

BABERGH DISTRICT COUNCIL

FROM: Chief Executive

REPORT NUMBER: H102

TO: STRATEGY COMMITTEE

DATE OF MEETING: 18 SEPTEMBER 2008

LOCAL GOVERNMENT REVIEW – RESPONSE TO THE BOUNDARY COMMITTEE’S DRAFT PROPOSALS FOR SUFFOLK

1. PURPOSE OF REPORT

1.1 This report is to enable the Committee to consider a draft response to the Boundary Committee’s Draft Proposals for unitary local government in Suffolk and Norfolk (insofar as the latter affects Lowestoft in Suffolk), and to make appropriate recommendations to an Extraordinary Meeting of Full Council on 23 September 2008.

2. RECOMMENDATIONS

2.1 That subject to:

- i) further information on affordability assessments of the Boundary Committee’s Draft Proposal for Suffolk and the alternative pattern for a single unitary council also identified in their Report as having merit, and
- ii) final consideration of all responses received to Babergh’s consultation with Town and Parish Councils and other stakeholders in the district, as summarised at Appendix (a), together with any other responses that might follow.

2.2 The Boundary Committee’s Draft Proposal to create a North Haven and a Suffolk unitary authority be supported.

2.3 In accordance with paragraph 6.38 of the Boundary Committee’s Report, the Boundary Committee be requested to consider modifying the boundary between the two proposed unitary councils within the current Babergh district to include Hadleigh and a number of its neighbouring parishes as shown on the map at Appendix (b).

2.4 The draft response to the Boundary Committee at Appendix (c) be endorsed.

The Committee is asked to make recommendations to Full Council on the above matters.

3. FINANCIAL IMPLICATIONS

3.1 The projected financial implications of implementing particular unitary patterns for Suffolk are still the subject of detailed consideration by the S151 Officers of each of the Suffolk councils. At the time of preparing this report, their analysis is still not complete. If any information becomes available for 18 September, it

will be circulated at the meeting as an additional paper for this agenda item. However, subject to further legal advice, this may at that stage still have to be treated as confidential. In these circumstances, the information would be contained in a paper to be dealt with in the exempt part of the agenda, but the Chairman would seek the agreement of the Committee to deal with that exempt information before dealing with the substantive paper in the open part of the meeting.

4. **RISK MANAGEMENT**

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

Risk Description	Likelihood	Seriousness or Impact	Mitigation Measures
Local Government Review Failure to engage in the review process Lack of influence on future local government arrangements	Low	Critical	Strong political and managerial leadership to secure effective engagement with the process Engagement with stakeholders during consultation period Submission of consultation response by deadline

5. **KEY INFORMATION**

- 5.1 Strategy Committee has considered this matter on 31 July 2008 (paper H74) and 14 August 2008 (paper H89). Between those two meetings, a Members' Seminar on 5 August discussed the issues informally. Full Council then gave preliminary consideration to the Council's response on 2 September 2008.
- 5.2 Members are asked to bring these papers with them to the meeting.
- 5.3 During the consultation period, the views of Babergh's Town and Parish Councillors and other key stakeholders has been sought, both on the Boundary Committee's Draft Proposal and on the possibility of seeking a modification to the proposed boundary between the two proposed unitary areas, as shown on the map at Appendix (b).
- 5.4 A summary of consultation responses received to date is provided at Appendix (a). An update on any further responses received by 18 September will be

provided at the meeting. It is acknowledged that revisions to parts of the draft response may be needed in the light of a final analysis of all consultation responses received.

- 5.5 The position on affordability assessments is referred to in section 3 of this paper.
- 5.6 Subject to final analysis of all consultation responses and the affordability assessments, the Council's suggested response is at Appendix (c).
- 5.7 This draft response considers the key issues raised by Babergh at the Concept Formulation Stage (April 2008) and the extent to which these issues are satisfactorily addressed by the Boundary Committee's Draft Proposal for Suffolk. The draft response deals with key matters, including:
 - i) the extent to which the proposals for a two-unitary county involving a North Haven and a Suffolk unitary council adequately meet the Secretary of State's five criteria. The draft response suggests that these criteria are likely to be well met by the Draft Proposal, and therefore indicates that this Council supports the Draft Proposal.
 - ii) concerns that the case for the Suffolk unitary (referred to in the draft response as the Rural Suffolk unitary) has not been well-articulated to date, with the focus in discussions across the county generally being on the North Haven unitary, a single unitary for the county (referred to in the draft response as the One Suffolk unitary) and other alternatives to the Boundary Committee's Draft Proposal. The response suggests that urgent attention should be given to this if the overall Draft Proposal is not to be placed in jeopardy.
 - iii) a suggestion that the boundary between the two proposed unitaries within the Babergh district be modified as shown on the map at Appendix (b). It is acknowledged that Strategy Committee and Full Council will wish to give full consideration to this particular matter in the light of all consultation responses received and, therefore, that this part of the draft response may need modification or even removal from our response. The section dealing with this matter is therefore simply drafted as suggested appropriate wording if Members are ultimately minded to make this recommendation to the Boundary Committee after full consideration of all relevant issues.
 - iv) a recommendation that the single unitary option for Suffolk be not pursued.
 - v) a recommendation that in the event of Lowestoft being included in unitary arrangements for Suffolk, the Boundary Committee looks at alternative two or three unitary arrangements as referred to in the draft response, on the basis that the inclusion of Lowestoft in a Rural Suffolk unitary would fundamentally distort the rationale for that unitary and that a single unitary in the county is not a model that this Council now wishes to support, for reasons set out in the draft response.

