

## **CABINET MEMBERS DELEGATED DECISIONS**

1. **SUBMISSION OF CONSULTATION RESPONSE ON LOCAL GOVERNMENT REORGANISATION TO THE MINISTRY OF HOUSING, COMMUNITIES AND LOCAL GOVERNMENT** (Pages 1 - 21)

## CABINET MEMBERS DELEGATED DECISION

<b>Open</b>		Mandatory/			
<b>Any especially affected Wards</b>	No	Discretionary / Operational			
Lead Member: Cllr Alistair Beales E-mail: cllr.Alistair.Beales@West-Norfolk.gov.uk		Other Cabinet Members consulted:			
		Other Members consulted: Members Briefing held 18 <sup>th</sup> December			
Lead Officer: Kate Blakemore E-mail: Kate.Blakemore@West-Norfolk.gov.uk		Other Officers consulted: Monitoring Officer			
Financial Implications NO	Policy/Personnel Implications NO	Statutory Implications NO	Equality Impact Assessment NO	Risk Management Implications NO	Environmental Considerations NO
Date of publication of report: 19 <sup>th</sup> December 2025			Date decision to be taken: 2 <sup>nd</sup> January 2026		
Deadline for Call-In: 9 <sup>th</sup> January 2026					

### **TITLE: SUBMISSION OF CONSULTATION RESPONSE ON LOCAL GOVERNMENT REORGANISATION TO THE MINISTRY OF HOUSING, COMMUNITIES AND LOCAL GOVERNMENT**

#### **Summary**

The purpose of this report is to present the Councils' response to the consultation on Local Government Reorganisation (LGR) proposals in Norfolk. The consultation seeks to gain a view on the proposal to establish either a single county unitary, two unitary or three unitary model in Norfolk. The council's position on this matter is that three unitary councils in Norfolk would be the best option for Norfolk.

#### **Decision to be taken**

To submit the council's response to the consultation on Local Government Reorganisation in Norfolk to the Ministry of Housing, Community and Local Government by its closing date on 11<sup>th</sup> January 2026.

#### **Reason for Decision**

The council unanimously supported a three unitary proposal for Local Government reorganisation in Norfolk on 18<sup>th</sup> September 2025. It is seeking to submit a consultation to the Ministry of Housing, Community and Local Government that supports this position.

## **1 Background**

- 1.1 On 18th September 2025, Council endorsed the Final Proposal for a three-unitary model for Local Government Reorganisation. This proposal was

endorsed by five other district, city and borough councils in Norfolk, and was submitted to the Secretary of State for Housing, Communities and Local Government.

- 1.2 A further two proposals were also submitted to the Government regarding LGR in Norfolk, these were, a single unitary council, put forward by Norfolk County Council, and a two unitary council proposal submitted by South Norfolk Council.
- 1.3 Before an LGR outcome can be implemented it is required that consultation with any council affected that has not submitted the proposal, as well as any other persons considered appropriate, takes place.
- 1.4 Government have decided to consult on all three proposals put forward for Norfolk. This statutory consultation was opened on 19th November 2025 and will run for 7 weeks until 11th January 2026.
- 1.5 The council has been invited by Government to submit a response to the consultation outlined and it intends to do so supporting its agreed position around a three unitary council being the best solution for Norfolk. The proposed response is attached as appendix one of this document.
- 1.6 A 'minded to' decision as to which proposal to implement within Norfolk is expected in March of 2026. And it is stated that the responses to this consultation will help to inform the Secretary of State's assessment of whether, and to what extent, the proposals meet the criteria set out in the invitation.

## **2 Options Considered**

- 2.1 Do nothing and do not submit a response to the Ministry of Housing, Community and Local Government.
- 2.2 Submit a response supportive of a three unitary solution for Norfolk in line with the council's agreed position on Local Government Reorganisation (recommended).

## **3 Policy Implications**

- 3.1 There are no policy implications for the council to submit a consultation response to the Ministry of Housing, Community and Local Government. The proposed consultation response is supporting a three unitary council solution for Norfolk. The council unanimously support the submission of a business case proposing this solution for Norfolk on 18<sup>th</sup> September 2025.

## **4 Financial Implications**

- 4.1 There are no financial implications for the council to submit a consultation response to the Ministry of Housing, Community and Local Government.

## **5 Personnel Implications**

- 5.1 There are no personnel implications for the council to submit a consultation response to the Ministry of Housing, Community and Local Government.

