



# NORWICH City Council

**Committee name:** Cabinet

Committee date: **19/03/2025**

**Report title:** Local Government Reorganisation – interim submission to Government

**Portfolio:** Councillor Stonard, Leader of the council

**Report from:** Chief executive

**Wards:** All wards

## OPEN PUBLIC ITEM

## KEY DECISION

### Purpose

The Ministry of Housing, Communities and Local Government (MHCLG) wrote to all Norfolk Leaders on 5 February 2025 inviting them to work with other council leaders in the area to develop a proposal for Local Government Reorganisation (LGR). The letter sets out the criteria and what is expected to be received in the interim plan to be submitted by 21 March 2025.

This report sets out the work that has been undertaken to date and appends draft documents which fulfil Government's requirements for the interim plan.

The report seeks Cabinet's views on the proposals, including taking into account the views expressed at the Council meeting on 18 March 2025 on the same subject, and seeks agreement for submission of the relevant reports to MHCLG by 21 March.

### Recommendation:

- For Cabinet to note the work undertaken in collaboration with the Norfolk districts (Appendix A), as resolved in Motion 10a at Full Council on 21 January, recommending a three Unitary solution for Norfolk and including a Norwich unitary
- For Cabinet to note the case being developed for a new unitary authority for the Norwich urban area (to follow) in line with the resolutions agreed in Motion 10a
- Following Council's consideration on 18 March, for Cabinet to:
  - Endorse the relevant unitary option for Norfolk
  - Submit the appropriate Interim plan documents to MHCLG by 21 March

### Policy framework

The council has five corporate priorities, which are:

- A prosperous Norwich.
- A fairer Norwich.
- A climate responsive Norwich.
- A future-proof Norwich.
- An open and modern council.

This report meets all the corporate priorities

## **Report details**

### **Introduction**

1. The Ministry of Housing, Communities and Local Government (MHCLG) wrote to all Norfolk Leaders on 5 February 2025 inviting them to work with other council leaders in the area to develop a proposal for Local Government Reorganisation (LGR). The letter sets out the criteria and what is expected to be received in the interim plan to be submitted by 21st March 2025.
2. At its meeting on 21 January 2025, Council agreed a motion (10a), which included resolutions to
  - a. identify, in collaboration with all Norfolk districts, the best options for local government reform across Norfolk
  - b. develop the case for a Unitary Norwich on urban boundaries
3. Both pieces of work are well underway.
4. The work so far has ranked a three unitary solution for Norfolk, including a Norwich unitary, as the best option for Norfolk against the Government's criteria. A strong business case is being developed for that unitary.
5. Council on 18 March 2025 will consider two reports
  - Appendix A - Interim Plan (for Local Government Reorganisation in Norfolk) this is the work which was developed in collaboration with District Councils across Norfolk.
  - A Case for Greater Norwich – Supporting the Interim Plan, to follow – setting out in more detail the case for a Norwich unitary on urban boundaries.
6. Council has been asked to:
  - Endorse the three Unitary proposal for Norfolk, as set out in “Interim Report” Appendix A and supported by “A Case for Greater Norwich: Supporting the Interim Plan” to follow - including a Unitary Norwich on urban boundaries.
  - To recommend to Cabinet that the Interim report (Appendix A), supported by “A Case for Greater Norwich – Supporting the Interim Plan” (to follow) should be submitted to Government in line with their request for an interim plan by 21 March.
7. Further information on the work that has been undertaken at a district level to identify the best options for Norfolk, and to develop a business case for a

Norwich unitary on urban boundaries, is included in the 18 March 2025 Council paper and these are appended to the report as Appendix C for Cabinet's further information.

## **Implications**

### **Financial and resources**

8. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its community-led plan "We are Norwich" and budget.
9. There are no proposals in this report that would reduce or increase resources at this time. Appendix A in Section 4 includes estimated costs to develop the full plan. These are estimated costs and will be shared across the Norfolk Council's. It is unclear at this stage whether there will be government funding to support these costs. A one-off sum of £250K was approved by Council as part of the 2025/26 budget to support devolution and local government reorganisation proposals. Additionally Appendix A also includes estimated costs of implementation. Further work will have to be undertaken on how these costs will be funded, but it is assumed at the current time that they could be capitalised and funded from the potential future savings delivered from creating the new unitary authorities.
10. As a consequence of the timelines imposed upon the council there has been a need to commission some work to support the preparation of the submissions required, full details of which will be reflected within future budget management reports and the provisional outturn report for 2024/25 to Cabinet. It is proposed that reserves will be utilised to support any assessed financial implications and will be approved by the Chief Finance Officer in line with the Constitution.
11. The implementation of LGR in Norfolk will require significant resource and have financial implications for each Council. The exact implications will not be known until a full business case is developed. This will be outlined in the submission expected to be made to MHCLG by the September date.
12. Any additional funding required over and above the £250K already approved in the 2025/26 budget, will be met from the budget risk reserve subject to the approval process set out above.

### **Legal**

13. Until the English Devolution Bill becomes law, the legislation governing the creation of Combined County Authorities is the Levelling Up and Regeneration Act 2023. This act sets out that only upper tier authorities may be constituent members of the CCA. If the Government decides to establish a Norfolk and Suffolk CCA, statutory orders will need to be made to bring the new authority into being and to confer powers.
14. The decision to submit a proposal for LGR is not a function that is reserved to the Full Council. Therefore, by virtue of the definitions contained in the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended), it is an executive decision to be taken by the Cabinet. However, it is recognised custom and practice that a decision of such significance will be debated at a meeting of the Full Council, and that the Cabinet will have regard to the comments of the Full Council when making its final decision.

15. As with Devolution, new unitary authorities can only be vested and conferred powers by statutory instrument. If the Government accepts a proposal for LGR in Norfolk, relevant statutory orders will be made dealing with amongst other matters:

- a. The necessary postponement of any elections to existing authorities.
- b. The dissolution of existing authorities.
- c. The number and names of the new unitary authorities.
- d. The number of members on each authority and its cycle of ordinary elections.
- e. The conferring of powers to the new unitary authorities.
- f. The transfer of finances, staff and assets to the new authorities.

### Statutory considerations

<b>Consideration</b>	<b>Details of any implications and proposed measures to address:</b>
Equality and Diversity	<p>This report does not have direct impacts for equality and diversity. It provides a progress update.</p> <p>Impacts will be considered as part of business case proposals.</p>
Health, social and economic impact	<p>This report does not have direct impacts for health, social and economic impact.</p> <p>Impacts will be considered as part of business case proposals.</p>
Crime and disorder	<p>This report does not have direct impacts for crime and disorder. It provides a progress update.</p> <p>Impacts will be considered as part of business case proposals.</p>
Children and adults safeguarding	<p>This report does not have direct impacts for children and adults safeguarding. It provides a progress update.</p> <p>Impacts will be considered as part of business case proposals.</p>
Environmental impact	<p>This report does not have direct impacts for environment. It provides a progress update.</p> <p>Impacts will be considered as part of business case proposals.</p>

## Risk management

Risk	Consequence	Controls required
An inability to create consensus across Norfolk for a new Norwich Unitary Council	Outcomes for Norwich and Norfolk residents are less positive as the urban focus of a wider authority would be diluted; e.g. around sustainable joined up growth and housing delivery. Wider effects on national growth given the role cities play in the drivers of growth.	Developing a strong case for a Norwich Unitary. Ongoing collaborative working with Norfolk authorities and internally a Working Group to be established with cross party representation
Norwich may not have constituent membership in the new Mayoral Strategic Authority	Less focus within the MSA around the power of cities to drive sustainable and equitable growth, leading to worse outcomes for Norfolk and the UK.	Develop strong case for a Norwich Unitary and demonstrate impact on Government's missions.

## Other options considered

16. There is an option to not proceed with a submission of an interim plan in March. This is not the preferred route as it does not enable the council to use its voice and ensure that views of Norfolk residents, communities and businesses are represented.
17. Various options for Local Government Reorganisation in Norfolk were considered as part of our collaborative work with other Norfolk districts. Some were excluded at an early stage, and a final set of options (a single unitary, two unitaries, or three unitaries for Norfolk), were ranked against the Government's criteria with a three unitary option ranking the highest. Appendix A, the Interim Plan, sets out the detail.

## Reasons for the decision/recommendation

18. Government has set out its intentions around Local Government Reform and have requested interim plans in March and full plans in September. To get the best option for the communities of Norwich, and Norfolk, it is important that we engage in this process and ensure our views are heard. The proposals we are putting forward in the *Interim Plan for Local Government Reorganisation in Norfolk* and *A Case for Greater Norwich, Supporting the Interim (To Follow) Plan*, set out the arguments for a model for 3 unitaries across Norfolk, including one for Norwich on urban boundaries.

## Background papers:

None

**Appendices:**

Appendix A – Interim plan

Appendix B – Report to Council (18 March 2025) – Local Government reorganisation – Interim Plan Submission

To follow - A Case for Greater Norwich - Supporting the Interim Plan

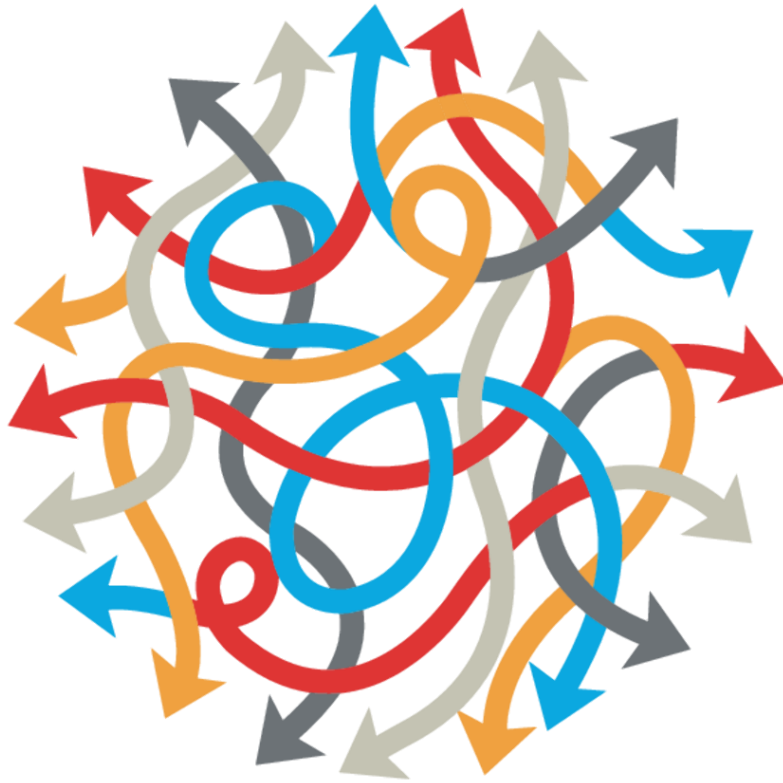
**Contact officer:** Chief Executive

**Name:** Lou Rawsthorne

**Email address:** [louiserawsthorne@norwich.gov.uk](mailto:louiserawsthorne@norwich.gov.uk)



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Interim Plan for Local Government Reorganisation in Norfolk

DRAFT - March 2025

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Deloitte LLP  
March 2025

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## The interim plan

### The purpose of this paper

In December 2024, the Ministry of Housing, Communities and Local Government released the English Devolution White Paper. The White Paper sets out the Government's ambitions around local government reorganisation in that they are seeking to establish Unitary Councils in existing two-tier areas. Subsequently, on 5th February 2025, a formal call for unitary solutions was made by Government, with a March 21st deadline for initial plans. Each Council in Norfolk was invited to work with the other council leaders in the area to develop a proposal for local government reorganisation. In this context, the District Councils wished to undertake a piece of work to review all of the options for local government reorganisation and select the option with the most benefits for the people of Norfolk. Therefore, the District Councils commissioned Deloitte to undertake an appraisal of the options and prepare a submission for Government on this basis.

