Appendix 2: Norwich City Council response to MHCLG consultation on Suffolk LGR proposals

Scoring for the one and three unitary bids are shown across righthand columns

Question	1UA	3UA
1) To what extent do you agree or disagree that the proposal suggests a council that is based on a sensible geography and economic area?	**Strongly disagree**	**Strongly agree**
2) To what extent do you agree or disagree that the proposed council will be able to deliver the outcomes they describe in the proposal?	**Disagree**	**Strongly agree**
3) To what extent do you agree or disagree that the proposed council is the right size to be efficient, improve capacity and withstand financial shocks?	**Disagree**	**Strongly agree**
4) To what extent do you agree or disagree that the proposed council will deliver high quality, sustainable public services?	**Disagree**	**Strongly agree**
5) To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?	**Disagree**	**Agree**

6) To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements, for example, the establishment of a strategic authority?	**Disagree**	**Strongly agree**
7) To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?	**Strongly disagree**	**Strongly agree**
9) This proposal is accompanied by a request that the Secretary of State considers boundary change. To what extent do you agree or disagree that the proposal sets out a strong public services and financial sustainability justification for boundary change?	**N/A**	**Agree**

Rationale for scoring

One unitary proposal rationale (Suffolk)

1) To what extent do you agree or disagree that the proposal suggests a council that is based on a sensible geography and economic area?	Strongly disagree

- The proposed single-unitary model raises significant concerns. With a population exceeding 760,000, it risks creating a council that is too remote and unable to deliver responsive services across a large, diverse county.
- This approach overlooks Suffolk's varied economies and distinct local needs, imposing a uniform model that undermines localism and democratic representation.
- A single entity would weaken the ability of communities to have their voices heard within the Mayoral Combined County Authority and compromise effective service delivery at a strategic level.

2) To what extent do you agree or disagree that the proposed council will be able to deliver the outcomes they describe in the proposal?	Disagree
• While the One Suffolk business case sets out ambitious aims, its ability to deliver these outcomes is uncertain. • The proposal assumes seamless integration of services and significant cultural change yet acknowledges risks around disaggregating vital care services and the wholesale abolition of established governance structures. • These challenges could undermine financial resilience and service continuity, making the projected benefits difficult to realise in practice.	
3) To what extent do you agree or disagree that the proposed council is the right size to be efficient, improve capacity and withstand financial shocks?	Disagree
• The proposal for 140 councillors is potentially unworkable because it creates an overly large and complex governance structure. • With such a high number of elected members, decision-making would become slow and fragmented, reducing accountability and efficiency. • It risks duplicating roles, increasing costs, and making the council less agile in responding to local needs	
4) To what extent do you agree or disagree that the proposed council will deliver high quality, sustainable public services?	Disagree
• Centralisation through a single unitary authority risks reducing responsiveness. With a population of over 760,000, this model concentrates decision-making and weakens local voices. It creates the potential for slower responses to community needs and imposes a one-size-fits-all approach that fails to reflect Suffolk's diversity – from urban centres to rural and coastal areas. Local responsiveness is critical for delivering high-quality services and maintaining democratic accountability, ensuring decisions reflect the unique needs of every community.	
5) To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?	Disagree
• Unlike the extensive engagement undertaken by district and borough councils – including parish meetings, roadshows in market towns and stakeholder consultations – this model relies significantly on	

engagement through resident surveys rather than a more comprehensive approach across platforms.	
6) To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements, for example, the establishment of a strategic authority?	Disagree
• The single-unitary model risks undermining devolution arrangements such as the Mayoral Combined County Authority (MCCA) by concentrating power in an exceptionally large and remote authority. • With over 760,000 residents and limited representation, this structure reduces local accountability and weakens the ability of diverse communities – rural, urban, and coastal – to influence strategic decisions.	
7) To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment	Strongly disagree
• The single-unitary model does not enable stronger community engagement or neighbourhood empowerment because it centralises decision-making within a large, remote authority. • This structure limits opportunities for local voices to influence priorities and reduces flexibility to tailor services to distinct community needs. • Unlike models that embed local governance, it risks weakening trusted relationships with residents and partners, making engagement less meaningful and less effective.	

Three unitary proposal rationale (Suffolk)

1) To what extent do you agree or disagree that the proposal suggests a council that is based on a sensible geography and economic area?	Strongly agree

- There is a clear rationale for establishing three distinct unitary authorities. Each reflects unique economic strengths, and enables more effective coordination of housing delivery and infrastructure planning while remaining responsive to local needs.
- While populations of approximately 250,000 fall below the thresholds suggested in government guidance, the proposal provides a robust justification for this approach. Smaller units will allow for governance that is agile, locally accountable, and better aligned with community priorities.
- The proposed division of Suffolk into three unitary areas is consistent with the views expressed by Alison McGovern MP (Medium.Com, 1 December 2025) and supported by Norwich City Council:

  > *"We're undertaking the biggest reforms to local government in more than 50 years. It would be an almighty wasted opportunity if we didn't use that moment to make sure our councils match the modern realities of our cities and stop outdated boundaries constraining cities' growth. Look at **Ipswich** for example – it's stuck trapped in boundaries designed in 1835."*

- The case for establishing three unitary authorities, rather than a single entity, is strongly reinforced by the principles of localism and democratic representation. This approach ensures that the governance structure within the Mayoral Combined County Authority (MCCA) reflects and responds to the distinct needs of diverse communities – from coastal and rural areas to urban centres – while delivering strategic responsibilities at a regional level.

