# **Appendix 1:** Norwich City Council response to MHCLG consultation on Norfolk LGR proposals

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

| Question | 1UA | 2UA | 3UA |
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| 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** | **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** | **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? | **Strongly disagree** | **Disagree** | **Strongly agree** |
| 4) To what extent do you agree or disagree that the proposed council will deliver high quality, sustainable public services? | **Strongly disagree** | **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? | **Strongly disagree** | **Disagree** | **Strongly agree** |

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| 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 Disagree** | **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** | **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? | **NA** | **NA** | **Strongly agree** |

# Rationale for scoring

# One unitary proposal rationale (Norfolk)

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| **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 |
| • **Overly large and impractical geography:** the proposed council covers 932,000 people across 2,000 square miles, making it one of the largest unitary councils in England. This scale risks creating a remote, centralised authority disconnected from local communities. By way of illustration, the footprint of the county area equates to around 42 London Boroughs (based on an average size of 49km²).<br>• **Ignores local identity and lived experience:** Norfolk's identity is rooted in distinct towns, rural villages, and coastal communities, not a single county-wide construct. The proposal assumes people identify with the whole county, but engagement shows strong attachment to local areas. | |

- **Will inhibit Norwich's growth potential:** Norwich is a fast-growing city with complex housing, transport, and infrastructure needs that differ significantly from rural and coastal areas. The proposal does not set out how these urban challenges will be prioritised within a single, county-wide model, risking slower progress and missed opportunities for sustainable growth.
- **Risk of one-size-fits-all approach:** Norfolk's communities – from urban Norwich to rural and coastal areas—have very different needs. A single authority risks imposing uniform solutions that fail to address local challenges such as rural isolation, coastal deprivation, and infrastructure gaps.
- **Fails to reflect functional economic realities:** while Norwich is an economic hub, the county's economy is not uniform. Rural and coastal areas face very different challenges (e.g., significant deprivation, housing shortages, infrastructure gaps). A single council will not tailor strategies effectively across such diverse needs.
- **Creates risk of economic imbalance:** combining prosperous areas with deprived ones under one authority risks unequal resource allocation and widening inequalities. Smaller authorities could better focus on local priorities and regeneration.
- **Risks the ongoing development of nationally significant sectors:** by imposing a one-size-fits-all approach, the development of nationally significant sectors are undermined. Norwich's fast-growing knowledge, creative, and life sciences industries, the Energy Coast's strategic role in the UK's energy transition, and the rural heartland's agri-tech and advanced manufacturing sectors each require tailored strategies. Consolidating governance into one authority would dilute the ability to deliver bespoke solutions, jeopardising economic growth and sector-specific priorities across the county.
- **Contradicts principles of localism:** the proposal claims "local where it matters," but governance will be dominated by a large central body. Mechanisms like Neighbourhood Area Committees are untested and may not compensate for loss of district-level accountability.
- **Risks to democratic representation within authority hubs and workspaces:** centralising service delivery may preclude democratic representation within the workforce with an average rail journey time for a trip from King's Lynn in the north to Great Yarmouth in the southeast of the county taking three hours or more (requiring two changes).
- **Strategic planning assumptions are flawed:** the argument that Norfolk is a "single economic area" oversimplifies reality. Travel-to-work patterns, housing markets, and infrastructure needs vary significantly across the county.
- **Potential inefficiency and democratic deficit:** reducing representation from 399 councillors to around 168 (or fewer long-term)

will dilute local voice and increase workloads, undermining effective democratic engagement.

- **Risks to service delivery and responsiveness:** centralising services like housing, planning, and social care under one authority could lead to postcode lottery effects, slower decision-making, and reduced responsiveness to local issues.
- **Risks to local voices being heard within county-wide strategic planning:** a single entity would weaken the ability of local communities to have their voices heard within the Mayoral Combined County Authority (MCCA) and compromise effective service delivery at a strategic level.

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| **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 |

