Submission (Unmodified): Three Unitary Councils in Norfolk

Introduction

In response to the invitation made by the Secretary of State for Housing, Communities and Local Government, on the 5 February 2025, the partnership of six Norfolk district councils (Breckland, Broadland, Great Yarmouth, Kings Lynn and West Norfolk, North Norfolk and Norwich City) jointly and severally submit the following proposals under the Local Government and Public Involvement in Health Act 2007.

As a partnership we believe the optimal solution for Local Government Reorganisation in Norfolk is three strong unitaries firmly rooted in place, and reflecting a detailed understanding of both the challenges and opportunities facing Norfolk, its communities and local economies.

Our model acknowledges Norwich's historical and functional status as a major regional city and creates two other distinct unitaries, with a recognisable centre and urban focus, with King's Lynn in the West and Great Yarmouth in the East, and extensive rural hinterlands with their own distinct characters and communities. The model also ensures that other areas – including North Norfolk, the Broads, Brecks and Fens and market towns – retain their identities and spatial interrelationships.

We believe that the three-unitary model creates more opportunity to deliver integrated and inclusive economic growth in support of the Mayoral Strategic Authority than alternative proposals for unitary structures in Norfolk. It reflects the unique characteristics of the key urban centres and the need for tailored approaches to local economies and housing to unlock their potential across a geography of more than 2,000 square miles and a population of over 916,521 people based on 2021 Census data, precited to rise to more than 1.1 million people by 2035, accounting for the latest housing targets (MHCLG 2024). It also recognises the historic status and potential of Norwich as a regional economic powerhouse, with cities delivering a disproportionate contribution to national GVA.

Our proposal also provides the basis for: -

- the transformation of public services to serve the needs of each community, improving outcomes and value for money;
- a strong platform for local voices and democratic representation;
- effective devolution with the optimal balance of leadership and democratic representation within the Strategic Authority (SA); and
- a clear focus from each unitary on the tools needed to unlock local growth.

A vision for change -

Our submission is built from our fundamental belief and understanding that:

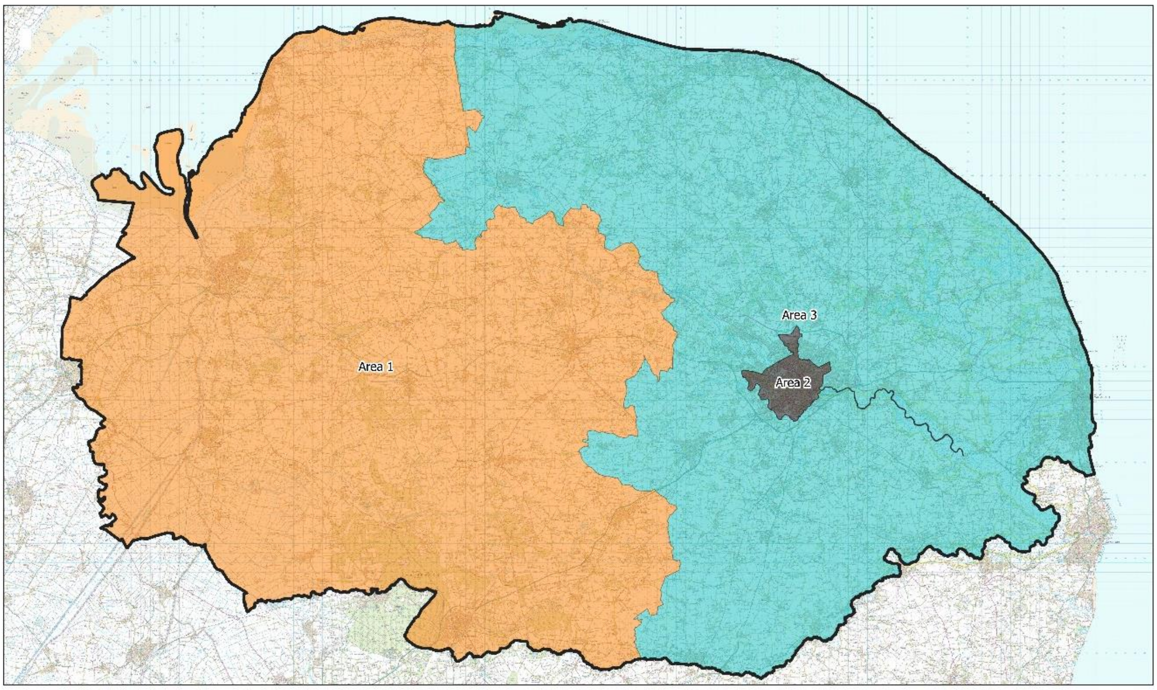
1. Norfolk is not a single homogeneous area. With a population and geographic size vastly greater than almost every other unitary authority in the country, it