2) To what extent do you agree or disagree that the proposed council will be able to deliver the outcomes they describe in the proposal?	Strongly agree

- The proposal ensures that each new council will be operationally robust from inception and strategically positioned to drive housing delivery, infrastructure investment, and economic growth amongst other priorities.
- By working in partnership with the MCCA, these councils will unlock opportunities that foster inclusive and sustainable development across Suffolk.

3) To what extent do you agree or disagree that the proposed council is the right size to be efficient, improve capacity and withstand financial shocks?	Strongly agree
• The proposal, including the indicative member numbers, strikes an appropriate balance between delivering efficiencies and safeguarding local democracy and accountability. • It ensures streamlined governance without compromising representation or community engagement. • It delivers strong financial resilience, with £34m annual savings within five years (3.5% of the current combined budget). £20m will be reinvested to bring services closer to communities, while still achieving a net annual benefit of £14m, demonstrating that the financial gains of reorganisation outweigh transition costs.	
4) To what extent do you agree or disagree that the proposed council will deliver high quality, sustainable public services?	Strongly agree
• The creation of three unitary authorities in Suffolk, and the MCCA, provides an effective structure for modern public service reform. • This model balances efficiency and scale with local responsiveness, delivering Best Value through economies of scale, good governance, and equitable outcomes. • It enables a shift to person-centred, community-rooted services focused on trust and long-term wellbeing, improving outcomes and reducing demand.	
5) To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?	Agree
• Local views have been central to shaping this proposal. • Suffolk's District and Borough Councils undertook extensive engagement, including an open public survey with over 2,200 responses, meetings with Town and Parish Councils, and roadshows in market towns. • They consulted widely with key stakeholders – health partners, businesses, education institutions, MPs, and representative bodies such as the Suffolk Association of Local Councils and Suffolk Care Forum • This work has ensured the proposal reflects the priorities and concerns of communities across the county.	

6) To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements, for example, the establishment of a strategic authority?	Strongly agree

- The proposed Norfolk and Suffolk Mayoral area spans 9,169 km². Within this context, a multi-unitary model for Suffolk strengthens devolution by safeguarding local representation and ensuring the voices of rural, urban, and coastal communities are heard.
- Establishing three unitary authorities, rather than a single entity, upholds the principles of localism and democratic accountability. This structure enables the Mayoral Combined County Authority (MCCA) to reflect the distinct needs of diverse areas while delivering strategic responsibilities effectively at a regional level.
- Establishing three unitary authorities in Suffolk would create parity with Norfolk should a three-unitary model be adopted there. This alignment is critical for ensuring equitable representation within the proposed Mayoral Combined County Authority (MCCA). A symmetrical structure across both counties would:
    - **Promote fairness and democratic legitimacy**: equal representation avoids disproportionate influence by any single authority and ensures that all communities have a balanced voice in regional decision-making.
    - **Support strategic coherence**: with both Norfolk and Suffolk operating under comparable governance models, the MCCA can pursue priorities –such as housing, transport, and economic growth – on a consistent and coordinated basis.
    - **Enable effective resource allocation**: a balanced framework reduces complexity, streamlines funding decisions, and fosters collaboration across shared strategic corridors, including the Cambridge-Norwich Tech Corridor and major growth areas.
    - **Strengthen accountability and public confidence**: residents will see a fair and transparent governance

7) To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment	Strongly agree

- Neighbourhood engagement and empowerment are central to the proposed model. It embeds the principle of being local and responsive, respecting the unique geography, demographics, and priorities of each area.

• This approach champions a person-centred model, enabling residents to influence decisions on issues that matter most to them. • Beyond residents, the proposal fosters strong, trusted partnerships with the voluntary, community, faith and social enterprise sectors, local businesses, and statutory agencies, ensuring joined-up services that meet the full spectrum of community needs.	
9) This proposal is accompanied by a request that the Secretary of State considers boundary change. To what extent do you agree or disagree that the proposal sets out a strong public services and financial sustainability justification for boundary change?	Agree
• Boundary changes are both sensible and necessary to reflect modern realities. The proposed three-unitary model enables Ipswich and other urban centres to grow effectively and ensures a fair balance between new authorities. • Current boundaries, dating back to 1835, constrain urban development and fail to match today's economic and social geography. • Reforming these boundaries supports localism and democratic representation, allowing governance within the MCCA to address the distinct needs of rural, coastal, and urban communities while delivering strategic responsibilities at a regional level.	