- **Financial assumptions are highly optimistic and fragile:** the proposal relies on achieving £39.8m annual savings and rapid integration of systems and processes. These figures are based on best-case scenarios and do not account for delays, cost overruns, or the complexity of harmonising operations across such a large geography. Any deviation will erode the claimed benefits and undermine service delivery. In addition, savings appear heavily dependent on reducing district-level staffing and management costs. This raises serious concerns about whether such cuts can be delivered without undermining local service capacity and responsiveness.
- **No clear strategy for transformational change:** while the proposal uses language about “radical reform” and “local empowerment,” it lacks concrete, detailed plans for how these changes will be embedded. The reliance on untested mechanisms like Neighbourhood Area Committees and Integrated Neighbourhood Teams does not set out a coherent strategy for the level of transformation required. It feels that the premise of this proposal is based on delivering more of the same.
- **Delivery risks are significant and underplayed:** the proposal acknowledges risks such as democratic deficit, workforce morale, and service continuity but offers limited mitigation beyond high-level statements. There is no evidence of capacity or capability to manage these risks at the scale proposed.
- **Dependent on external factors:** many promised outcomes hinge on future collaboration with the Mayoral Combined County Authority and securing national funding. These dependencies introduce uncertainty and reduce the council’s ability to guarantee delivery.
- **Promises outcomes without credible implementation detail:** the proposal claims improvements in housing, transport, economic growth, and public health, yet provides little evidence of how these will be

achieved beyond aspirational statements. There is no clear sequencing, prioritisation, or measurable milestones.

- **Fails to demonstrate how localism will be real:** the proposal asserts "local where it matters," but the governance model is heavily centralised. Without proven structures or guaranteed resources for local decision-making, this ambition risks remaining theoretical.
- **Proposals around elected members numbers are unworkable:** proposed numbers would result in a significant democratic deficit in decision making. It is clear practicalities around how council meetings would work have not been considered. For example, if all members wished to talk on an issue, then council meetings would last more than 8 hours.

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| **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 disagree |

- **Size does not guarantee efficiency or resilience:** the proposal assumes that a very large authority will automatically deliver efficiencies and withstand shocks. This scale will introduce bureaucracy, slows decision-making, and creates distance from communities and will undermine responsiveness and agility.
- **Financial resilience claims are overstated:** the business case suggests that size will protect against financial shocks, yet the model is heavily reliant on optimistic savings projections and workforce reductions. These savings appear premised on cutting district-level staff and management, which risks hollowing out local capacity rather than strengthening resilience.
- **Dilution of local voices:** a council of this size will inevitably reduce democratic representation and weaken local influence. Fewer councillors and centralised governance mean communities will have less say in decisions that affect them, contradicting the principle of localism.
- **Concentration of risk in one organisation:** placing all services and financial responsibility into a single authority creates a single point of failure. If the council faces financial or operational difficulties, the entire county is exposed, with no fallback or alternative governance structure.
- **Evidence from other large unitary councils do not support a single county unitary approach:** in Somerset its single large unitary council failed to deliver the full savings promised in its business case, achieving less than half of the £18.5m forecast within the first two years. Reasons for this included underestimating the time and complexity required for transformation and unrealistic assumptions about cost reductions. The council now faces a £190m budget shortfall

by 2029 and has required exceptional financial support from government.

- **No evidence of improved capacity or transformational change:** the proposal does not demonstrate how the new council will build additional capability beyond what currently exists. There is no clear plan for investment in skills, systems, or infrastructure to match the scale of the organisation, nor a credible roadmap for cultural or operational transformation.
- **Bigger does not mean better for Norfolk's challenges:** Norfolk's significant challenges of ageing population, rural isolation, coastal deprivation and urban deprivation all require tailored, place-based solutions. A single, oversized council risks diluting focus and creating a one-size-fits-all approach that fails to meet diverse local needs.

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| **4) To what extent do you agree or disagree that the proposed council will deliver high quality, sustainable public services?** | Strongly disagree |

- **Financial fragility undermines sustainability:** the proposal's savings plan is heavily reliant on reducing district-level staff and management costs. This approach risks stripping out local capacity and expertise, leaving frontline services overstretched and unable to maintain quality. If savings targets are missed the council could face severe budget gaps, forcing further cuts and service reductions.
- **No credible plan for long-term investment:** sustainable services require ongoing investment in infrastructure, workforce development, and digital capability. The business case offers no clear roadmap for these investments, focusing instead on short-term cost reduction rather than building resilience.
- **Lack of transformational change:** the proposal uses aspirational language about "radical reform" but fails to set out how cultural and operational transformation will be embedded. Without genuine structural change, the new council risks becoming a larger, more bureaucratic version of the current system, unable to innovate or adapt.
- **Centralisation reduces responsiveness:** a single authority covering 932,000 residents will concentrate decision-making and dilute local voice. This risks slower responses to local needs and a one-size-fits-all approach that fails to reflect Norfolk's diverse communities, from urban centres to rural and coastal areas.
- **Single point of failure:** consolidating all services into one organisation places all financial and operational risk in one place. If the council fails to achieve its savings commitments or there are failures in service delivery, then the entire county will be affected.