does not lend itself to being supported through a large and remote single Council.
2. The City of Norwich is an economic driving force and powerhouse for the wider region, and unitary status focused on Norwich could unlock its significant further potential.
3. There are distinct geographies across the County, based on historic urban centres, coastal and rural identities, and economies. These distinctions help form the basis of natural areas of local government and governance.
4. The cornerstone of effective local government is its locality, and the ability for residents to access local services and democracy locally.
5. Status quo is unsustainable in public service delivery. Effective public service reform is most effectively delivered at a local level, with services tailored to neighbourhood need and focused on partnership and prevention.
6. Devolution, and the success of the future Mayor of Norfolk and Suffolk, is best supported by multiple strong unitary Councils aligned to distinct local economic geographies, and working in partnership with the Mayor to provide on the ground delivery for housing and economic growth – as exemplified in successful established Strategic Authorities across the Country.

Proposal

We formally submit the following ‘Type B’ submission (as set out in the Local Government and Public Involvement in Health Act 2007) for three new Norfolk Unitary Councils.

Figure 1. Unmodified Unitary Map – using district boundaries as the building blocks



As set out in the diagram above, our proposal, based on unmodified local government district boundaries, is for three new unitary Councils designed around distinct social, economic and place geographies covering:

New Unitary	Comprised of (full Districts)	Population (2021)	Population Projection (2035)	Council Tax Base 25/26
West (Area 1)	• The Borough of Kings Lynn & West Norfolk Council • Breckland District Council	294,677	358,744	104,365
Norwich (Area 2)	• Norwich City Council	144,426	169,856	39,166
East (Area 3)	• Broadland District Council • Great Yarmouth District Council • North Norfolk District Council • South Norfolk District Council	477,418	578,985	180,477

Policy Alignment

We believe our approach represents a strong fit against all criteria set out in the invitation for LGR submissions:

Criteria 1: Establishing of a single tier of local government for the whole area concerned	✓
Our three-unitary model creates a single tier of local government across the whole of Norfolk. Government which is based around real geographies that map closely to existing economic areas: in particular the City of Norwich, Kings Lynn and Great Yarmouth, incorporating rural and urban areas and the coast. This design allows for the delivery of responsive economic growth by recognising and capitalising on the specialisms, diversity and challenges of economies across Norfolk, allowing for local policy and strategy formulation based on a deep understanding of both place and the local economy. Norwich requires its own solutions to integrated economic and housing growth, unlocking the potential of the Norwich economy as a GVA powerhouse, but connected to the wider region. A three-unitary model, with a strong city of Norwich at its centre reflects the city's significance and provides scope for the creation of balanced and distinctive arrangements centred around the historic centres of King's Lynn and Great Yarmouth, with respective rural areas and coast across the rest of the County.	

Criteria 2: Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shock	✓

All three proposed authorities are within comparable bounds to other authorities nationally. East Norfolk, with a population of 477,418, would become the eighth largest unitary area in England by population. Norwich, with a population of 144,426, will have a larger population than existing unitary councils such as Kensington and Chelsea, Blackpool and Darlington. West Norfolk, will have a population of 294,677, making it the 39th largest unitary in England with a population larger than Brighton and Hove, Medway and many of the London Boroughs.

All three unitaries will benefit from the agility, through size, to provide sufficient resilience to financial shocks and would be better-placed to deliver more locally-responsive, transformational public services, including the co-creation of preventative services with voluntary and community sector partners that reduces demand – and therefore realise savings – in the longer term.

