

OUTLINE PROPOSAL

A FEDERAL UNITARY SYSTEM OF LOCAL GOVERNMENT FOR NORFOLK AND SUFFOLK

Ian Burbidge, Peter Hardy: May 2025

“The Government’s proposals will lead to geographically vast Councils that are remote from local communities”

“It is District Councils which have the expertise locally in many of the policy area on which the government will be judged”

“The key to local government is the word “local”

“We are a diverse County with coastal, rural and urban areas”

Local Political Reactions following the 2024 White Paper

EXECUTIVE SUMMARY

The authors of this report contributed to previous reviews of local government structure in Norfolk, leading respectively for the District Councils in 2007-10¹ and for the County Council in 1994-97.

We offer here a proposal which applies hitherto unused statutory freedoms introduced in 2011 allowing Councils to revert from Cabinet government to a Committee system. This enables a large unitary Council to build into its Constitution a highly devolved local political decision-making structure.

The model incorporates elements of the proposal adopted and submitted by Norfolk County Council to the Local Government Commission in 1994, before Councils were required to replace the Committee system. It has been updated and simplified, with emphasis on ease of initial transition from the current two-tier structure.

The model can equally be applied for Suffolk, or any unitary Council comprising multiple whole Districts. If adopted by both Counties, the new structure can articulate smoothly with the planned Mayoral Authority for Norfolk and Suffolk. It also takes fully into account the political diversity of different parts of the two counties as well as offering appropriate solutions for the urban areas.

¹ Excepting Norwich City Council

BACKGROUND

The current review of local government structure in Norfolk and Suffolk is the third since the establishment of the current two-tier structure in 1974. Closely following a pattern set in the previous two reviews, the local authorities in Norfolk and Suffolk are currently deadlocked, with disagreement centring principally on the perceived conflict between the need for “local” and “strategic” capabilities, together with strong advocacy for separate “urban” authorities for Norwich and Ipswich. Indeed, South Norfolk Council’s recently expressed willingness to countenance a single unitary solution for Norfolk is the first time in the three reviews that any District Council in Norfolk has stopped short of outright rejection of a such a solution. We believe the experience in Suffolk has been similar.

In the absence of a consensus, or evidence of strong public support for any option, the risk of a Government-imposed solution is high, and the experience from previous reviews suggests that a so-called “doughnut” solution might again feature in Government thinking.

For the first review in 1994-97 (the “Banham Commission”) Norfolk County Council came to an all-party consensus to advocate no change to the two-tier structure, while offering a detailed “Devolved Unitary County” model as the preferred option if a unitary structure were to be imposed. This was well received by the Commission, but rejected on the sole grounds that it was “too big”, given the guidance that had been provided by the then Secretary of State advocating generally smaller unitary Councils. That position has been superseded by the 2024 White Paper and subsequent informal guidance.

In 2000, legislation² mandating a Cabinet system of government in place of the Committee system prevented this highly devolved model from being presented for the 2007-10 Boundary Commission review, since the Committee system was fundamental to it. Since 2011³, however, Councils have had the freedom to again adopt the Committee system.

THE ISSUES

The critical dilemma, yet to be resolved through these review processes, is worth reiterating: Norfolk is too large in geographical terms for a single unitary council to be effective and too small in population terms for multiple unitary councils to be effective. This is before the ‘Norwich issue’ is factored in to the debate. The review process must resolve this dilemma or risk the adoption of sub-optimal solutions.

Despite the starkly contrasting visions among the local authorities in the two Counties, it is possible to discern a fair consensus about what an ideal structure should achieve. For Norfolk (similar considerations will prevail in Suffolk) this can be summarised as:

1. *Strategic capability, economies of scale and operating cost savings.*
2. *Providing effective and truly local governance.*
3. *Minimising transition cost and disruption.*

² The Local Government Act 2000

³ The Localism Act 2011

4. *Respecting the economic role, culture and historic status of the three main urban areas of Norwich, Great Yarmouth and King's Lynn while ensuring the rural and coastal areas are equally well served.*
5. *Articulating effectively with the proposed Mayoral Strategic Authority (MSA).*

The given rationale for two or three unitary councils is increased local accountability, with the required strategic capability being achieved through collaboration. But with two or at most three unitaries in each County, the intrinsic “localness” of any structure will be severely diminished compared to the existing two-tier arrangements. This is especially true given that Great Yarmouth and King's Lynn, proposed as administrative centres in these models, would be each be on the fringe of their geographically large unitary council areas.

The principal argument for unitary Counties is cost-effectiveness and built-in strategic capability while still delivering locally, though the way this would be achieved in practice is yet to be made convincing to sceptics (and remains a challenge for those authorities created through the 2007-10 process). The current Cabinet system is often criticised as over-centralised and less democratic when operating in a geographically large Council.

Aside from resolving these core issues, there is a particular need to address the highly politicised question of **unitary status for Norwich and Ipswich**. There is important history here, ever since several larger urban authorities gained unitary status in the Banham review. Although Banham recommended against unitary status for Norwich, lobbying by the shadow Secretary of State led to Norwich being the specific subject of a follow-up review, which also led to no change. However, at the conclusion of the 2007-10 review the then Secretary of State sought to impose unitary status for Norwich against the advice of the Boundary Commission, a decision struck down by the Courts prior to the incoming coalition Government closing the process.