This paper represents the output of this work. It provides the information requested by Government in initial plans by March 21<sup>st</sup>, including an appraisal of three key options for the future of local government in Norfolk, barriers and challenges faced so far, and early views on costs and councillor numbers.

### 1. Context and Approach

This report represents the culmination of collaborative efforts by Norfolk's District Councils, driven by a shared commitment to securing the best possible outcomes for the citizens of Norfolk. Recognising the Government's call for unitary solutions in the English Devolution White Paper, council leaders and chief executives have dedicated significant time and resources to appraising options for local government reorganisation. This collaborative spirit, deeply ingrained in Norfolk's ethos, is exemplified by existing successful partnerships like the Norfolk Waste Partnership. These initiatives demonstrate the District Councils' proven ability to work together effectively, leveraging shared expertise and resources to deliver high-quality services that meet the diverse needs of Norfolk's residents.

Norfolk, a county rich in history and natural beauty, presents a unique tapestry of vibrant communities, each with its own distinct identity and economic profile. From the bustling urban centre of Norwich, a recognised economic powerhouse, to the coastal communities of Great Yarmouth and North Norfolk, and the rural heartlands of Breckland and King's Lynn & West Norfolk, the county offers a diverse landscape of opportunities and challenges.

This report acknowledges the unique nuances of Norfolk, recognising that a one-size-fits-all approach to local government reorganisation would fail to capture and address the specific needs and aspirations of its diverse communities. The options appraisal process has been guided by a deep understanding of these local contexts, ensuring that the chosen model not only delivers administrative efficiencies, but also empowers communities, fosters local ownership, and celebrates the distinct identities that make Norfolk so unique.

### 2. Barriers and Challenges

Firstly, please note that the options appraisal is work in progress and an evolving document. Meaningful engagement with broader key stakeholders, in particular with local communities, is currently being planned and will have a key impact in finalising the options appraisal. This will also play a key role in finalising the specific boundaries for the proposed unitaries in each option: the Districts would like to hear and take into account local views on the identities of individual communities.

Therefore, the findings in this paper should be considered transitional and interim until further discussions and, in particular, public engagement can be undertaken.

Second, Norfolk District Council Leaders and Senior District Council Officers have engaged positively and collaboratively in discussions and exploratory working sessions to discuss and appraise suitable options. This has taken time and resource to collate data, discuss the options, and undertake engagement. Much further work will be required to build on this positive start. Therefore, securing funding to further develop the full plan and supporting business case will be essential. This is costed below.

Third, the Districts would welcome further clarity from Government on their position regarding the future of urban areas in two-tier areas. The White Paper highlights the crucial role of cities as economic drivers and their unique needs in terms of housing, infrastructure, and service delivery. However, specific guidance on how these considerations should be factored into local government reorganisation proposals would be beneficial. In particular, the issues involved in defining the boundaries around the city of Norwich to create a unitary are complicated. Further clarity on what the Government perceives as key considerations here would be welcome, enabling the Districts to assess the options and ensure the chosen model best serves the needs of all Norfolk's citizens, including those in urban areas.

### **3. Option Appraisal**

An initial longlist of options was developed based on a review of previous work around local government reorganisation in Norfolk, inputs from Deloitte, discussions with Leaders and Chief Executives, and a review of population numbers and the Government's criteria.

This longlist was then reviewed and the following notable options were eliminated:

- The 'doughnut' option (carving out Norwich as a single unitary with the rest of the county forming a separate unitary) was eliminated as the 'worst of all worlds' with the breadth of places that would be covered by the 'ring', including significant travel times from one end of the unitary to the other, whilst not having the scale and efficiency advantages of the single county unitary model. The shortlisted two-unitary model outlined below was preferred.
- Cross-county boundary changes (i.e. forming unitaries that span across the Norfolk – Suffolk border) were ruled out as this would mean changes to both District and County boundaries. The potential arguments for this level of change did not justify the added complexity, in particular given Government indicated they wished for minimal change to existing broader public service boundaries (e.g. the Police).
- A three-unitary model focusing on extended Norwich boundaries (i.e. including the whole of South Norfolk and Broadland in a single unitary with Norwich) was rejected on the basis that it would leave behind an unsustainably small local authority in population terms in a combination of North Norfolk and Great Yarmouth.

A shortlist of three options was created. The three shortlisted options for local government reorganisation have been examined as outlined below.

#### **Option 1 – Single County Unitary**

#### **Option 2 – Two Unitary Option**

- Unitary 1: Kings Lynn and West Norfolk, Breckland, and a part of North Norfolk
- Unitary 2: Broadland, Great Yarmouth, Norwich, South Norfolk, and the remainder of North Norfolk

### **Option 3 – Three Unitary Option**

- Unitary 1: Greater Norwich on Extended Boundaries
- Unitary 2: Breckland, Kings Lynn and West Norfolk, and a part of North Norfolk
- Unitary 3: Great Yarmouth, the remainder of Broadland and South Norfolk, and the remainder of North Norfolk

Please note that the specific boundaries under option 2 and option 3 are currently being defined with the support of community engagement. It would be helpful to receive a steer from the Government on the criteria for changing current District boundaries, as described above.

### **The Criteria**

The three options have been assessed against the following criteria, as set by the Government in the letter dated 5<sup>th</sup> February 2025:

1. A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government.
2. Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.
3. Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.
4. Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views.
5. New unitary structures must support devolution arrangements.
6. New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.

### **Ranking the options against the criteria**

Each of the three options have been given a forced ranking against each of the six criteria, as indicated in the table below. The forced ranking approach means that each option is scored either one, two or three against the criteria with no tied rankings, in order to establish each option's merits against each criteria in a relative fashion, allowing conclusion to be reached on which option is best (and worst).

This process has been undertaken objectively by assessing the relative merits of the evidence provided by the seven Districts, as well as the theoretical benefits and disbenefits of each option against each criteria. Please note that a score of 3 is best and a score of 1 is worst. The rankings for each option have then been added together and ranked with the highest score being selected as the preferred option.

Table 1: Rankings of each option against the six criteria.

Criteria	Option 1: Single Unitary	Option 2: Two-Unitary	Option 3: Three-Unitary
1. Establishment of a single tier of local government	1	2	3
2. Right size to achieve efficiencies, and withstand financial shocks	3	2	1
3. Public service delivery	1	3	2
4. Councils working together and local place identity	1	2	3
5. Support devolution arrangements	1	2	3
6. Stronger community engagement	1	2	3
<b>Overall Ranking</b>	<b>Third (Score: 8)</b>	<b>Second (Score: 13)</b>	<b>First (Score: 15)</b>

When considering the scoring above, it is important to note a couple of things:

1. **This assessment has not applied any weighting to the individual criteria.** Each criterion has been appraised and ranked on an equal footing, recognising the importance of each, and given that Government has given no formal steer on the most important factors. **Therefore individual councils may wish to decide which of the criteria are most important to them – and prioritise the scores in those areas, which may lead to a different overall assessment.**

The Districts would **welcome clarification from the Government on whether this assumption of equal weighting across all criteria is correct.** If specific criteria are considered more critical than others, receiving this steer would be beneficial in refining the assessment and ensuring alignment with the Government's priorities.

2. As mentioned above, **each unitary model in Norfolk presents distinct advantages and disadvantages and a set of trade-offs and competing arguments.** The analysis of the key metrics across the county within this report, which support the Government's preferred criteria, do not create a robust picture of the perfect configuration of unitaries moving forward. For example, metrics indicate a range of places with differing demographics, different economies, different housing markets, and different needs. Therefore, the selection of the preferred option becomes a balancing act of competing arguments based on the evidence.

Three further key things should be noted:

First and foremost, **the single county unitary scored significantly lower than the other two options.** It was the best option identified against only one of the six criteria – the financial and demographic assessment in criteria 2. **Therefore, despite the complexity outlined above and potential trade offs, a clear conclusion does emerge from this assessment that the single county unitary option should be rejected.**

Second, it should be noted that for several of the criteria, there were small differences between the **two-unitary and three-unitary models.**

Third, the **three unitary model did score the best overall against the Government's criteria and therefore has been selected as the preferred option.**

## Summary of scoring against the criteria

The appendix to this report contains the detailed evidence and rationale for each ranking against the criteria. A summary has been provided below.

### Criteria one: Establishment of a single tier of local government.

The two and three-unitary models **create more opportunity for delivering economic growth** by acknowledging that different areas of the county have extremely different economies, and allowing for local plans to address the local needs of each area, based on a real understanding of place and the local economy. For example, Norwich will focus on knowledge and innovation, professional and technology services; the coastal areas will focus on becoming an energy hub, and the rural areas will focus on market towns, agri-tech and manufacturing.

**The three unitary model has been ranked as best because of the evidence of the unique nature of the Norwich economy.** Norwich requires its own solutions to economic and housing issues and the creation of integrated growth, unlocking the potential of the Norwich economy as the powerhouse of the region. The UK's economic future hangs on the success of its cities, which generate the majority of national GVA. Option 3 (three unitary model) is the only option that gives due weight and focus to the City of Norwich in this regard, supporting its delivery of economic growth.

Furthermore, the three unitary model creates two distinct other unitaries rooted in place. Each would have an urban focus in Great Yarmouth and King's Lynn. There is also evidence of some economic, travel to work, and housing market similarities across the two potential new unitaries built around the West Norfolk / Breckland and South Norfolk / Broadland areas, which builds the relative case for the three unitary model: the new unitaries can develop plans to tackle the shared needs in these areas and deliver economic growth.

The possible shortcoming of the three unitary model is that **it breaks the Norwich travel to work area**: a very large geographic area from which residents commute into Norwich, and therefore potentially isolates some communities outside of their most suitable economic zone. This will have to be managed carefully if this option is implemented. Overall, this concern is counterbalanced by the unique position of Norwich and the creation of three new unitaries, each with an urban focus and a set of shared economic issues, but it must be acknowledged that this is a trade-off between reasonable arguments.

Finally, **the single county unitary creates a footprint that is too big** covering the whole 2000+ square miles of Norfolk and has less chance of creating economic growth due to its lack of focus on place. The data is very clear that different areas of the county have extremely different economies, with different sectoral focuses, and different economic challenges, such as high housing prices in some areas, or a lack of skills in other areas. For one local authority to develop individualised plans to address these needs would be very difficult. Instead, local plans are required to address these local needs, based on a real understanding of place and local economy, which is best provided by a greater number of smaller unitaries dedicated to place. Therefore the single county unitary has been ranked as worst against this criterion.

### Criteria two: Right size to achieve efficiencies, and withstand financial shocks

A rapid financial assessment has been undertaken as part of this work and it indicates that **option one – the single county unitary – may achieve the greatest net financial benefits** due to its scale and ability to make savings from exploiting economies of scale.

Option three – a three-unitary model – may achieve the lowest savings due to the need to create three councils with separate structures and services, and smaller economies of scale.

Option two (two-unitary model) represents a compromise between options one and three.

However, it should be noted that the financial assessment has only looked at transactional savings from bringing services together. Smaller unitaries may be able to deliver more transformational change through better understanding and management of local demand and by creating more locally designed preventative services by working with the voluntary and community sector. Investing in these preventative measures can generate long-term cost savings. Moreover, the unitaries could create some shared services across the Norfolk footprint to achieve economies of scale where required, for example in corporate services. Existing examples of collaboration and shared services between the Districts prove this can be done successfully. These two points could bridge the savings gap to the single unitary model.

Furthermore, diseconomies of scale are also possible when organisations get bigger. Organisational structures and processes can become too complicated and cumbersome. Many Town and Parish councils would describe the County Council in these terms. Further public and stakeholder engagement will be important on this point.

This has been a purely theoretical exercise to look at costs and benefits. Savings delivery from this kind of programme is much more difficult in reality. There are certainly examples of county unitaries that have been formed which have struggled to deliver financial savings, and then struggled financially subsequently, particularly in rural areas. Size alone is not an answer to financial sustainability.