Criteria 3: prioritising the delivery of high quality and sustainable public services to citizens	✓

The design and delivery of public services around specific local needs and demands is central to our three-unitary proposal, especially in areas such as, tackling unemployment and economic inactivity, serving an ageing population and its social care needs, and wider health and wellbeing. A three-unitary arrangement will be implicitly more agile and responsive, directing and prioritising resources to where they are needed most.

Our model is proposed based on a dynamic approach to scaling, and whilst all three unitaries would retain independence and accountability for delivery. In key service areas, such as Adult Social Care, Children's Services and Housing and Homelessness, delivery models are proposed which enable innovatively aggregating interventions to extend quality and impact with local teams focused on assessment, prevention and intervention such as social prescribing – rooted in local communities working in partnership with the voluntary sector. This represents an optimal balance of the competing requirements to deliver high quality, responsive public services, realise economies of scale and align with existing public service delivery infrastructure – including healthcare, the police and skills providers.

Criteria 4: Showing how councils can work together and support local place identity	✓

Under our model, unitaries will better reflect and extend residents lived experiences and their understanding and sense of 'place' and identity. The three-unitary arrangement consolidates and capitalises upon, rather than subsumes, Norwich's historic and economic status as the major city for the region – as well as its very specific urban challenges – and embraces distinctive civic and cultural identities of King's Lynn and Great Yarmouth. This ensures that councils can focus on local priorities and concerns rather than being spread too thinly in responding to competing interests.

The proposals also reflect the distinct geographies, 'natural' boundaries and identities understood by our residents – the North Norfolk coast, the Broads,

Brecks and Fens, and vibrant, distinctive market towns, small rural villages and coastal resorts. Consultation with over 5,000 residents has indicated a strong preference for local decision making, local accountability, and the types of approach aligned to three unitary Councils for Norfolk.

Criteria 5: Supporting devolution arrangements	✓
Our three-unitary model can realise and combine the benefits and impact of the Strategic Authority operating in areas such as planning and transport across Norfolk and Suffolk with responsive, locally focused authorities delivering tailored public services, creating a balanced and democratically accountable power dynamic and ensuring a voice for community interests and local voices. The Norfolk and Suffolk Combined Authority will be strengthened by constituent members which reflect the opportunities for housing delivery, economic growth and an ambitious skills agenda. Our proposal ensures that the only city in the combined authority has a seat at the table and distinct economic interests in the West and the East are fully engaged in realising the promises of English Devolution.	

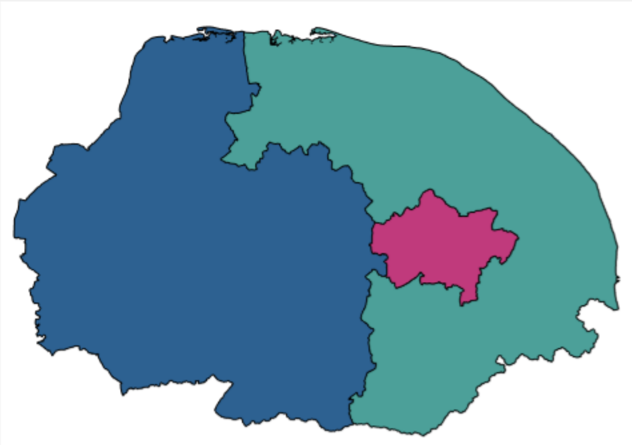
Criteria 6: Stronger community engagement and empowerment	✓
Our three unitary approach maintains locally accessible democratic accountability and decision-making, close to those who benefit and reflective of local needs and opportunities. Ultimately three unitary authorities will strengthen local democracy and engagement with clear representation that is supportive of our smaller towns and communities, improving public service outcomes and unlocking inclusive growth across the whole county.	