6. **APPENDICES**

- (a) Summary of Consultation Responses.
- (b) Map Showing Possible Alternative Boundary between the North Haven and Suffolk unitary councils within the current Babergh district.
- (c) Babergh's Draft Response to the Boundary Committee's Draft Proposal.

7. **BACKGROUND PAPERS REFERRED TO:**

Babergh DC Concept Submission to the Boundary Committee – April 2008

The Boundary Committee's Draft Proposals for Unitary Local Government in Norfolk and Suffolk – July 2008

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SUMMARY OF CONSULTATION RESPONSES

	Boundary Committee Proposal (Rural and North Haven Authorities)	Boundary Committee Proposal with Extended Boundary for North Haven	Unitary Suffolk
PARISH AND TOWN COUNCILS			
Lavenham	Maintain status quo		
Groton	Yes		No
Shelley	Yes - but Shelley to be in Rural Suffolk		No
Belstead	Yes		
Polstead	Yes	No strong view	No
Holbrook		Yes – Hadleigh & surrounding parishes	No
Stutton		Yes – Hadleigh & surrounding parishes	
Copdock & Washbrook		Yes – Hadleigh & surrounding parishes	
Chilton		Yes – Hadleigh & surrounding parishes	No
Shotley		Yes – Hadleigh & surrounding parishes (but further meeting being held)	
Burstall		Yes – with Burstall switching from Rural Suffolk to North Haven	
Sudbury		The two unitary set-up needs to be more evenly split	No
Elmsett	No – but if it does come in, then no change to the boundary		Yes (further meeting being held)
Assington	No – but if it does come in, then Assington to be in Rural Unitary		Yes (further meeting being held)
Stratford St Mary		Yes (2 nd preference? - but with Stratford St Mary moving into Rural Unitary)	Yes (1 st preference?)
Sproughton		No (but if it does come in, then Hadleigh to be included)	Yes (further meeting being held)
Layham		Yes (2 nd preference? – Hadleigh & surrounding parishes)	Yes (1 st preference?)
Aldham			Yes
Great Wenham		No	Yes (inc Lowestoft)
Little Wenham		No	Yes (inc Lowestoft?)
Stoke by Nayland	No		Yes

	Boundary Committee Proposal (Rural and North Haven Authorities)	Boundary Committee Proposal with Extended Boundary for North Haven	Unitary Suffolk
Milden		No	Yes
East Bergholt	No		Yes (inc Lowestoft)
Thorpe Morieux			Yes (further meeting being held)
Kersey	No		Yes (further meeting being held)
Freston	Initial response received but no clear view yet		
Leavenheath			
Kettlebaston			
Capel St Mary			
OTHER STAKEHOLDERS			
SAVO			Yes
Suffolk Preservation Society	Proposals are fundamentally flawed and therefore not acceptable.		

Following the publication of the Boundary Committee's report meetings were held on 14 and 17 July, in the west and east of the district, with parish and town councils and SALC. On 8 and 15 August, letters and copies of the reports discussed at Strategy Committee were sent out to update parish and town councils on progress in developing Babergh's response to the Boundary Committee's proposals. An initial letter and an update were also sent to other stakeholders in the Babergh area, such as Chambers of Commerce and voluntary organizations.

The parish and town councils and other stakeholders were asked to let us know their views on the Boundary Committee's proposals to assist in formulating our own response.

28 parish and town councils and two other stakeholders have written to us. The views of Hadleigh Town Council are not yet known, but the Hadleigh Town mayor has consulted with local residents through the Hadleigh Community News, expressing his view that the possible boundary change would be beneficial to Hadleigh and surrounding parishes. He is calling a special meeting of the town council to consider its response in light of that consultation.

Of the 28 parish and town councils, 25 indicated preferences, but it should be noted that in a number of cases only preliminary views have been given with a formal response to follow later in the consultation period.

Of the 25 parish and town council responses, whilst a number of councils questioned the need for the review, only one rejects the Boundary Committee's proposals and recommends no change.