## **6 Environmental Implications**

- 6.1 There are no environmental implications for the council to submit a consultation response to the Ministry of Housing, Community and Local Government.

## **7 Statutory Considerations**

- 7.1 There are no statutory considerations for the council to submit a consultation response to the Ministry of Housing, Community and Local Government. It has been invited to submit a consultation response as a named consultee but there is no statutory requirement for it to submit one.

## **8 Equality Impact Assessment (EIA)**

- 8.1 There are no equalities implications for the council to submit a consultation response to the Ministry of Housing, Community and Local Government. As and when further decisions are taken and impacts of the government's decision in respect of Local Government Reorganisation, and the proposal it wishes to pursue are known, full EIAs will be undertaken.

## **9 Risk Management Implications**

- 9.1 There are no risk management implications for the council to submit a consultation response to the Ministry of Housing, Community and Local Government.

## **10 Declarations of Interest / Dispensations Granted**

- 10.1 None

## **11 Background Papers**

Appendix one – proposed consultation response (attached)

Signed: Councillor Alistair Beales

Leader of the Council

Date: 19<sup>th</sup> December 2025

## Stage 1 - Pre-Screening Equality Impact Assessment

For equalities profile information please visit [Norfolk Insight - Demographics and Statistics - Data Observatory](#)

Name of policy/service/function	CONSULTATION RESPONSE ON LOCAL GOVERNMENT REORGANISATION TO THE MINISTRY OF HOUSING, COMMUNITIES AND LOCAL GOVERNMENT				
Is this a new or existing policy/service/function? ( <i>tick as appropriate</i> )	New	<input checked="" type="checkbox"/>	Existing	<input type="checkbox"/>	
Brief summary/description of the main aims of the policy/service/function being screened.  Please state if this policy/service is rigidly constrained by statutory obligations, and identify relevant legislation.	To submit a consultation response to MHCLG on the council's agree position on local government reorganisation.				
Who has been consulted as part of the development of the policy/service/function? – new only ( <i>identify stakeholders consulted with</i> )	We worked collaboratively with Broadland District Council, Breckland District Council, Great Yarmouth Borough Council, North Norfolk District Council and Norwich City Council to develop our response.  Leaders and Chief Executives were extensively involved in the development and oversight of the final submission				
<b>Question</b>	<b>Answer</b>				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group. NB. Equality neutral means no negative impact on any group.</p> <p><b><i>If potential adverse impacts are identified, then a full Equality Impact Assessment (Stage 2) will be required.</i></b></p> <p><i>*For more information on health inequalities please visit <a href="#">The King's Fund</a></i></p>		Positive	Negative	Neutral	Unsure
	Age				<input checked="" type="checkbox"/>
	Disability				<input checked="" type="checkbox"/>
	Sex				<input checked="" type="checkbox"/>
	Gender Re-assignment				<input checked="" type="checkbox"/>
	Marriage/civil partnership				<input checked="" type="checkbox"/>
	Pregnancy & maternity				<input checked="" type="checkbox"/>
	Race				<input checked="" type="checkbox"/>
	Religion or belief				<input checked="" type="checkbox"/>
	Sexual orientation				<input checked="" type="checkbox"/>
	Armed forces community				<input checked="" type="checkbox"/>
	Care leavers				<input checked="" type="checkbox"/>
	Health inequalities*				<input checked="" type="checkbox"/>
Other (eg low income, caring responsibilities)				<input checked="" type="checkbox"/>	

**Please provide a brief explanation of the answers above:**

This decision relates to the submission of a consultation response on LGR in Norfolk to the MHCLG. The Secretary of State will ultimately decide what the future of local government in Norfolk will look like, following receipt of all relevant proposals. This decision is expected in spring 2026. Once this decision has been made and we know which of the proposals has been accepted, we will be more informed on what the potential impacts may be and therefore a full and thorough Equality Impact Assessment will be conducted at this stage.



