

BABERGH DISTRICT COUNCIL

FROM: Chief Executive

REPORT NUMBER

G239

TO: EXTRAORDINARY COUNCIL

DATE OF MEETING:

8 April 2008

**CONCEPTS FOR THE POSSIBLE FORMATION OF NEW UNITARY AUTHORITIES:
RESPONSE TO THE BOUNDARY COMMITTEE**

1. **PURPOSE OF REPORT**

- 1.1 To consider and agree the Council's response to an invitation by the Boundary Committee to submit concepts for future unitary local government arrangements for Suffolk.

2. **RECOMMENDATIONS**

- 2.1 That the Council considers the draft response to the Boundary Committee, set out in the annex to this report, and determines its response for submission by the Boundary Committee's deadline of 11 April 2008.

3. **FINANCIAL IMPLICATIONS**

- 3.1 There are no financial implications arising directly out of this report.

4. **RISK MANAGEMENT**

- 4.1 This report is most closely linked with the Council's Significant Business Risk No. 1, Local Government Review. Key risks are set out below:

Risk Description	Likelihood	Seriousness or Impact	Mitigation Measures
Failure to achieve LGR outcomes that are in the best interests of residents.	Significant	Catastrophic	Full engagement with the Boundary Committee in the review process. Full engagement with partners and stakeholders in developing detailed unitary solutions.

5. **KEY INFORMATION**

Background

- 5.1 On 5 December 2007 the Government announced its final decision on the viability of Ipswich Borough Council's proposal for a new unitary authority in Ipswich, which was submitted as part of the invitation to submit unitary proposals attached to the Local Government White Paper '*Strong and Prosperous Communities*' in October 2006.

- 5.2 In a written statement to the House of Commons on 5 December the Minister for Local Government stated Ipswich's proposal was "*not likely to achieve the outcomes specified by the affordability criterion*" and therefore, "*that there is not a reasonable likelihood of it, if implemented, achieving the outcomes specified by all the five criteria*".
- 5.3 Under section 4 of the Local Government and Public Involvement in Health Act 2007, the Secretary of State for Communities and Local Government referred Ipswich's proposal to the Boundary Committee for review. The Secretary of State has requested that the Boundary Committee look "*at local government structures and advise whether there could be alternative unitary authority solutions for Suffolk and Norfolk, which may involve changes to local authority boundaries.*"
- 5.4 The Secretary of State has requested that the Boundary Committee make its recommendations by 31 December 2008. When providing advice and making any proposals for unitary local government to the Secretary of State, the Committee will use the same criteria that the Secretary of State used when assessing the bids she received for unitary status in 2007, which are:
- i) Affordability
 - ii) A broad cross section of support
 - iii) Strategic leadership
 - iv) Neighbourhood empowerment
 - v) Value for money services

The Review Process

- 5.5 The Boundary Committee has now commenced the structural reviews in Norfolk and Suffolk. As requested by the Secretary of State, it has agreed to provide advice on:
- i) Whether there could be an alternative unitary pattern of local government for Ipswich and the remaining Suffolk county area
 - ii) Whether there could be a unitary pattern of local government for Suffolk which includes all or part of the Borough of Great Yarmouth, and
 - iii) As part of the advice on the unitary proposals made by Norwich City Council, whether there could be a unitary pattern of local government for Norfolk which includes all or part of the district of Waveney.

The Boundary Committee therefore intends to conduct a combined review of local government structures in the counties of Norfolk and Suffolk. There will be four stages of the review.

5.6 Stage One (3 March to 11 April)

The Boundary Committee invites local councils and other stakeholders to submit concepts for unitary options. These are not detailed business cases but a broad overview of how any preferred unitary concept might work and meet the Secretary of State's criteria. At a recent briefing meeting with Babergh representatives, the Boundary Committee indicated that it would be particularly helpful not just to hear *what* the local authorities' views are but also *why* they hold such views.

Whilst requesting that a concept submission should address whether it would meet the criteria referred to in paragraph 5.4 above, the Boundary Committee has made it clear that no council should undertake any detailed work on the affordability criterion at this stage. The Boundary Committee will undertake the affordability assessment with independent consultancy input and the support of Suffolk's and Norfolk's S151 Officers once one or a very limited number of concepts have been identified by the Boundary Committee as worthy of particular consideration (see paragraph 5.8 below)

5.7 Stage Two (14 April to 4 July)

The Boundary Committee will review the concepts and information it received during Stage One and may request further information in relation to particular concepts or a potential unitary authority option not identified locally during Stage One. The Boundary Committee will also decide which options it will consult on in Stage Three and indicate its preferred option.