On the population size question, option one is the only option that meets the Government's criteria for a minimum population size of 500,000. However, this would create the second largest authority by population in England, covering a very large geography and therefore diluting community identity and place-making and shaping. Both the proposed two councils and three councils under options two and three would cover a significant population size and geography and compare favourably to other unitary councils that currently exist in England.

### Criteria three: Public service delivery

A two or three-unitary model has more chance of improving services due to the potential focus on local need. Residents have different needs in different places across the county. Evidence makes this clear in areas such as skills and education, unemployment rates, ageing population and social care needs, and health and wellbeing indicators. **A two or three-unitary model can take into account these different local needs, and deliver services that are responsive to them**, being more agile and more easily moving resources to where they are needed most.

However, there is the risk of disaggregation of services as existing county level services may be divided up into two unitaries or three unitaries. This could be expensive as it will need to recreate staffing structures. To mitigate this, for services where scale is important, and local need less so, the two or three unitaries could collaborate and create shared services. For example, a Children's Trust model could be set up for Children's Social Care. Elements of commissioning and market management could be conducted on the county footprint (or Strategic Authority footprint) as a shared service where appropriate, whilst local teams in the individual unitaries focus on assessment and prevention. This could achieve a balance between the benefits of economies of scale, and locally tailored services. All the District Councils are keen to explore this as part of the next detailed analysis stage.

On the other hand, the single county unitary could in theory create more economies of scale, and potentially deliver greater performance consistency across the county. However, the County Council has not been able to achieve this at the current time. For example, 28% of Norfolk's 320 care homes need improvement. A more locally driven approach may be able to generate more improvement.

As noted above, a number of smaller unitaries may be able to deliver more transformational change by creating more locally designed preventative services, rooted in local communities and new relationships with residents and the voluntary sector, and built around concepts of social prescribing.

A three unitary model would be effectively aligned to existing public service delivery infrastructure, including the three Public Protection Divisions of the Police, the three principal Further Education colleges, and the three acute hospitals in Norfolk. Similarly, the three-unitary model would mean that the highest crime areas of Norwich, Great Yarmouth, and King's Lynn and West Norfolk each fall under a separate unitary authority. This could facilitate dedicated police attention and resources to reduce crime levels and implement prevention strategies.

**Overall, option two – a two-unitary model – has been scored best as is it minimises the disaggregation risk (which grows with the greater number of unitaries) and improves economies of scale, whilst being able to better take into account local needs than the single county unitary.**

The three unitary model has the best chance of improving services due to the potential focus on local need, and is aligned to existing public service delivery infrastructure, but this model will require a greater level of disaggregation than the two unitary model.

#### **Criteria four: Councils working together and local place identity**

**The two and three-unitary models build on the Districts' track record of collaborative working.** There is much evidence in this regard. Existing collaboration shows that shared services between councils in Norfolk can be highly effective, and new unitaries can build on this base. The two and three unitary models also clearly create brand new entities, removing any sense of 'takeover', which may cause cultural problems.

Perhaps most importantly, **smaller unitaries are more likely to develop and maintain a sense of real place, community and identity.** The three-unitary model acknowledges Norwich's historic and cultural identity as the major city of the region. It also makes it possible for the unitary to focus on tackling Norwich's urban issues, which are different to the rest of the county. It also creates **two distinct other unitaries rooted in place.** Each would have a single historic centre and urban focus, one with King's Lynn in the West, and one with Great Yarmouth in the East. It also ensures that other areas (including North Norfolk, the Broads, Brecks and Fens, and market towns) **will have appropriate place identities** as far as possible.

**Again, here, the differences between a two and three unitary model are not huge.** A three unitary model places a clearer focus on the Norwich identity, but would remove certain South Norfolk and Broadland communities from their natural place connection to Norwich, and instead puts these communities in a new unitary council with Great Yarmouth and parts of North Norfolk. There is also a risk that a Norwich unitary on extended boundaries results in the inclusions in the unitary of geographically separate, distinct settlements, with natural boundaries between them and Norwich. This could create a swamping effect that would be more diluted in the two unitary model.

This is a trade-off that must be acknowledged: some communities unfortunately will lose out whichever model is selected. Resident consultation and engagement will support further work on this area as the full plan is developed. On the basis that a two unitary model creates an authority that would have to serve a greater number of distinct places that encompasses all of Great Yarmouth, Norwich, South Norfolk, Broadland, and part of North Norfolk – the three unitary model has been ranked best.

**The single county unitary scores lowest against this criteria.** The current county council area of Norfolk is not a coherent single place. There is so much variation within the county that any solution must take into account the unique challenges and priorities of each place. For example, the significant size of Norfolk means that is likely to be too big to be managed by one council. Travel times and mileage from one end of the county to another are significant (with a one hour, twenty five minute drive from Great Yarmouth to King's Lynn). In some parts of the county, populations are dispersed over enormous areas – for example, King's Lynn and West Norfolk covers an area of 552 square miles. Breckland covers 500 square miles.

### Criteria five: Support devolution arrangements

**The two and three-unitary models can achieve the potential economic benefits of operating strategically at scale if the Norfolk and Suffolk Strategic Authority is created.** It is easy to envisage an approach that combines multiple unitaries across Norfolk and Suffolk with the Strategic Authority, therefore providing an ideal combination of strategic thinking on issues such as planning and transport, and local focus on the specific challenges that need to be faced in the individual places within the two counties.

**The three unitary model has been ranked as best on the basis of the arguments above, in that it creates a more balanced power dynamic within the Strategic Authority.** Each unitary would represent a distinct community of interest with a comparable population size, ensuring that no single authority dominates the partnership. Three unitaries would also provide a stronger platform for local voices to be heard within the Strategic Authority.

**A single county unitary would be too similar in size to the Strategic Authority for it to make sense.** It would create a power imbalance between the county and the Strategic Authority given the size difference would not be large. The three unitary model creates a clear size differential.

### Criteria six: Stronger community engagement

The two or three-unitary models better maintain effective local engagement. There is a **significant danger that a county unitary could become too remote** from citizens and communities, reduce local decision making, and even perhaps damage the interests of the individual places. Bigger local authorities may be more inclined to give more focus to factors such as value for money at the expense of local need and have to trade off the different needs of different places, simply due to their size. This can mean that local places lose out.

By contrast, a **two or three-unitary model could create a very different culture**, building on the strengths of the districts in working with their local residents and communities of place and interest. There is lots of evidence of the effectiveness of the local engagement programmes of the District Councils in Norfolk.

**The three unitary option has been ranked as best on the basis that it creates councils of a more relatable scale that are therefore closer to their communities: smaller is better for local engagement.**

### Summary of the scoring against the criteria

This methodology results in the following conclusion:

- The three-unitary model (option 3) has received the highest ranking.
- The two-unitary model (option 2) has received the second overall ranking.
- The single county unitary model (option 1) has received the lowest overall ranking.

Fundamentally the three-unitary option scored the best because it:

- Is firmly rooted in an understanding of the places of Norfolk, in that **it reflects and prioritises the three main historic urban centres (Norwich, Great Yarmouth and King's Lynn)** which act as the main civic and economic hubs for Norfolk. Each of these places has its own distinct characteristics and opportunities which can be exploited under a unitary structure based around these three urban centres.
- Will drive the **delivery of improved outcomes for the people of Norfolk**, including focusing on attracting globally renowned companies investing in the UK driving both local



and national economic growth, reducing worklessness in deprived areas, contributing to building social cohesion, and driving a strong prevention agenda for health and wellbeing.

- Creates a **singular focus for Norwich as the economic driving force and powerhouse of Norfolk**, creating opportunity for significant growth around the urban fringe in an integrated way, therefore promoting future economic and housing growth.
- Creates **more opportunity for delivering economic growth** by acknowledging that different areas of the county have extremely different economies, and allowing for local plans to address the local needs of each area, based on a real understanding of place and the local economy. For example, Norwich will focus on knowledge and innovation, professional and technology services; the coastal areas will focus on becoming an energy hub and strong tourist economy, and the rural areas will focus on market towns, agri-tech and manufacturing.
- Ensures that **areas will have appropriate place identities** as far as possible, given the more relatable scale of the authorities and therefore greater focus on individual place, in particular giving greater focus to Norwich, and reflecting the identities, economic, travel to work, and housing market similarities across the West Norfolk / Breckland and South Norfolk / Broadland areas.
- Is based on local relationships between existing Districts with **a track record of successful collaboration and delivering highly effective, cost effective services**. For example, each unitary can work closely alongside its acute hospital, and with new build replacement hospitals proposed at Great Yarmouth (Gorleston) and Kings Lynn and an ageing population, the integration between social care and health to accelerate prevention and healthy ageing programmes can be more rapidly achieved.
- Provides a **strong base for devolution alongside a Norfolk and Suffolk Strategic Authority** due to the balanced nature of the population sizes of the proposed unitaries, allowing equal representation; the differential between the proposed unitaries and the potential Strategic Authority (as the Government has requested), and the ability to create economic growth through focus on delivering local plans for local places, and in particular unleashing the potential of Norwich, working with the new Strategic Authority which will be critical in creating the strategic infrastructure and roadmap.
- Better maintains effective **local engagement due to the number of smaller authorities**, which can build on highly successful methods of community and stakeholder engagement employed by each of the Districts.

#### 4. Indicative costs and arrangements

An initial estimate of costs has been made at £1.2m for developing the full plan up to September 2024, as per the table below.

These costs include the officer implementation team required to develop the full plan.

Table 5: Estimation of direct process costs.

Area	Description	Estimated Cost
	Officer time within Councils to support project management, policy development and subject matter expert input.	£0.3m
<b>Capacity Funding: Proposal Development, Financial Modelling, and Implementation planning.</b>	External advisory spend: <ul style="list-style-type: none"> <li>Support with preparation of full plan.</li> <li>Advice on development of Target Operating Model, workforce integration, estates rationalization, business case, financial modelling, as required.</li> </ul>	£0.7m
<b>Stakeholder Communications and Engagement</b>	Appointing external advisors to help manage overall communications and engagement process.	£0.2m
<b>Total</b>		<b>£1.2m</b>

An estimate has also been made of the costs of implementation of the three unitary model at £14.4m. Again, a breakdown is provided below.

This is early work. The assumptions made so far are based on previous experience of undertaking similar exercises. Therefore these figures cannot be relied upon at this stage by the local authorities concerned as accurate estimates.

Table 6: Estimation of enabling restructuring costs.

Area	Description	Estimated Cost
<b>Redundancies</b>	Redundancies to facilitate restructuring, to reduce long term management costs.	£5.1m
<b>Programme Integration (PMO)</b>	Costs of an integrated programme office to drive rapid and effective integration of services needed to deliver benefits.	£1.6m
<b>Digital/IT</b>	<ul style="list-style-type: none"> <li>Data Centre and data migration</li> <li>IT Networks</li> <li>Telephony</li> <li>Financial Ledgers</li> <li>Payroll systems</li> <li>Procurement systems</li> </ul>	£7m
<b>Estates</b>	Costs to consolidate the estate as part of restructure.	£0.7m
<b>Total</b>		<b>£14.4m</b>

Further work will have to be undertaken on how these costs will be funded, but it is assumed at the current time that they could be funded from the potential savings delivered from creating the new unitaries, as per the financial assessment.

The costs could be phased over a period of time depending on the pace of implementation plans and the degree of change that the new authorities wish to implement.

## 5. Councillor numbers

The following councillor numbers have been estimated at this stage, based on a ratio of 5000 electors to one councillor. This ratio is based on potentially similar councils such as North Yorkshire and Cornwall.

Three-Unitary Model	Indicative Councillor Numbers
Unitary 1	43
Unitary 2	48
Unitary 3	50

## 6. Structures to support devolution

The three-unitary model for Norfolk presents a promising approach to supporting devolution arrangements and fostering a balanced and effective partnership within a two-county (Norfolk and Suffolk) Strategic Authority.

