schooling etc • Risks of vulnerable clients falling between two authorities • Great Yarmouth, Waveney and Norwich City Council are all currently on ‘Use of Resources’ scores of 1 and all have severe financial pressures and inadequacies. With three Councils | <ul style="list-style-type: none"> • There is very little information available to consultees concerning the service delivery model for the ‘remainder Norfolk’ authority on which to base an informed assessment of the likelihood that value for money could or would be achieved. Norfolk County Council appear to have undertaken a fairly crude financial exercise based on a simplistic scaling down of their single county model. This is therefore a high risk proposal • Would create new administrative boundaries between two authorities where there are major daily population movements, for work, for schooling etc • Risks of vulnerable clients falling between two authorities • There is no doubt that “County” services will need to be disaggregated and that is of major concern. This will heighten the risks, at least in the short-term, of service failure, which could lead to catastrophic consequences, e.g. in Children’s Services with looked after and other vulnerable children. • Norwich City Council has failed to demonstrate that any savings will be achieved from the proposed new City authority. This indicates that there is little financial benefit for city residents from the adoption of a model that will leave them in a position of paying the highest Council Tax levels in Norfolk • The financial case appears to be based on weak and under-developed proposals for service development, leaving a new |

| | Single County Unitary | 'Wedge' | 'Doughnut' |
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| | <p>development, leisure, culture etc) will be reduced and local flexibility diminished</p> <ul style="list-style-type: none"> The County councils financial projections are bullish in their expectations of savings and costs. As the financial bottom line will be binding, if they turn out to be incorrect, the consequences will be borne by Norfolk's communities To balance the books for over-optimistic assumptions, service delivery ambitions may need to be scaled back The financial data is very unclear with regard to the localisation and area working The financial case is almost entirely silent on the very significant challenges facing the 8 authorities, in capital funding, particularly in light of the ongoing and deepening impact of the credit crunch There is no detail on the shared services trading model other than an assertion that it will provide a trading surplus to help towards savings. As a consequence we have reservations that capacity can be sold. Therefore the costs of redundancy are likely to be understated Given the experience of integrating ICT platforms within individual districts we have serious reservations about the quoted cost of ICT change CIPFA data demonstrates that two tier Norfolk currently delivers many services at a lower cost than that achieved by many existing unitary councils of a similar geographic/sparsity level. For example the net cost of waste collection and disposal (2008/09) – a function currently split between the two tiers. See table below | <p>having a Use of Resources score of 1 forming the major parts of a new Unitary there is no doubt that these issues will leak into the new unitary council.</p> <ul style="list-style-type: none"> Disaggregation of Norfolk and Suffolk County Council services will undoubtedly add to costs and has the very real serious risk of gaps appearing in service. Additional arrangements would be needed to manage strategic infrastructure, for example, transport There is a serious risk that the discretionary services that impact most strongly on successful place shaping (economic regeneration, leisure, culture etc) will be reduced or cut completely if the calculations turn out to be over optimistic There is no clear model on which to base the calculation for localisation and area working The financial case is almost entirely silent on the very significant challenges facing the 10 authorities, in capital funding, particularly in light of the ongoing and deepening impact of the credit crunch The Boundary Committee report fails to mention even once the issue of equity in public services There would be duplication of some strategic planning arrangements that are currently done on a county-wide basis e.g. there would be two local transport plans (currently one), two strategic planning authorities (currently one) etc There is an uneven spread of specialist assets, for example, special schools, | <p>authority poorly placed to address and meet the challenges and opportunities facing Norfolk</p> <ul style="list-style-type: none"> There is a very real risk that discretionary services that impact most strongly on successful place shaping (economic development, leisure, culture etc) will be reduced and local flexibility diminished The County councils financial projections for the remainder of Norfolk authority are bullish in their expectations of savings and costs. If they turn out to be incorrect, as the financial bottom line will be binding, the consequences will be borne by the authorities communities To balance the books for over – optimistic assumptions, service delivery ambitions may need to be scaled back The financial data is very unclear with regard to the localisation and area working for the remainder of Norfolk authority The financial case is almost entirely silent on the very significant challenges facing the authorities in the remainder of Norfolk, in capital funding, particularly in light of the ongoing and deepening impact of the credit crunch There are no details on the shared services trading model other than an assertion that it will provide a trading surplus to help towards savings. As a consequence we have reservations that capacity can be sold. Therefore the costs of redundancy are likely to be understated There are serious deficiencies in the |

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| <table border="1"> <tr> <td>Norfolk</td> <td>118.26</td> <td>per cost per dwelling</td> </tr> <tr> <td>North Lincolnshire</td> <td>136.58</td> <td>per cost per dwelling</td> </tr> <tr> <td>West Berkshire</td> <td>145.26</td> <td>per cost per dwelling</td> </tr> <tr> <td>East Riding</td> <td>148.82</td> <td>per cost per dwelling</td> </tr> <tr> <td>Herefordshire</td> <td>170.06</td> <td>per cost per dwelling</td> </tr> </table> | | | Norfolk | 118.26 | per cost per dwelling | North Lincolnshire | 136.58 | per cost per dwelling | West Berkshire | 145.26 | per cost per dwelling | East Riding | 148.82 | per cost per dwelling | Herefordshire | 170.06 | per cost per dwelling | involving 'out-of-area' transactions <ul style="list-style-type: none"> • The Audit Commission issued qualified audit opinions in respect of the financial year 2006/07 for both Great Yarmouth and Norwich City and has also expressed a number of concerns relating to the financial management of each authority | financial and delivery calculation concerning ICT for the remainder of Norfolk authority <ul style="list-style-type: none"> • Disaggregation of Norfolk and Suffolk County Council services will undoubtedly add to costs and has the very real serious risk of gaps appearing in service • Additional arrangements would be needed to manage strategic infrastructure, for example, transport • There would be duplication of some strategic planning arrangements that are currently done on a county-wide basis e.g. there would be two local transport plans (currently one), two strategic planning authorities (currently one) etc • Uneven spread of specialist assets, for example, special schools, involving 'out-of-area' transactions • In March 2008 the Audit Commission issued a qualified audit opinion on the City Councils 2006/2007 accounts |
| Norfolk | 118.26 | per cost per dwelling | | | | | | | | | | | | | | | | | |
| North Lincolnshire | 136.58 | per cost per dwelling | | | | | | | | | | | | | | | | | |
| West Berkshire | 145.26 | per cost per dwelling | | | | | | | | | | | | | | | | | |
| East Riding | 148.82 | per cost per dwelling | | | | | | | | | | | | | | | | | |
| Herefordshire | 170.06 | per cost per dwelling | | | | | | | | | | | | | | | | | |
| <ul style="list-style-type: none"> • Some services e.g. planning and benefits, have lower consumer satisfaction in authorities of larger population sizes (Population Size and Local Authority Performance CLG 2006 p12) • Norfolk borough and district authorities achieve good value for money by, for example, letting small contracts often won by local contractors • The Boundary Committee report fails to mention even once the issue of equity in public services | | | | | | | | | | | | | | | | | | | |