5.8 Stage Three (7 July to 26 September)

During this stage the Boundary Committee will publicly consult on draft proposals including on the specific boundaries of any new unitary authorities. The Committee will also collect and assess information on the affordability of the draft proposals during this stage.

5.9 Stage Four (29 September to 19 December)

The Boundary Committee will consider the response to the public consultation and the information collected. It will then formulate its advice to the Secretary of State.

Implementation

5.10 Following receipt of the Boundary Committee's advice and recommendation, and a further four-week period in which representations can be made, the Secretary of State will decide whether to implement the Boundary Committee's advice, with or without modification, or to take no action on that advice and recommendation.

5.11 Although not formally stated, it is understood that the Secretary of State would intend any new unitary structures to come into effect in April 2010.

Conceptual proposals for consideration by the Boundary Committee

5.12 Leaders of the Suffolk Councils have identified four concepts that might in principle meet the criteria set by the Secretary of State. These are

- a single unitary for Suffolk (one unitary council)
- an expanded Ipswich unitary plus a unitary based upon the remainder of the county (two unitaries)
- east plus west unitaries with Ipswich included as part of the east unitary (two unitaries)
- east plus west unitaries plus an expanded Ipswich unitary (three unitaries).

However, they acknowledge that there is not consensus amongst the Suffolk councils as to which of the four concepts should be implemented.

- 5.13 They have also agreed unanimously that the concept of a unitary council involving all or part of the Waveney District Council and Great Yarmouth District Council areas should be vigorously opposed.
- 5.14 The Suffolk Leaders have therefore agreed that all councils should consider the submission of a joint statement to the Boundary Committee, reflecting paragraphs 5.12 and 5.13 above, together with their own submission detailing their own preferred concept(s). That joint statement is attached as Appendix 1 to the draft of Babergh's own submission, set out as an annex to this report.

6 **APPENDICES**

Babergh's draft submission to the Boundary Committee

7 **BACKGROUND PAPERS REFERRED TO:**

Local Government White Paper "Strong and Prosperous Communities" – October 2006

HMSO (2007) Local Government and Public Involvement in Health Act 2007

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EXTRAORDINARY COUNCIL MEETING ON 8 APRIL 2008

ANNEX TO PAPER G239

BOUNDARY COMMITTEE REVIEW: PHASE 1 (CONCEPTS STAGE) RESPONSE BY BABERGH DISTRICT COUNCIL – APRIL 2008

Thank you for the opportunity to submit unitary concepts for future local government arrangements in Suffolk, for consideration by the Boundary Committee.

First of all, Babergh District Council (BDC) would wish to place on record its strong support for the principle of unitary arrangements for Suffolk, and that it is therefore keen to engage fully with the Boundary Committee in this welcome review of local government structures across the whole of Suffolk.

The Suffolk Councils have jointly identified four possible concepts for unitary arrangements within the county. These are set out at Appendix 1. BDC does not wish to add any other concepts for consideration by the Boundary Committee. Nor does it wish to reject any of the four concepts identified in Appendix 1 at this stage. It is felt that, in principle, each of these concepts has the potential to provide enhanced service quality, efficiency and value for money as well as stronger and clearer community leadership in comparison with Suffolk's current arrangements.

However, this Council would wish to clearly affirm its view that the concept of a unitary council comprising all or any part of the Great Yarmouth and Waveney districts ("Yartoft") should be rejected, for the reasons set out in Appendix 1, and elsewhere in this submission.

The Council has some reluctance to make a formal statement of preference for any one of the four concepts identified by the Suffolk Councils at this preliminary stage, in the absence of any detailed comparative analysis of the four concepts and also in advance of close and meaningful engagement with our key stakeholders, not least our Town and Parish Councils.

However, the Council is pleased to have the opportunity to provide a preliminary indication of how in principle it believes each of the four concepts identified by the Suffolk Councils might perform against each of the five criteria set by the Secretary of State, and to add further comments where appropriate against each of these concepts on their perceived impact on Suffolk communities in general and on Babergh communities in particular. These preliminary conclusions are summarised in a 0-5 rating table below and are explained in a more detailed commentary in Appendix 2.