11 are in favour of a two-unitary Suffolk. Four of these would like the boundaries as set out in the Boundary Committee's main proposal (one would be in the proposed North Haven Authority and three in Rural Suffolk) with the remaining seven indicating that they would like to see changes made to the boundaries. Five of these would like to see the North Haven boundary extended to include Hadleigh and its surrounding parishes, and one, currently just inside the Rural Suffolk boundary would like to be moved into the North Haven area. The remaining council advocates a more even geographical or population-based split between the North Haven and Rural Suffolk authorities.

Of the seven councils, four are already in the proposed North Haven area, one wishes to be moved into North Haven and two would remain in Rural Suffolk after the boundary change.

The 13 other councils are in favour of the One Suffolk option. 10 would be in the proposed Rural Suffolk Authority, of which five would transfer to North Haven if the boundary was extended to include Hadleigh and its surrounding parishes. The remaining three are in the proposed North Haven Authority.

Of the 13 councils in favour of the One Suffolk option, five gave views on the two-unitary Suffolk option. If this went forward:

- One would like the boundaries as set out in the Boundary Committee's main proposal (this council would transfer from Rural Suffolk to North Haven if the boundary was extended to include Hadleigh and its surrounding parishes);
- One would like to remain in Rural Suffolk if the North Haven boundary was extended (this council would not be directly affected if the North Haven boundary was extended to include Hadleigh and its surrounding parishes);
- One, currently just inside the North Haven boundary would like to be moved into the Rural Suffolk area; and
- Two would like the North Haven boundary to be extended to include Hadleigh and its surrounding parishes (one of these councils is already within the proposed North Haven Authority whilst the other would be moved from Rural Suffolk to North Haven).

With regard to the two other stakeholders, the Suffolk Association of Voluntary Organisations (SAVO) is firmly in favour of the One Suffolk proposal whilst the Suffolk Preservation Society argues that the Boundary Committee proposals are fundamentally flawed and therefore not acceptable.

**LOCAL GOVERNMENT REVIEW IN SUFFOLK AND NORFOLK: DRAFT
RESPONSE BY BABERGH DISTRICT COUNCIL TO THE BOUNDARY
COMMITTEE'S DRAFT PROPOSALS**

Thank you for the opportunity to comment on the Boundary Committee's Draft Proposals for unitary local government in Suffolk and Norfolk.

For the purposes of this response, the Council has restricted itself to consideration of the Draft Proposals insofar as they affect Suffolk, including Lowestoft.

The Draft Proposal for Suffolk has been the subject of consultation with Babergh's Town and Parish Councils and other key stakeholders. During that process, the District Council has endeavoured to ensure that all parties were as fully and objectively informed as possible on the Draft Proposal and on the consultation process itself.

The Draft Proposal has received detailed consideration by Babergh Members, both informally at Members' Seminars and formally through Strategy Committee and Full Council.

At the same time, Babergh Members and Officers have participated fully in countywide arrangements to develop the business cases for the two unitary councils proposed for Suffolk by the Boundary Committee as well as the business case for the single unitary pattern for Suffolk also identified in the Boundary Committee's report as having merit.

More recently, at the request by the Boundary Committee, Babergh Members and Officers have also been fully engaged with their Suffolk counterparts in consideration of the possible impact of the inclusion of Lowestoft on the business cases of the two unitary councils proposed for Suffolk and the single unitary council for Suffolk.

In addition to seeking to ensure that all stakeholders had access to objective and balanced information on the Draft Proposal for Suffolk, the Council's emerging views on these Proposals have also been shared at meetings and in correspondence with our key stakeholders. However, at no stage have either Members or Officers sought on this Council's behalf to persuade either organisations or individuals to support or oppose any particular option or to purport to guarantee that a particular option would yield specific future outcomes.

The findings from this consultation are summarised in an Appendix to our own consultation response.

During the consultation period and in the formulation of this response, the Council has focused its attention on the Boundary Committee's Draft Proposal, rather than on seeking to develop or promote any alternative

propositions, including this Council's own previously stated preference for a two-unitary solution for Suffolk based on an east-west split of the county.

However, our approach has been to measure the Draft Proposal against the key issues and considerations raised in the Council's response to the Boundary Committee in April 2008 at the Concept Formulation stage and to consider the extent to which the Draft Proposal satisfactorily addresses those matters. Where appropriate, we have therefore necessarily compared the Draft Proposal with this Council's own previously stated preference for a two-unitary county based on an east-west split.

Following Babergh's full engagement in the review and consultation process as described above, an Extraordinary Meeting of Council called on 23 September 2008 for the specific purpose of considering the Boundary Committee's Draft Proposals, has endorsed the enclosed response.

The Ipswich and Felixstowe or North Haven unitary is referred to throughout this response as North Haven. For the purposes of distinction between the two, the Suffolk unitary proposed by the Boundary Committee is referred to throughout the consultation response as the "Rural Suffolk" unitary. The alternative pattern referred to in the Boundary Committee's report is referred to as the "One Suffolk" unitary.