### ***Enhanced balance and representation***

- **More equitable power dynamics:** Dividing Norfolk into three unitaries, as proposed, creates a more balanced power dynamic within the Strategic Authority. Each unitary would represent a distinct community of interest, ensuring that no single entity dominates the partnership. This aligns with the Devolution White Paper's emphasis on "partnerships that bring more than one Local Authority together over a large geography" and avoids the risk of a single dominant authority overshadowing others.
- **Amplifying local voices:** Three unitaries would provide a stronger platform for local voices to be heard within the Strategic Authority. Each unitary would be more directly accountable to its residents, fostering greater responsiveness to local needs and priorities. This structure promotes the White Paper's principle of "ensuring that decisions are made at the most appropriate level," empowering communities to have a greater say in shaping their future.

### ***Strengthening collaboration and local focus***

- **Facilitating strategic alignment:** The three unitary model can facilitate better alignment between strategic priorities and local needs. Each unitary, with its more focused geographical area, can develop a deeper understanding of its communities' specific challenges and opportunities. This local expertise can then be brought to the Strategic Authority, ensuring that decisions are grounded in local realities and reflect the diverse needs of the region.
- **Promoting integrated solutions:** While some issues require a county-wide approach, many challenges are best addressed at a more localised level. Three unitaries would empower local leaders to develop tailored solutions, fostering innovation and responsiveness. For example, Unitary 3, encompassing Great Yarmouth, part of Broadland and South Norfolk, and part of North Norfolk, could develop specialised strategies for coastal management and tourism, while Unitary 2, comprising Breckland, Kings Lynn and West Norfolk, and the North Norfolk County divisions of Fakenham & The Raynhams, Holt and Wells, could focus on rural transport and economic development initiatives tailored to their specific needs.

### ***Unlocking devolution's full potential***

- **Nurturing strong local leadership:** Three unitaries would foster the development of strong local leadership, empowering communities to take ownership of their future. This aligns with the White Paper's vision of "a strong foundation of capable and responsive local governance" as a prerequisite for successful devolution. By distributing power and decision-making across

three entities, this model encourages greater accountability and responsiveness to local needs.

- **Building blocks for an established Mayoral Strategic Authority:** The White Paper envisions a future where all parts of England have an Established Mayoral Strategic Authority, unlocking further devolution and an Integrated Settlement. This three-unitary model for Norfolk provides the necessary building blocks for achieving this ambition. By establishing a balanced and collaborative framework at the local level, this structure paves the way for a smooth transition to an Established Mayoral Strategic Authority, ensuring that Norfolk is well-positioned to benefit from further devolution.

The three-unitary option for Norfolk aligns strongly with the principles and objectives of devolution as outlined in the White Paper. It promotes a balanced and representative Strategic Authority, enhances collaboration and local focus, and fosters the development of strong local leadership. This model offers a promising pathway for unlocking the full potential of devolution, ensuring that all communities in Norfolk and Suffolk have a meaningful voice in shaping their future and benefitting from a more prosperous and equitable region.

## **7. Local engagement**

As noted above, the tight deadlines for creating the proposal have thus far precluded the opportunity for meaningful engagement with key stakeholders, town and parish councils and Norfolk's residents.

The District Councils are keen to inform and involve residents, businesses, and staff, the opportunities for which have been severely constrained in this early phase of work.

To do this the districts will utilise existing community networks, working closely with existing community groups, parish and town councils, and other local organisations to reach residents through established channels. Briefings are already taking place with parish and town councils across Norfolk.

The districts will also employ a variety of communication channels: using a mix of online and offline communication channels, including social media, local newspapers, public meetings, and focus groups, to ensure that information is accessible to all. Recognising that a one-size-fits-all approach is not always effective, and local communities and demographic groups have different preference towards routes of engagement, each districts tailor engagement strategies to the audience, topic or outcome being sought.

The districts have written to a range of key stakeholders including the Integrated Care Board, Acute Hospital Trusts, Police and Crime Commissioner, Fire and Rescue Authority, local Higher Education and Further Education providers, National Park Authorities, and the voluntary and third sector. They will seek meetings to explore the preferred option of these stakeholders for local government reorganisation.

## **8. Voluntary arrangements**

A range of regular meetings have been set up to enable the councils involved to keep working on these proposals. These meetings are supported by a programme team with membership taken from all the districts. The meetings are as follows:

- The Programme Team meet every Tuesday afternoon
- Council Leaders meet every week on a Monday
- Council Chief Executives meet every week on a Friday
- There are regular touchpoints between the districts and the County Council.

## Conclusion

This paper has identified **a three unitary model** as the preferred option for the future structure of local government in Norfolk (please see the 'Summary of the scoring against the criteria' section above for details).

In arriving at this conclusion, Norfolk District Council Elected Leaders and Senior District Council Officers have engaged positively and collaboratively in discussions and exploratory working sessions to discuss and appraise suitable options.

Initial thoughts have already been provided on potential costs, councillor numbers and devolution arrangements.

The District Councils would now like to continue to work together to develop this option further for final submission in September 2025, including a full business case and fully worked up boundaries.

In this regard, a steer from Government on the criteria for determining whether changes are required to existing District boundaries would be very helpful. The issues involved in defining the boundaries around the city of Norwich to create a unitary are complicated. Further clarity on what the Government perceives as key considerations here would be welcome.

## Examples of the evidence used for the options appraisal

The following sections provide a summary of evidence supporting the conclusions outlined above.

### Criteria one: Establishment of a single tier of local government.

#### Economy

Norfolk's local economies share several key similarities and potential synergies that could be leveraged for collective growth and prosperity as part of a potential multi-unitary model:

- **Economic powerhouse:** Norwich City stands out as the urban centre, dominated by public administration, education, and retail, reflecting its role as a regional hub. Norwich's growth in sectors like digital technology, financial services, and healthcare creates potential employment opportunities for residents of surrounding areas like South Norfolk and Broadland. Improving transport links and promoting skills development aligned with these sectors could enhance access to these opportunities.
- **Coastal Tourism:** Great Yarmouth, North Norfolk, and King's Lynn & West Norfolk all benefit significantly from coastal tourism, attracting visitors to their beaches, seaside towns, and natural beauty. This shared strength presents opportunities for collaboration, particularly in attracting a wider visitor demographic, extending the tourism season and invest in maritime related industries.
- **Agriculture and Agri-Tech:** Agriculture remains a significant sector in North Norfolk, Breckland, and South Norfolk. Collaboration on initiatives to promote agri-tech innovation, support rural businesses, and enhance agricultural productivity could benefit all three regions.
- **Manufacturing:** King's Lynn & West Norfolk and Breckland both have a long history of manufacturing, forming a significant part of their economic identity and employment base. Collaboration on initiatives to support manufacturing businesses, attract investment in the sector, and develop a skilled workforce to meet industry needs would enhance the growth of this market area. This could involve joint skills training programs, shared resources for business support, and promoting the region as a hub for manufacturing excellence.
- **Professional and Technical Sectors:** Norwich and the surrounding urban areas have key economies in financial and professional services. This continued growth could see a spill over affect to wider areas, accelerating innovation and growth across the wider county.
- **Market Town Revitalisation:** With a network of market towns that serve as vital economic and social hubs for their communities, King's Lynn & West Norfolk and Breckland face similar challenges from the rise of online shopping, changing consumer habits, and the need to attract new businesses and investment. Collaboration on initiatives to revitalise market town centres, promote local businesses, and create attractive public spaces could benefit both districts.
- **Access to Knowledge and Innovation:** South Norfolk and Broadland benefit from their proximity to Norwich, with its world-leading research institutes, universities, and thriving business clusters. This proximity provides opportunities for collaboration on research and development, knowledge transfer, and skills development, potentially benefiting businesses in both regions.

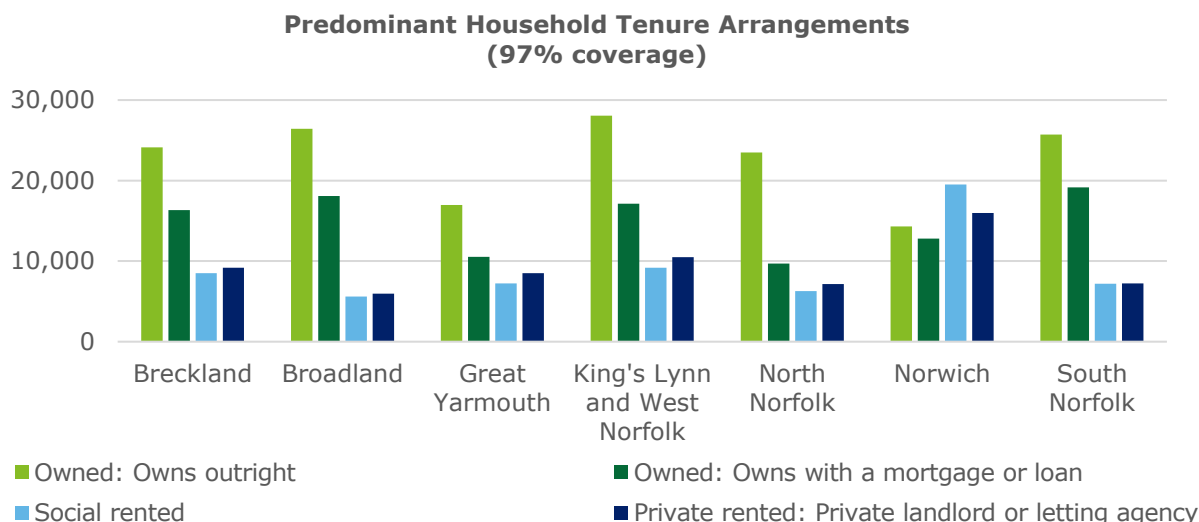
This analysis indicates that the two and three-unitary models create more opportunity for delivering economic growth by acknowledging that different areas of the county have extremely different

economies, and allowing for local plans to address the local needs of each area, based on a real understanding of place and the local economy.

For example, Norwich will focus on knowledge and innovation, professional and technology services; the coastal areas will focus on becoming an energy hub, and the rural areas will focus on market towns, agri-tech and manufacturing.

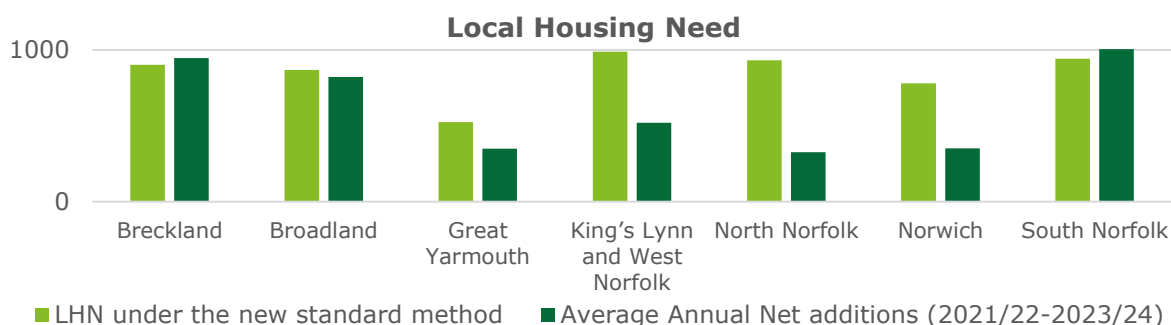
**Housing**

Analysis of housing tenure patterns across Norfolk districts reveals distinct variations that highlight the varied market dynamics within the county.



These variations in housing tenure patterns have implications for the proposed unitary models. The concentration of private and social renting in Norwich highlights the need for a greater focus on resources and support services related to tenant rights, housing affordability, and homelessness prevention in the city. Conversely, the high levels of homeownership in King's Lynn & West Norfolk, South Norfolk and Broadland might influence planning strategies under the three unitary model focusing on supporting sustainable development that meets the needs of homeowners, while also ensuring a sufficient supply of affordable housing options.

The annual net additions to the housing stock across the Norfolk districts illustrate some notable gaps between housing delivery and projected needs.