It is critically important that any new arrangements work well for the **whole** of the county, even if this requires some compromise to individual preferences at a more local level within the county. On the basis of the high level analysis at Appendix 2, Babergh's preliminary conclusions are that, with differing strengths and weaknesses against the five criteria, either a two unitary county based on an east/west split or a single unitary for the county as a whole is

likely to produce the best overall balance of outcomes for the residents of Suffolk. **This Council would therefore ideally wish to see these two concepts being worked up in more detail for comparative analysis, with stakeholder consultation thereafter on either or both of these options as informed by that analysis.**

However, it is stressed that in the spirit of wishing to secure the perceived advantages of unitary structures compared with current arrangements, this Council would work constructively with the Boundary Committee, other Suffolk Councils and key stakeholders to further develop any of the four concepts identified, and indeed any other(s) that might be put forward by the Boundary Committee itself.

A summary of the Council's preliminary views is set out in the rating (0 – 5) of each concept against each of the five criteria below:

SECRETARY OF STATE CRITERIA	Single Unitary for Suffolk (one Unitary Council)	Expanded Ipswich Unitary plus single Unitary for remainder of Suffolk (two Unitary Councils)	East and West Suffolk Unitaries, with Ipswich included in the East (two Unitary Councils)	East Suffolk, West Suffolk, and expanded Ipswich Unitaries (three Unitary Councils)
Affordability	* * * * *	* * *	* * * * *	* * *
Broad Cross-Section of Support	* * * *	* *	* * * *	* * *
Strategic Leadership	* * * * *	* *	* * * * *	* * *
Neighbourhood Empowerment	* *	* * *	* * * * *	* * * * *
Value for Money Services	* * * * *	* * *	* * * * *	* * *
TOTAL RATING (OUT OF 25)	21	13	24	17

APPENDIX 1

Boundary Committee – Structural Review of Local Government in Suffolk

Joint Statement from the Leaders of the Suffolk Local Authorities

At its initial meeting with Leaders and Chief Executives from the Suffolk Local Authorities on 26th February 2008, the Boundary Committee requested Councils to submit concepts, for the possible formation of new unitary authorities, by 11th April 2008.

Having regard to that request, the Leaders have explored and considered a range of options for unitary local government in Suffolk. Following a further meeting between them on 14th March, they arrived at several high level conclusions which are summarised below.

Concepts for new unitary authorities

Leaders agreed that they could identify four general concepts, for consideration by the Boundary Committee. These are as follows:

- a single unitary Suffolk (one unitary)
- an expanded Ipswich unitary plus a unitary based upon the remainder of the County (two unitaries)
- East plus West unitaries with Ipswich included as part of the East unitary (two unitaries)
- East plus West unitaries plus an expanded Ipswich unitary (three unitaries)

Waveney and Great Yarmouth

It is appreciated that in conducting its review, the Boundary Committee must also address for Suffolk, the question as to:

‘whether there could be an alternative proposal for a single tier of local government and if so on what basis, for Ipswich and the whole or part of the surrounding Suffolk county area, together with the whole or part of the district of Great Yarmouth’...

and in relation to Norfolk, the question as to:

‘whether there could be an alternative proposal for a single tier of local government and if so on what basis, for Norwich and the whole or part of the surrounding Norfolk county area, together with the whole or part of the district of Waveney’.

Consequently Leaders also addressed the possibility of combining all or some part of Waveney with Great Yarmouth and have concluded, unanimously, that they cannot support or substantiate a case for putting together the whole, or any part of these two areas, in any permutation of unitary local authority,

whether based in Suffolk, Norfolk or having its own independent geographical identity. The reasons for this collective view are set out below:

- **Affordability** – given the overall performance levels of both authorities (i.e. Waveney and Great Yarmouth) at the present time, questions and doubts reasonably arise, in the relation to the practical reality of achieving affordability, by combining them. The Audit Commission also may have concerns, in that connection, were such a proposal to come forward.
- **Broad Cross Section of Support** - Initial indications suggest that a 'Yartoft' proposal is unlikely to gain the support of the majority of the public, local authorities or the police. Whilst, therefore, it is understood that this criterion does not demand anything like a unanimous expression of support, the view remains that a broad spectrum of support will not be expressed, in relation to a concept of this nature.
- **Strategic Leadership** – this criterion requires that a unitary structure must provide strong effective and accountable strategic leadership, inclusive of strong economic leadership. Currently, both areas, either side of the county boundary, have difficult social and economic issues to tackle. Consequently, the possibility of joining them together, in a new unitary authority, could well generate or exacerbate a sense of isolation, instead of creating a supportive environment in which such problems can be addressed positively and with a sense of optimism for the future. Furthermore, in terms of impact upon the remainder of Suffolk, the County would lose its current strategic approach to coastal issues, its focus upon renewable energy and its drive to achieve an improved transport infrastructure, through its coastal areas.
- **Value for Money** – the comments made above, concerning performance levels, in the context of Affordability, are also considered to be applicable, when it comes to the need to demonstrate Value for Money. The 'Yartoft' combination inevitably raises the issue of capacity, both in relation to the challenge of actually establishing a new unitary local authority, as well as providing high quality services at a reasonable cost. It is also questionable whether all this could be accomplished alongside the need, successfully, to address a number of regeneration challenges.