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| **5) To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?** | Strongly disagree |

- **Engagement was limited and high-level:** the proposal cites online surveys and a small number of engagement events, but these were focused on broad principles rather than detailed structural options. There is no evidence that local communities were meaningfully involved in shaping the final model.
- **Local priorities are not reflected in the design:** residents consistently value strong local identity, accessible services, and clear accountability. A single council covering 932,000 people undermines these priorities by centralising decision-making and reducing democratic representation.
- **Slow and generic responses to local issues:** Norfolk is one of the largest counties in England and as such the challenge felt by residents in one area differ significantly from that of another. These challenges include rural isolation, coastal deprivation, and infrastructure gaps and require tailored, place-based solutions. A large, centralised council risks imposing one-size-fits-all policies and being too slow to respond to urgent local problems.
- **Consultation did not test appetite for scale:** there is no indication that residents supported the creation of one of the largest unitary councils in England. Feedback emphasised simplicity and local voice, not a model that risks diluting both.
- **Mechanisms for localism are unproven:** the proposal relies on Neighbourhood Area Committees and Integrated Neighbourhood Teams to deliver local engagement, but these are conceptual and lack detail on resourcing, governance, or decision-making powers.

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| **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 disagree |

- **One voice for Norfolk risks being ignored:** a single council creates only one voice for Norfolk within a Mayoral Combined County Authority. If priorities clash with Suffolk or the Mayor's agenda, Norfolk's interests could easily be sidelined, leaving communities with little influence over regional decisions.
- **Does not reflect Norfolk's economic geography:** Norfolk is not a single, uniform economic area. It has distinct economic geographies, housing markets, and travel-to-work patterns. For example, Norwich's urban economy operates very differently from rural west Norfolk or coastal communities like Great Yarmouth.

- **Fails to address Norwich's growth challenges and strategic positioning:** Norwich is a fast-growing city with complex housing, transport, and infrastructure needs that differ significantly from rural and coastal areas. The proposal does not explain how these urban priorities will be championed within a single council when negotiating with a Mayor whose focus may lean toward wider regional agendas. This risks Norwich's growth ambitions being diluted or deprioritised in favour of competing priorities.
- **Potential loss of strategic economic advantages:** Norfolk's Energy Coast and offshore renewables sector are nationally significant. A single council risks diluting focus on these assets by forcing a one-size-fits-all approach, rather than enabling tailored strategies for different economic zones.
- **Centralisation undermines local empowerment:** devolution is intended to bring decision-making closer to communities, yet this model does the opposite. It reduces democratic representation and concentrates power in a remote authority, weakening the ability of local areas to shape strategic priorities.
- **Creates dependency and vulnerability:** placing all local government functions into one organisation creates a single point of failure. If the council faces financial or operational difficulties, Norfolk's ability to engage effectively with the strategic authority will collapse.

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| **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 |

- **Centralisation undermines local voice:** a single council covering 932,000 residents will inevitably concentrate decision-making at the centre. This reduces democratic representation and makes it harder for communities to influence decisions that affect them.
- **Unproven mechanisms for localism:** the proposal relies on Neighbourhood Area Committees and Integrated Neighbourhood Teams to deliver local engagement, but these are conceptual and lack detail on governance, resourcing, or real decision-making powers. Without clear authority and funding, these structures risk being tokenistic.
- **Distance from communities:** Norfolk's geography is large and diverse, spanning from urban Norwich to rural west Norfolk and coastal communities. A remote, centralised council will struggle to understand and respond quickly to local priorities, especially in areas with unique challenges like rural isolation or coastal deprivation.
- **Risk of slower, generic responses:** local empowerment requires flexibility and speed. A large, bureaucratic council will impose uniform policies and processes, making it harder to tailor solutions to neighbourhood needs.

- **No guarantee of neighbourhood budgets or influence:** while the proposal mentions devolved budgets supporting neighbourhood area committees, there is no clear commitment to scale, timing, or accountability. Without guaranteed resources, neighbourhood empowerment remains aspirational rather than real.
- **Contradicts what residents value:** Engagement feedback across all three proposals put forward emphasised local identity, and strong local representation. This proposal delivers the opposite; it will see fewer councillors, centralised governance, and reduced local autonomy.

