

1 September 2008

Review Manager
(Norfolk and Suffolk)
The Boundary Committee for England
Trevelyan House
Great Peter Street
London SW1P 2HW

Dear Sir

Suffolk – Proposals for Unitary Local Government

1. The Suffolk Preservation Society (the Society) submits the following observations in response to the Boundary Committee's invitation for comments on this important issue. The Society has 1800 members, drawn from all corners of Suffolk. In addition one third of all town and parish councils in the county as well as 54 amenity societies are members of the Society.
2. The Society has, for convenience, divided its response into two main sections, the first dealing with the Boundary Committee's proposal for Suffolk as published in July and secondly, its comments on the future of Local Government in Suffolk.

Section 1 - The Boundary Committee's Proposals:

Background

3. It is perhaps worthwhile summarising, at the outset, the background to this review. It stems from the rejection of a bid by Ipswich Borough Council for Unitary Status. The review does not therefore stem from the rest of the communities in Suffolk deciding they want Unitary Local Government. This is an important point and one which should not be overlooked.
4. Unitary Local Government (ULG), as a model or concept for service delivery, was devised some years ago mainly to address issues in larger urban areas and is less easily applied in the rural parts of counties such as Suffolk and Norfolk. It is nevertheless noticeable how strikingly different are the Boundary Committee's proposals for Norfolk as against those for Suffolk.
5. The background to this review is therefore less than straight forward. It appears that the county and its communities are being required to consider how ULG might be delivered rather than whether the principle of ULG is suitable for the county. The county has not had an opportunity, as it should of considering what other options are open to it to secure improvements to service delivery, the accountability of those making decisions and the making of decisions at a local level. There is little evidence of a widespread view that within rural Suffolk the current structure is not working to the extent that it should be replaced.

To quote the Chairman of the last local government review of Suffolk of the early/mid 1990's "*if it ain't broke don't fix it*".

6. Finally, and most importantly, Suffolk is a rural county and still largely functions as such. Market Towns are the focus for service delivery to the many villages in their hinterland. Having a clear understanding of the county, its characteristics, the feelings and views of local communities and what they want is critical to delivering local government which local people support and claim as their own. If they do not, then that structure, whatever it is and for whatever reasons it is established, will, despite the best intentions, fail.

Draft Proposals

7. The draft proposal to create two unitary councils in Suffolk, excluding Lowestoft, is noted. The Society offers the following detailed comments.

Lowestoft

8. The proposal for Lowestoft with the very northern part of the county of Suffolk to transfer into Norfolk ignores a critical issue, namely the views of local people. When, despite total local opposition (as there is in this case) parts of counties have been severed from their historic neighbours or amalgamated with areas with which they have no real affinity, it has never worked. One cannot ignore generations of history and lightly set it aside without far reaching consequences. For example, the creation of Humberside County Council by the amalgamation of part of North Lincolnshire and East Yorkshire in 1974 is a classic example. Within 20 years that amalgamation had to be reversed because the two communities failed to support it at any level and in fact vigorously opposed it. As with the proposal for Lowestoft, amalgamation was justified on the grounds that it would improve the local economy. Should the Boundary Committee for economic reasons decide to amalgamate Lowestoft with parts of Norfolk/Great Yarmouth against the views of local communities then it will simply fail to work or knit together. The Society urges the Committee to consider the strong views of local communities and take careful note of them. While those communities see their future in a Suffolk Local Government Structure, then that, despite other apparent reasons of justification for change, is where they should stay.

Ipswich and Felixstowe

9. The proposed Ipswich/Felixstowe Unitary Authority (IFUA) is noted. The rationale or justification appears, in the main, to be creating a northern Haven Gateway area by amalgamating the main ports of Felixstowe and Ipswich together in one local government area. This the Society finds weak and insubstantial as justification for such a fundamental change. If the main justification is to deliver a Unitary Local Government for the Haven Gateway then it is illogical to do so in a piece meal fashion. Why not include Colchester and Tendring? (We hasten to add that we are not advocating that.) It appears as if an attempt is being made to create a critical population mass in order to justify a Unitary Authority (UA) and make it work. But even with Felixstowe the population of the area would only be approximately 200,000 and the Society cannot see that this is sufficient to justify what will be an Ipswich dominated UA. The proposed UA also includes most of the Shotley Peninsula area of Babergh District and part of Constable Country - because they are within the Haven Gateway Sub-Region? There is no local rationale for their inclusion other than that and to the Society and, we suspect local communities, it is a flawed rationale.