The Council's response is set out under the following headings:

1. Headline Summary of the Council's Response

2. Draft Proposal

- 2.1 General Comments
- 2.2 The Proposed North Haven Unitary
- 2.3 Recommended Alternative Boundary for the North Haven Unitary
- 2.4 The Proposed Rural Suffolk Unitary

3. Alternative Pattern

- 3.1 The One Suffolk Unitary

4. Lowestoft

- 4.1 The Draft Proposal
- 4.2 The Possible Inclusion of Lowestoft in Suffolk Unitary Arrangements

1. HEADLINE SUMMARY OF THE COUNCIL'S RESPONSE

1.1 After full consideration of the Boundary Committee's Draft Proposal, the Council's response can be summarised as

1. support for the concept of a "North Haven" unitary (see sections 2.1 and 2.2)
2. a recommendation that this concept be further strengthened by a change to the proposed North Haven boundary to include Hadleigh and a number of its neighbouring parishes in the Babergh district (see section 2.3)
3. support for the concept of a Rural Suffolk unitary, although it is noted with concern that there may not be sufficient commitment to this concept in other parts of the county served by that proposed unitary council (see section 2.4)
4. a recommendation that if commitment to the Rural Suffolk unitary does not exist in sufficient measure elsewhere in the county, urgent discussions take place to refine and/or better articulate this element of the Draft Proposal or to develop alternative proposals that have a broader measure of support (see section 2.4) whilst also retaining a North Haven unitary
5. a recommendation that the alternative pattern of unitary government (the One Suffolk unitary) identified in the Boundary Committee report has having merit be not pursued (see section 3.1)
6. a recommendation that, in the event of it being proposed to include Lowestoft in unitary arrangements for Suffolk, it be not included in the proposed Rural Suffolk unitary and that an alternative two or three unitary solution be evaluated in place of the Boundary Committee's current Draft Proposal for Suffolk (see sections 4.1 and 4.2)

2. DRAFT PROPOSAL

2.1 GENERAL COMMENTS

Considerations at Concept Formulation Stage

2.1.1 Of the four concepts identified by Suffolk Council Leaders as potential unitary models for Suffolk, this Council expressed its preference for a two-unitary council solution based on an east-west split of the county. It was considered that this model was likely in principle to offer the optimum balance between cost effectiveness in service delivery and democratic engagement and accountability at community and neighbourhood level.

2.1.2 We suggested that a useful starting point for determining the boundary for such an east-west split could be the current boundary between the West Suffolk and the Babergh East LSPs within this district and the A140 trunk road to the north of Babergh. We argued that there **should not** be a reversion to pre-1974 east-west boundaries, and that the boundary of any new east-west split should reflect the current and future needs in the county. For example, whereas Hadleigh had been in the former West Suffolk area, this Council believed that it had a much closer connection with East Suffolk, and Ipswich in particular.

2.1.3 We had suggested that, within this proposed two-unitary solution, the headquarters of the new councils should be Ipswich and Bury St Edmunds respectively. We believed that this would make democratic and geographic sense in an east-west split of the county, and would make optimum use of strong existing and planned local government infrastructure in both towns.

The Draft Proposal

2.1.4 Whilst the Boundary Committee's Draft Proposal does not reflect Babergh's preferred geographical boundary between the two unitary councils, Babergh nonetheless welcomes the fact that the Boundary Committee's Draft Proposal is for two unitary councils for Suffolk, for the reasons set out in our earlier submission. We remain of the view that this size of unitary is likely to give the best overall balance of outcomes against the Secretary of State's five criteria.

2.1.5 We also welcome the fact the Draft Proposal would be likely to achieve headquarters for the two unitary councils in Ipswich and Bury St Edmunds.

2.1.6 Even with the differing boundaries proposed by the Boundary Committee compared with Babergh's own preference, the Draft Proposal overall would work very well for the current Babergh area, with the east looking as it does to Ipswich and the west looking to Bury St Edmunds for some key services. Indeed, the impact of the Boundary Committee's Draft Proposal on the Babergh area is that of an east-west split and in this respect at least it therefore has considerable resonance with this Council's own submission at the Concept Formulation stage.

2.1.7 From a countywide perspective, Babergh strongly supports the North Haven proposal and believes that the development of this concept will be of enormous benefit to the proposed North Haven area and to the county as a whole. However, whilst the Rural Suffolk unitary would also serve the western part of Babergh district equally well, this Council does recognise and sympathise with some of the concerns being expressed by other councils about the effect of the Rural Suffolk proposal on their own areas, particularly in the north east of the county.