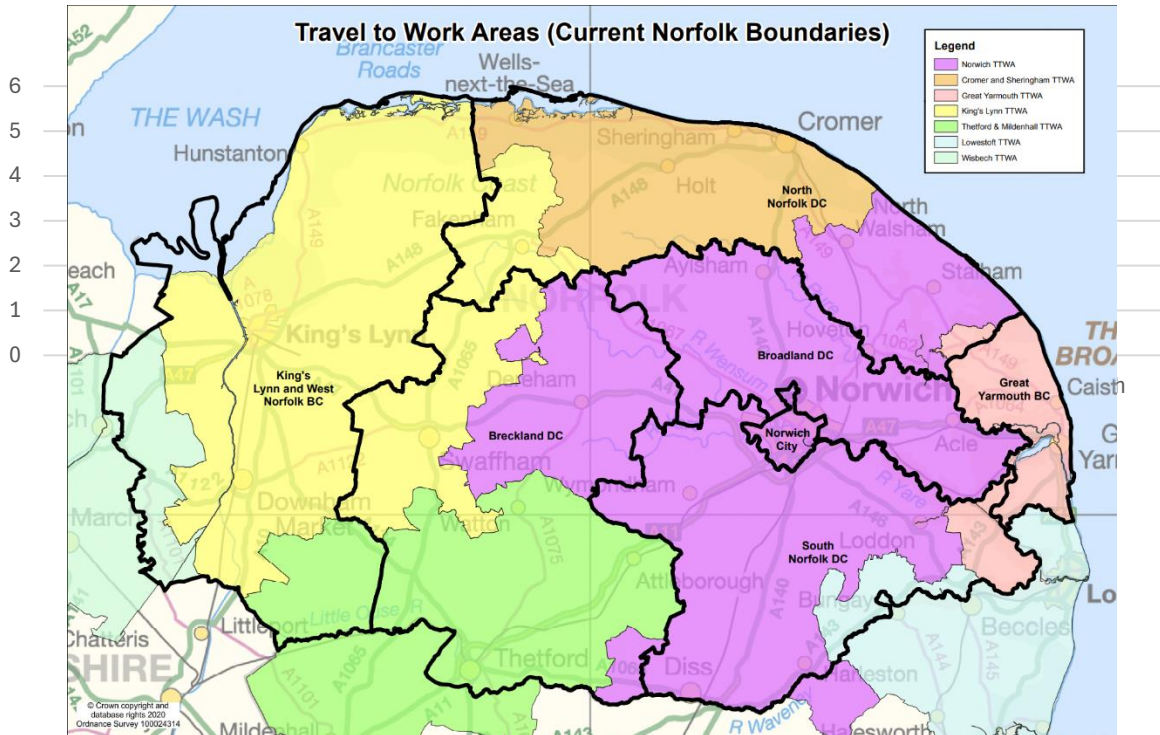


Across Norfolk, the average annual net additions of housing (dark green bars) generally fall short of the Local Housing Need targets (light green bars) set by the new standard method. This shortfall is particularly pronounced in North Norfolk, King's Lynn & West Norfolk, and Norwich. This suggests these areas face a greater challenge in meeting their housing needs, and working across three unitaries may be helpful in the future. For example, an integrated approach on a bigger footprint may help Norwich to deliver more housing. However, this must be done carefully. It must be

acknowledged that South Norfolk and Broadland have excellent track records of housing delivery, and a three unitary model could disrupt this, when compared to a two unitary model. Issues such as the strategic gap between communities around the fringe of Norwich must be maintained.

Considering economic inactivity, five of the seven Districts exhibit similar rates of residents receiving unemployment-related benefits. By contrast, the needs in Great Yarmouth (5%) and Norwich (4.1%) are significantly different. A three unitary model could ensure focused on attention on these issues as Great Yarmouth and Norwich will be in different local authorities.

**Travel to work**



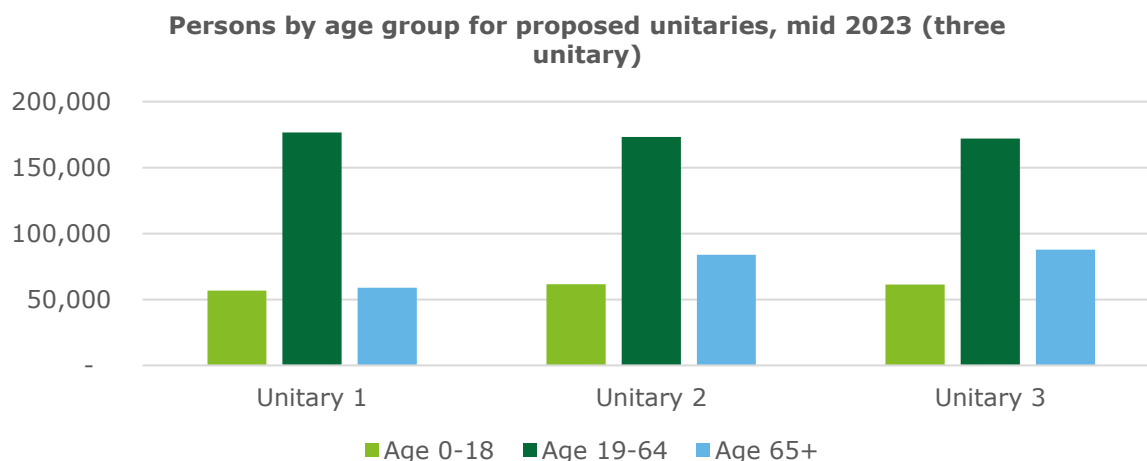
The disadvantage of the three unitary model is that it breaks the travel to work area across South Norfolk and Broadland where residents commute into Norwich and potentially isolates some communities outside of their most suitable economic zone. This will have to be managed carefully if this option is implemented, which should be helped by the economic similarities between South Norfolk and Broadland, which will put these interests at the heart of the potential new unitary. This focus is already evident through the existing Greater Norwich Growth Board (GNGB) which brings together Norwich City, South Norfolk, and Broadland, in conjunction with the wider county, to accelerate infrastructure development and access into the area.

Please note that the travel to work data above is from 2014 and before the Covid pandemic – but it is the latest available data on this subject.



## Demography

A two or three-unitary model could also be built on similarities in population demographics. For example, King's Lynn & West Norfolk and Breckland, both share a comparable split of their population aged 0-18 (c.20%) and working aged adults (c.55%). Similarly, Great Yarmouth, Broadland and South Norfolk all demonstrate a similar population size of older-aged adults (c.35,000). These similarities indicate a good basis for the two or three unitary model.



## Criteria two: Right size to achieve efficiencies, and withstand financial shocks

A rapid financial assessment has been undertaken as part of this work, considering both estimated costs and savings across the proposed models. The results of this work are shown in the table below.

	Area	Option 1: Single-Unitary	Option 2: Two-Unitary	Option 3: Three-Unitary
<b>Costs</b>	Redundancy Costs	£7.3m	£6.3m	£5.1m
	Integration PMO	£1.1m	£1.3m	£1.6m
	Digital/IT	£5m	£6m	£7m
	Estates	£0.9m	£0.8m	£0.7m
	Council tax harmonisation	£9.8m	£8.2m	£5.5m
	<b>Total Costs</b>	<b>£24.1m</b>	<b>£22.6m</b>	<b>£19.9m</b>
<b>Savings</b>	Leadership savings	£5.5m	£4.6m	£3.7m
	Corporate Services	£15.9m	£14.3m	£12.9m
	Property Rationalisation	£2.7m	£2.4m	£2.2m
	Service Optimisation	£10m	£9m	£8.1m
	Democratic Savings	£1.3m	£0.8m	£0.6m
	<b>Total Savings</b>	<b>£35.4m</b>	<b>£31.1m</b>	<b>£27.5m</b>
<b>Net Saving</b>		<b>£11.3m</b>	<b>£8.5m</b>	<b>£7.6m</b>

Please note that an exercise of this type is by its nature very driven by the assumptions made. The assumptions made so far are based on previous experience of undertaking similar exercises. Therefore these figures cannot be relied upon at this stage by the local authorities concerned as accurate estimates. This is an exercise to show relative costs and benefits, which can then give an indication of which option may be the most financially advantageous.

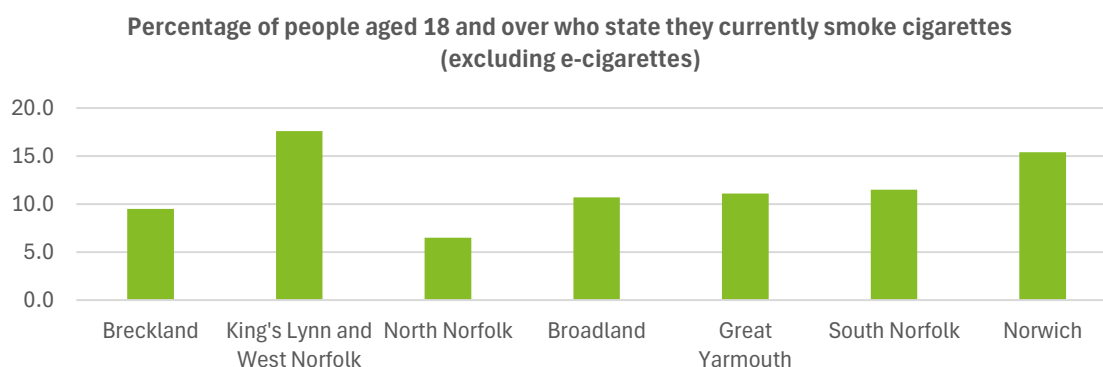
Please also note that further areas would be looked at where savings could be made as part of the move towards a final plan and supporting business case. These might include service transformation opportunities, or potentially looking at issues such as the costs of creating and managing new parish councils, or any potential savings from possibly merging the Broads Authority into the new unitaries.

### Criteria three: Public service delivery

A two or three-unitary model has more chance of improving services due to the potential focus on local need. Residents have different needs in different places across the county. Evidence makes this clear in areas such as skills and education, unemployment rates, ageing population and social care needs, and health and wellbeing indicators.

#### Health and wellbeing

For example, health and wellbeing indicators indicate different challenges in different places, as indicated by the graph below showing smoking prevalence.



Smaller unitaries may be able to deliver more transformational change by creating more locally designed preventative services, rooted in local communities and new relationships with residents and the voluntary sector, and built around concepts of social prescribing. Investing in these preventative measures promises not only to reduce homelessness but also to generate long-term cost savings.

#### Deprivation

Area	Number of communities in 20% most deprived in England	% of population in 20% most deprived in England
<b>Breckland</b>	6	10.4%
<b>Kings Lynn &amp; West Norfolk</b>	7	15.4%
<b>North Norfolk</b>	2	2.6%
<b>South Norfolk</b>	0	0.0%
<b>Broadland</b>	0	0.0%
<b>Great Yarmouth</b>	9	40.0%
<b>Norwich</b>	12	39.0%

Norwich faces a unique challenge with regards to deprivation, with 20 communities classified within the most deprived 20% in England. While Great Yarmouth follows with nine communities in the same category, the concentration in Norwich highlights a specific need for targeted intervention. A three-unitary model, where Norwich is addressed in the context of the immediate greater Norwich area, allows for a bespoke approach to tackling these deeply rooted issues. This focused strategy can

better address the complex interplay of socio-economic factors contributing to deprivation in Norwich.

#### Criteria four: Councils working together and local place identity

**The two and three-unitary models build on the Districts' track record of collaborative working.** There is much evidence in this regard, with examples provided below.

##### Parking Operations

Parking Operations is a service department of the Borough Council of King's Lynn & West Norfolk (BCKLWN), providing parking related services to a number of local authority partners. Those included in the partnership are Borough Council of King's Lynn and West Norfolk, Breckland District Council, Great Yarmouth Borough Council, Norfolk County Council, North Norfolk District Council, Norwich City Council and South Norfolk & Broadland.

The partnership behind Parking Operations exemplifies the collaborative spirit already present amongst Norfolk's District Councils. This joint venture, responsible for managing on-street parking operations, demonstrates the tangible benefits of shared services and regional cooperation.