| | Single County Unitary | 'Wedge' | 'Doughnut' |
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| Neighbourhood Engagement | <ul style="list-style-type: none"> • This model offers no meaningful neighbourhood engagement – the proposed Community Partnership Boards will operate with a population of 35,000 whereas neighbourhood engagement works best at the level of the village or estate. • Creates a democratic deficit with the ratio of citizens to each Councillor substantially higher than for any unitary authority in England • Recent research shows that the majority of case work is carried out by District Councillors rather than County Councillors. Thus, the commitment needed from the proposed 120 or less Unitary Councillors will make it difficult to recruit from a broad cross section of the public • No evidence provided that citizens, as individuals or as part of local communities with which they strongly identify, will have enhanced opportunities to influence and participate in real decision-making through the Community Partnership Boards • The lack of a strong champion for the areas with the loss of Borough and District Councils in no way adequately addressed by the proposed area Cabinet Members • Creates additional bureaucracy and an increase in the number of 'layers' between the citizen and the decision maker • One large authority almost universally regarded in Norfolk as being too remote | <ul style="list-style-type: none"> • There is no concept document or indeed substance in the Boundary Committee report which enables a thorough analysis of the neighbourhood engagement aspect of this proposal to be assessed or educated. However assuming that the neighbourhood engagement model is, as suggested by the Boundary Committee report, broadly based on the single county model the following points apply • Creates additional bureaucracy and an increase in the number of 'layers' between the citizen and the decision maker • The remainder Norfolk authority would be extremely large and consequently remote from residents, businesses, voluntary groups and Parish / Town Councils • Access to decision makers will be difficult in the remainder Norfolk council due to the geographical size making senior officers and councillors inaccessible to many people and organisations • Local identity and distinctiveness in both councils would be diluted • Residents are clearly expressing strong fears that this model will disconnect them from their Council • Acknowledgement by the Boundary Committee officers of the issues that size presents – “Large geographic area presents challenges to neighbourhood empowerment” (Boundary Committee Officer Report 21/5/08) | <ul style="list-style-type: none"> • There is no concept document or indeed substance in the Boundary Committee report for the proposed 'remainder Norfolk' authority which would constitute the great majority of Norfolk's resident population. There is no vision for this authority. Again one can only work on the basis that its neighbourhood engagement model is expected to be broadly based on an adapted version of the single county model put forward by Norfolk County Council • The remainder Norfolk authority would be almost as large as that of the single county authority but would be expected to operate without the inclusion of the county town and would consequently be remote from its citizens • In the event that a variation of the Single County Unitary model is used to try and overcome the size of the remainder of Norfolk model it would introduce a similar level of Area Committees and Community Partnership Boards with their attendant weaknesses • Access to decision makers will be difficult in the remainder Norfolk Council due to its geographical size making senior officers and councillors inaccessible to many people and organisations • Creates a democratic deficit in the remainder of Norfolk unitary with a high citizen to elector ratio • Creates additional bureaucracy and an increase in the number of 'layers' between the citizen and the decision |

| | Single County Unitary | 'Wedge' | 'Doughnut' |
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| | <p>from residents, business, voluntary groups, Parish and Town Councils is acknowledged by the Boundary Committee officers – “Large geographic area presents challenges to neighbourhood empowerment” (Boundary Committee Officer Report 21/5/08)</p> <ul style="list-style-type: none"> • Access to decision makers will be considerably more difficult due to the sheer size of Norfolk. For businesses and voluntary groups in the west of the County, for example, access to senior officers will require a 90 mile round trip • Local identity and distinctiveness, the product of centuries of different development and economic focus would be lost, for example, the proud Hanseatic tradition in King’s Lynn • Residents are clearly expressing strong fears that this model will disconnect them from their Council • No attempt to build on existing structure for locality working and place shaping to build on established good practice • The proposal also fails to build upon the existing leading edge practice developed by the District Councils – such as King’s Lynn’s participation in the CLG Neighbourhood Charter pilot programme • The proposed Area Committees and Community Partnership Boards reflect administrative convenience rather than real communities and engagement and if implemented would represent a backward step rather an improvement • Area Committees and Community Partnership Boards proposed reflect a | <ul style="list-style-type: none"> • No attempt to build on existing structure for locality working and place shaping to build on established good practice • This proposal also fails to build upon the existing leading edge practice developed by the District Councils such as King’s Lynn’s participation in the CLG Neighbourhood Charter programme within the remainder of Norfolk authority • The proposed arrangements reflect administrative convenience rather than real communities and engagement and if implemented would represent a backward step rather an improvement • The proposed arrangements reflect a failure to understand the localities within the County particularly within the remainder of Norfolk authority • The proposal reveals a lack of awareness and lack of understanding of what locality working and place shaping really mean • The lack of vision of how to secure the benefits of locality working can only sell Norfolk’s communities short particularly within the remainder of Norfolk authority • Fails to take the needs of the community as a starting point and to redesign service delivery models with agencies and partners that add value to the outcomes particularly within the remainder of Norfolk authority • As a consequence of the lack of understanding of locality working the proposed structure of the new organisation is ‘light’ on senior officer capacity to address strategic leadership, place shaping and enabling at the area | <p>maker in the remainder of Norfolk authority area</p> <ul style="list-style-type: none"> • Local identity and distinctiveness in both Councils would be diluted • Residents are clearly expressing strong fears that this model will disconnect them from their Council • Acknowledgement by the Boundary Committee officers of the issues that size presents – “Large geographic area presents challenges to neighbourhood empowerment” (Boundary Committee Officer Report 21/5/08) • No attempt to build on existing structure for locality working and place shaping to build on established good practice • The proposal also fails to build upon the existing leading edge practice developed by the District Councils such as King’s Lynn’s participation in the CLG Neighbourhood Charter programme within the remainder of Norfolk authority • The proposed arrangements reflect a failure to understand the localities within the County particularly within the remainder of Norfolk authority • The proposal reveals a lack of awareness and understanding of what locality working and place shaping really mean • The lack of vision of how to secure the benefits of locality working can only sell Norfolk’s communities short particularly within the remainder of Norfolk authority • Fails to take the needs of the community as a starting point and to redesign service delivery models with agencies and partners that add value to the outcomes particularly within the |