## MHCLG Statutory Consultation Response

### Question Scoring Matrix

Question	1UA	2UA	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	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
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



**Question 8 – Free Text Response explaining answers you have given in Q1-7 (optional)**

***One Unitary proposal response***

<p><b>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?</b></p>	<p>Strongly disagree</p>
<p>The proposal to create a single unitary council for Norfolk raises significant concerns about scale, identity, and effectiveness. Covering 932,000 people across 2,000 square miles, it would be the second largest unitary authorities in England and Europe. This size risks creating a remote, centralised body that feels disconnected from local communities and undermines the principle of localism. While the proposal claims to deliver “local where it matters,” reducing representation from 399 councillors to around 168 will dilute local voices and create a democratic deficit.</p> <p>Norfolk’s identity is rooted in its diverse towns, rural villages, and coastal communities, not in a single county-wide construct. Engagement with Norfolk residents shows they have a strong attachment to local areas, yet the proposal assumes people identify with the whole county. This approach ignores lived experience and risks imposing a one-size-fits-all model on communities with very different needs. Urban Norwich faces complex housing, transport, and infrastructure challenges that differ significantly from rural and coastal areas. Without clear mechanisms to prioritise these urban issues, the city’s growth potential could be inhibited, slowing progress and missing opportunities for sustainable development. Rural and coastal communities will equally not have their needs met.</p> <p>The plan also oversimplifies Norfolk’s economic reality. While Norwich is an economic hub, rural and coastal areas struggle with deprivation, housing shortages, and infrastructure gaps. A single authority may fail to tailor strategies effectively, creating risks of economic imbalance and unequal resource allocation. Centralising services such as housing, planning, and social care could lead to slower decision-making, postcode lottery effects, and reduced responsiveness. Overall, the proposal contradicts the principles of localism and strategic planning, threatening both democratic engagement and service delivery across the county.</p>	
<p><b>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?</b></p>	<p>Disagree</p>
<p>The financial assumptions underpinning the proposal are highly optimistic and fragile. It relies on achieving £39.8 million in annual savings through rapid integration of systems and processes figures based on best-case scenarios that fail to account for delays, cost overruns, or the complexity of harmonising operations across such a large geography. Any deviation from these assumptions will erode the claimed benefits and undermine service delivery. Moreover, the savings appear heavily dependent on reducing district-level</p>	

staffing and management costs, raising serious concerns about whether such cuts can be delivered without damaging local service capacity and responsiveness. Despite references to “radical reform” and “local empowerment,” the proposal lacks a clear strategy for transformational change. It leans on untested mechanisms such as Neighbourhood Area Committees and Integrated Neighbourhood Teams without setting out a coherent plan for embedding these changes. Promises of improved housing, transport, economic growth, and public health remain aspirational, with no credible implementation detail, sequencing, or measurable milestones. Delivery risks including democratic deficit, workforce morale, and service continuity are acknowledged but underplayed, with little evidence of capacity or capability to manage them at the proposed scale.

The proposal is also heavily dependent on external factors, such as 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. Furthermore, the governance model remains highly centralised, contradicting claims of “local where it matters.” Without proven structures or guaranteed resources for local decision-making, this ambition risks remaining theoretical. Even practicalities around elected member numbers appear unworkable; if all members wished to speak on an issue, council meetings could last more than eight hours, highlighting a lack of consideration for democratic functionality.

**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

The assumption that size guarantees efficiency or resilience is fundamentally flawed. A very large authority will not automatically deliver efficiencies or withstand shocks; instead, it risks introducing layers of bureaucracy, slowing decision-making, and creating distance from communities. This undermines responsiveness and agility, qualities essential for addressing Norfolk’s diverse and complex challenges.

Claims of financial resilience are overstated. The business case suggests that scale will protect against financial shocks, yet the model relies heavily 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. Furthermore, concentrating all services and financial responsibility into a single organisation 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 does not support this approach. In Somerset, its single large unitary council failed to deliver the full savings promised, achieving less than half of the £18.5 million forecast within two years. Underestimating the time and complexity required for transformation and unrealistic assumptions about cost reductions have left Somerset facing a £190 million budget shortfall by 2029, requiring exceptional financial support from government. This proposal shows similar weaknesses: no clear plan for investment in skills, systems, or infrastructure, and no credible roadmap for cultural or operational transformation. Bigger does not mean better especially for Norfolk’s challenges of ageing population, rural isolation, coastal deprivation, and urban deprivation, which demand tailored, place-based solutions rather than a one-size-fits-all model.