Parking Operations provides a comprehensive range of services, including: **enforcement of parking regulations, management of parking permits, and operation of pay and display machines**: Parking Operations manages and maintains pay and display machines in both districts, ensuring a consistent and user-friendly experience for motorists.

Key aspects of this collaboration that highlight its effectiveness:

- **Pooling resources, increasing efficiency:** By joining forces, the councils have streamlined their parking operations, achieving cost savings and increased efficiency. This partnership allows for the sharing of expertise, technology, and resources, ultimately benefiting both councils and Norfolk's residents.
- **Seamless service delivery across boundaries:** Parking Operations provides a seamless experience for residents and visitors, regardless of which district they are in. This joined-up approach simplifies parking regulations and enforcement, enhancing convenience and promoting a more positive image for both areas.
- **A model for future collaboration:** The success of Parking Operations serves as a blueprint for future collaborations between Norfolk's District Councils. It demonstrates the potential for shared services to deliver tangible benefits, paving the way for a more integrated and efficient approach to local governance.

The existence of Parking Operations directly challenges the notion that a single, large unitary authority is necessary for effective service delivery in Norfolk. This partnership showcases the ability of District Councils to collaborate successfully, leveraging their combined strengths to provide efficient and cost-effective services for their residents.

The volume and diversity of collaborations across Norfolk demonstrate that:

- **Partnership is ingrained within the county:** Collaboration is deeply ingrained in the ethos of local governance in Norfolk. It is not a reactive response to specific funding opportunities or government mandates, but a proactive and enduring commitment to working together for the greater good.
- **District councils are not siloed entities:** The widespread collaboration across Norfolk demonstrates that District Councils are not operating in isolation. They are actively engaged in partnerships, both as leaders and participants, demonstrating their commitment to working across boundaries for the benefit of the wider community.

- **Effective collaboration can exist independently of structural change:** The success of existing partnerships, operating within the current District Council framework, challenges the assumption that a single unitary authority is a prerequisite for effective collaboration and service delivery.

The evidence overwhelmingly points to a local governance landscape in Norfolk where collaboration is not just an aspiration, but a lived reality. This collaborative spirit, evident in the breadth and depth of partnerships across the county, provides a strong foundation for future devolution and local empowerment, regardless of structural changes to local government.

### Criteria five: Support devolution arrangements

The UK Government's Devolution White Paper outlines a clear vision for empowering local areas through Strategic Authorities. In the context of Norfolk, a two-county Strategic Authority encompassing both Norfolk and Suffolk presents a compelling opportunity. However, the success of this model hinges on establishing a strong foundation at the unitary level.

A two-unitary model for Norfolk, while a step towards a more balanced structure, still presents challenges to the effective implementation and long-term success of devolution arrangements within a proposed two-county Strategic Authority with Suffolk.

#### Addressing imbalance

- **Mitigating dominance:** Dividing Norfolk into two unitaries, as proposed, would partially address the issue of a single, dominant entity within the Strategic Authority. However, Unitary 2, encompassing the more populous and economically powerful areas of Broadland, Great Yarmouth, Norwich, and South Norfolk, would still hold a significant advantage over both Unitary 1 and Suffolk. This could lead to an uneven playing field within the Strategic Authority, potentially hindering equitable decision-making and resource allocation.
- **Population disparity persists:** Unitary 2 would have a much bigger population than unitary 1, potentially creating a democratic deficit and undermining the principle of "one person, one vote".

#### Challenges to collaboration and local focus

- **Strategic alignment and local needs:** The Devolution White Paper emphasizes the importance of aligning strategic priorities with the nuanced understanding of local needs. While two unitaries offer a degree of local focus, the proposed division could create challenges in addressing issues that require a more integrated approach. For example, transport infrastructure planning, economic development strategies, and environmental management often transcend unitary boundaries, necessitating strong collaboration and a shared vision.
- **Risk of a two-tier system:** Dividing Norfolk into two unitaries, with one encompassing the more urbanised and economically powerful areas, could inadvertently create a two-tier system within the county. Unitary 1, with its predominantly rural character, might struggle to compete for resources and influence within the Strategic Authority, potentially exacerbating existing inequalities and hindering its ability to effectively address the needs of its communities.

#### Unlocking devolution's potential

- **Fostering local leadership:** Two unitaries would provide a platform for stronger local leadership compared to a single unitary model. However, the potential for an imbalance between the two unitaries could hinder the development of truly equitable and

representative local governance. The Devolution White Paper's vision of empowered local authorities working in partnership within a Strategic Authority might be compromised by this uneven power dynamic.

In contrast, the three-unitary model for Norfolk presents a more promising approach to supporting devolution arrangements and fostering a balanced and effective partnership within a two-county Strategic Authority with Suffolk.

### Enhanced balance and representation

- **More equitable power dynamics:** Dividing Norfolk into three unitaries creates a more balanced power dynamic within the Strategic Authority. Each unitary would represent a distinct community of interest with a more comparable population size to Suffolk, ensuring that no single entity dominates the partnership. This aligns with the Devolution White Paper's emphasis on "partnerships that bring more than one Local Authority together over a large geography" and avoids the risk of a single dominant authority overshadowing others.
- **Amplifying local voices:** Three unitaries would provide a stronger platform for local voices to be heard within the Strategic Authority. Each unitary would be more directly accountable to its residents, fostering greater responsiveness to local needs and priorities. This structure promotes the White Paper's principle of "ensuring that decisions are made at the most appropriate level," empowering communities to have a greater say in shaping their future.

### Strengthening collaboration and local focus

- **Facilitating strategic alignment:** While three unitaries might require more coordination, this structure can actually facilitate better alignment between strategic priorities and local needs. Each unitary, with its more focused geographical area, can develop a deeper understanding of its communities' specific challenges and opportunities. This local expertise can then be brought to the Strategic Authority, ensuring that decisions are grounded in local realities and reflect the diverse needs of the region.
- **Promoting integrated solutions:** While some issues require a county-wide approach, many challenges are best addressed at a more localised level. Three unitaries would empower local leaders to develop tailored solutions, fostering innovation and responsiveness. For example, Unitary 3, encompassing Great Yarmouth, part of Broadland and South Norfolk, and part of North Norfolk, could develop specialised strategies for coastal management and tourism, while Unitary 2, comprising Breckland, Kings Lynn and West Norfolk, and the North Norfolk County divisions of Fakenham & The Raynhams, Holt and Wells, could focus on rural transport and economic development initiatives tailored to their specific needs.

### Unlocking devolution's full potential

- **Nurturing strong local leadership:** Three unitaries would foster the development of strong local leadership, empowering communities to take ownership of their future. This aligns with the White Paper's vision of "a strong foundation of capable and responsive local governance" as a prerequisite for successful devolution. By distributing power and decision-making across three entities, this model encourages greater accountability and responsiveness to local needs.
- **Building blocks for an established Mayoral Strategic Authority:** The White Paper envisions a future where all parts of England have an Established Mayoral Strategic Authority, unlocking further devolution and an Integrated Settlement. This three-unitary model for Norfolk provides the necessary building blocks for achieving this ambition. By establishing a balanced and collaborative framework at the local level, this structure paves the way for a smooth transition to an Established Mayoral Strategic Authority, ensuring that Norfolk is well-positioned to benefit from further devolution.

### Imbalance and ineffective representation

- **Dominating the Strategic Authority:** A single Norfolk unitary, with its significantly larger population compared to Suffolk, would create an inherent imbalance within the Strategic Authority. This dominance risks sidelining Suffolk's needs and priorities, hindering equitable decision-making and potentially leading to a "Norfolk-centric" approach to strategic planning. The Devolution White Paper explicitly cautions against such imbalances, emphasising the importance of "partnerships that bring more than one Local Authority together over a large geography." In addition, having a single county unitary in Norfolk and Suffolk would create an imbalanced dynamic with the Strategic Authority potentially blurring the lines between their accountabilities due to the similar scales to which they operate.
- **Diluting Local Voices:** A single unitary for Norfolk would encompass a vast and diverse area, potentially diluting the voices of individual communities within the Strategic Authority. This could lead to reduced accountability and responsiveness, as decision-making becomes more centralised and removed from the specific needs and concerns of local communities. The White Paper stresses the importance of "ensuring that decisions are made at the most appropriate level," which a single, dominant unitary for Norfolk would fail to achieve.

### Hindered collaboration and local input

- **Struggling with strategic priorities:** The Devolution White Paper outlines key areas of competence for Strategic Authorities, including transport, skills, housing, economic development, environment, health, and public safety. These areas require a nuanced understanding of local needs and effective collaboration between the Strategic Authority and its constituent unitaries. A single unitary for Norfolk, with its vast and diverse geography, would struggle to provide the necessary local insight and collaborative spirit. This is particularly crucial for areas like health and social care, where effective communication and collaboration are essential for delivering integrated services.
- **Stifling local leadership:** The White Paper envisions a future where all parts of England have an Established Mayoral Strategic Authority, unlocking further devolution and an Integrated Settlement. However, achieving this ambition requires a strong foundation of capable and responsive local governance. A single unitary for Norfolk could stifle local leadership, concentrating power and decision-making in a single entity, rather than fostering the "multiple Local Authorities" model that the White Paper advocates for.

### Population ratio and democratic deficit

- **Disproportionate representation:** A single unitary for Norfolk would create a stark population imbalance within the Strategic Authority. This disproportionate representation could lead to Suffolk's needs being overlooked and a democratic deficit within the partnership. The White Paper highlights the importance of "a sensible population size ratio" between local authorities and the Strategic Authority, which a single Norfolk unitary would fail to achieve.
- **Reduced accountability:** A large, single unitary might be less responsive to the needs of individual communities, as decision-making becomes more centralised and removed from those directly affected. This reduced accountability could undermine trust in the devolution process and hinder the long-term success of the Strategic Authority.

### Criteria six: Stronger community engagement

The two or three-unitary models better maintain effective local engagement. A single unitary authority for Norfolk, while potentially offering administrative efficiencies, presents a significant risk

of centralising power and decision-making, potentially diminishing neighbourhood empowerment. A single, county-wide authority could:

- **Increase distance between decision-makers and communities:** A larger, more remote authority could lead to a disconnect between residents and those making decisions that affect their lives. This distance can encourage a loss of civil pride and reduce opportunities for meaningful community input.
- **Prioritise county-wide agendas over local needs:** A single unitary might focus on strategic priorities at the county level, potentially overlooking the specific needs and aspirations of individual neighbourhoods. This could result in a "one-size-fits-all" approach that fails to address the unique challenges and opportunities of diverse communities. Broader, county-wide, and regional priorities should be picked up by the Strategic Authority.
- **Undermine existing hyperlocal structures:** Norfolk already has a network of parish and town councils that play a vital role in representing local interests and engaging residents at the neighbourhood level. A single unitary could inadvertently diminish the role of these hyperlocal structures, as decision-making power shifts to a more centralised authority.

Furthermore, a single unitary structure faces the challenge of effectively engaging communities across a vast and diverse county. A centralised structure could:

- **Limit opportunities for meaningful participation:** A single authority might struggle to create sufficient opportunities for residents across the county to participate in consultations and decision-making processes. This could lead to a sense of disenfranchisement, particularly in more remote or less populous areas.
- **Struggle to reach diverse communities:** Norfolk is home to a wide range of communities, each with its own unique characteristics and communication preferences. A single unitary might struggle to develop tailored engagement strategies that effectively reach and resonate with all these diverse groups.
- **Create a perception of "top-down" decision-making:** A centralised structure could foster a perception that decisions are being made remotely, without sufficient consideration of local perspectives. This could erode trust in the new authority and hinder community buy-in.
- **Prompt the recreation of multiple tiers:** The potential disconnect between a single unitary and local communities could be mitigated through the creation of forums at a local level which would add additional complexity and potential fragmentation across the county.

By contrast, a **two or three-unitary model could create a very different culture**, building on the strengths of the districts in working with local people. There is lots of evidence of the effectiveness of the local engagement programmes of the District Councils in Norfolk.