Conclusion

This Statement sets out the common approach adopted by the Leaders of the Suffolk local authorities. It will be supplemented by a further document, prepared and submitted by each Council, individually. The purpose of each such additional document will be to identify the concept or concepts supported by a particular Council, together with a summary of the reasons which justify any such preference.

APPENDIX 2

PRELIMINARY HIGH LEVEL COMMENT BY BABERGH DISTRICT COUNCIL ON THE FOUR UNITARY CONCEPTS IDENTIFIED BY THE SUFFOLK COUNCILS AGAINST THE FIVE CRITERIA STIPULATED BY THE SECRETARY OF STATE

AFFORDABILITY

We are advised that the Boundary Committee is not looking for any detailed analysis of affordability at this stage. The comments that follow are, therefore, merely a high level preliminary assessment of the likely relative affordability in principle of each of the four concepts identified by the Suffolk Councils.

In principle, it would be expected that the fewer the number of councils in new unitary structures, the greater their affordability compared with either the costs of current structures, involving eight separate councils, or with alternative unitary arrangements that involve a larger number of councils.

Thus, the concept of a single unitary for the whole county would be expected in principle to score highest against the affordability criterion in comparison with unitary arrangements involving two or more new councils. However, of the four concepts identified by the Suffolk Councils, the single unitary is most vulnerable to the weakness of remoteness between this new unitary tier and arrangements at neighbourhood and community level. Thus, the savings that might be achieved in the first instance by replacing the eight existing councils with a single unitary council for Suffolk are highly likely to be offset to the greatest degree by the need to redirect resources to the significant strengthening of neighbourhood and community structures.

Conversely, at the other end of the spectrum, the concept of three unitary councils (West Suffolk, East Suffolk and an expanded Ipswich) is likely in principle to be the most costly of the four concepts identified, involving not only the overheads of three separate organisations, but also the costs and effort involved in securing strategic leadership for Suffolk as a whole amongst those three councils and their key partners. However, in that scenario, it is likely to be easier for each of these councils to achieve better and closer engagement with its neighbourhoods and local communities, which could yield some offsetting savings compared with single or two-unitary arrangements for Suffolk. However, on balance this Council would expect to see this concept as scoring at the lower end of the scale on the affordability criterion.

The two remaining concepts both involve the proposition of a two-unitary county, either on the basis of an expanded Ipswich and the rest of the county or on an east/west split.

In principle, it might be expected that these two concepts would score similarly against the affordability criterion. However, the differing

characteristics of the two concepts are likely in reality to achieve different affordability outcomes.

In relation to the concept of a two unitary Suffolk based on an expanded Ipswich and the rest of the county, Babergh has concerns against all four of the other criteria, which impact in turn and to varying degrees on the likely affordability of this option.

The principal merit of this concept is that it creates the least possible number of unitary councils for Suffolk involving the creation of a separate expanded Ipswich unitary. It might thus be expected to score reasonably highly against the affordability criterion.

However, whilst Babergh would not doubt that this concept might well score strongly in relation to an affordable expanded Ipswich unitary, this Council does not feel that there are any other overwhelmingly strong arguments for then consolidating into a single unitary what might best be described as the Suffolk “leftovers” once the boundaries of a viable expanded Ipswich unitary have been identified.

This “doughnut” concept has the inherent danger of creating around an expanded Ipswich a disparate unitary that lacks any real identity or *raison d’être* in its own right, with all of the potential disadvantages of a single unitary for the rest of the county in relation to remoteness but without the cohesive benefit of the current county town’s inclusion. Once account is taken of the need to build an infrastructure to offset these potentially negative characteristics of such a “doughnut” unitary, the overall performance of this concept against the affordability criterion is likely to be less than might otherwise have been expected in principle for a two-unitary concept.