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| | <p>failure to understand the localities within the county and a lack of awareness and understanding of what locality working and place shaping really mean</p> <ul style="list-style-type: none"> • The lack of vision of how to secure the benefits of locality working can only sell Norfolk's communities short • Fails to take the needs of the community as a starting point and doesn't redesign service delivery models with agencies and partners that add value to the outcomes • As a consequence of the lack of understanding of locality working, the proposed structure of the new organisation is 'light' on senior officer capacity to address strategic leadership, place shaping and enabling at the area level • The area structure proposed recreates the administrative function of the districts but strips out the ability to play the modern place shaping and enabling role at area level • No clear explanation of area and locality working at officer level or what services will be delivered / managed at an area or neighbourhood level • There is no place in the proposed Area Committee / Community Partnership Board model for significant local partners involvement and interaction and they will consequently lose their ability and enthusiasm to engage • There is no clear reference to resourcing capacity building for communities and the third sector, revealing little understanding of empowerment | <p>level particularly within the remainder of Norfolk authority</p> <ul style="list-style-type: none"> • The area structure proposed recreates the administrative function of the districts but strips out the ability to play the modern place shaping and enabling role at the area level particularly within the remainder of Norfolk authority • There is no place in the proposed Area Committee / Community Partnership Boards model for significant local partners involvement and interaction and they will consequently lose their ability and enthusiasm to engage, particularly within the remainder of Norfolk authority • The proposal shows little recognition of the need to take an approach which integrates services in order to address locality issues, again illustrating a lack of imagination and new thinking behind the proposal particularly within the remainder of Norfolk authority • No explanation of area and locality working at officer level or what services will be delivered / managed at an area or neighbourhood level • The risk is that for a new authority (for the remainder Norfolk authority) the scale of the challenge of ensuring engagement and involvement across such a large population and geography would prove so daunting that effectively in the short to medium term very little would happen other than a few pilots | <p>remainder of Norfolk authority</p> <ul style="list-style-type: none"> • As a consequence of the lack of understanding of locality working the proposed structure of the new organisation is 'light; on senior officer capacity to address strategic leadership, place shaping and enabling at the area level particularly within the remainder of Norfolk authority • Area structure proposed recreates the administrative function of the districts but strips out the ability to play the modern place shaping and enabling role at the area level particularly within the remainder of Norfolk authority • There is no place in the proposed Area Committee / Community Partnership Boards model for significant local partners involvement and interaction and they will consequently lose their ability to engage particularly within the remainder of Norfolk authority • The proposal shows little recognition of the need to take an approach which integrates services to address locality issues, again illustrating a lack of imagination and new thinking behind the proposal particularly within the remainder of Norfolk authority • No explanation of area and locality working at officer level or what services will be delivered/managed at an area or neighbourhood level • The risk is that for a new authority (for the remainder Norfolk authority) the scale of the challenge of ensuring engagement and involvement across such a large population and geography would prove so daunting that effectively |

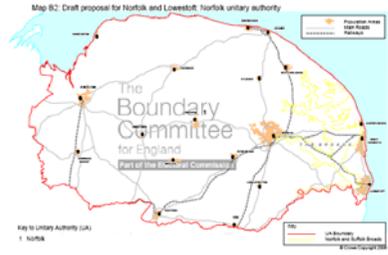
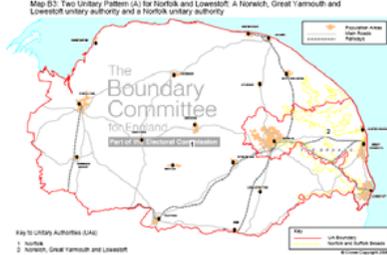
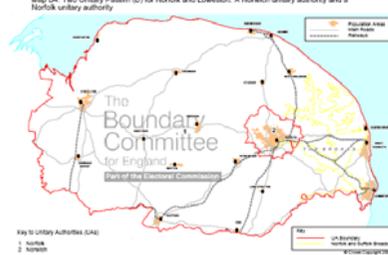
| | Single County Unitary | 'Wedge' | 'Doughnut' |
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| | <ul style="list-style-type: none"> • The proposal shows little recognition of the need to take an approach which integrates services in order to address locality issues, again illustrating a lack of imagination and new thinking behind the proposal • Local diversity is merely skimmed over in the proposal, in which there has been no serious attempt to describe and respond to local diversity • The potential for community leadership, developing neighbourhood management and place shaping is greatly undermined by the disenfranchisement and democratic deficit – attributable almost exclusively to the sheer size and scale of the proposed council • The proposal gives Norfolk's residents the highest resident to Councillor ratio of <u>any</u> existing or proposed unitary. It is impossible to see how the Councillors can fulfil effectively the expectations set out in the White Paper with such a workload | | <p>in the short to medium term very little would happen other than a few pilots</p> <ul style="list-style-type: none"> • The proposed arrangements for the remainder of Norfolk authority area reflect administrative convenience rather than real communities and engagement and if implemented would represent a backward step rather than an improvement |

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| Broad Cross-Section of Support | <ul style="list-style-type: none"> • This is opposed by every MP in Norfolk • Strongly opposed by all 8 District Councils affected • Regarded as very much 'second best' to the two tier system by its proponents Norfolk County Council • Opposed by overwhelming majority of Parish / Town Councils • Considerable opposition from stakeholders (Hospital Trusts, FE College etc) with a sub county remit • Low level of support from individual respondents to the Boundary Committee website (based on responses shown on BC website up to 15.09.08) • Little support from the voluntary and community sector • Significant lack of support from businesses across the county and almost unanimously rejected by businesses in the west | <ul style="list-style-type: none"> • It is not possible to undertake a meaningful and informed consultation exercise on this proposal in the absence of any substantive detail • Opposed by 7 of the 8 Districts affected and only second preference of its proponent Great Yarmouth Borough Council • Opposed by Norfolk County Council • Opposed by the majority of Parish / Town Councils • Opposed by a clear majority of the voluntary and community sector • Opposed by the majority of the business community outside the immediate Yarmouth / Lowestoft area • Opposed by the majority of county and sub county level stakeholders outside of the immediate Yarmouth / Lowestoft area • Opposed by an overwhelming majority of MP's in Norfolk • Negligible public support from respondents to the Boundary Committee website (based on responses shown on BC website up to 15.09.08) | <ul style="list-style-type: none"> • Low level of public support from respondents to the Boundary Committee web site (based on responses shown up to 15.09.08) despite a two year campaign by the City Council • Opposed by 7 of the 8 Districts affected • Opposed by Norfolk County Council • Opposed by all the county level stakeholders and a majority of the sub county stakeholders outside of Norwich itself • Opposed by much of the voluntary and community sector outside of Norwich itself • Opposed by the clear majority of Norfolk MP's • Significant lack of support from businesses across the county and almost unanimously rejected by businesses in the west • Not supported by any Parish / Town Council in Norfolk (based on responses shown on BC website up to 15.09.08) |