<u>**Request for modification –**</u> **The preceding proposals are submitted following the invitation and the terms of section 2 of the Act. They follow a considerable amount of work completed within our partnership and with our partners. Pursuant to the Act, in particular section 7, the Secretary of State can, by order, implement proposals with modifications. Following our extensive workings, local knowledge, and analysis we are requesting that modifications are made to our proposals in order to substantially improve the overall benefits to be gained by reorganisation.** This approach follows the trajectory set out in our Interim Plan submissions and is considered by all partner to be essential to achieve best outcome for residents, communities and businesses through substantial enhancement of the benefit case. The modified proposal delivers a local government structure fit for the next fifty years. **The specific modification we are seeking is that –** • The boundaries of the 'Norwich' unitary set out above are extended to encompass the true economic geography of Greater Norwich, Civil Parishes of: Colney, Cringleford, Keswick and Intwood, Easton, Great Melton,Marlingford and Colton, Bawburgh, Hethersett, Little Melton, Costessey, Caistor St

Edmunds & Bixley, Framingham Earl, Framingham Pigot, Poringland, Trowse with Newton, Kirby Bedon, Blofield, Hemblington, Brundall, Postwick with Witton, Drayton North, Drayton South, Honingham, Ringland, Hellesdon, Horsford, Old Catton, Sprowston West, Great & Little Plumbstead, Beeston St Andrew, Horsham & Newton St Faiths, Spixworth, Sprowston Central, Sprowston East, Taverham North, Taverham South, Thorpe St Andrew, Rackheath, and Salhouse.

- The boundaries of the 'West' unitary set out above are extended to encompass the Civil Parishes of: Deopham & Hackford, Hingham, Barford, Barnham Broom, Brandon Parva, Kimberly & Carleton Forehoe, Morley, Wicklewood, and Wramplingham.

Figure 2. Modified Unitary Map -



We request this on the basis that –

- This would allow a substantial enhancement to the proposal set out above, and in particular our ability to better meet the LGR criteria, as set out in our modified submission (attached) and enable the creation of a new Greater Norwich authority.
- There is a very strong public service justification, on the basis that our core service models are rooted in the establishment of new prevention and neighbourhood focused services, aligned around the demographic differences found across the county, which are not considered to be achievable via other means. This modification provides the scale (particularly for Greater Norwich) and focus to achieve this.
- Modifications would see the creation of three similar-sized councils by population compared to the Type B compliant proposals, creating an even more balanced set of unitary authorities within the County of Norfolk.
- There is a very strong financial sustainability justification, on the basis these modified proposals unlock a combined model which achieve £49m recurring net annual savings across the Norfolk Local Government system, and eliminates the existing structural deficit within 8 years of implementation (a level of impact we do not believe attainable under the unmodified proposals)
- Whilst we model a significant reorganisation one-off cost, estimated at around £111m, these are proximate to estimates for other forms of reorganisation

(reflecting the fact that changing 8 Councils is inherently expensive), and still self-financing within 4 years of vesting day.

These boundary changes are –

- The most effective way to deliver a new Greater Norwich Unitary, which addresses the historic under-bounding. Formed of the key areas adjacent to the City where much new housing and economic growth is proposed, thereby supporting its long-term and sustainable growth and eliminating the democratic deficit which sees residents in the suburbs excluded from decisions within the city's current boundaries.
- Minimal in overall impact, with five of our seven Districts contained entirely within the three new unitaries, and only two (Broadland and South Norfolk) split through necessity to achieve the above.
- Through the required rebalancing of areas affected by the creation of Greater Norwich, we are further able to align Unitary Boundaries to Parliamentary Constituencies and ensure each of the three unitaries shares a border and has balanced spread of population.

Discounted options

We do not believe it practical to achieve the same via other means – particularly a future Principal Area Boundary Review (PABR). The significant downside of a PABR approach would be the substantially increased transition and service disruption time, alongside the significantly – and unnecessary – increased costs to implement. In effect, as the size and shape of authorities (particularly Norwich) are materially different a PABR would mean –

- Requiring, effectively, two rounds of reorganisation. Round 1 impacting all 8 authorities, and round 2 impacting all 3 authorities.
- Transition period extended by a further 4 years, with substantial additional disruption for staff and service users.
- Transition costs growing by a further £26m–£38m driven, in particular, by duplication of transformation elements and additional ICT costs accrued.
- Payback being delayed substantially to by over 4 years, and deferring benefits worth a further £80m or more.

On this basis we believe immediate modification to the only practical route forward.

With the support of all authorities, we request this be taken into account, and our modified submission, as attached, be the version presented for consultation.