10. Of course there would be benefits for the creation of the IFUA in bidding for and potentially securing regional and national funding for delivering growth area objectives, but communities must realise that inclusion in the UA is tantamount to accepting growth identified in the regional plan now and more importantly in the future, with little prospect of stopping it.

Remainder of Suffolk or Rural Suffolk

11. Finally there is the Rural Suffolk (RSUA). This is, in fact, the remainder of Suffolk after the Lowestoft area has gone to Norfolk and after the Ipswich/Felixstowe unitary authority has been created. It is vast in area, diverse in character, and rural in nature. Its creation is devoid of any logic in relation to its geographical area or the problems it has. The separation of Ipswich, Felixstowe and Lowestoft from the rest of the county, as argued above, is illogical and only creates other problems and issues, more than it potentially solves. It is the sheer scale of the area and its diverse nature, issues and problems which is the worry in terms of a UA. Communities will inevitably be geographically remote from its administrative centre, wherever it is located and therefore from decision making and the ability to influence those decisions. No amount of tinkering with the secondary structure of town and parish councils will deal with the problems a large single UA will create for communities. If a secondary structure is going to have to be devised, one might as well leave existing district councils where they are. The questions asked by the Committee on how town and parish councils might work together to help deliver a new structure locally is, in the Society's view, alarming. Surely this is such a fundamental part of any new structure that it should be resolved before any potential UA structure can even be contemplated.

Conclusion of Section 1

12. For the reasons set out above, the Society cannot support the Boundary Committee proposals. If the perceived gain in these proposals is an alleged improvement in the local economy then the loser is certainly local democracy. The rationale for the changes and new UAs including the separation of Lowestoft, is tenuous, fragile and flawed. More importantly, the proposals move decision making and, therefore, the ability of communities to influence decisions affecting them further away from them. The recommendations appear to have been produced after only a superficial examination of the county and without a deep understanding of it. There is no overall agreement within the existing local government structure that either fundamental change of the nature proposed is required, or that what is proposed represents any improvement. The lack of consensus as to what is needed for the county in terms of a local government structure is a major concern. Without any such consensus the Society asks if there is any mandate from the communities of Suffolk for existing local authorities to progress with UA other than perhaps for Ipswich. Most importantly communities in Suffolk have not been really engaged in the whole process nor allowed to voice an opinion on the principle of change. We suspect if they were asked if they want a UA, outside Ipswich, the answer would be a loud and clear NO.

Section 2 - The future of Local Government in Suffolk

13. The Society has concluded that the Boundary Committee proposals are not the right way forward for Suffolk. Given that the Committee have to make a recommendation to the Secretary of State in late December, 2008 it is critical it has some knowledge of what communities and the people of Suffolk want.

14. There is no doubt that communities want a cost effective local government service for Suffolk and one which is of high quality, efficient and effective for as minimal cost as is

possible. But that is not all they require. They want to see that local government is transparent, accountable, responsive to their needs, and makes decisions based on what is best of them and Suffolk. Most of all they want to be able to influence decisions made about their future and to be able to ask questions of people who make decisions and deliver services locally. At present it is not unfair to say that many communities feel this is not happening. Decision making is based on a 'top down' approach rather than 'bottom up'. Nothing in the new structure appears to reverse this. There is in some areas, such as planning, deep dissatisfaction and mistrust of the current system. That is not to say however, that the public want the current system scrapped entirely. What they desire is a local government that is more responsive to their needs.