By comparison, the East and West of the county have, to perhaps varying degrees, distinct communities of interest and identity with their sub-county area, together with an existing local government infrastructure within the Ipswich and Bury St Edmunds areas that would support a two-unitary arrangement on an east/west split with the principal respective Headquarters of each new unitary council being in these two locations.

Whilst it might be expected in principle that this two-unitary concept would be more costly to implement than a single unitary for the county, Babergh believes that the closer proximity between each of these unitary councils and their constituent neighbourhoods and communities, together with the existing infrastructure to support such an east/west split, could well have some offsetting advantages compared with the single unitary that is likely to make the affordability criterion quite closely run between these two concepts.

In summary, therefore, either single unitary or the two-unitary arrangements for Suffolk are likely, in Babergh’s view, to score most highly against the affordability criterion and the relative merits of each warrant a more detailed comparative analysis.

Yartoft

Babergh would not presume to comment on the likely affordability of the Yartoft concept itself, but other councils better placed than Babergh in this respect will no doubt wish to do so. Whilst the Yartoft concept is not supported, in terms of its possible impact on the four concepts identified by the Suffolk Councils were it to be pursued, it is Babergh's view that, in relation to viability and affordability, a single unitary for Suffolk would be the most likely to be able to withstand the impact of the Yartoft concept. The viability and affordability of a doughnut unitary around an expanded Ipswich might also be able to withstand that impact. However, Babergh is of the view that the creation of a Yartoft unitary would have an adverse impact on the viability of an East Suffolk unitary, and a fatal impact on an East Suffolk unitary that was separate from an expanded Ipswich unitary.

BROAD CROSS SECTION OF SUPPORT

There has not as yet been any formal canvassing of views on any of these four concepts (or, indeed, on the principle of changing from two tier to unitary arrangements for Suffolk's principal councils) amongst Suffolk stakeholders. Any comments at this stage, therefore, should be read with that "health warning".

There is a strong Suffolk identity amongst residents and stakeholders across the county. This sense of identity must be respected and protected in any of the options that are developed for future local government structures in the county. The Suffolk boundary should be sacrosanct in this review, and whilst Babergh DC has great concerns about the prospect of all or any part of the Waveney district being severed from the remainder of Suffolk, this Council would wish to place on record its gratitude for the confirmation already given by the Boundary Committee that no other part of the current Suffolk county boundary is subject to review.

The strong sense of Suffolk identity referred to above lends weight to the argument that Suffolk stakeholders as a whole would be likely to support in principle the concept of a single unitary for the county. Clearly, the views of residents and key partners would then be further informed by predicted outcomes against the four other criteria set out by the Secretary of State, some of which would be likely to strengthen support for this concept whilst analysis against other of the criteria might be more likely to weaken support for a single unitary. These arguments are dealt with elsewhere in this submission.

On the balance of all criteria, Babergh considers that a single unitary for the county is likely to have a substantial measure of support, although it is acknowledged that this may be significantly less evident within the current Ipswich Borough Council (IBC) area where it is understood that the Borough Council has already satisfied itself that there is significant support for an urban Ipswich unitary based on current IBC boundaries.

The question of whether there would be a broad cross-section of support for either the principle or the detail of an expanded Ipswich unitary is a more

complex issue to address. Self-evidently, much would be determined by the actual boundaries proposed; the rationale for any such changes; the perceived impact on Suffolk residents as a whole and, in particular, on those residents who would be living in the new Ipswich unitary area.

The original IBC bid was heavily predicated on the concept of an urban unitary for Ipswich. This Council was never convinced either that such a concept was in the best interests of Suffolk as a whole or that, if such a concept were accepted, the boundaries for such an urban unitary should be based on current IBC boundaries.

Babergh believes that the bid made an artificial and unhelpful distinction between the urban characteristics of our county town and its more rural hinterland and that it thereby failed to recognise the mutual interdependency of the two. Indeed, Babergh believes that this concept also ran counter to development of the concept of an Ipswich City Region and was also unhelpful to a number of partnerships such as the Haven Gateway partnership.

However, the Council recognised that, if the concept of an urban unitary were to be developed, it should logically include those urban outskirts of Ipswich that fall within the areas of the three surrounding district councils, including Babergh.

That said, the Council acknowledges that there is likely to be considerable hostility and resistance amongst those residents in all three surrounding district council areas whose homes might fall within an expanded urban Ipswich unitary. This could arise from fears and perceptions about future Council Tax levels as well as from more emotive feelings about their sense of place and the distinction that they might wish to make about the location of their homes in a rural rather than an urban area.