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| Affordability | <ul style="list-style-type: none"> The publication of raw financial data in a "financial work book" does not constitute a coherent or adequate exposition of the affordability of a county unitary authority. In any event the workbook was published too late in the consultation process to admit a proper or any analysis of the affordability of a county unitary authority. The County Council's publication of a more detailed analysis of the affordability of a county unitary authority does not cure this defect in the consultation process. The County Council are not appointed as the Boundary Committee's agent and the document they have produced is a partisan representation in support of a proposal that the County Council submitted to the Boundary Committee at an earlier stage in the review process. The assumptions on which the proposal is based are not agreed by Norfolk District Councils. Nor have other Norfolk authorities had a proper or any opportunity to consider and critique the County Council's proposals (even if those are, in themselves, a proper substitute for information on affordability that should have been developed by the Boundary Committee). | <ul style="list-style-type: none"> The publication of raw financial data in a "financial work book" does not constitute a coherent or adequate exposition of the affordability of a county unitary authority. In any event the workbook was published too late in the consultation process to admit a proper or any analysis of the affordability of a county unitary authority. The County Council's publication of a more detailed analysis of the affordability of a county unitary authority does not cure this defect in the consultation process. The County Council are not appointed as the Boundary Committee's agent and the document they have produced is a partisan representation in support of a proposal that the County Council submitted to the Boundary Committee at an earlier stage in the review process. The assumptions on which the proposal is based are not agreed by Norfolk District Councils. Nor have other Norfolk authorities had a proper or any opportunity to consider and critique the County Council's proposals (even if those are, in themselves, a proper substitute for information on affordability that should have been developed by the Boundary Committee). | <ul style="list-style-type: none"> The publication of raw financial data in a "financial work book" does not constitute a coherent or adequate exposition of the affordability of a county unitary authority. In any event the workbook was published too late in the consultation process to admit a proper or any analysis of the affordability of a county unitary authority. The County Council's publication of a more detailed analysis of the affordability of a county unitary authority does not cure this defect in the consultation process. The County Council are not appointed as the Boundary Committee's agent and the document they have produced is a partisan representation in support of a proposal that the County Council submitted to the Boundary Committee at an earlier stage in the review process. The assumptions on which the proposal is based are not agreed by Norfolk District Councils. Nor have other Norfolk authorities had a proper or any opportunity to consider and critique the County Council's proposals (even if those are, in themselves, a proper substitute for information on affordability that should have been developed by the Boundary Committee). |

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| Conclusion | <ul style="list-style-type: none"> This proposal FAILS on each of the criteria assessed | <ul style="list-style-type: none"> This proposal FAILS on each of the criteria assessed | <ul style="list-style-type: none"> This proposal FAILS on each of the criteria assessed |

Appendix Three – Critique of Options

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| <p>General</p> | <ul style="list-style-type: none"> • This proposal is regarded as a 'second best' option by its proponents Norfolk County Council who would prefer to retain the two tier system (Council Resolution 15/9/08) • This proposal was also regarded as second best by the Boundary Committee Officer Team "we are not persuaded on the basis of the available evidence that a single unitary authority for the whole of Norfolk would best meet the criteria" (BCFE (08) 14-21 May 08) • This proposal is not supported by any of Norfolk's seven District Councils or Waveney District Council • This proposal is underpinned by the Boundary Committee's view that Norwich provides a strong economic focus for the whole County. It does not. • This model is unprecedented in terms of its scale, the incorporation of two competing economic sub regions, plus a significant town located in a different County. Consequently this proposal represents a high degree of risk • There is no clear sense of vision or ambition about how the new authority could achieve a step change in | <ul style="list-style-type: none"> • This proposal is not backed up by a business case, therefore there are no source documents on which to base a proper or comprehensive assessment of this proposal – there are less than 500 words in the Boundary Committee's report to go on • The Boundary Committee commentary on this model in their report gives no explanation as to how the rural Norfolk Unitary would operate • There is no connection between King's Lynn as the major town in the rural Unitary and the towns and villages located in the east of the county • The rural Unitary would have a very sparse population, and therefore high service delivery costs • There is considerable uncertainty about the location of the boundaries for this model • Will create enormous upheaval, service disruption and loss of focus on service delivery as key staff leave due to uncertainty, and services are both aggregated (Norfolk) and disaggregated (Suffolk). Disruption and risk is even | <ul style="list-style-type: none"> • There is no business case or concept paper which explains how the unitary council for the remainder of Norfolk would work • There is as yet no financial information available for the unitary council for the remainder of Norfolk to enable value for money and affordability to be assessed • In their own report the Boundary Committee give little credence to this model – covered in less than 300 words • No evidence of public support for this model outside the confines of Norwich City itself • Will create enormous upheaval, service disruption and loss of focus on service delivery as key staff leave due to uncertainty, and services are both aggregated (Norfolk) and disaggregated (Suffolk). Disruption and risk even greater than single County unitary option due to the additional need to disaggregate services in Norfolk (county and district) as well as Suffolk • The experience of structural change is that it tends to over promise and under deliver and diverts energy and focus from improvement. Savings are not always |

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| | <p>outcomes, or of an authority eager to commit to stretch itself and the aspiration of its communities</p> <ul style="list-style-type: none"> The proposal is weak on how to gain added value by working collaboratively across internal teams or between council services and external partners. The proposal is generic and reflects 'Norfolk the administrative entity' rather than 'Norfolk the place', its communities or its distinctive issues The experience of structural change is that it tends to over promise and under deliver and diverts energy and focus from improvement. Savings are not always accurately stated because they ignore offsetting costs or are optimistically calculated. Similarly costs are often understated or glossed over. A single unitary, especially in a large county such as Norfolk, and with the added dimension of Lowestoft, will have a tendency to become remote and distant from its customers and perform badly in true local engagement. As costs become tight there will inevitably be a move to centralise functions, which will reinforce the remoteness of the organisation. <p>Will create enormous upheaval, service disruption and loss of focus on service delivery as key staff leave due to uncertainty, and services are both aggregated (Norfolk) and disaggregated (Suffolk). The Annual Audit and Inspection letter, March 2008 for NCC stated that – “the County is distracted by local government review.....and is not likely to be able to handle reorganisation and service improvement...”</p> | <p>greater than single County unitary option due to the additional need to disaggregate services in Norfolk (county and district) as well as Suffolk</p> <ul style="list-style-type: none"> The wedge extends only to the Greater Norwich boundary as proposed by the City Council. This boundary is too tightly drawn to cover the growth areas around the City. This will inevitably lead to partnership working being required from the two unitary councils along similar lines to that which is already in place through the Greater Norwich Development Partnership. This will give rise to issues of primacy and self-interest. The experience of structural change is that it tends to over promise and under deliver and diverts energy and focus from improvement. Savings are not always accurately stated because they ignore offsetting costs or are optimistically calculated. Similarly costs are often understated or glossed over. As costs become tight there will inevitably be a move to centralise functions, which will reinforce the remoteness of the organisation. The affordability work book has apparently been based on assumptions derived from a disaggregation of the Single County model with minimal input from those who are developing this model | <p>accurately stated because they ignore offsetting costs or are optimistically calculated. Similarly costs are often understated or glossed over. As costs become tight there will inevitably be a move to centralise functions, which will reinforce the remoteness of the organisation.</p> <ul style="list-style-type: none"> The unitary council outside of Greater Norwich has no coherence whatsoever. There are large / major settlements, all of which are on the extreme edges of that authority – King’s Lynn, Cromer, Great Yarmouth, Diss, Thetford and Lowestoft. |