<p><b>4) To what extent do you agree or disagree that the proposed council will deliver high quality, sustainable public services?</b></p>	<p>Strongly disagree</p>
<p>The proposal’s financial model is inherently fragile and undermines long-term sustainability. Its savings plan is heavily reliant on reducing district-level staff and management costs, an approach that risks stripping out local capacity and expertise. This could leave 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, compounding the problem rather than solving it.</p> <p>There is also no credible plan for long-term investment. Sustainable services require ongoing investment in infrastructure, workforce development, and digital capability, yet the business case offers no clear roadmap for these priorities. Instead, it focuses on short-term cost reduction rather than building resilience. Similarly, while the proposal uses aspirational language about “radical reform,” it 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 that is unable to innovate or adapt.</p> <p>Centralisation further reduces responsiveness. A single authority covering 932,000 residents will concentrate decision-making and dilute local voice, creating 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. Consolidating all services into one organisation also creates a single point of failure: if the council fails to achieve its savings commitments or experiences service delivery breakdowns, the entire county will be affected, with no fallback or alternative governance structure.</p>	
<p><b>5) To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?</b></p>	<p>Strongly disagree</p>
<p>The proposal’s engagement process was limited and high-level, failing to involve local communities in shaping the final model. It cites online surveys and a small number of engagement events, but these focused on broad principles rather than detailed structural options. There is no evidence that residents were meaningfully consulted on the scale or design of the proposed authority.</p> <p>Local priorities such as strong identity, accessible services, and clear accountability are not reflected in the design. A single council covering 932,000 people undermines these priorities by centralising decision-making and reducing democratic representation. Norfolk’s size and diversity mean that challenges vary significantly across the county, from rural isolation and coastal deprivation to infrastructure gaps. These issues require tailored, place-based solutions, yet a large, centralised council risks imposing generic policies and responding too slowly to urgent local problems.</p> <p>Consultation did not test appetite for creating one of the largest unitary councils in England. Feedback emphasised simplicity and local voice, not a model that risks diluting both. Furthermore, mechanisms intended to deliver localism—such as Neighbourhood Area Committees and Integrated Neighbourhood Teams—are unproven and lack detail on resourcing, governance, or decision-making powers. Without clear structures and guarantees, these concepts remain theoretical and do little to address concerns about loss of local accountability.</p>	

<p><b>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?</b></p>	<p>Strongly disagree</p>
<p>The proposal risks weakening Norfolk’s strategic influence rather than strengthening it. 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. This centralisation undermines the principle of devolution, which is intended to bring decision-making closer to communities—not concentrate power in a remote authority.</p> <p>The model also fails to reflect Norfolk’s economic geography. The county is not a single, uniform economic area; it comprises distinct housing markets, travel-to-work patterns, and economic zones. Norwich’s urban economy operates very differently from rural west Norfolk or coastal communities like Great Yarmouth. Yet the proposal does not explain how these differences will be addressed. Norwich, as a fast-growing city, faces complex housing, transport, and infrastructure challenges that require focused attention. Under a single council negotiating with a Mayor whose priorities may lean toward wider regional agendas, Norwich’s growth ambitions risk being diluted or deprioritised.</p> <p>Norfolk’s Energy Coast and offshore renewables sector are nationally significant assets, but a one-size-fits-all approach could dilute strategic focus on these economic advantages. Furthermore, placing all local government functions into one organisation creates dependency and vulnerability: if the council faces financial or operational difficulties, Norfolk’s ability to engage effectively with the strategic authority will collapse. Overall, the proposal centralises power, reduces democratic representation, and fails to provide a credible plan for championing Norfolk’s diverse economic priorities.</p>	
<p><b>7) To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?</b></p>	<p>Strongly disagree</p>
<p>The proposal fundamentally undermines local voice by concentrating decision-making within a single council covering 932,000 residents. This scale inevitably reduces democratic representation and makes it harder for communities to influence decisions that directly affect them. Engagement feedback consistently emphasised the importance of local identity and strong representation, yet this model delivers the opposite. It will deliver fewer councillors, centralised governance, and diminished local autonomy.</p> <p>Mechanisms intended to deliver localism, such as Neighbourhood Area Committees and Integrated Neighbourhood Teams, remain unproven and lack detail on governance, resourcing, or real decision-making powers. Without clear authority and guaranteed funding, these structures risk being tokenistic rather than meaningful. Similarly, while the proposal mentions devolved budgets, there is no commitment to scale, timing, or accountability, leaving neighbourhood empowerment aspirational rather than real.</p> <p>Norfolk’s large and diverse geography presents unique challenges such as rural isolation and coastal deprivation. A remote, centralised council will struggle to understand and respond quickly to these priorities. Local empowerment requires flexibility and speed, yet a large, bureaucratic authority will impose uniform policies and processes, slowing responses and diluting the ability to tailor solutions to neighbourhood needs.</p>	