Norfolk boasts a diverse network of partnerships that exemplify a proactive and inclusive approach to community engagement. These partnerships provide valuable insights into how a new unitary structure can effectively involve residents in decision-making processes and ensure that local government is truly responsive to their needs.

- **Collaborative service delivery:** Partnerships like CNC Building Control (detailed in previous responses) demonstrate how collaborative service delivery models can enhance community engagement. By bringing together multiple authorities and stakeholders, these partnerships create more accessible points of contact for residents, foster a more joined-up approach to service provision, and encourage community input into service design and delivery.

- **Addressing community needs:** Numerous partnerships in Norfolk focus on addressing specific community needs, demonstrating a commitment to involving residents in finding solutions to local challenges. For example, the Norfolk Community Advice Network (NCAN) Strategic Partnership brings together a wide range of organisations to provide advice and support services, ensuring that residents have access to the help they need. Similarly, the Greater Norwich Homelessness Forum and the Norfolk Housing Alliance demonstrate a collaborative approach to tackling homelessness, involving both statutory and voluntary sector partners in developing and implementing solutions.
- **Promoting health and wellbeing:** Partnerships like Active Norfolk and the Norwich Health and Wellbeing Partnership highlight the importance of community engagement in promoting health and wellbeing. These partnerships involve a wide range of stakeholders, including local authorities, the NHS, and community groups, in developing and delivering initiatives that address local health needs and promote healthy lifestyles.
- **Safeguarding vulnerable individuals:** Norfolk's commitment to safeguarding vulnerable individuals is evident in partnerships like the District Councils Safeguarding Group and the Norfolk Safeguarding Children Partnership Group. These partnerships bring together statutory and voluntary sector organisations to develop and implement safeguarding strategies, ensuring that the voices of vulnerable individuals and their families are heard, and their needs are met.
- **Valuing resident's views:** Councils currently employ various methods to engage residents and incorporate their feedback into decision-making. For instance, Norwich City Council's "Get Talking Norwich" initiative demonstrates a proactive approach to gathering resident opinions on key issues. Additionally, Broadland District Council and South Norfolk Council employ the use of targeted pulse surveys to gauge public satisfaction with services. These surveys provide valuable insight into resident experiences.
- **Shaping growth:** Community partnerships have been shaped through initiatives such as the "Future Breckland" initiative, which was designed to prioritise community involvement in shaping the district's growth. Through extensive engagement with over 22,000 stakeholders, including residents, businesses, and community groups, the project identified six key objectives for each market town in the region, ranging from economic growth to sustainability and wellbeing. This collaborative approach, involving workshops, interviews, and data analysis, resulted in documents outlining tailored strategies for each town, addressing unique challenges and leveraging opportunities to enhance the lives of residents and businesses.
- **Local government outreach:** Norfolk demonstrates its commitment to resident involvement through local government engagement. North Norfolk District Council actively engaged town and parish councils to receive their input on reorganisation criteria and potential challenges, as part of a consultation on English Devolution and Local Government Reorganisation. Processes such as this ensure that town and parish council perspectives are considered when shaping the new unitary structure. Additionally, Breckland Council is establishing new avenues for community engagement and building upon existing partnerships. This includes briefing council members on devolution and Local Government Reorganisation plans, engaging with towns and parishes through online briefings and press releases, and collaborating with local MPs. An independent consultation has also taken place to gather resident feedback, ensuring local perspectives shape the council's approach.

The success of these existing partnerships provides a strong foundation for ensuring community engagement within a new unitary structure. By learning from these examples, Norfolk can:

- **Build on established networks and relationships:** New unitary authorities can leverage the existing networks and relationships established through these partnerships, ensuring continuity of engagement and building trust with communities.



- **Adapt successful engagement methods:** The diverse range of engagement methods employed by these partnerships, including public meetings, focus groups, online consultations, and collaborative workshops, can be adapted and implemented by new unitary authorities to suit the specific needs of their communities.
- **Embed a culture of collaboration and co-production:** The collaborative ethos that underpins these partnerships should be embedded within the culture of new unitary authorities, ensuring that community engagement is not just a one-off event but an ongoing process that informs decision-making at all levels.

Norfolk's existing collaborative arrangements provide a wealth of experience and best practice in community engagement. By building on these strengths, a new unitary structure can ensure that residents are actively involved in shaping their communities, that local government is truly responsive to their needs, and that the transition to a new system is smooth, inclusive, and successful.

Based on the successful track record outlined above, multiple unitary authorities for Norfolk, with their smaller, more focused geographical areas, offer a more promising framework for ensuring effective community engagement. This model can:

- **Create more accessible points of contact:** Smaller unitaries, with their closer proximity to communities, can provide more accessible points of contact for residents seeking information or wishing to share their views. This could involve:
  - Decentralised offices and service points: Establishing local offices and service points in each unitary area, making it easier for residents to engage with their local authority.
  - Dedicated locality teams: Creating dedicated teams within each unitary authority responsible for developing and implementing community engagement strategies.
- **Tailor engagement methods to local contexts:** Multiple unitaries can develop tailored engagement methods that are appropriate for the specific characteristics of their communities. This could involve:
  - Utilising existing community networks: Working closely with existing community groups, parish and town councils, and other local organisations to reach residents through established channels.
  - Employing a variety of communication channels: Using a mix of online and offline communication channels, including social media, local newspapers, public meetings, and focus groups, to ensure that information is accessible to all.
- **Foster a culture of collaboration and co-production:** Multiple unitaries can foster a culture of collaboration and co-production, actively involving residents in the design and delivery of services.

Ensuring community engagement is not just a box to be ticked; it is a fundamental principle that must underpin Norfolk's transition to a new unitary structure. Multiple unitary authorities, with their emphasis on local focus, accessibility, and tailored engagement strategies, offer a more promising framework for achieving this goal than a single, centralised authority. By actively seeking and incorporating community input throughout the process, Norfolk can create a new system of local governance that is truly representative, responsive, and accountable to its residents.

**The three unitary option has been ranked as best on the basis that it creates councils of a more relatable scale that are therefore closer to their communities: smaller is better for local engagement.**



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**Committee name:** Council

**Committee date:** 18/03/2025

**Report title:** Local Government Reorganisation – interim submission

**Portfolio :** Councillor Stonard, Leader of the council

**Report from:** Chief executive

**Wards:** All wards

## **OPEN PUBLIC ITEM**

### **KEY DECISION**

**Purpose** The Ministry of Housing, Communities and Local Government (MHCLG) wrote to all Norfolk Leaders on 5 February 2025 inviting them to work with other council leaders in the area to develop a proposal for Local Government Reorganisation (LGR). The letter sets out the criteria and what is expected to be received in the interim plan to be submitted by 21 March 2025.

This report sets out the work that has been undertaken, the recommendations of that work for three unitary councils for Norfolk, work undertaken to set out the case for a Norwich unitary on urban boundaries, and requests that Council recommends to Cabinet the submission of the relevant documents to Government to fulfil their request for interim plans by 21 March 2025.

### **Recommendation:**

- For Council to endorse the three unitary proposal for Norfolk, as set out in “Interim Report” Appendix A and supported by “A case for Greater Norwich: Supporting the Interim Plan, to follow.
- To recommend to Cabinet that the Interim report (Appendix A), supported by “A Case for Greater Norwich – Supporting the Interim Plan” to follow, should be submitted to Government in line with their request for an interim plan by 21 March.
- For Council to note emerging plans for engagement on these issues before a final report to Government in September.

### **Policy framework**

The council has five corporate priorities, which are:

- A prosperous Norwich.
- A fairer Norwich.

- A climate responsive Norwich.
- A future-proof Norwich.
- An open and modern council.

This report meets all corporate priorities

## Report details

### Introduction

1. As set out in the [Council paper](#) of 25 February 2025, the Ministry of Housing, Communities and Local Government (MHCLG) wrote to all Norfolk Leaders on 5 February 2025 inviting them to work with other council leaders in the area to develop a proposal for Local Government Reorganisation (LGR). The letter sets out the criteria and what is expected to be received in the interim plan to be submitted by 21 March 2025.
2. This report sets out the work that has taken place, in line with the [Council motion](#) on 21 January 2025, to:
  - a. identify, in collaboration with all Norfolk districts, the best options for local government reform across Norfolk (Appendix A – Interim Plan for Local Government Reorganisation in Norfolk)
  - b. develop the case for a Unitary Norwich on urban boundaries (A Case for Greater Norwich – Supporting the Interim Plan) - to follow.
3. This report seeks Council's endorsement of a three unitary proposal for Norfolk, including a Norwich unitary on urban boundaries, and asks Council to recommend to Cabinet the submission of the relevant documents (Appendix A and A Case for Greater Norwich- Supporting the interim plan, to follow, to Government.
4. Noting the views expressed at Council on 25 February around the need for consultation and engagement with our communities on these critical issues, the report also provides initial thinking on engagement and consultation activities going forward.

### Interim plan requirements

5. The interim plan to be submitted to Government should set out the progress to date on developing proposals in line with the criteria and guidance. The Government recognises that that the level of detail that is possible at this stage may vary from place to place but the expectation is that an interim plan is submitted jointly by all councils in the area. However, it is also recognised that the interim plan can describe more than one potential proposal for the area, if there is more than one option under consideration.
6. Government have stated that the interim plan should:
  - a. Identify any barriers or challenges where further clarity or support would be helpful
  - b. Identify the likely options for the size and boundaries of new councils that will offer the best structures for delivery of high-quality and sustainable

public services across the area, along with indicative efficiency saving opportunities

- c. Include indicative costs and arrangements in relation to any options including planning for future service transformation opportunities
- d. Include early views as to the councillor numbers that will ensure both effective democratic representation for all parts of the area, and also effective governance and decision-making arrangements which will balance the unique needs of your cities, towns, rural and coastal areas, in line with Local Government Boundary Commission for England (LGBCE) guidance
- e. Include early views on how new structures will support devolution ambitions
- f. Include a summary of local engagement that has been undertaken and any views expressed, along with your further plans for wide local engagement to help shape your developing proposals
- g. Set out indicative costs of preparing and standing up an implementation team as well as any arrangements proposed to coordinate potential capacity funding across the area
- h. Set out any voluntary arrangements that have been agreed to keep all councils involved in discussions as this work moves forwards and to help balance the decisions needed now to maintain service delivery and ensure value for money for council taxpayers, with those key decisions that will affect the future success of any new councils in the area

## **Developing Proposals**

7. In Motion 10a passed at Full Council on 21 January 2025, Council resolved:
  - “To commit to collaborating with other relevant authorities to ensure that the whole system of new unitary authorities is able to realise our ambitions for our communities, reduce inequalities and accelerate growth in our key economic areas. This includes building on best practice and retaining current exemplar services when developing new models for service delivery.
  - To commission the development of a business case for a new unitary authority for the Norwich urban area, to be submitted to Government within the required timescales.”
8. Both pieces of work are well underway. Interim findings are appended to this report with the intention that they are sent to Government on 21 March, fully responding to Government’s request for interim plans if endorsed by Council. A summary of the work is set out in the following paragraphs.