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| Strategic Leadership | <ul style="list-style-type: none"> In incorporating two economic sub regions it fails to reflect the economic reality of Norfolk, notwithstanding the Secretary of States clearly expressed view that 'the more an authorities area matches the economic reality, the more likely that it will be effective in providing the strategic leadership necessary to create prosperity (Hazel Blears 18/12/07) The model proposed is based upon the concept that Norwich is the economic driver for the whole of Norfolk. This assumption is entirely wrong "... a population of 840,000 and a large geographical area presents challenges to effective strategic leadership" (Boundary Committee Officer Report 21/5/08) Too big (second largest population 840,000 of any unitary council in England behind Birmingham) Too remote (significantly larger than any existing unitary council) Strategic leadership in the face of too many diverse geographical priorities will be extremely difficult This proposal is more bureaucratic than the two tier system it seeks to replace – creating area committees <u>and</u> community partnership boards to replace the district authorities This proposal is overtly focused on the Norwich economic sub region, creating a special economic development vehicle with many 'millions of pounds of resources'. This will inevitably result in the marginalisation of the County's second economic sub region in the west | <ul style="list-style-type: none"> The 'rest of Norfolk' authority has no natural coherence, or identity. No thought has been given whatsoever to the sense of place, the needs of the communities and their future well being The model separates Norwich from much of its economic sub region Will require the establishment of a multi area agreement in order to reconnect Norwich to much of its economic sub region Will lead to tension within Norfolk/Lowestoft/Great Yarmouth authority with conflicting and very different economic and social priorities – regeneration versus growth agendas This model splits the Norwich Planning Area and the housing sub regions leading to a weaker strategic approach to these issues Does not reflect natural communities in either authority area The large geographic area and sparse population of the 'remainder county' authority would present major challenges in terms of effective strategic leadership Boundary Committee's report states "...it is not clear to us how King's Lynn's sphere of influence would be accommodated in the strategic leadership and vision for the rural Norfolk authority" As with the proposed unitary county authority, we also have concerns as to whether a 'remainder county' authority would best address the peripheral situation and socio-economic challenges | <ul style="list-style-type: none"> The 'remainder county' authority has no natural coherence, or identity. No evidence that there is a sense of place underpinning this authority or that any consideration has been given to the needs of the communities and their future well being The model separates Norwich from much of its economic sub region No evidence for the rationale or vision for the 'remainder county' authority Will require the establishment of a multi area agreement in order to reconnect Norwich to its economic sub region The two main centres of population for the 'remainder of Norfolk' unitary are located at the western (King's Lynn) and eastern (Great Yarmouth) extremities of the area some 65 miles apart There is no connection in social and economic terms between the western and eastern parts of the rest of Norfolk council Tension and conflict between the small Norwich authority and its much larger neighbour is effectively 'designed in' to this model. This will be exacerbated by differences of political control, as the two councils compete for growth and inward investment This model splits the Norwich planning area leading to a weak strategic approach to key issues such as the growth agenda The Greater Norwich proposal does not reflect a viable authority to achieve the growth agenda and political aspirations of the City Council |

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| | <p>of the County</p> <ul style="list-style-type: none"> The management model proposed, effectively 'bolting on' district services to the existing County structure will lead to a failure to deliver transformational change The thinking that permeates this proposal is unambitious, the steady state structure betrays a deeply embedded complacency that has no prospect of delivering a step change in outcomes The inclusion of a Norwich Development Board and a Cabinet Member for Norwich chosen by Norwich Councillors is ill conceived and is likely to lead to conflict as Norwich itself is likely to be dominated by councillors from a different political party to the remainder of Norfolk The proposal is not built around the distinctive opportunities, strengths and challenges within Norfolk. There is no sense of place, or the required tailored, localised solutions needed to ensure the future prosperity of its communities | <p>of Great Yarmouth</p> <ul style="list-style-type: none"> This model is not aligned with the two economic sub regions and is likely to lead to the marginalisation of peripheral areas | <ul style="list-style-type: none"> Lack of focus for the east of the County as a consequence of severing the natural retail, cultural, education, health and social centre from its hinterland Extremely challenging for a 'remainder county' authority to effectively address the peripheral situation and socio economic challenges of Great Yarmouth in the east and King's Lynn/Thetford in the west We do not believe that the Greater Norwich Unitary will have the capacity or influence regionally to deliver the significant infrastructure needed to deliver the jobs and housing growth in the next 10-25 years. We have particular concerns about the Norwich Northern Distributor Road. With the doughnut on constrained boundaries it will require both Unitary Councils to give this road their top priority. Some of the areas of major future growth will fall across the two unitaries and the long term delivery of new homes, jobs and infrastructure could be prejudiced The doughnut option would set back the work on the joint core strategy at the very time growth needs to be well planned. Authorities will become disengaged from strategic priorities to focus on the creation of new structures leading to a detrimental impact for residents and the quality of leadership being reduced at a time it is most needed The large geographic area of the 'remainder county' authority would present challenges in terms of effective strategic leadership due to its scale and population |

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| Value for Money & Equity in Public Services | <ul style="list-style-type: none"> The proposals could jeopardise the financial stability of future service delivery by under-estimating the cost of transition and over estimating the scale of savings. As the financial case has still not been published and the “work book” was not available until a few days prior to the close of the consultation period, and has continued to change on an almost daily basis we have not yet had the opportunity to properly test the basis of the business case This will be bureaucratic – 5 Area Committees and 21 Community Partnership Boards to replace 7 District Councils each with their own staff and budgets This will be Norwich centric – likely to be based in Norwich; special economic development company with many millions of resources for Norwich; £104 reduction in Council Tax for Norwich residents; but no significant reduction for residents of rural Norfolk Because the new authority will face severe financial pressures its likely response is to level services down rather than adopting more innovative practices The financial case appears to be based on weak and under-developed proposals for service development, leaving a new authority poorly placed to address and meet the challenges and opportunities facing Norfolk There is a very real risk that discretionary services that impact most strongly on successful place shaping (economic | <ul style="list-style-type: none"> There is no information available whatsoever to consultees that would enable a serious attempt to be made at assessing even the potential value for money achievable through the implementation. This is a very high risk proposal. The total lack of a worked up proposal could be disastrous in implementation terms. The financial projections produced by the County Council have been produced without reference to the assumptions which underline the proposal being prepared by Great Yarmouth Borough Council There is a 20 mile gap between Great Yarmouth and Norwich. Much of that gap is rural in character. We have no doubt that this new Unitary would concentrate its resources into the three urban areas and the rural areas would, as a consequence, be neglected. This would lead to resentment, could reduce community cohesion and would certainly reduce access to services to residents in those rural areas. Would create new administrative boundaries between two authorities where there are major daily population movements, for work, for schooling etc Risks of vulnerable clients falling between two authorities Great Yarmouth, Waveney and Norwich City Council are all currently on ‘Use of Resources’ scores of 1 and all have severe financial pressures and inadequacies. With three Councils | <ul style="list-style-type: none"> There is very little information available to consultees concerning the service delivery model for the ‘remainder Norfolk’ authority on which to base an informed assessment of the likelihood that value for money could or would be achieved. Norfolk County Council appear to have undertaken a fairly crude financial exercise based on a simplistic scaling down of their single county model. This is therefore a high risk proposal Would create new administrative boundaries between two authorities where there are major daily population movements, for work, for schooling etc Risks of vulnerable clients falling between two authorities There is no doubt that “County” services will need to be disaggregated and that is of major concern. This will heighten the risks, at least in the short-term, of service failure, which could lead to catastrophic consequences, e.g. in Children’s Services with looked after and other vulnerable children. Norwich City Council has failed to demonstrate that any savings will be achieved from the proposed new City authority. This indicates that there is little financial benefit for city residents from the adoption of a model that will leave them in a position of paying the highest Council Tax levels in Norfolk The financial case appears to be based on weak and under-developed proposals for service development, leaving a new |