## Two Unitary proposal rationale

<p><b>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?</b></p>	<p>Disagree</p>
<p>The proposed councils are simply too large to deliver the local accountability people expect. Covering up to 1,430 square miles and serving populations of half a million, these authorities would feel remote and bureaucratic, not rooted in the communities they represent. Centralising power at this scale risks weakening responsiveness and eroding trust, precisely the opposite of what residents have asked for.</p> <p>Norwich illustrates the fundamental flaw in this model. It is a dense urban centre with unique economic drivers based around finance, technology, and higher education, while the surrounding areas are rural and coastal, with very different priorities. Forcing these together creates conflicting agendas and dilutes focus. Even the proposal admits boundaries like North Norfolk may need future refinement, signalling that this structure does not reflect natural economic or community patterns from the outset.</p> <p>Economic diversity compounds the problem. Combining Norwich’s tech and finance cluster with Great Yarmouth’s energy coast makes it almost impossible to set coherent priorities or deliver tailored growth strategies. Residents have been clear that they want stronger local identity and decision-making. Two large councils fail to deliver that, instead, they risk creating governance that feels distant, complex, and unresponsive which undermining the very purpose of reform.</p>	
<p><b>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?</b></p>	<p>Disagree</p>
<p>The scale of the proposed councils still undermines the promise of locally tailored, community-led services. Covering up to 1,430 square miles and serving populations of 400,000 to 530,000, these authorities would remain remote from rural and coastal communities, making genuine local responsiveness almost impossible. Centralising decision-making at this level risks leaving residents feeling disconnected and disempowered.</p> <p>The financial case is equally fragile. Projected savings of £72 million by 2028/29, rising to £90 million the following year, rely on optimistic assumptions about “service optimisation” and “early intervention.” These depend on cultural change and demand reduction which are ambitious goals that rarely materialise at speed, especially in organisations of this scale. The largest savings hinge on reducing demand in social care and SEND through prevention strategies, yet evidence shows these benefits take years to deliver and require strong local networks.</p> <p>Crucially, the proposals fail to reflect public priorities. Residents have consistently called for stronger local identity and decision-making, yet two large councils still centralise power far from communities. Promises of “empowered neighbourhoods” ring hollow when governance remains distant and bureaucratic. Instead of creating a system that feels closer and more responsive, these plans risk delivering one that is remote, high-risk, and financially uncertain.</p>	

<b>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?</b>	Disagree
<p>The proposed councils remain far too large to deliver the local responsiveness and agility that reform is meant to achieve. Covering up to 1,430 square miles, these authorities would struggle to provide efficient decision-making and tailored services. Rural and coastal communities would still feel disconnected from leadership, undermining the goal of community-led governance.</p> <p>Size alone does not guarantee efficiency. The assumption that bigger councils automatically deliver economies of scale is flawed. True efficiency depends on service design and organisational culture. In fact, large, complex organisations are often slower making decisions and face higher overheads, creating the risk of bureaucracy rather than streamlined delivery.</p> <p>Financial resilience claims are equally optimistic. Projected savings rely heavily on ambitious demand reduction and early intervention strategies, which take years to materialise and are difficult to achieve consistently, yet this proposal seeks to deliver them in the first year. This creates real uncertainty about whether these councils could withstand financial shocks. At the same time, capacity challenges remain; managing strategic planning alongside local delivery across diverse geographies from urban growth areas to remote rural communities will stretch resources and weaken focus.</p> <p>Norfolk’s diversity demands a different approach. Better outcomes require smaller, more locally focused councils that provide strong leadership and accountability while still enabling collaboration on strategic issues. A more granular structure would deliver the local identity and responsiveness residents want, without sacrificing efficiency or resilience</p>	
<b>4) To what extent do you agree or disagree that the proposed council will deliver high quality, sustainable public services?</b>	Disagree
<p>The promises in this proposal are aspirational rather than guaranteed. Its financial case hinges on ambitious early intervention and prevention strategies to reduce demand for costly services. While these approaches are sound in theory, the timeline for implementation is highly aggressive and almost certain to slip, making both outcomes and projected savings uncertain.</p> <p>Scale adds further complexity. Councils covering up to 1,430 square miles would need to manage vastly different service needs, ranging from dense urban Norwich to remote rural and coastal communities. This diversity, combined with the size of the proposed unitaries, makes it harder to deliver locally focused interventions that address Norfolk’s unique geographic and economic challenges.</p> <p>Financial sustainability is far from assured. The model assumes savings will fund service improvements, yet those savings depend on optimistic projections. If they fail to materialise, the risk is not transformation but cuts to essential services. At the same time, local accountability would be diluted. High-quality services depend on strong engagement with communities, but councils of this scale weaken the connection between decision-makers and residents, reducing the ability to tailor services effectively.</p>	