# Two unitary proposal rationale (Norfolk)

| **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?** | Disagree |
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- **Still too large and remote from communities:** each proposed council covers vast areas (up to 1,430 square miles) and populations of 400k–530k. This scale risks creating authorities that feel distant from residents, weakening local accountability and responsiveness.
- **Fails to deliver truly local decision-making:** while smaller than a single unitary, these councils still centralise power far from rural and coastal communities. Residents in rural communities will have limited influence compared to urban hubs like Norwich.
- **Norwich is fundamentally different from the rest of its proposed council:** Norwich is a dense urban centre with unique economic drivers including finance, tech, higher education. For example, clusters of industry of national importance in Norwich have had big growth in specialised sectors like FinTech and digital industries with a 13.2% rise in businesses since 2015 in those sectors. In comparison. the surrounding proposed East Norfolk area is dominated by rural and coastal communities with very different priorities. Grouping these areas together risks diluting focus and creating conflicting agendas with rural priorities dominating council agendas.
- **Geography remains artificial in places:** the proposal admits that North Norfolk boundaries may need future refinement. This signals that the model does not fully reflect natural economic or community patterns from the outset.
- **Economic diversity undermines focus:** each unitary combines very different economies for example Norwich's technology and finance cluster with Great Yarmouth's energy coast which would make it hard to set coherent priorities and deliver tailored growth strategies.
- **Public engagement priorities not fully met:** residents said they want stronger local identity and decision-making. Two large councils still dilute

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| local voices and risk creating governance that feels remote and bureaucratic | |
| **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 |
| • **Scale still undermines local responsiveness:** each proposed council is very large (up to 1,430 square miles and 400k–530k population). This size makes it difficult to deliver the "locally tailored, community-led" services promised. Rural and coastal communities will remain remote from decision-making.<br>• **Savings depend on optimistic assumptions, not guaranteed efficiencies:** the proposal claims £72m savings in 2028/29 rising to £90m in 2029/30, largely from "service optimisation" and "early intervention." These are reliant on cultural change and demand reduction, which are unlikely to be achieved in such an aggressive timescale.<br>• **Demand management savings are high-risk:** the largest projected savings come from reducing demand in social care and SEND through prevention strategies. Evidence shows these savings take years to materialise and depend on strong local networks which will be harder to build in councils of larger scale.<br>• **Locally-based solutions are essential to sustaining progress in Norwich, especially across high demand services areas:** with 20% of residents living in areas among the most deprived nationally (2019 figures) and historic challenges in educational outcomes, relative improvements as evidenced by Indices of Multiple Deprivation figures released this year, have likely been driven by hyper-local interventions across housing, health, and socio-economic disadvantage. Maintaining this momentum requires governance that prioritises Norwich's unique needs, while recognising that surrounding rural and coastal communities face very different challenges. A structure that enables tailored, place-based strategies will ensure these gains are protected and extended.<br>• **Public priorities not fully addressed:** residents want stronger local identity and decision-making. Two large councils still centralise power far from communities, making it unlikely that outcomes around "empowered neighbourhoods" will be achieved. | |
| **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 |
| • **Councils remain too large and remote**: each proposed authority covers vast areas of up to 1,430 square miles which make it difficult to deliver the local responsiveness and agility needed for efficient | |

decision-making. Rural and coastal communities will still feel disconnected from leadership.

- **Size does not guarantee efficiency**: the proposal assumes bigger councils deliver economies of scale, but efficiency depends on service design and culture, not just footprint. Large, complex organisations often face slower decision-making and higher overheads.
- **Financial resilience claims are optimistic**: projected savings rely heavily on ambitious demand reduction and early intervention strategies, which take years to materialise and are difficult to achieve consistently. This creates uncertainty about whether the councils can truly withstand financial shocks.
- **Capacity challenges remain**: councils of this size will need to balance strategic planning with local delivery across very diverse geographies. Managing urban growth areas alongside remote rural communities which risks stretching resources and weakening focus.
- **Better outcomes require smaller, more locally focused councils**: Norfolk's diversity means a more granular structure would provide stronger local leadership and accountability, while still enabling collaboration on strategic issues.

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| **4) To what extent do you agree or disagree that the proposed council will deliver high quality, sustainable public services?** | Disagree |

- **Promises are aspirational, not guaranteed:** The proposal relies on an ambitious approach to early intervention and prevention to reduce demand for costly services. While these are sound in theory the timeline for implementation is aggressive and highly likely to be subject to significant slippage, making the outcomes and achievement of savings highly uncertain.
- **Scale creates delivery challenges:** Councils covering up to 1,430 square miles will need to manage very different service needs from dense urban Norwich to remote rural and coastal communities. This diversity and the size of the proposed unitaries makes it harder to deliver local focused service interventions that address Norfolk's many diverse challenges which are driven by its geographic and economic landscape.
- **Financial pressures threaten sustainability:** The model assumes savings will fund service improvements, but those savings depend on optimistic projections. If they fail to materialise, services could face cuts rather than enhancements.
- **Local accountability diluted:** High-quality services depend on strong local engagement. Councils of this large size risk weakening the connection between decision-makers and communities, reducing the ability to tailor services effectively