2.1.8 Whilst that effect is no worse (and at least in some cases better) than the effect of a single unitary with headquarters in Ipswich, this Council would nonetheless urge the Boundary Committee to continue to work with those

councils, particularly in the north east of the county, whose areas are currently wholly or partly within the proposed Rural Suffolk unitary to seek to identify solutions to the concerns being raised. This would become even more critical if Lowestoft were to be included within Suffolk's unitary arrangements.

2.1.9 These issues are considered in greater detail in sections 2.4, 4.1 and 4.2.

2.1.10 In summary, from a Babergh perspective this Council is happy to support the Boundary Committee's substantive Draft Proposal for a North Haven and a Rural Suffolk unitary pattern, although we will argue in section 2.3 for modification within the Babergh area to the boundary between the proposed North Haven and Rural Suffolk unitary areas.

2.1.11 However, we have always argued that the unitary pattern for Suffolk must work for Suffolk as a whole and we are anxious to see the concerns that are currently being expressed in other parts of the county addressed as far as is reasonable and practicable within the substantive Draft Proposal.

2.1.12 North Haven is a radical and exciting proposal, support for which is clearly gaining considerable ground. Indeed, even those councils who have concerns about the Rural Suffolk proposal appear to recognise the strong merits of the Boundary Committee's Draft Proposal for North Haven.

2.1.13 Nonetheless, a North Haven unitary cannot be created and succeed at the perceived expense of the rest of the county. We would therefore now urge the Boundary Committee to do whatever is necessary before 31 December either to ensure that the case for Rural Suffolk is better made and articulated than it has been to date (see sections 2.4 and 3.1) or to revise this element of the overall Draft Proposal to achieve a broader measure of support across other parts of the county affected by the Rural Suffolk proposal.

2.2 THE PROPOSED NORTH HAVEN UNITARY

i) Affordability

Considerations at Concept Formulation Stage

2.2.1 The Council considered that a single or two-unitary solution would be likely to score most highly against the affordability criterion. We specifically considered that an expanded Ipswich unitary would score very highly against this criterion.

The Draft Proposal

2.2.2 We are pleased to note that analysis of this proposal demonstrates that it can meet the Secretary of State's affordability criterion.

ii) Broad Cross Section of Support

Considerations at Concept Formulation Stage

2.2.3 We highlighted our belief that there would be considerable hostility and resistance to an expanded urban Ipswich unitary amongst the residents of the three surrounding district council areas whose homes would be drawn into an urban Ipswich unitary area.

2.2.4 We recognised that proper consideration should be given to the merits of unitary structures that reflected the Ipswich City Region and/or the Haven Gateway economic sub-region. However, we believed that even an expanded Ipswich not so closely predicated on the urban uniqueness of the town (e.g. based on the concept of the City Region or the Haven Gateway economic sub-region) would still raise issues and concerns amongst residents prospectively drawn into the boundaries of such a unitary council area and that considerable effort would be needed to allay these.

2.2.5 We expressed our concern to avoid the eastern part of Babergh district, and the Shotley peninsula in particular, being shunted between proposed unitary areas either to build an urban Ipswich unitary of a viable size or for the numerical convenience of equalising population figures between two proposed unitary areas.

2.2.6 We argued that the needs of east Babergh, and perhaps the Shotley peninsula in particular, reflected some real problems of rural isolation and that these must be adequately addressed by any new unitary structures. In particular, we pointed out that there would be immense hostility to merely adding eastern parts of the district 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.

The Draft Proposal

2.2.7 The Council is strongly supportive of the North Haven concept, and believes that the proposal has addressed in very significant measure the issues and concerns highlighted by Babergh at the Concept Formulation stage.

2.2.8 In particular, we are satisfied that this is not a “Greater Ipswich” unitary parading under another guise, and that it would have a reasonably good balance between urban and rural communities.

2.2.9 We believe, for example, that it would be very helpful for the new unitary council to be responsible for the protection of the unique environment of the Shotley peninsula as well as for stewardship of the growth of this important economic sub-region.

2.2.10 The new council would have to take a balanced view between the needs of its urban and rural communities, and we believe that the protection of rural communities would be much more assured in this model with its

strong focus on south east Suffolk in all its diversity than if, for example, the Shotley peninsula were just a small wedge in a unitary “doughnut” around Ipswich or, indeed, if it were a relatively marginal part of a single unitary arrangement for the county.

2.2.11 We do consider, however, that this model could have been further improved upon by including an even greater proportion of rural parishes from the three surrounding district council areas to reflect more closely the area covered by the current Haven Gateway Partnership.

2.2.12 We do not propose to argue that case for towns and parishes outside of Babergh, although we will develop this argument in section 2.3 in relation to Hadleigh and some of its neighbouring parishes in the Babergh district.