Most, if not all, of these fears and concerns might well be able to be allayed during the course of developing proposals for an expanded urban Ipswich unitary, and through further analysis of this concept against the Secretary of State's criteria. Nonetheless, it remains Babergh's view that any such proposal would be likely to be strongly resisted by residents directly affected by this proposal, at least in the initial stages, and quite probably through to implementation. The Council would be willing to work closely with affected Babergh residents to seek to provide a balanced and objective analysis of the pros and cons of such a change, but the enormity of the task of gaining popular support for such a move should not be underestimated.

Different, but not necessarily dissimilar, issues would arise if the concept of an expanded Ipswich were not so closely predicated on the urban uniqueness of the town, for example if the new unitary that included Ipswich were to be based on the concept of the City Region or the Haven Gateway economic sub-region and thereby take in other urban areas (e.g. Felixstowe in the Suffolk Coastal area) as well as rural areas such as the Shotley peninsula in Babergh.

At this point, the Council would wish to place on record its concern to avoid the eastern part(s) of Babergh district being “shunted” for reasons of convenience between one or more unitary options, for example, to equalise population figures between proposed new unitary council areas. The Shotley peninsula may be particularly vulnerable in this respect. The needs of east Babergh, and perhaps the Shotley peninsula in particular, reflect some real problems of rural isolation and must be adequately addressed by any new unitary structures. There would be immense hostility to merely adding eastern parts of the district as a potentially poor relation to an expanded Ipswich unitary that primarily regarded itself as an urban entity and therefore concentrated its efforts and resources on the town at the expense of the needs of its rural residents.

It is Babergh’s view that, overall, and outside of Ipswich itself, an expanded Ipswich unitary would be unlikely to achieve popular support amongst residents drawn into the boundaries of this unitary, although there are arguments around the City Region and the Haven Gateway economic sub-region in favour of boundaries that reflect these considerations and these should be properly considered. However, the Council does not believe that either of the concepts involving an expanded Ipswich would score highly against the criterion of a broad cross-section of support.

Moreover, the concept of an expanded Ipswich unitary that also included the doughnut of what was left out of the Ipswich unitary would have little, if any, resonance with the majority of Suffolk’s residents and would probably score lowest of the four concepts against this criterion.

This leaves for consideration the concept of a two-unitary county based on an east/west split. The Council believes that this could have some real resonance for Suffolk people as a whole, and is most likely to compete with the concept of a single unitary for Suffolk for highest score against this criterion.

There is a historic identity of East and West Suffolk, although it must be stressed that this Council would not argue for an unchallenged return to the pre-1974 east/west boundary. A new unitary arrangement based on such a split should be forward looking and reflect current and predicted needs and aspirations within the county. Whilst this historic structure might therefore provide a strong foundation for a broad cross-section of support for a two-unitary county based on an east/west split, the boundary between these two councils should be updated, and probably could be so revised whilst still retaining a broad measure of support in principle.

In particular, the likely concerns of residents about inclusion in an enlarged Ipswich unitary would be largely neutralised by the concept of an East Suffolk unitary that included both the county town and its rural hinterland. Such an East Suffolk concept could also comfortably embrace the City Region and the Haven Gateway sub-region considerations already referred to.

North of Babergh, the A140 might well provide the starting point for a review of a possible updated east/west boundary. Within Babergh, the current

boundary between our two LSPs (developed specifically to reflect the distinct communities of interest between the east and west of Babergh district) is a suggested starting point for analysis of this option.

In conclusion, therefore, this Council believes that the two concepts that score highest against this criterion are a single unitary for the county and a two-unitary county based on an east/west split and should, therefore, be the subject of a more detailed comparative analysis.

Yartoft

Babergh is firmly supportive of the view expressed by all other Suffolk Councils that the separation of all or part of the Waveney district from the remainder of Suffolk would not enjoy any significant support amongst Suffolk residents and should be resisted.

STRATEGIC LEADERSHIP

One of the primary defects of current two/three tier structures is the confusion and duplication of roles between the tiers of local government in both strategic and community leadership.

In principle, therefore, a move to unitary structures offers much greater scope to strengthen, streamline and clarify these roles and responsibilities, and this is a significant factor in Babergh's support for a move to such structures.

On that basis, the Council believes that all of the four unitary concepts identified by the Suffolk Councils have the potential, to varying degrees, to yield streamlined and more effective strategic and community leadership compared with current arrangements. Beyond that, the devil is in the detail of what might be proposed under each of the concepts identified, since to a large extent the same principles of sound strategic and community leadership could be applied to each of the four concepts, albeit with variable degrees of cost-effectiveness and efficiency.