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| **5) To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?** | Disagree |

- **Engagement was broad but not deep:** the proposal cites 804 survey responses and 446,000 campaign impressions, but this is a small sample compared to Norfolk's population of over 930,000. It is unclear whether this reflects fully local views or delivers the local accountability people want. The evidence provided does not justify strong confidence this will be achieved.
- **Local priorities identified but not fully addressed:** residents highlighted improved services and stronger local decision-making as top priorities. The proposed councils have remained very large which risks leaving rural and coastal communities feeling remote from decision-makers.
- **Local identity concerns remain:** while the proposal claims to preserve identity, grouping Norwich with East Norfolk combines very different communities and priorities. This will dilute local voice and create tensions between urban and rural needs.
- **Evidence of listening is limited:** the proposal references engagement themes but does not clearly show how feedback shaped the final boundaries or governance model. Key concerns such as avoiding remoteness appear unresolved.

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| **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 |

- **Avoids the "one voice" risk but still lacks strong local representation:** two councils give Norfolk more than one voice in a Mayoral Combined County Authority, reducing the risk of being sidelined. However, each council still represents very large, diverse areas, meaning local priorities could still be lost in regional negotiations. Notably, the levers that help deliver sustainable urban and rural growth are different and will require focussed consideration if growth is to be maximised.
- **Partially reflects economic geography:** while better than a single council, the proposal still groups very different economies together. Norwich's urban economy and growth pressures sit alongside rural and coastal priorities in one authority, creating competing agendas.
- **Urban challenges risk being diluted:** Norwich's housing, transport, and infrastructure needs are complex and fast-moving. In a council covering both Norwich and Great Yarmouth, these priorities could be diluted by rural and coastal issues, weakening the Norwich's strategic positioning. Notably, the stark differences in housing challenges between urban and rural areas require different approaches. Urban

centres such as Norwich and Great Yarmouth face acute pressures from homelessness, temporary accommodation demand, and concentrated deprivation, requiring locally targeted interventions. In contrast, rural districts struggle with limited social housing supply, high house-price-to-income ratios, and infrastructure constraints that hinder development. These divergent needs demand tailored strategies and neighbourhood-level engagement, which a more remote authority would be unable to deliver effectively.

- **Local empowerment remains limited:** devolution is meant to bring decisions closer to communities. Two councils are an improvement on one, but they still centralise decision-making far from many towns and villages, leaving rural communities with limited influence over strategic priorities that impact them significantly.

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

- **Councils remain too large and remote:** each proposed authority covers up to 1,430 square miles, making meaningful engagement difficult. Communities in rural and coastal areas will still feel disconnected from decision-makers.
- **Promises of neighbourhood empowerment lack substance:** the proposal outlines Community Boards and new Town/Parish Councils, but these are not fully defined and risk being tokenistic without real decision-making power or resources.
- **Urban-rural divide undermines local voice:** Norwich's priorities will dominate in the East Norfolk council, leaving smaller towns and villages with limited influence. Similarly, rural West Norfolk communities will struggle to shape decisions in such a large governance footprint.
- **Engagement mechanisms unclear:** the proposal does not explain how residents will influence strategic decisions or how neighbourhood-level input will be embedded in planning and service delivery.

# Three unitary proposal rationale (Norfolk)

| 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 |
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- **Distinct geographies reflected**: the three proposed unitaries align with real-world patterns of how people live, work, and travel, rather than boundaries set in 1974. This ensures councils are rooted in genuine communities (city, coast, countryside).
- **Wymondham and neighbouring parishes**: we are disappointed that Wymondham and it's neighbouring parishes are not within the proposed Greater Norwich boundary. This would have aligned with the Greater Norwich Local Plan (GNLP) and the Strategic Growth Area (SGA), which includes 70% of housing growth and all strategic employment locations, and with national planning and housing targets, enabling coordinated delivery of infrastructure and services. While anticipating future housing needs, its inclusion would also have supported the development of the Spatial Development Strategy (SDS) for Norfolk and Suffolk under the Mayoral Combined County Authority by focussing the major growth area in one unitary authority area.
- **Functional economic areas**: each unitary is designed around coherent economic zones:
    - *Greater Norwich*: a fast-growing city-region and economic engine with strong knowledge, creative, and life sciences sectors.
    - *East Norfolk*: the "Energy Coast," nationally significant for offshore wind, carbon capture, and tourism.
    - *West Norfolk*: a productive rural heartland with agri-tech, advanced manufacturing, and strategic connectivity to the Midlands and Cambridgeshire.
- **Balanced tax bases and sustainability**: the model creates three authorities with robust and balanced tax bases, avoiding undue advantage or disadvantage for any area and ensuring financial resilience for the future. It is worth noting that population and tax base projections for Norwich, East Norfolk, and West Norfolk, if Wymondham had been included into Greater Norwich, would show a better-balanced distribution of population and tax base across all three unitaries, enabling more focussed consideration for each of their unique strengths and any constraints they may face.
- **Supports housing and growth**: logical boundaries enable coordinated housing delivery and infrastructure planning while responding to local needs through Growth Plans and Spatial Development Strategies.