2.2.13 Even so, and as we anticipated at the Concept Formulation stage, this Proposal struggled initially to gain widespread popular support amongst affected rural communities for the reasons we predicted in our April 2008 submission. There are still significant concerns about being “part of Ipswich” and in particular fears about future Council Tax levels. The County Council’s One Suffolk campaign has also had an appreciable impact on local views regarding the Haven Gateway concept.

2.2.14 Nonetheless, growing support for the North Haven concept has been expressed during the consultation period amongst our affected rural residents. We are aware that there are mixed views on this concept versus the One Suffolk concept, and that this is likely to remain the position. Thus, we do not see that we will achieve consensus on any one model amongst our residents.

2.2.15 That being the case, and having regard to what we judge to be the overall best interests of our residents in the east of our district, Babergh is very comfortable in supporting this model as being the most likely to achieve the best long term outcomes for residents in south east Suffolk in general and specifically in the east of Babergh.

iii) Strategic Leadership

Considerations at Concept Formulation Stage

2.2.16 We recognised that size was critical to the capacity of a unitary council to provide effective strategic leadership in key issues such as economic development, transport infrastructure and climate change, but that it was important to strike the optimum balance between that strategic capacity and the ability to connect meaningfully and effectively with communities and neighbourhoods.

The Draft Proposal

2.2.17 We believe that the rationale for the proposed North Haven unitary is very well articulated in the Boundary Committee’s Draft Report and that this provides a clear basis for a coherent approach to the strategic leadership of

the proposed North Haven area. The proposed unitary area is large enough for the exercise of strong leadership in the key issues identified above but not too large to secure effective engagement with its diverse rural and urban communities.

iv) Neighbourhood Empowerment

Considerations at Concept Formulation Stage

a) General Observations

2.2.18 We would wish to begin by making comments that are general to this whole debate and relevant to all the unitary models referred to.

2.2.19 We stated in our April submission that neighbourhood empowerment arrangements will be of critical importance to the perceived success of new unitary arrangements. We also asserted that *no* unitary structure would 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 current structures at this most local level of governance.

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

2.2.21 We suggested that new arrangements might 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.

2.2.22 We expressed our wish to explore these issues as a collaborative venture involving all three tiers of government.

2.2.23 We now make the observation that this still remains the most undeveloped aspect in all of the unitary deliberations that have taken place within Suffolk to date. Collectively, we have still not meaningfully begun the process of genuinely collaborative discussion with SALC and our Town and Parish Councils to begin to develop *and cost* favoured options.

2.2.24 Perhaps understandably in the tight timeframe imposed by this review process, the dialogue to date has been rather one-sided, focusing on the theoretical models referred to in the Ipswich BC and Suffolk CC submissions, and been more in the nature of “promises” to devolve budgets, power and decision-making to Town and Parish level, without any real clarity on what that would involve; what the legislative basis would be of any such changes

and, significantly, without real clarity on whether the costs associated with any such devolvement would be contained within the projected costs of the new unitary council(s) or whether they would themselves become separate costs falling on the Town and Parish Councils as precepting authorities. In other words, there is at least the risk that purported savings in new unitary structures could well return in the form of new and increased Town and Parish Council precepts to support neighbourhood empowerment arrangements.

2.2.25 Thus, much remains to be done to develop this key tier of any new governance arrangements. In this connection, it must be stressed that no one “neighbourhood empowerment” model is unique to any particular unitary solution. The best neighbourhood empowerment arrangements could be applied in a single, two or more unitary arrangement.

2.2.26 We would therefore suggest that the detail of real rather than theoretical neighbourhood empowerment arrangements starts being collectively discussed by Suffolk’s three tiers of government and SALC in earnest from October, and in particular during any transitional or “shadow” period for the new unitary council(s), with a view to their application in whatever form of unitary structure emerges from this review process.

2.2.27 In the meantime, comments on neighbourhood empowerment arrangements in any of the unitary patterns referred to in the Boundary Committee report can at best only be theoretical at this stage and carry with them some appreciable risks to the affordability assessments of each of the unitary patterns under review.

b) North Haven

2.2.28 We indicated our expectation that a two-unitary solution for the county had the capacity to score highly in relation to neighbourhood empowerment arrangements, and this remains our view.

2.2.29 In relation to an enlarged Ipswich unitary, we were clear that this could yield strong neighbourhood empowerment arrangements, subject to the new unitary council paying due regard to *all* communities and neighbourhoods in the expanded area, whether urban or rural in character.

The Draft Proposal

2.2.30 For reasons covered in the paragraphs on Broad Cross Section of Support, we are satisfied that the nature of the proposed North Haven unitary does not and cannot focus disproportionately on Ipswich. We believe that a unitary council of this size can achieve a very good balance between strategic capacity and its capacity to engage meaningfully and effectively at local level.