The comments that follow endeavour, therefore, to consider in principle the ease with which this criterion could be met under each of the four unitary concepts identified by the Suffolk Councils, although it is accepted that detailed proposals for each of these concepts might satisfactorily address the issues raised.

Implicit in this criterion is the need to optimise the balance between achieving the support and trust of individual communities from whom the mandate for action is given and the capacity to take a broader strategic view of the overall needs of the wider area, bearing in mind that there will be occasions when the two are in apparent or actual conflict.

In principle, the smaller the area covered by the unitary council, the easier it should be to secure meaningful and effective engagement with local communities, and thereby a strong and stable mandate for action. By the same token, the larger the area covered by the unitary, the easier it should be to take an overall strategic view of issues that cannot so readily be addressed by more local actions alone. Achieving economic development and prosperity

would be a clear example where the capacity to exert influence at county, sub-regional, regional and even national level would be essential, and where a larger unitary council might be more effective than a more locally based unitary arrangement.

It is considered that a three unitary arrangement would risk failing to secure a cohesive strategic vision and leadership for the county as a whole. Although such arrangements would have the capacity to score highly on community engagement in all three areas, they would be more likely to fall short on their capacity to deliver on their local mandates, particularly in relation to key strategic issues that required a wider perspective. Economic development, transport infrastructure and climate change would be examples where a smaller unitary might struggle to deliver on local mandates and/or also to exert meaningful influence and impact on the big agendas facing their areas. Babergh therefore considers that the three unitary concept is relatively weak in relation to this criterion.

The Council has similar, indeed greater, concerns in relation to the two-unitary concept involving an enlarged Ipswich and a single unitary for the rest of the county. The enlarged Ipswich would have real strengths in relation to community engagement with its urban core, but would need to pay due regard to equality of engagement with any part of its enlarged area that fell outside of that urban definition.

However, Babergh fears that a doughnut unitary around an expanded Ipswich could represent the worst of all worlds in relation to strategic and community leadership, failing to have a sufficiently coherent identity to exercise true strategic vision and leadership for the area, whilst also having such a disparate range of communities and needs within its area that effective community engagement would be either unduly complex or expensive or both. On balance, therefore, this is seen as the weakest of the four unitary concepts in relation to its capacity to deliver balanced strategic and community leadership.

The Council considers that the debate on the optimum unitary structure for the county in relation to this criterion centres on the relative merits of a single unitary compared with a two-unitary county on an east/west split.

A single unitary clearly has the capacity in principle to deliver strong and clear overall strategic leadership and would probably score highest of the four concepts on this. However, as already stated earlier in this submission, it is vulnerable to being remote from local communities and is therefore at risk of failing to give sufficient community leadership at more local level and of achieving the confidence and trust of local electorates, and thereby of failing to secure a strong and stable mandate from those communities. That is not to say that it would be impossible to put in place structures that mitigate these risks, but these may be relatively costly, time-consuming and complex.

A two-unitary county on an east/west split is likely to have a high score against strategic leadership, not least because of the historic sense of identity and coherence of local government arrangements on similar boundaries. By

being relatively closer to their local communities, these two unitaries would also be less likely to struggle to develop strong community leadership arrangements locally than a single unitary might.

The arguments would be finely balanced between these two concepts and, once again therefore, Babergh would wish to see these worked up in more detail and subjected to a rigorous comparative analysis and thereafter consultation on either or both as appropriate.

Yartoft

Babergh would reiterate the concerns set out at Appendix 1 both in relation to Yartoft's capacity to deliver strong strategic leadership in that area and to the potentially damaging impact of Yartoft on overall capacity to deliver strategic leadership in Suffolk e.g. around transport infrastructure and coastal erosion.

NEIGHBOURHOOD EMPOWERMENT

Babergh would state at the outset that neighbourhood empowerment will be of critical importance to the perceived success of new unitary arrangements. However, new unitary structures in place of the current two-tier arrangements for the principal councils will not be sufficient alone to deliver against this objective. Whilst the Council has already argued that particular unitary structures may have potentially greater capacity than others to engage with their local councils, Babergh is strongly of the view that *no* unitary structure will be completely successful in delivering neighbourhood empowerment without a parallel review, undertaken in partnership with the Suffolk Association of Local Councils (SALC) and our Town and Parish Councils, of existing structures at this most local level of governance to establish how these can relate to and work in harmony with new unitary arrangements.