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| | <p>development, leisure, culture etc) will be reduced and local flexibility diminished</p> <ul style="list-style-type: none"> The County councils financial projections are bullish in their expectations of savings and costs. As the financial bottom line will be binding, if they turn out to be incorrect, the consequences will be borne by Norfolk's communities To balance the books for over-optimistic assumptions, service delivery ambitions may need to be scaled back The financial data is very unclear with regard to the localisation and area working The financial case is almost entirely silent on the very significant challenges facing the 8 authorities, in capital funding, particularly in light of the ongoing and deepening impact of the credit crunch There is no detail on the shared services trading model other than an assertion that it will provide a trading surplus to help towards savings. As a consequence we have reservations that capacity can be sold. Therefore the costs of redundancy are likely to be understated Given the experience of integrating ICT platforms within individual districts we have serious reservations about the quoted cost of ICT change CIPFA data demonstrates that two tier Norfolk currently delivers many services at a lower cost than that achieved by many existing unitary councils of a similar geographic/sparsity level. For example the net cost of waste collection and disposal (2008/09) – a function currently split between the two tiers. See table below | <p>having a Use of Resources score of 1 forming the major parts of a new Unitary there is no doubt that these issues will leak into the new unitary council.</p> <ul style="list-style-type: none"> Disaggregation of Norfolk and Suffolk County Council services will undoubtedly add to costs and has the very real serious risk of gaps appearing in service. Additional arrangements would be needed to manage strategic infrastructure, for example, transport There is a serious risk that the discretionary services that impact most strongly on successful place shaping (economic regeneration, leisure, culture etc) will be reduced or cut completely if the calculations turn out to be over optimistic There is no clear model on which to base the calculation for localisation and area working The financial case is almost entirely silent on the very significant challenges facing the 10 authorities, in capital funding, particularly in light of the ongoing and deepening impact of the credit crunch The Boundary Committee report fails to mention even once the issue of equity in public services There would be duplication of some strategic planning arrangements that are currently done on a county-wide basis e.g. there would be two local transport plans (currently one), two strategic planning authorities (currently one) etc There is an uneven spread of specialist assets, for example, special schools, | <p>authority poorly placed to address and meet the challenges and opportunities facing Norfolk</p> <ul style="list-style-type: none"> There is a very real risk that discretionary services that impact most strongly on successful place shaping (economic development, leisure, culture etc) will be reduced and local flexibility diminished The County councils financial projections for the remainder of Norfolk authority are bullish in their expectations of savings and costs. If they turn out to be incorrect, as the financial bottom line will be binding, the consequences will be borne by the authorities communities To balance the books for over – optimistic assumptions, service delivery ambitions may need to be scaled back The financial data is very unclear with regard to the localisation and area working for the remainder of Norfolk authority The financial case is almost entirely silent on the very significant challenges facing the authorities in the remainder of Norfolk, in capital funding, particularly in light of the ongoing and deepening impact of the credit crunch There are no details on the shared services trading model other than an assertion that it will provide a trading surplus to help towards savings. As a consequence we have reservations that capacity can be sold. Therefore the costs of redundancy are likely to be understated There are serious deficiencies in the |

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| <table border="1"> <tr> <td>Norfolk</td> <td>118.26</td> <td>per cost per dwelling</td> </tr> <tr> <td>North Lincolnshire</td> <td>136.58</td> <td>per cost per dwelling</td> </tr> <tr> <td>West Berkshire</td> <td>145.26</td> <td>per cost per dwelling</td> </tr> <tr> <td>East Riding</td> <td>148.82</td> <td>per cost per dwelling</td> </tr> <tr> <td>Herefordshire</td> <td>170.06</td> <td>per cost per dwelling</td> </tr> </table> | | | Norfolk | 118.26 | per cost per dwelling | North Lincolnshire | 136.58 | per cost per dwelling | West Berkshire | 145.26 | per cost per dwelling | East Riding | 148.82 | per cost per dwelling | Herefordshire | 170.06 | per cost per dwelling | involving 'out-of-area' transactions <ul style="list-style-type: none"> • The Audit Commission issued qualified audit opinions in respect of the financial year 2006/07 for both Great Yarmouth and Norwich City and has also expressed a number of concerns relating to the financial management of each authority | financial and delivery calculation concerning ICT for the remainder of Norfolk authority <ul style="list-style-type: none"> • Disaggregation of Norfolk and Suffolk County Council services will undoubtedly add to costs and has the very real serious risk of gaps appearing in service • Additional arrangements would be needed to manage strategic infrastructure, for example, transport • There would be duplication of some strategic planning arrangements that are currently done on a county-wide basis e.g. there would be two local transport plans (currently one), two strategic planning authorities (currently one) etc • Uneven spread of specialist assets, for example, special schools, involving 'out-of-area' transactions • In March 2008 the Audit Commission issued a qualified audit opinion on the City Councils 2006/2007 accounts |
| Norfolk | 118.26 | per cost per dwelling | | | | | | | | | | | | | | | | | |
| North Lincolnshire | 136.58 | per cost per dwelling | | | | | | | | | | | | | | | | | |
| West Berkshire | 145.26 | per cost per dwelling | | | | | | | | | | | | | | | | | |
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| Herefordshire | 170.06 | per cost per dwelling | | | | | | | | | | | | | | | | | |
| <ul style="list-style-type: none"> • Some services e.g. planning and benefits, have lower consumer satisfaction in authorities of larger population sizes (Population Size and Local Authority Performance CLG 2006 p12) • Norfolk borough and district authorities achieve good value for money by, for example, letting small contracts often won by local contractors • The Boundary Committee report fails to mention even once the issue of equity in public services | | | | | | | | | | | | | | | | | | | |