2.2.31 We are therefore satisfied that this model has the capacity in principle to provide efficient and cost-effective neighbourhood empowerment arrangements for all of the diverse rural and urban communities in the North

Haven area, subject to the considerations above that apply to all prospective unitary models.

v) Value for Money

Considerations at Concept Formulation Stage

2.2.32 We considered that a two-unitary proposal was likely in principle to provide the capacity for good value for money.

Draft Proposal

2.2.33 We believe that, being one of two proposed unitary councils, we can be confident that the proposed North Haven unitary has the capacity to provide good value for money.

2.3 RECOMMENDED ALTERNATIVE BOUNDARY FOR THE NORTH HAVEN UNITARY

Considerations at Concept Formulation Stage

2.3.1 In our submission at the Concept Formulation stage, we argued that the concept of an urban Ipswich unitary council based on the current Ipswich BC boundaries made an artificial and unhelpful distinction between the urban characteristics of our county town and its more rural hinterland and thereby failed to recognise the mutual interdependency of the two. We expressed the view that such a proposal in any event ran counter to the concept of an Ipswich City Region and was also unhelpful to a number of partnerships such as the Haven Gateway Partnership.

2.3.2 We argued that the strong inter-relationship between Ipswich and its rural hinterland should be recognised and reflected in new unitary arrangements. We believed that this could be achieved by the inclusion of Ipswich as the focal point in an East Suffolk unitary council, and that such a concept would also fully embrace both City Region and Haven Gateway economic sub-region considerations.

2.3.3 We suggested that the starting point for consideration of the detailed boundary for such an east-west split insofar as this affected Babergh could be the boundary between the West Suffolk LSP and the Babergh East LSP. Whilst it would be difficult to draw a definitive line to mark the extent of the impact of the Haven Gateway partnership in the Babergh district, the working assumption that has always been made for the purposes of that partnership is that the area covered by the Babergh East LSP is included in the Haven Gateway partnership area.

2.3.4 Both for the LSPs and the Haven Gateway partnership, the reality on the ground is a blurred edge rather than a clear dividing line in the middle of the district. However, the impact of the Haven Gateway partnership is certainly tangible as far west as Hadleigh, and in any event the social and economic

links between Hadleigh and Ipswich are long-standing, strong and palpable. In our April submission, we accordingly assumed that Hadleigh would be included in our proposed East Suffolk unitary, together with Ipswich, and that this would also comfortably embrace the Haven Gateway partnership concept.

2.3.5 We also expressed the view that the creation of an East Suffolk unitary that included Ipswich could largely neutralise the anticipated concerns of residents about their inclusion in an enlarged Ipswich unitary area.

The Draft Proposal

2.3.6 From a Babergh perspective, the proposal is not dissimilar in its effect to the east-west split of the district that we proposed, except that the boundary proposed by the Boundary Committee does not extend as far west in this district as we believe it could and probably should. Specifically, since this proposed unitary is predicated very significantly on the Haven Gateway sub-region, we would argue that the proposed boundary should in any event reflect more closely the actual impact of that economic partnership area.

2.3.7 The North Haven concept goes a long way towards addressing our concerns about the artificial separation of Ipswich from its rural hinterland, and also in the creation of a reasonable balance between the rural and urban communities of south east Suffolk.

2.3.8 It deals commendably with the strategic issues facing this part of the county, whilst also creating a unitary of a size and nature capable of meaningful and effective neighbourhood empowerment and inclusion.

2.3.9 On that basis, the Council is willing to support the Draft Proposal for North Haven as set out in the Boundary Committee's Report. It is, however, noted and welcomed that at paragraph 6.38 of its Report, the Boundary Committee confirms that the boundary as currently drafted is primarily indicative, and that further views on this are welcomed.

2.3.10 In this Council's view, modifying the proposed boundary for the North Haven unitary in the Babergh district could further enhance all of the strong advantages of this proposal and also serve to mitigate some of those aspects of the North Haven proposal that are still creating a degree of local concern.

2.3.11 Whilst we note that similar considerations quite probably arise in other district council areas also affected by the North Haven proposal, we do not intend to comment on these, and will restrict ourselves to commenting on a possible modification to the North Haven boundary within the current Babergh district.

2.3.12 We attach a map indicating our suggested modification to the North Haven boundary within the Babergh district. We have addressed our rationale for this proposal as far as possible to the Secretary of State's five criteria, as set out below.

i) Affordability

2.3.13 The affordability assessments carried out make it clear that both the Draft Proposal and the alternative pattern meet the affordability criteria.

2.3.14 We also note that, in any event, the population split at 2001 census levels between the Rural Suffolk (395,597) and North Haven (201,256) unitaries is approximately 2:1.

2.3.15 The suggested boundary change would move some 11,000 population from the Rural Suffolk to the North Haven unitary area.