This appears to be arising again as a central issue with Ministers, as in this response to a question in Parliament in January 2025 from the Member for Norwich North⁴:

“We absolutely believe that in large parts of the country—I see it in Exeter, Lincoln, Ipswich and Norwich—we have important economic anchors in cities that previously have not had a seat at the devolution table because they have been district councils. We have to deal with that as we go forward.”

A “FEDERAL” SOLUTION – BLENDING LOCAL AND STRATEGIC GOVERNANCE

The constitutional structure described here is adapted from Norfolk County Council's 1994 “Devolved Unitary County” submission to the Local Government Commission:

- 1) The new authority will adopt a **Committee system of governance** in place of the previously mandated Cabinet arrangements. Only a minority of local authorities

⁴ Local Government Reorganisation: Hansard Volume 760: Wednesday 15 January 2025

have opted for this system but for example the Isle of Wight Council is currently introducing it to enhance democratic accountability.⁵

- 2) The seven District Council areas, on unchanged boundaries, will be established as **local administrative and political units** (here “Divisions”), based in their current headquarters offices.
- 3) Within a budgetary framework set by the Council, the Constitution will establish:
 - a. County-wide Committees responsible for **all central support services**;
 - b. Separate Committee arrangements in each of the seven Divisions with delegated responsibility **for all local services not deemed strategic or specialist**.
 - c. Centralised county-wide Committees for those **strategic and specialist service functions which otherwise will require formal joint arrangements**.
- 4) All the above Committees will operate with **prescribed freedoms for virement** between services, including at Divisional level.
- 5) The new Council will make use of Regulations⁶ which allows the Divisional Committees to be formed **exclusively by Councillors elected to Wards within that Division**, without the constraint of political proportionality rules.
- 6) Identification of which functions will be delegated or centralised (3b and 3c above) will be achieved through a detailed assessment and dialogue. The criterion for each service area will be the balance between localness, operating cost and strategic capability. As a starting point the delegation is likely to cover substantially all current District Council services, together with current County Council functions such as local highway network management and local library provision. Some services, such as Economic Development and Regeneration, may be coordinated between “strategic” and “local” as they are at present, but with the advantage of closer integration within a single budgetary framework.
- 7) The Constitution will allow discretion for the Councillors for each Division to establish the Committee and Sub-Committee structure most appropriate for their local needs.
- 8) The new Council might be composed of two or perhaps three Members elected for each current County Council Ward, giving 168 or 252 Councillors in total. The number of Councillors in the smallest Division (Great Yarmouth Borough) would be 18 or 27, and for the City of Norwich it would be 26 or 39.

⁵ The Council say “This means that more councillors are actively involved in decision-making and is seen to be more inclusive. Decisions are made collectively by committee members with shared accountability for the decisions made.”

⁶ The Local Government (Committees and Political Groups) Regulations 1990.

9) Officer structures will be developed as follows:

- a. Service Departments will be grouped within (say) three Strategic Directorates based at County Hall, with operational staff and management variously based in the Divisional Offices or retained centrally, matching the balance of delegated and centralised functions.
- b. A Managing Director will head each Division. This role will be critical in ensuring local coordination of decision making and service delivery, feedback with County Hall and liaison with local Councillors, Town and Parish Councils and fostering partnerships with other local bodies.
- c. Central support services, including Finance, Council tax and Audit, Procurement, HR, IT, Legal, strategic Property Management, Committee support and Communications will be consolidated at County Hall under a Chief Operating Officer. Staff may be based in Divisional offices where appropriate. Specialist support services may be fully delegated to Strategic Directorates or Divisions where circumstances warrant it.
- d. The Strategic Directors, Divisional Managing Directors and the Chief Operating Officer will form the corporate management team, reporting to the Chief Executive.

10) This framework gives a solid basis for each Division over time to put in place suitable local Area/Neighbourhood governance arrangements in collaboration with the appropriate outside bodies, including Town and Parish Councils. To ease transition, these arrangements need not all be designed and implemented on day one⁷.

11) Any concerns about a new unitary authority backsliding into a centralised model is easily resolved. In the first instance, legislation prevents any move back from a Committee system to a Cabinet system for five years, absent approval in a referendum⁸. In any event, with a single tier of local Councillors, such a decision will be entirely in their hands.

12) Respecting Norwich's historic status as a ceremonial County, it is provisionally suggested that the title "Norfolk and Norwich Council" be adopted for the new unitary Council.

IMPLEMENTATION

A critical advantage of this approach is ease of implementation, with low transition costs and disruption. It avoids having to do everything, everywhere, all at once and the new Council can focus on reorganising those services most likely to generate savings first and ensure learning is applied to subsequent adaptations within appropriate timescales. Importantly, the

⁷ The County Council's 1994 Submission proposed that, after reorganisation, there should be consultation on a structure based on up to 20 Area Committees.