15. In addition, any local government structure needs to be tuned to the unique nature, characteristics and issues of the county and to respect its history and the strong views of local people and communities. The desire to deliver UAs is no justification to ride roughshod over local opinion. After all, any local government system will only work and function successfully if it has the support of local communities. Without their ownership any system is doomed to failure.

16. In the Society's view this suggests that any new structure (and it questions later in this section if one is required) must be built up from ground level first. Far greater attention needs to be paid to understanding the needs of the people and communities of Suffolk than appears to have been the case up to now. That can only happen if the public is properly engaged in the process and decisions from the outset. It is wrong to rely on the views of the representatives of current structure of local government who perhaps have their own agenda when making suggestions or comments.

17. Town and Parish Councils play a pivotal role in local government but have largely been excluded from the real decision making process. Because of the short timetable, many have been unable to comment. This, along with perhaps difficulties in understanding the complexity of the issues and the profound implications of the changes proposed for them and their communities, means to date they are not really a part of the process in shaping their future. Yet they are the voice of communities and a part of the local government structure of profound importance. It is, in the Society's view, their role, purpose and function which needs to be considered first, not the automatic implementation of UAs.

18. Elsewhere in this letter the Society has questioned the Terms of Reference for the review. As stated, while there might be concerns about the current structure of local government in the county, there has been no agreement, except perhaps in Ipswich, that it should be scrapped and replaced by a new structure. The option to address short comings in the current structure, improve it and deliver a more streamlined structure has not been considered. It is quite simply unrealistic to undertake a review without allowing all possible options and solutions to be considered. If that is the way the review is operating then it is not a review in the true sense, but a process and procedure for implementing ULG and it should be portrayed as such.

19. The Society is aware of the many initiatives in Suffolk where authorities are working together to improve service delivery and cut costs. It suggests that far greater cost savings might be made and service improvements secured by further joint working of this type without abolishing the existing local government structure and starting again with all the associated disruption it will cause. Such an approach is more likely to receive the support of communities across Suffolk, be cheaper and quicker to implement and harness current

good practice and positive initiatives. It is important that the Boundary Committee do not underestimate the severity of disruption caused by scrapping the old structure and implementing the new and the loss of good working that will take place and the time that a new system or structure will take to bed in.

Conclusion of Section 2

20. The Terms of Reference of the review appear geared to deliver ULG and nothing else. There is no evidence this is what Suffolk communities want or need or that it is the best way of delivering a more effective, efficient, accountable, and responsive local government at a reduced cost. There needs to be honesty about what the review can deliver. Changes need to be made to the review process to allow it to consider retaining the status quo and consider changes and fine tuning of that to deliver more of what Suffolk people want and need. The starting point for determining the future of local government in the county should be proper engagement with communities and town and parish councils to determine what their role and function should be. After that is established, the structure above their level can then be considered. That structure needs to reflect Suffolk's uniqueness and not be a standard model. It needs to take account of the strong role of market towns and the villages in their hinterland and the strong associations and loyalty communities have to this and to Suffolk.

Overall Conclusions

21. The Boundary Committee proposals are fundamentally flawed and are therefore not acceptable. The review needs to start from a different point. Communities need to be asked if they want ULG and offered other options, including retaining the current structure with improvements and changes. They need time to formulate responses to what is a critical decision. Quick consultations are neither necessary, desirable or likely to secure the best way forward for ensuring common ownership of any local government structure. There is a real risk if the current review imposes a structure which is supported by some existing local authorities but not by the majority of communities of Suffolk, that the outcome will be even deeper dissatisfaction with local government. Suffolk communities should have the structure they want and need, not what others want them to have.

22. The Society requests that the Committee takes account of all of the above in finalising its proposals.

Yours sincerely

Richard Ward
Director
Cc SPS/CPRE Suffolk Branch members
Cc Suffolk MPs
Cc Suffolk Town and Parish Councils
Cc Suffolk Amenity Societies
Cc Suffolk Authority Chief Executives and Leaders
Cc SALC
Cc CPRE Norfolk
Cc CPRE EoE
Cc Media Consultants