- **Respects local identity**: the proposal considers cultural and historic importance of key conurbations in Norfolk anchoring councils in Norwich, Great Yarmouth, and King's Lynn and protecting distinct rural, coastal, and urban identities.
- **Addresses demographic deficit in Norwich services**: Norwich acts as the primary hub for Norfolk, with many residents across the county relying on its services for employment, healthcare, education, and retail. This level of dependency underscores the need for expansion of the Norwich beyond its bounded footprint enabling more service users to have a say in how the services they use are delivered.

| 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 |
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- **Clear, evidence-based design**: the proposal is grounded in robust analysis of demographics, service demand, and financial sustainability, ensuring each council is fit-for-purpose from day one.
- **Financial resilience and efficiency**: modelling shows cumulative savings of £220m over eight years, with breakeven by Year 4 and recurring annual savings of £49m, enabling reinvestment in frontline services.
- **Tailored service models**: each unitary will implement bespoke operating models aligned to local needs (urban deprivation in Greater Norwich, coastal challenges in East Norfolk, and rural isolation in West Norfolk) rather than a one-size-fits-all approach.
- **Focus on prevention and innovation**: the councils will embed early intervention and prevention strategies, reducing demand for acute services and improving long-term outcomes for residents.
- **Significant capacity for transformation**: the proposal includes investment in digital services, streamlined processes, and workforce integration, ensuring councils can modernise and deliver high-quality, sustainable services.
- **Accelerated improvements for disadvantaged groups in Norwich**: Greater Norwich faces some of Norfolk's deepest deprivation, but progress is being made. In 2019, 20% of Norwich's population lived in areas classified within the most deprived 10% nationally. According to 2025 figures, the city's relative position nationally has improved. This may be attributed in part to targeted, hyper-local interventions in housing, health, and across socio-economic disadvantage. A new Greater Norwich unitary will accelerate this improvement by aligning resources and decision-making with the city's unique challenges, enabling neighbourhood-level solutions that tackle inequality head-on and build a fairer, more prosperous future for all residents.

- **Strong local engagement**: over 5,000 survey responses and 100+ engagement events demonstrate that the design reflects community priorities, increasing the likelihood of successful implementation.
- **A wide range of diverse voices engaged in Norwich**: in Norwich, engagement sought to ensure inclusive participation, particularly from groups such as young people, VCSEs, rural residents, and those from marginalised communities. This included in-person roadshows across all 13 wards delivering 391 direct interactions; over 300 invitations being sent to VCSE organisations in Norwich and Broadland to attend a workshop on proposals which delivered 50 attendees; officer engagement with the young people who make up the Norwich and Broadland youth advisory board; drop-in and 121 sessions with stakeholders; a focus piece in Norwich's residents' magazine sent to 70,000 homes within the Norwich footprint; and five LGR related releases being broadcast from 21 January to 20 June achieving 4,880 views collectively over the period. Overall, these engagements demonstrated strong support for a three-unitary model.
- **Alignment with strategic growth**: the councils are positioned to unlock housing, infrastructure, and economic opportunities through partnership with the Mayoral Combined Authority, supporting inclusive growth across Norfolk. Representation of the three unitaries in this further enables local voices to be heard within the strategic county-wide decision-making structure, something that would be more difficult to achieve if a single authority or two-unitary model were adopted.

| **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 |
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- **Optimal balance of scale and local responsiveness**: each proposed unitary has a population between 278,000 and 336,000, this is large enough to achieve efficiencies but small enough to remain close to communities.
- **Meets Government criteria for resilience**: while below the 500,000 guideline, the proposal justifies this with strong evidence of functional need and strategic opportunity, ensuring councils can deliver sustainable services without creating a democratic deficit.
- **Financial sustainability from day one**: baseline modelling shows all three councils start in a viable position, with projected cumulative savings of £220m over eight years and recurring annual savings of £49m.
- **Avoids single-point failure risk**: a single county unitary would concentrate financial and operational risk in one structure. Three councils distribute risk and create more resilient organisations.
- **Capacity for transformation**: each council will have sufficient tax base and organisational scale to invest in digital innovation and preventative service models.