⁸ Localism Act 2011

new structure will retain names and contact points familiar to the public – Breckland, North Norfolk and so forth.

Most front-line District Council service delivery staff (housing and planning for example) will transfer to the new system on day one, thus ensuring continuity of service. Management structures can readily be adjusted as needs be and merged into the appropriate Strategic Directorate but still with broad delegation of responsibility for day-to-day local decision making to middle and senior managers in the District offices. Some County Council front line staff with local area responsibilities would be relocated to operate from the current District offices.

Rationalisation and centralisation of support services, which benefit from scale and are not location sensitive, is a major task whatever unitary structure is proposed. The outcome will however be highly beneficial since it is in these areas that the lion's share of the forecast savings from larger authorities are to be found.

These arrangements would mean no immediate change to principal office accommodation (County Hall and District Offices), minimising the disruption and potentially prohibitive cost of property churn required for the two- or three- Council proposals.

FINANCIAL IMPLICATIONS

We note that the available financial models which have guided Government policy towards the minimum population figure are disputed. That said, it is uncontroversial that centralising many support services will generate large cost savings. Regarding front line staff, there will be substantially no difference in cost, whichever model is chosen.

As for senior management, the only significant effect of adopting this federal solution over a more centralised unitary county model is the proposal for seven Managing Director posts for the Divisions. In our judgement any extra cost over a centralised structure will be fully justified given the importance of this role in coordinating activities in their respective local areas, coupled with the reduction in load on the central Strategic Directors in managing the interface with local Councillors and Committees.

Transition to this structure will cost no more, and probably less, than transition to a conventional Cabinet-based unitary County structure. The opportunity of direct “slotting in” to many posts at all management levels will be maximised, reducing redundancy costs and easing the natural anxieties of staff affected by the change. For the same reason the costs will be far lower than any two or three Council transition, more especially in cross-boundary variants where existing District functions need to be disaggregated.

Overall, therefore, cost savings with this model are expected to be close to those attainable with a conventional unitary County, with considerable added value in terms of local responsiveness and accountability.

MAYORAL DEVOLUTION

The ideal match with Mayoral devolution will be for Norfolk and Suffolk to adopt broadly similar arrangements, with attention given to representation that provides suitable coordination and subsidiarity between the Mayoral Authority, the two Unitary Councils and the 12 Divisions.

THE “URBAN” DIMENSION – NORWICH AND IPSWICH

This is an understandably vexed area of debate, with much stress on the “urban” as opposed to “rural” character, needs and opportunities. But the issues are nuanced:

- The 1969 Redcliffe Maud Commission drew quite different conclusions when Norwich and Great Yarmouth were separately administered as County Boroughs: *“Town and country are interdependent, therefore the separate administration of urban areas and their rural hinterlands should cease.”*
- Evidence of the advantage of unitary urban areas is limited. Norwich has operated well under the two-tier structure, in common with other thriving historic cities such as Oxford and Cambridge. Meanwhile decades of unitary structures in urban areas such as Middlesbrough and Sheffield, while functioning adequately, have not proven transformative.
- Over the past decades, cooperation between the City Council, the adjoining District Councils and the County Council has successfully delivered major sub-regional projects including the recently adopted Greater Norwich Local plan, the Park and Ride system, the Broadland Northway, the award-winning Forum central library and the current refurbishment of Norwich Castle Museum.
- Importantly, any “urban” versus “rural” arguments promoted in support of unitary status for Norwich need to be critically tested, most notably in respect of Great Yarmouth. A former County Borough, with a contiguous built-up area approaching 75,000 population (encompassing Gorleston, Bradwell and Caister-on-Sea), Great Yarmouth has a distinctly urban character and a profile of social and economic need which is very different from most of rural Norfolk. Similar arguments apply in respect of Ipswich and Lowestoft in Suffolk.
- Furthermore, there are advantages in conserving the current tight City Council administrative boundary since this provides a focus on the historic urban area and its role as a cultural, retail and employment centre for the City’s exceptionally wide hinterland which extends far out beyond the suburbs into much of Norfolk.

CONCLUSIONS

On the key criteria set out in the White Paper we believe this approach will achieve maximum scores:

- **No existing District administrations will be broken up;**
- **There will be effectively localised democratic representation and decision making for all parts of the County, more so than with any alternative model under consideration;**
- **The strong Divisional delegation arrangements will balance the needs of Norwich, the towns, rural and coastal areas and will respect their local identity, culture and history;**
- **The Divisions will be well placed to develop local Area/Neighbourhood governance arrangements to suit the character and demographics of their area;**
- **Increased housing supply will be facilitated through Norfolk-wide coordination of local development planning and management, administered and delivered locally;**
- **Identified “crucial services”, notably social care, children’s services, SEND and homelessness, will benefit from economies of scale, strategic financial and policy management and local delivery where appropriate.**
- **Effective representation and collaboration with the proposed MSA will be easily achieved.**

DISCLAIMER: *All interpretations of legislation in this paper are the authors’ own understanding and are subject to professional legal verification.*