<p><b>5) To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?</b></p>	<p>Disagree</p>
<p>The engagement process, while broad, was not deep enough to provide confidence in the proposals. The cited 804 survey responses and 446,000 campaign impressions represent only a small fraction of Norfolk’s population of over 930,000. This limited sample makes it unclear whether the feedback truly reflects local views or delivers the level of accountability residents expect. The evidence presented does not justify strong confidence that these outcomes will be achieved.</p> <p>Local priorities were identified around improved services and stronger local decision-making but they have not been fully addressed. The proposed councils remain very large, leaving rural and coastal communities at risk of feeling remote from decision-makers. Claims of preserving local identity are also questionable. Grouping Norwich with East Norfolk combines fundamentally different communities and priorities, diluting local voice and creating tensions between urban and rural needs.</p> <p>Finally, evidence of listening is limited. While engagement themes are referenced, the proposal does not clearly demonstrate how feedback shaped final boundaries or governance models. Key concerns, such as avoiding remoteness, appear unresolved. Without stronger alignment between public priorities and the proposed structure, the model risks delivering governance that feels distant and unresponsive</p>	
<p><b>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?</b></p>	<p>Disagree</p>
<p>The proposal avoids the risk of Norfolk having only “one voice” in a Mayoral Combined County Authority by creating two councils, but this improvement is limited. Each council would still represent very large and diverse areas, meaning local priorities could easily be lost in regional negotiations. Devolution is meant to bring decisions closer to communities, yet these councils still centralise power far from many towns and villages, leaving rural communities with little influence over strategic decisions that affect them most.</p> <p>While the structure partially reflects economic geography, it still groups very different economies together. Norwich’s urban economy with its housing, transport, and infrastructure challenges will sit alongside rural and coastal priorities in one authority. This creates competing agendas and risks diluting Norwich’s strategic positioning. The city’s fast-moving growth pressures could be overshadowed by rural and coastal issues, weakening its ability to secure investment and deliver solutions at pace.</p> <p>Ultimately, local empowerment remains limited. Two councils are better than one, but they do not resolve the fundamental problem: governance that feels remote and disconnected. Without a more locally focused structure, the promise of devolution of stronger local identity, accountability, and influence will remain unfulfilled</p>	

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

Disagree

The proposed councils remain far too large to deliver meaningful local engagement. Covering up to 1,430 square miles, these authorities would leave rural and coastal communities feeling disconnected from decision-makers, undermining the principle of governance that is close to the people it serves.

Promises of neighbourhood empowerment lack substance. While the proposal references Community Boards and new Town or Parish Councils, these mechanisms are not fully defined and risk being tokenistic without real decision-making power or resources. Without clarity on how these bodies will influence strategic decisions, the commitment to local empowerment appears weak.

The urban–rural divide further compounds the problem. Norwich’s priorities will inevitably dominate in the East Norfolk council, leaving smaller towns and villages with limited influence. Similarly, rural West Norfolk communities will struggle to shape decisions within such a large governance footprint. Engagement mechanisms remain unclear, with no explanation of how neighbourhood-level input will be embedded in planning or service delivery. Without stronger guarantees, these proposals risk creating governance that feels remote and unresponsive.