The distance between an individual Town or Parish Council and any new unitary council would be immense. Structures and arrangements within new unitary arrangements that endeavour to bridge this gap without also reviewing current Town and Parish Council structures and arrangements would run a serious risk of effectively re-introducing three tier local government and thereby offsetting many of the efficiencies and cost savings that would otherwise result from new unitary structures.

New arrangements might, for example, include a consolidation of current Town and Parish Councils into new Neighbourhood or Community Councils perhaps based on the parishes within current district council ward or county division boundaries. Within this framework, there could be a significantly strengthened role for the locally elected councillor to champion local community aspirations; strong Community Call for Action arrangements and effective scrutiny arrangements over the action and decisions of the unitary council for that area.

There could also be significant budgetary devolution and/or delegation of functions to these new councils. Whereas most Parish Councils in the district have hitherto indicated that they do not have the capacity or desire to take on devolved functions, Babergh would wish to explore whether this view might

change within the framework of consolidated Neighbourhood or Community Council arrangements.

It is stressed that any such review would need to be a collaborative venture involving all three of the current tiers of government in Suffolk, and this is not a proposal that seeks to enforce any such proposals on unwilling Town and Parish Councils.

All of that said, the question then still arises as to which of the four unitary concepts might in principle offer the strongest neighbourhood empowerment arrangements in conjunction with revised local arrangements.

In principle, the smaller the area covered by the new unitary council, the greater its potential to engage effectively with its constituent neighbourhoods. Thus, one would expect the three unitary concept to score highly against this criterion, and Babergh is of the view that it would do so. The concept that would also score strongly in principle against this criterion would be the two-unitary arrangement based on an east/west split, subject in both cases to a close scrutiny of the detailed proposals for engagement with their respective neighbourhoods.

A single unitary for the county would be weakest in principle of the four concepts under consideration, although it is accepted that detailed proposals for neighbourhood empowerment under this concept could mitigate that risk, albeit at a cost and level of complexity that might impact adversely against other criteria such as affordability and value for money.

The concept of an expanded Ipswich could certainly yield strong neighbourhood empowerment arrangements within that part of the county, subject to the previously stated caveat of paying due regard to *all* communities and neighbourhoods in the expanded area, whether urban or rural in character. However, the strength of neighbourhood empowerment arrangements in the doughnut unitary around an expanded Ipswich would carry the same inherent risks as those of the single unitary, and this has the effect of reducing the overall score of this concept against this criterion.

Overall, therefore, the Council believes that either the two-unitary on an east/west split or the three unitary concept scores most strongly against this criteria. However, since this is the only criterion where the three unitary concept scores more highly than the single unitary concept, and this is also the criterion where it is in any event suggested that a parallel review of local arrangements will be the real key to success, it is not considered that this score creates a case to undertake a more rigorous review of the three unitary option in comparison with either the single unitary or the two east/west unitary concepts.

Yartoft

There are no comments beyond those set out at Appendix 1 against this criterion.

VALUE FOR MONEY SERVICES

In principle, the larger the unitary council, the more scope there would be to achieve critical mass in service delivery, leading to greater efficiencies and service improvement. However, there is not a straightforward correlation between size of authority and value for money in service delivery, since it would be possible for partnership working on specific services between unitary councils within Suffolk or between Suffolk councils and others outside the county area to achieve the same VFM effect as that of a single unitary. For example, a Joint Waste Authority could be set up to cover the whole of the Suffolk area, irrespective of the number of unitary councils covering the county.

However, Babergh is of the view that, once again, the concepts that promise most in relation to VFM in service delivery are the single unitary and the east/west unitary concepts. The three unitary concept is likely to yield less overall value for money for Suffolk as a whole, due to increased overheads and sub-optimal arrangements in relation to critical mass for particular service areas, unless offset by separate partnership arrangements with each other, or with councils outside the county area.

The potential VFM benefits of a two-unitary county based on an expanded Ipswich with a doughnut unitary for the rest of the county is likely to be diminished by the fragmentation of service delivery created by the exclusion of the expanded Ipswich area in comparison with the single unitary concept.

Either the single unitary or the east/west unitary concepts offer scope for VFM service delivery within coherent areas of delivery, and it is these two unitary concepts that Babergh believes should be further developed for comparative analysis within the current review.

Yarftoft

There are no comments beyond those set out at Appendix 1 against this criterion.

April 2008

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