- **Supports efficiency without remoteness**: the model avoids the inefficiencies and democratic deficit of a mega-council, while still enabling economies of scale through shared procurement and collaboration.

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| **4) To what extent do you agree or disagree that the proposed council will deliver high quality, sustainable public services?** | Strongly Agree |

- **Designed for transformation**: the proposal creates councils built to deliver modern, preventative, and integrated services. Investment in digitally enabled services and streamlined processes will improve accessibility, reduce duplication, and free resources for frontline delivery.
- **Prevention-focused model**: each unitary will embed early intervention strategies across social care, housing, and health, reducing demand for costly crisis services and improving long-term outcomes.
- **Tailored to local needs**: service delivery models are bespoke for each area (urban deprivation in Greater Norwich, coastal challenges in East Norfolk, and rural isolation in West Norfolk) ensuring relevance and effectiveness.
- **Integration with partners**: the model aligns with NHS reforms and other public services, enabling joined-up delivery and better coordination across health, education, and community support.
- **Financial sustainability underpins quality**: robust modelling shows recurring annual savings of £49m and cumulative benefits of £220m by Year 8, ensuring councils can maintain and improve services without compromising quality.
- **Evidence-led and engagement-driven**: service design is informed by extensive engagement with residents and partners, ensuring priorities reflect real community needs and expectations.

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| **5) To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?** | Strongly Agree |

- **Extensive engagement programme**: over 5,403 survey responses, 100+ public and partner events, and direct contact with 304,500 households show strong public involvement.
- **A wide range of diverse voices engaged in Norwich:** extensive and inclusive engagement was underken in the city to capture diverse perspectives, including young people, VCSEs, rural residents, and marginalised communities. Activities included:
    - Roadshows across all 13 wards, delivering 391 direct interactions
    - Invitations to over 300 VCSE organisations, resulting in 50 workshop attendees
    - Engagement with Norwich and Broadland Youth Advisory Board
    - Drop-in and one-to-one stakeholder sessions
    - A feature in Norwich's residents' magazine reaching 70,000 homes
    - Five LGR-related press broadcasts between January and June, achieving 4,880 views

  In addition, across districts, there was broad stakeholder input with town and parish councils, MPs, businesses, voluntary sector, and health and education partners ~~all contributed~~, ensuring diverse perspectives shaped the proposal.

  These efforts demonstrated strong support for a three-unitary model, especially for its ability to maintain local responsiveness and ensure the preservation of local identity.
- **Clear alignment with community priorities**: feedback emphasised accountability, local identity, and financial sustainability which are core principles embedded in the design of the proposal.
- **Place-based approach**: each unitary reflects distinct local needs:
    - *Greater Norwich*: Tackles urban deprivation and housing pressures.
    - *East Norfolk*: Addresses coastal challenges, energy sector growth, and rural isolation.
    - *West Norfolk*: Focuses on ageing population, connectivity, and rural service delivery.
- **Strong political backing**: supported by **8 out of 10 Norfolk MPs**, demonstrating broad democratic and cross-party endorsement.

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| **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 |

- **Strengthens regional governance**: the three-unitary model creates balanced representation within the Norfolk & Suffolk Mayoral Combined County Authority (MCCA) avoiding dominance by any single area and ensuring urban, rural, and coastal voices are heard.
- **Enables strategic planning with local delivery**: councils will focus on local service delivery while the MCCA handles regional priorities like transport, housing, skills, and infrastructure this will align local needs with strategic investment.
- **Locally informed delivery**: multiple unitaries provide the skills, resources, and local knowledge needed to support the MCCA's commissioning model, ensuring effective delivery of major projects.
- **Strong geographies for economic growth**: each unitary reflects functional economic areas, enabling coherent collaboration on regional priorities such as clean energy, agri-tech, and housing, but ensures they are shaped for successful local delivery. This includes Norwich which is a high growth city (64% growth since 2010) and only exceeded by Manchester, Bristol and Belfast of the core cities. Its nationally important industries (financial services, life sciences/Agri tech, creative industries and high-growth sectors like FinTech and digital industries) are bound by 54% of GVA outside its council area – up from 47% in 2010 – and 47% of jobs now located outside of the city. A larger footprint and seat at the Mayor's table enables more strategic growth opportunities to deliver for UK PLC. As per Alison McGovern's written statement (19 November 2025):

  > *"Cities such as Colchester, Portsmouth and **Norwich** can drive growth at the national scale, but we need to make sure the structures around them support, rather than hinder, their ambitions".*

- **Aligns with Government's devolution agenda**: the model meets Local Government Reorganisation criteria by creating councils that can partner effectively with a strategic authority to unlock investment and accelerate growth.