### Three Unitary proposal rationale

<p><b>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?</b></p>	<p>Strongly Agree</p>
<p>The proposed model offers a clear improvement by reflecting Norfolk’s distinct geographies and aligning boundaries with real-world patterns of how people live, work, and travel. Unlike outdated structures set in 1974, these councils would be rooted in genuine communities focused on city, coast, and countryside ensuring governance feels relevant and connected.</p> <p>Each unitary is designed around coherent economic zones, creating a structure that supports growth and resilience. Greater Norwich would act as a dynamic city-region and economic engine, driven by knowledge, creative, and life sciences sectors. East Norfolk would anchor the nationally significant “Energy Coast,” powering offshore wind, carbon capture, and tourism. West Norfolk would remain a productive rural heartland, leveraging agri-tech, advanced manufacturing, and strategic links to the Midlands and Cambridgeshire. This approach balances priorities while respecting the unique strengths of each area.</p> <p>Financial sustainability is built into the model. By creating three authorities with robust and balanced tax bases, it avoids undue advantage or disadvantage for any area and ensures resilience against future shocks. Logical boundaries also enable coordinated housing delivery and infrastructure planning through Growth Plans and Spatial Development Strategies, while still responding to local needs. Crucially, the proposal respects cultural and historic identities, anchoring councils in Norwich, Great Yarmouth, and King’s Lynn and protecting the distinct character of rural, coastal, and urban communities.</p>	
<p><b>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?</b></p>	<p>Strongly Agree</p>
<p>This proposal is built on clear, evidence-based design, underpinned by robust analysis of demographics, service demand, and financial sustainability. Each council is structured to be fit-for-purpose from day one, ensuring governance that is both practical and resilient. Financial modelling demonstrates cumulative savings of £220 million over eight years, with breakeven achieved by Year 4 and recurring annual savings of £49 million creating the capacity to reinvest in frontline services rather than cut them.</p> <p>Crucially, the model rejects a one-size-fits-all approach. Each unitary will implement tailored operating models aligned to local needs: addressing urban deprivation in Greater Norwich, coastal challenges in East Norfolk, and rural isolation in West Norfolk. This flexibility is reinforced by a strong focus on prevention and innovation, embedding early intervention strategies to reduce demand for acute services and improve long-term outcomes for residents.</p> <p>The proposal also commits to transformation at scale. Investment in digital services, streamlined processes, and workforce integration will enable modern, high-quality service delivery. Engagement has been extensive, with over 5,000 survey responses and more than 100 events shaping the design, ensuring it reflects community priorities. Finally, the model aligns with Norfolk’s strategic growth ambitions to unlocking housing, infrastructure, and economic opportunities through partnership with the Mayoral Combined Authority, supporting inclusive growth across the county.</p>	

<b>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?</b>	Strongly Agree
<p>This proposal strikes the optimal balance between scale and local responsiveness. Each unitary council would serve a population of 278,000 to 336,000 which would be large enough to achieve efficiencies and financial resilience, yet small enough to remain close to communities and avoid the democratic deficit that comes with mega-councils. While below the Government's 500,000 guideline, the model is backed by strong evidence of functional need and strategic opportunity, ensuring sustainability without sacrificing accountability.</p> <p>Financial viability is built in from day one. Baseline modelling shows all three councils start in a strong position, with projected cumulative savings of £220 million over eight years and recurring annual savings of £49 million. This structure also avoids the single-point failure risk inherent in a county-wide unitary, distributing financial and operational risk across three resilient organisations. Each council will have sufficient tax base and organisational scale to invest in digital innovation and preventative service models, driving transformation and improving outcomes.</p> <p>Crucially, this approach supports efficiency without remoteness. It avoids the inefficiencies and democratic deficit of a mega-council while still enabling economies of scale through shared procurement and collaboration. By combining financial sustainability, capacity for innovation, and genuine local responsiveness, this model offers a credible, future-proof solution for Norfolk.</p>	
<b>4) To what extent do you agree or disagree that the proposed council will deliver high quality, sustainable public services?</b>	Strongly Agree
<p>This proposal is designed for transformation, creating councils built to deliver modern, preventative, and integrated services. Investment in digitally enabled platforms and streamlined processes will improve accessibility, reduce duplication, and free resources for frontline delivery. By embedding innovation at the core, the model ensures councils can adapt and thrive in a changing service landscape.</p> <p>Prevention is central to the approach. Each unitary will implement early intervention strategies across social care, housing, and health, reducing demand for costly crisis services and improving long-term outcomes for residents. Crucially, service delivery models are tailored to local needs, addressing urban deprivation in Greater Norwich, coastal challenges in East Norfolk, and rural isolation in West Norfolk rather than imposing a one-size-fits-all solution.</p> <p>Integration with partners strengthens this design. 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, with robust modelling showing recurring annual savings of £49 million and cumulative benefits of £220 million by Year 8. These efficiencies ensure councils can maintain and improve services without compromising standards. Finally, the proposal is evidence-led and engagement-driven, shaped by extensive consultation with residents and partners to reflect real community priorities.</p>	