## **Collaborating with relevant authorities:**

9. A Norfolk wide project group has been convened consisting of officers from all District, City and Borough Councils within Norfolk, responsible for developing proposals for reorganisation. This includes working with any consultants that are commissioned and conducting research, gathering feedback, and drafting recommendations. The group reports regularly into Chief Executives and Leaders, who have been meeting regularly on this subject.
10. Through a combined procurement exercise, Norfolk District, City and Borough Councils have contracted with Deloitte to provide a report to assess the best option for local government reorganisation in Norfolk, and to fulfil the other

requirements for an interim plan to be submitted to Government. This report is at Appendix A – Interim Plan

11. The assessment of the options for local government reform in Norfolk identifies three unitary councils to be the most advantageous option against the Government's criteria, including a unitary Norwich.
12. The reasons for this are set out in the Appendix A but in summary, a three unitary option including a Norwich unitary scores highest as it:
  - Is firmly rooted in an understanding of the places of Norfolk, in that it **reflects and prioritises the three main historic urban centres** (Norwich, Great Yarmouth and King's Lynn) which act as the main civic and economic hubs for Norfolk. Each of these places has its own distinct characteristics which can be exploited under a unitary structure based around these three urban centres.
  - Will drive the **delivery of improved outcomes for the people of Norfolk**, including focusing on attracting globally renowned companies investing in the UK driving both local and national economic growth, reducing worklessness in deprived areas, contributing to building social cohesion, and driving a strong prevention agenda for health and wellbeing.
  - Creates a **singular focus for Norwich as the economic driving force and powerhouse of Norfolk**, creating opportunity for significant growth around the urban fringe in an integrated way, therefore promoting future economic and housing growth.
  - Creates **more opportunity for delivering economic growth** by acknowledging that different areas of the county have extremely different economies and allowing for local plans to address the local needs of each area, based on a real understanding of place and the local economy. For example, Norwich will focus on knowledge and innovation, professional and technology services; the coastal areas will focus on becoming an energy hub, and the rural areas will focus on market towns, agri-tech and manufacturing.
  - Ensures that **areas will have appropriate place identities** as far as possible, given the smaller scale of the authorities and therefore greater focus on individual place, in particular giving greater focus to Norwich, ensuring that the residents of North Norfolk are aligned with the appropriate identity for them, and reflecting the identities, economic, travel to work, and housing market similarities across the West Norfolk / Breckland and South Norfolk / Broadland areas.
  - Is based on local relationships between Districts with a **track record of successful collaboration and delivering highly effective, cost-effective services**. For example, each unitary can work closely alongside its hospital, and with two new builds in Norfolk and an ageing population, the integration between social care and health to accelerate prevention and healthy ageing programmes can be more rapidly achieved.
  - Provides a **strong base for devolution alongside a Norfolk and Suffolk Strategic Authority** due to the balanced nature of the population sizes of the proposed unitaries, allowing equal representation; the differential between the

proposed unitaries and the potential Strategic Authority (as the Government has requested), and the ability to create economic growth through focus on delivering local plans for local places, and in particular unleashing the potential of Norwich, working with the new Strategic Authority which will be critical in creating the strategic infrastructure and roadmap.

- Better maintains effective **local engagement due to the smaller number of local authorities**, which can build on highly successful methods of community and stakeholder engagement employed by each of the Districts.

13. The Interim Plan is being considered by all District, City and Borough Councils in Norfolk at Full Council meetings week commencing 17 March. Councils are being requested to confirm their preference in terms of the options set out, so that this information can be included in the Norfolk submission to Government, meeting the ambition of Government to receive joint submissions from the Norfolk area.

### **Development of a business case for a new unitary authority for the Norwich urban area**

14. As resolved in Motion 10a, work has also been undertaken to commission the development of a business case for a new unitary authority for the Norwich urban area.

15. This work builds on the case developed within the district collaboration work set out above, acknowledging that the district work, with its broader remit, could not, at this point, get into the level of detail that Norwich City Council was seeking to set out in terms of the case for a Norwich unitary, given our ambition for the area and huge opportunity a unitary Norwich provides for the region and nation in terms of sustainable growth.

16. "A Case for Greater Norwich – Supporting the Interim Plan"- to follow, sets out initial thinking on the opportunity for Norwich, and the wider proposed devolution area, from a unitary Norwich and will be submitted, alongside the Interim Plan, to Government on 21 March. It will set out core arguments as to why a unitary Norwich, within a wider devolved area, offers the best model to improve public services, strengthen local democracy, and drive economic growth.

### **Consultation**

17. Evidencing local engagement and how it has informed proposals is a key theme throughout the Local Government Reorganisation criteria set by the Government. Development of the full business case will be underpinned by a comprehensive piece of engagement work to demonstrate:

- a. how proposals meet local needs and are informed by local views
- b. how communities will be engaged under the proposed structure
- c. how concerns will be addressed
- d. and specifically, issues of

– local identity

– cultural and historic importance.

18. This engagement work is seen as a continuation of the commitment set out in the community-led plan – a shift to build public participation into the everyday business of the council – and puts residents and customers at the heart of everything we do.

19. In-person briefing sessions are being hosted on Tuesday 11 March and Wednesday 12 March to provide informal briefings about local government reorganisation, devolution and what this means for Norwich. This is an opportunity for members and key stakeholders to discuss the interim proposals being submitted, the rationale that underpins the strategic case for a three-unitary model in Norfolk and build local engagement into this ongoing piece of work.

20. The engagement will run from late spring and include surveys and conversations with the following groups of stakeholders:

- a. Elected members
- b. Officers
- c. Residents including council tenants, students, community groups and grass roots organisations
- d. Tourists and visitors
- e. Workers and commuters
- f. Sector stakeholders including:

Accessibility & Inclusion	Education & Universities	Leisure & Hospitality
Business & Enterprise	Environment	Older People
Care	Health	Police & Fire
Creative	Housing & Development	Travel & Tourism
Young people	VCSE & Faith	

21. Generally, when engaging, there is a need to balance best practice on representation with considerations around protecting privacy and maximising response rates. There is no blanket rule or single set of guidance that directly applies. There are general sets of guidance, as well as specific rules around data privacy.

22. For this piece of work, there is a need to balance the desire for demographic data with the requirement for gathering as large a pool of opinion and comment as possible. Experience demonstrates that asking people for demographic data in online surveys is a barrier to participation, so the intention is to make demographic questions optional, prioritising a higher response.

23. Interviews and focus groups where people have been selected to take part, means privacy is a much greater consideration. There is a need to ensure their answers are unidentifiable, to support their candour. Therefore, the intention is not to ask for demographic data and to collate their answers in a way that protects their identities.



24. Any street engagement will also present a tension between successfully gathering a broad spread of responses and collecting demographic data. Experience shows that trying to collect ethnicity, sexuality etc data in a street setting is hard and likely to be unwelcome. So, it is the intention to prioritise being accessible and inviting.
25. In all cases, it is the intention to ask participants and respondents for the first part of their postcode, helping to provide a picture of geographic representation, which would add value to our proposal.
26. Overall, the approach being proposed is not a statistical one, focusing on numerical representation. What is required is a broad range of opinions, captured over a short period of time that provides a rich snapshot of how a broad selection of different kinds of people from different contexts feel about specific issues in relation to devolution and local government reorganisation.
27. In addition, Government is undertaking consultation on Devolution arrangements: Council's proposed response will be discussed at Scrutiny Committee on 20 March with recommendations taken to Cabinet on 2 April.

## **Implications**

### **Financial and resources**

28. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its community-led plan "We are Norwich" and budget.
29. There are no proposals in this report that would reduce or increase resources at this time. Appendix A in Section 4 includes estimated costs to develop the full plan. These are estimated costs and will be shared across the Norfolk Council's. It is unclear at this stage whether there will be government funding to support these costs. A one-off sum of £250K was approved by Council as part of the 2025/26 budget to support devolution and local government reorganisation proposals. Additionally, Appendix A also includes estimated costs of implementation. Further work will have to be undertaken on how these costs will be funded, but it is assumed at the current time that they could be capitalised and funded from the potential future savings delivered from creating the new unitary authorities.
30. As a consequence of the timelines imposed upon the council there has been a need to commission some work to support the preparation of the submissions required, full details of which will be reflected within future budget management reports and the provisional outturn report for 2024/25 to Cabinet. It is proposed that reserves will be utilised to support any assessed financial implications and will be approved by the Chief Finance Officer in line with the Constitution.
31. The implementation of LGR in Norfolk will require significant resource and have financial implications for each Council. The exact implications will not be known until a full business case is developed. This will be outlined in the submission expected to be made to MHCLG by the September date.
32. Any additional funding required over and above the £250K already approved in the 2025/26 budget, will be met from the budget risk reserve subject to the

approval process set out above.

## Legal

33. Until the English Devolution Bill becomes law, the legislation governing the creation of Combined County Authorities (CCA) is the Levelling Up and Regeneration Act 2023. This act sets out that only upper tier authorities may be constituent members of the CCA. If the Government decides to establish a Norfolk and Suffolk CCA, statutory orders will need to be made to bring the new authority into being and to confer powers.
34. The decision to submit a proposal for LGR is not a function that is reserved to the Full Council. Therefore, by virtue of the definitions contained in the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended), it is an executive decision to be taken by the Cabinet. However, it is recognised custom and practice that a decision of such significance will be debated at a meeting of the Full Council, and that the Cabinet will have regard to the comments of the Full Council when making its final decision.
35. As with Devolution, new unitary authorities can only be vested and conferred powers by statutory instrument, If the Government accepts a proposal for LGR in Norfolk, relevant statutory orders will be made dealing with amongst other matters:
- a. The necessary postponement of any elections to existing authorities.
  - b. The dissolution of existing authorities.
  - c. The number and names of the new unitary authorities.
  - d. The number of members on each authority and its cycle of ordinary elections.
  - e. The conferring of powers to the new unitary authorities.
  - f. The transfer of finances, staff and assets to the new authorities.

## Statutory considerations

Consideration	Details of any implications and proposed measures to address:
Equality and Diversity	<p>This report does not have direct impacts for equality and diversity. It provides a progress update.</p> <p>Impacts will be considered as part of business case proposals.</p>
Health, social and economic impact	<p>This report does not have direct impacts for health, social and economic impact.</p> <p>Impacts will be considered as part of business case proposals.</p>

<b>Consideration</b>	<b>Details of any implications and proposed measures to address:</b>
Crime and disorder	This report does not have direct impacts for crime and disorder. It provides a progress update.  Impacts will be considered as part of business case proposals.
Children and adults safeguarding	This report does not have direct impacts for children and adults safeguarding. It provides a progress update.  Impacts will be considered as part of business case proposals.
Environmental impact	This report does not have direct impacts for environment. It provides a progress update.  Impacts will be considered as part of business case proposals.

### **Risk management**

<b>Risk</b>	<b>Consequence</b>	<b>Controls required</b>
An inability to create consensus across Norfolk for a new Norwich Unitary Council	Outcomes for Norwich and Norfolk residents are less positive as the urban focus of a wider authority would be diluted; e.g. around sustainable joined up growth and housing delivery. Wider effects on national growth given the role cities play in the drivers of growth.	Developing a strong case for a Norwich Unitary. Ongoing collaborative working with Norfolk authorities and internally a Working Group to be established with cross party representation
Norwich may not have constituent membership in the new Mayoral Strategic Authority(MSA)	Less focus within the MSA around the power of cities to drive sustainable and equitable growth, leading to worse outcomes for Norfolk and the UK.	Develop strong case for a Norwich Unitary and demonstrate impact on Government's missions.

### **Other options considered**

36. There is an option to not proceed with a submission of an interim plan in March.

This is not the preferred route as it does not enable the council to use its voice and ensure that views of Norfolk residents, communities and businesses are represented.

37. Options for a single unitary, two unitaries and three unitaries are explored in Appendix A, the Interim Plan, and the reasons for ranking a three unitary highest are set out.

### **Reasons for the decision/recommendation**

38. Government has set out its intentions around Local Government Reform, and have requested interim plans in March and full plans in September. To get the best option for the communities of Norwich, and Norfolk, it is important that we engage in this process and ensure our views are heard. The proposals we are putting forward in the Interim Plan for Local Government Reorganisation in Norfolk and A Case for Greater Norwich, Supporting the Interim Plan (to follow, set out the arguments for a model for three unitaries across Norfolk, including one for Norwich on urban boundaries.

### **Background papers:**

[Council paper 25 February Devolution and Local Government Reorganisation including Appendix 1 \(of that paper\) 5 February 2025 letter from Jim McMahon OBE MP Minister of State for Local Government and English Devolution](#)

### **Appendices:**

Appendix A: Interim Plan for Local Government Reorganisation in Norfolk

**Contact officer:** Chief Executive

**Name:** Lou Rawsthorne

**Email address:** [louiserawsthorne@norwich.gov.uk](mailto:louiserawsthorne@norwich.gov.uk)



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