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| **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 |

- **Designed for local accountability**: the three-unitary model provides great democratic accountability than the other proposals, ensuring residents can easily identify and contact their local elected members and make their voices heard.
- **Neighbourhood-level structures**: each proposed council will deliver specific local shaped frameworks for community engagement, including enhanced roles for town and parish councils and new democratic models for unparished urban areas.

- **Reflects feedback on visibility and access**: engagement findings show residents value knowing their councillors and having decisions made by people who understand their community.
- **Closer decision-making**: councils will operate at a scale that allows decisions to be made nearer to communities, improving responsiveness and trust.
- **Empowers local identity**: the model respects cultural and historic importance, anchoring councils in Norwich, Great Yarmouth, and King's Lynn while supporting neighbourhood-level influence.
- **Norwich's commitment to democratic legitimacy through local empowerment:** the Greater Norwich submission is rooted in the principle that democratic legitimacy depends on meaningful participation from all communities, especially those historically marginalised. Its engagement strategy ensured these voices were not only heard but that they actively shaped the proposals, prioritising inclusion of young people, VCSE organisations, rural residents, and underrepresented groups through roadshows across all 13 wards, a VCSE workshop with 50 attendees, direct engagement with the Norwich and Broadland Youth Advisory Board and drop-in and one-to-one stakeholder sessions. This approach demonstrates its commitment to a governance model that reflects the lived experience of local communities. Feedback strongly supported a three-unitary structure, recognising it as the best way to maintain local responsiveness, preserve identity, and uphold democratic legitimacy by ensuring decisions are informed by those most affected.

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| **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?** | Strongly Agree |

- **Unlocks Greater Norwich's growth potential**: adjusting boundaries allows Norwich to expand beyond its constrained current boundaries, incorporating key suburbs and economic hubs in Broadland and South Norfolk that already identify as being part of the city. This enables the city to grow uninhibited, supporting housing delivery, infrastructure, and its role as Norfolk's economic engine.
- **Wymondham and neighbouring parishes**: as set out above, we were disappointed that Wymondham and neighbouring parishes were not included in the Greater Norwich boundary as there is a strong rationale for its inclusion. Wymondham is a natural extension of Norwich's economic and social sphere. The town functions as a satellite of Norwich, with strong daily connections for work, education, leisure, and retail. Residents rely heavily on Norwich's services and infrastructure, supported by excellent transport links: the train journey from Wymondham to Norwich typically takes 14–16 minutes, with the fastest services completing in as little as 11–13 minutes. Around 40 trains per day provide frequent and reliable connectivity, reinforcing

Wymondham's integration into Norwich's labour market and service network.

Strategically, Wymondham sits within the Greater Norwich Local Plan (GNLP) and the Strategic Growth Area (SGA), which accounts for 70% of planned housing growth and all strategic employment locations. Its proximity to major innovation hubs – Norwich Research Park, Hethel Innovation Centre, and the Food Enterprise Zone – aligns with the Cambridge-Norwich Tech Corridor, supporting economic clustering and integrated transport planning.

Developments within Wymondham and surrounding parishes could deliver significant new homes growth. These plans support significant housing and employment opportunities, requiring coordinated governance and infrastructure investment and its inclusion would have ensured efficient delivery of services, support net-zero ambitions, and avoid fragmentation of strategic assets. It would also have respected historic and functional community ties, reinforcing democratic legitimacy by aligning governance with real-world patterns of living and working.

- **Aligns with functional geographies**: the three-unitary proposal moves away from arbitrary historic lines to create councils that reflect real communities and economic patterns of the residents they support.
- **Improves service delivery**: boundary changes allow each unitary to design services around local needs rather than forcing a one-size-fits-all approach.
- **Financial sustainable**: modelling shows all three councils would be viable from day one, with cumulative savings of £220m over eight years and recurring annual savings of £49m. Ensuring that all have tax bases of a suitable size that will continue to grow and support them in the longer term.
- **Avoids structural weaknesses**: prevents importing Norfolk County Council's financial fragility into a single authority, reducing risk and improving resilience.
- **Supports housing and infrastructure growth**: logical boundaries enable coordinated planning for homes and transport that meet the needs of the local communities and address significant social demographic challenges.
- **Responds to engagement feedback**: residents and stakeholders supported councils that reflect local identity and functionality, leading to boundary changes that are being proposed.
- **Strong political backing**: supported by 6 out of the 8 Norfolk Councils and 8 out of 10 Norfolk MPs, reinforcing confidence that these changes are necessary and future-proof.