<p><b>5) To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?</b></p>	<p>Strongly Agree</p>
<p>This proposal is rooted in extensive engagement and broad democratic support. Over 5,400 survey responses, more than 100 public and partner events, and direct contact with 304,500 households demonstrate a genuine effort to involve communities in shaping the future of local governance. Stakeholder input has been equally diverse, with contributions from town and parish councils, MPs, businesses, the voluntary sector, and health and education partners ensuring the design reflects a wide range of perspectives.</p> <p>The model clearly aligns with community priorities. Feedback emphasised accountability, local identity, and financial sustainability, principles which are embedded throughout the proposal. Each unitary adopts a place-based approach tailored to distinct local needs: Greater Norwich tackles urban deprivation and housing pressures; East Norfolk addresses coastal challenges, energy sector growth, and rural isolation; and West Norfolk focuses on an ageing population, connectivity, and rural service delivery. This ensures governance is relevant and responsive to the realities of each area.</p> <p>Finally, the proposal enjoys strong political backing, with support from eight out of ten Norfolk MPs, demonstrating broad democratic and cross-party endorsement. Combined with its evidence-led design and deep engagement, this model offers a credible, community-driven solution that balances local identity with strategic capacity.</p>	
<p><b>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?</b></p>	<p>Strongly Agree</p>
<p>The three-unitary model strengthens regional governance by creating balanced representation within the Norfolk &amp; Suffolk Mayoral Combined County Authority (MCCA). This approach avoids dominance by any single area and ensures urban, rural, and coastal voices are heard in strategic decision-making. It delivers the best of both worlds, local accountability alongside regional influence.</p> <p>The structure enables strategic planning with local delivery. Councils will focus on responsive, community-based services while the MCCA handles priorities such as transport, housing, skills, and infrastructure. This alignment ensures local needs are reflected in major investment decisions and that regional strategies translate into tangible benefits for communities.</p> <p>Multiple unitaries also provide the skills, resources, and local knowledge needed to support the MCCA's commissioning model, ensuring effective delivery of major projects. Each council reflects a functional economic area, enabling coherent collaboration on regional priorities like clean energy, agri-tech, and housing, while tailoring solutions for successful local implementation. Crucially, the model aligns with Government's devolution agenda, meeting Local Government Reorganisation criteria and creating councils that can partner effectively with a strategic authority to unlock investment and accelerate growth.</p>	

<p><b>7) To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?</b></p>	<p>Strongly Agree</p>
<p>This proposal is designed to deliver genuine local accountability. The three-unitary model offers far greater democratic visibility than other options, ensuring residents can easily identify and contact their elected representatives and make their voices heard. Councils will operate at a scale that brings decision-making closer to communities, improving responsiveness and trust.</p> <p>Neighbourhood-level structures reinforce this commitment. Each council will implement locally shaped frameworks for engagement, including enhanced roles for town and parish councils and new democratic models for unparished urban areas. This reflects what residents told us matters most which were knowing their councillors and having decisions made by people who understand their community.</p> <p>The model also empowers local identity. By anchoring councils in Norwich, Great Yarmouth, and King’s Lynn, it respects the cultural and historic importance of Norfolk’s key conurbations while supporting neighbourhood-level influence. Together, these measures ensure governance that is visible, accessible, and rooted in the places people call home.</p>	
<p><b>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?</b></p>	<p>Strongly Agree</p>
<p>This proposal unlocks Greater Norwich’s full growth potential by adjusting boundaries to reflect real-world communities and economic patterns. Expanding beyond its constrained historic limits allows Norwich to incorporate key suburbs and economic hubs in Broadland and South Norfolk. Areas that already identify as part of the city. This creates space for housing delivery, infrastructure investment, and continued growth as Norfolk’s economic engine.</p> <p>The model moves away from arbitrary historic lines to align with functional geographies, enabling councils to design services around local needs rather than imposing a one-size-fits-all approach. Logical boundaries also support coordinated planning for homes and transport, addressing significant demographic challenges while ensuring sustainable development. Financial resilience is built in, with modelling showing all three councils viable from day one, delivering cumulative savings of £220 million over eight years and recurring annual savings of £49 million. This avoids importing Norfolk County Council’s financial fragility into a single authority, reducing risk and improving resilience.</p> <p>Crucially, the proposal responds to engagement feedback and enjoys strong political backing. Residents and stakeholders supported councils that reflect local identity and functionality, and six out of eight Norfolk councils plus eight out of ten MPs endorse these changes. Together, this creates a future-proof governance model that balances growth, sustainability, and local accountability.</p>	