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| Neighbourhood Engagement | <ul style="list-style-type: none"> • This model offers no meaningful neighbourhood engagement – the proposed Community Partnership Boards will operate with a population of 35,000 whereas neighbourhood engagement works best at the level of the village or estate. • Creates a democratic deficit with the ratio of citizens to each Councillor substantially higher than for any unitary authority in England • Recent research shows that the majority of case work is carried out by District Councillors rather than County Councillors. Thus, the commitment needed from the proposed 120 or less Unitary Councillors will make it difficult to recruit from a broad cross section of the public • No evidence provided that citizens, as individuals or as part of local communities with which they strongly identify, will have enhanced opportunities to influence and participate in real decision-making through the Community Partnership Boards • The lack of a strong champion for the areas with the loss of Borough and District Councils in no way adequately addressed by the proposed area Cabinet Members • Creates additional bureaucracy and an increase in the number of 'layers' between the citizen and the decision maker • One large authority almost universally regarded in Norfolk as being too remote | <ul style="list-style-type: none"> • There is no concept document or indeed substance in the Boundary Committee report which enables a thorough analysis of the neighbourhood engagement aspect of this proposal to be assessed or educated. However assuming that the neighbourhood engagement model is, as suggested by the Boundary Committee report, broadly based on the single county model the following points apply • Creates additional bureaucracy and an increase in the number of 'layers' between the citizen and the decision maker • The remainder Norfolk authority would be extremely large and consequently remote from residents, businesses, voluntary groups and Parish / Town Councils • Access to decision makers will be difficult in the remainder Norfolk council due to the geographical size making senior officers and councillors inaccessible to many people and organisations • Local identity and distinctiveness in both councils would be diluted • Residents are clearly expressing strong fears that this model will disconnect them from their Council • Acknowledgement by the Boundary Committee officers of the issues that size presents – "Large geographic area presents challenges to neighbourhood empowerment" (Boundary Committee Officer Report 21/5/08) | <ul style="list-style-type: none"> • There is no concept document or indeed substance in the Boundary Committee report for the proposed 'remainder Norfolk' authority which would constitute the great majority of Norfolk's resident population. There is no vision for this authority. Again one can only work on the basis that its neighbourhood engagement model is expected to be broadly based on an adapted version of the single county model put forward by Norfolk County Council • The remainder Norfolk authority would be almost as large as that of the single county authority but would be expected to operate without the inclusion of the county town and would consequently be remote from its citizens • In the event that a variation of the Single County Unitary model is used to try and overcome the size of the remainder of Norfolk model it would introduce a similar level of Area Committees and Community Partnership Boards with their attendant weaknesses • Access to decision makers will be difficult in the remainder Norfolk Council due to its geographical size making senior officers and councillors inaccessible to many people and organisations • Creates a democratic deficit in the remainder of Norfolk unitary with a high citizen to elector ratio • Creates additional bureaucracy and an increase in the number of 'layers' between the citizen and the decision |

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| | <p>from residents, business, voluntary groups, Parish and Town Councils is acknowledged by the Boundary Committee officers – “Large geographic area presents challenges to neighbourhood empowerment” (Boundary Committee Officer Report 21/5/08)</p> <ul style="list-style-type: none"> • Access to decision makers will be considerably more difficult due to the sheer size of Norfolk. For businesses and voluntary groups in the west of the County, for example, access to senior officers will require a 90 mile round trip • Local identity and distinctiveness, the product of centuries of different development and economic focus would be lost, for example, the proud Hanseatic tradition in King’s Lynn • Residents are clearly expressing strong fears that this model will disconnect them from their Council • No attempt to build on existing structure for locality working and place shaping to build on established good practice • The proposal also fails to build upon the existing leading edge practice developed by the District Councils – such as King’s Lynn’s participation in the CLG Neighbourhood Charter pilot programme • The proposed Area Committees and Community Partnership Boards reflect administrative convenience rather than real communities and engagement and if implemented would represent a backward step rather an improvement • Area Committees and Community Partnership Boards proposed reflect a | <ul style="list-style-type: none"> • No attempt to build on existing structure for locality working and place shaping to build on established good practice • This proposal also fails to build upon the existing leading edge practice developed by the District Councils such as King’s Lynn’s participation in the CLG Neighbourhood Charter programme within the remainder of Norfolk authority • The proposed arrangements reflect administrative convenience rather than real communities and engagement and if implemented would represent a backward step rather an improvement • The proposed arrangements reflect a failure to understand the localities within the County particularly within the remainder of Norfolk authority • The proposal reveals a lack of awareness and lack of understanding of what locality working and place shaping really mean • The lack of vision of how to secure the benefits of locality working can only sell Norfolk’s communities short particularly within the remainder of Norfolk authority • Fails to take the needs of the community as a starting point and to redesign service delivery models with agencies and partners that add value to the outcomes particularly within the remainder of Norfolk authority • As a consequence of the lack of understanding of locality working the proposed structure of the new organisation is ‘light’ on senior officer capacity to address strategic leadership, place shaping and enabling at the area | <p>maker in the remainder of Norfolk authority area</p> <ul style="list-style-type: none"> • Local identity and distinctiveness in both Councils would be diluted • Residents are clearly expressing strong fears that this model will disconnect them from their Council • Acknowledgement by the Boundary Committee officers of the issues that size presents – “Large geographic area presents challenges to neighbourhood empowerment” (Boundary Committee Officer Report 21/5/08) • No attempt to build on existing structure for locality working and place shaping to build on established good practice • The proposal also fails to build upon the existing leading edge practice developed by the District Councils such as King’s Lynn’s participation in the CLG Neighbourhood Charter programme within the remainder of Norfolk authority • The proposed arrangements reflect a failure to understand the localities within the County particularly within the remainder of Norfolk authority • The proposal reveals a lack of awareness and understanding of what locality working and place shaping really mean • The lack of vision of how to secure the benefits of locality working can only sell Norfolk’s communities short particularly within the remainder of Norfolk authority • Fails to take the needs of the community as a starting point and to redesign service delivery models with agencies and partners that add value to the outcomes particularly within the |

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| | <p>failure to understand the localities within the county and a lack of awareness and understanding of what locality working and place shaping really mean</p> <ul style="list-style-type: none"> • The lack of vision of how to secure the benefits of locality working can only sell Norfolk's communities short • Fails to take the needs of the community as a starting point and doesn't redesign service delivery models with agencies and partners that add value to the outcomes • As a consequence of the lack of understanding of locality working, the proposed structure of the new organisation is 'light' on senior officer capacity to address strategic leadership, place shaping and enabling at the area level • The area structure proposed recreates the administrative function of the districts but strips out the ability to play the modern place shaping and enabling role at area level • No clear explanation of area and locality working at officer level or what services will be delivered / managed at an area or neighbourhood level • There is no place in the proposed Area Committee / Community Partnership Board model for significant local partners involvement and interaction and they will consequently lose their ability and enthusiasm to engage • There is no clear reference to resourcing capacity building for communities and the third sector, revealing little understanding of empowerment | <p>level particularly within the remainder of Norfolk authority</p> <ul style="list-style-type: none"> • The area structure proposed recreates the administrative function of the districts but strips out the ability to play the modern place shaping and enabling role at the area level particularly within the remainder of Norfolk authority • There is no place in the proposed Area Committee / Community Partnership Boards model for significant local partners involvement and interaction and they will consequently lose their ability and enthusiasm to engage, particularly within the remainder of Norfolk authority • The proposal shows little recognition of the need to take an approach which integrates services in order to address locality issues, again illustrating a lack of imagination and new thinking behind the proposal particularly within the remainder of Norfolk authority • No explanation of area and locality working at officer level or what services will be delivered / managed at an area or neighbourhood level • The risk is that for a new authority (for the remainder Norfolk authority) the scale of the challenge of ensuring engagement and involvement across such a large population and geography would prove so daunting that effectively in the short to medium term very little would happen other than a few pilots | <p>remainder of Norfolk authority</p> <ul style="list-style-type: none"> • As a consequence of the lack of understanding of locality working the proposed structure of the new organisation is 'light; on senior officer capacity to address strategic leadership, place shaping and enabling at the area level particularly within the remainder of Norfolk authority • Area structure proposed recreates the administrative function of the districts but strips out the ability to play the modern place shaping and enabling role at the area level particularly within the remainder of Norfolk authority • There is no place in the proposed Area Committee / Community Partnership Boards model for significant local partners involvement and interaction and they will consequently lose their ability to engage particularly within the remainder of Norfolk authority • The proposal shows little recognition of the need to take an approach which integrates services to address locality issues, again illustrating a lack of imagination and new thinking behind the proposal particularly within the remainder of Norfolk authority • No explanation of area and locality working at officer level or what services will be delivered/managed at an area or neighbourhood level • The risk is that for a new authority (for the remainder Norfolk authority) the scale of the challenge of ensuring engagement and involvement across such a large population and geography would prove so daunting that effectively |

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| | <ul style="list-style-type: none"> • The proposal shows little recognition of the need to take an approach which integrates services in order to address locality issues, again illustrating a lack of imagination and new thinking behind the proposal • Local diversity is merely skimmed over in the proposal, in which there has been no serious attempt to describe and respond to local diversity • The potential for community leadership, developing neighbourhood management and place shaping is greatly undermined by the disenfranchisement and democratic deficit – attributable almost exclusively to the sheer size and scale of the proposed council • The proposal gives Norfolk's residents the highest resident to Councillor ratio of <u>any</u> existing or proposed unitary. It is impossible to see how the Councillors can fulfil effectively the expectations set out in the White Paper with such a workload | | <p>in the short to medium term very little would happen other than a few pilots</p> <ul style="list-style-type: none"> • The proposed arrangements for the remainder of Norfolk authority area reflect administrative convenience rather than real communities and engagement and if implemented would represent a backward step rather than an improvement |

| | Single County Unitary | 'Wedge' | 'Doughnut' |
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| Broad Cross-Section of Support | <ul style="list-style-type: none"> • This is opposed by every MP in Norfolk • Strongly opposed by all 8 District Councils affected • Regarded as very much 'second best' to the two tier system by its proponents Norfolk County Council • Opposed by overwhelming majority of Parish / Town Councils • Considerable opposition from stakeholders (Hospital Trusts, FE College etc) with a sub county remit • Low level of support from individual respondents to the Boundary Committee website (based on responses shown on BC website up to 15.09.08) • Little support from the voluntary and community sector • Significant lack of support from businesses across the county and almost unanimously rejected by businesses in the west | <ul style="list-style-type: none"> • It is not possible to undertake a meaningful and informed consultation exercise on this proposal in the absence of any substantive detail • Opposed by 7 of the 8 Districts affected and only second preference of its proponent Great Yarmouth Borough Council • Opposed by Norfolk County Council • Opposed by the majority of Parish / Town Councils • Opposed by a clear majority of the voluntary and community sector • Opposed by the majority of the business community outside the immediate Yarmouth / Lowestoft area • Opposed by the majority of county and sub county level stakeholders outside of the immediate Yarmouth / Lowestoft area • Opposed by an overwhelming majority of MP's in Norfolk • Negligible public support from respondents to the Boundary Committee website (based on responses shown on BC website up to 15.09.08) | <ul style="list-style-type: none"> • Low level of public support from respondents to the Boundary Committee web site (based on responses shown up to 15.09.08) despite a two year campaign by the City Council • Opposed by 7 of the 8 Districts affected • Opposed by Norfolk County Council • Opposed by all the county level stakeholders and a majority of the sub county stakeholders outside of Norwich itself • Opposed by much of the voluntary and community sector outside of Norwich itself • Opposed by the clear majority of Norfolk MP's • Significant lack of support from businesses across the county and almost unanimously rejected by businesses in the west • Not supported by any Parish / Town Council in Norfolk (based on responses shown on BC website up to 15.09.08) |

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| Affordability | <ul style="list-style-type: none"> The publication of raw financial data in a "financial work book" does not constitute a coherent or adequate exposition of the affordability of a county unitary authority. In any event the workbook was published too late in the consultation process to admit a proper or any analysis of the affordability of a county unitary authority. The County Council's publication of a more detailed analysis of the affordability of a county unitary authority does not cure this defect in the consultation process. The County Council are not appointed as the Boundary Committee's agent and the document they have produced is a partisan representation in support of a proposal that the County Council submitted to the Boundary Committee at an earlier stage in the review process. The assumptions on which the proposal is based are not agreed by Norfolk District Councils. Nor have other Norfolk authorities had a proper or any opportunity to consider and critique the County Council's proposals (even if those are, in themselves, a proper substitute for information on affordability that should have been developed by the Boundary Committee). | <ul style="list-style-type: none"> The publication of raw financial data in a "financial work book" does not constitute a coherent or adequate exposition of the affordability of a county unitary authority. In any event the workbook was published too late in the consultation process to admit a proper or any analysis of the affordability of a county unitary authority. The County Council's publication of a more detailed analysis of the affordability of a county unitary authority does not cure this defect in the consultation process. The County Council are not appointed as the Boundary Committee's agent and the document they have produced is a partisan representation in support of a proposal that the County Council submitted to the Boundary Committee at an earlier stage in the review process. The assumptions on which the proposal is based are not agreed by Norfolk District Councils. Nor have other Norfolk authorities had a proper or any opportunity to consider and critique the County Council's proposals (even if those are, in themselves, a proper substitute for information on affordability that should have been developed by the Boundary Committee). | <ul style="list-style-type: none"> The publication of raw financial data in a "financial work book" does not constitute a coherent or adequate exposition of the affordability of a county unitary authority. In any event the workbook was published too late in the consultation process to admit a proper or any analysis of the affordability of a county unitary authority. The County Council's publication of a more detailed analysis of the affordability of a county unitary authority does not cure this defect in the consultation process. The County Council are not appointed as the Boundary Committee's agent and the document they have produced is a partisan representation in support of a proposal that the County Council submitted to the Boundary Committee at an earlier stage in the review process. The assumptions on which the proposal is based are not agreed by Norfolk District Councils. Nor have other Norfolk authorities had a proper or any opportunity to consider and critique the County Council's proposals (even if those are, in themselves, a proper substitute for information on affordability that should have been developed by the Boundary Committee). |

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| Conclusion | <ul style="list-style-type: none"> This proposal FAILS on each of the criteria assessed | <ul style="list-style-type: none"> This proposal FAILS on each of the criteria assessed | <ul style="list-style-type: none"> This proposal FAILS on each of the criteria assessed |