2.3.16 In our view, this would represent a relatively minor shift in the two business cases that would not materially affect either. However, if the Boundary Committee is willing to give this proposal its consideration, we would be very happy to do whatever further work is necessary to validate the impact of this shift on both the Rural Suffolk and North Haven affordability assessments.

ii) Broad Cross Section of Support

2.3.17 We have already commented that the North Haven proposal has struggled to gain widespread popular support in the affected area, although there is evidence that this is growing. A key concern is still the fear of being subsumed in a Greater Ipswich urban unitary, both in terms of the needs of rural areas being marginalised and also in terms of the sense of place in which people live.

2.3.18 In our consultation with Town and Parish Councils and other stakeholders, we have specifically raised the possibility of recommending a boundary change within the Draft Proposal and sought views on this. At the time of preparing this response, replies are still coming in and being analysed. (NB this section of the response may be amended to reflect the most up to date position at the time of being endorsed by Full Council on 23 September).

2.3.19 It is apparent that there are mixed views on this possibility, but nonetheless some measurable support for this proposal, both from residents within the proposed North Haven area and also within the area that we suggest might also be included.

2.3.20 It should also be noted that it is difficult to disaggregate the impact of the County Council's promotion of the One Suffolk concept on responses to this specific issue relating to the Draft Proposal itself.

2.3.21 In Babergh's view, a shift in the boundary as we suggest could do a great deal to mitigate some of the fears of residents in the North Haven area as proposed by the Boundary Committee, as well as giving real benefits to residents in the additional area that we propose should be included in North Haven.

2.3.22 For those already included in the North Haven area, it would provide a further tangible improvement in the urban-rural balance of the proposed unitary area, and further reduce any sense of living in a Greater Ipswich unitary area. We believe that this would enhance the acceptability of the proposal to a measurable degree within the North Haven area.

2.3.23 We do recognise that the case for the Rural Suffolk unitary is predicated to a significant degree on the market towns concept, and it is therefore clear why the Boundary Committee has included Hadleigh in the Rural Suffolk unitary area. We acknowledge that Hadleigh and its surrounding parishes are on the cusp of the two proposed unitary areas and that there are arguments in favour of inclusion in each of the proposed unitary areas. Therefore, what local residents perceive to be in their best interests in this part of our district needs very careful consideration.

2.3.24 However, our own judgement is that there are strong and well-established social and economic links between Hadleigh and Ipswich that would be further improved if both were included in the same unitary area. We are also of the view that being inside the proposed North Haven area would be an advantage rather than a threat in seeking to protect the unique environment of this area whilst also benefiting from the economic growth of this sub-region. On balance, we consider that these advantages for Hadleigh and its neighbouring parishes outweigh those of inclusion in the Rural Suffolk unitary area.

2.3.25 In summary, in the light of these judgements and whilst we acknowledge that there are mixed views on this proposal, we believe there is sufficient local support to justify our proposing this boundary modification to the Boundary Committee.

iii) Strategic Leadership

2.3.26 We believe that our proposal would further enhance the strategic capacity of the new unitary.

2.3.27 The real impact of the Haven Gateway economic sub-region extends at least as far west as Hadleigh within the Babergh district. The boundary of the North Haven unitary council should reflect this to enable the council properly to balance and support the rural and urban needs of the area.

2.3.28 The North Haven unitary council would have the responsibility to secure the right balance between economic growth of the area and protection of the special rural environment of south-east Suffolk. We believe that the area we propose to be included in North Haven would benefit from inclusion in a unitary council area that could provide a coherent approach to urban and rural needs.

2.3.29 In terms of education, we note that 14 out of the 16 High Schools in the proposed South West Ipswich and South Suffolk (SWISS) Centre catchment area for 14-19 year olds would be within the same LEA area. One of the two

that would not be included in this proposal is Hadleigh High School. Whilst we recognise that school catchment areas can and do cross council and county boundaries, we do believe that, in terms of the school's involvement and influence on key issues, it would be to the significant advantage of young people in the Hadleigh High School catchment area if that school were to be in the same LEA area as other schools in the SWISS Centre's catchment area.

2.3.30 In terms of transport management, we do not think that the A12 should be used as a boundary between separate unitary areas, but rather as a conduit through a cohesive unitary area. In particular, the communities on both sides of the A12 suffer significantly in its not infrequent closures, and we believe it would be very helpful to the management of those problems if a single unitary council could work with the Highways Agency in dealing with these.

iv) Neighbourhood Empowerment

2.3.31 This proposal would further strengthen the rural balance in this unitary area, and we believe this would provide a sound basis for a strong rural voice in the North Haven unitary area.

v) Value for Money

2.3.32 We would not anticipate any significant impact from this proposal on the value for money of service delivery in either of the proposed unitary areas.

2.4 THE PROPOSED RURAL SUFFOLK UNITARY

i) Affordability

Considerations at Concept Formulation Stage

2.4.1 The Council considered that a single or two-unitary solution would be likely to score most highly against the affordability criterion.

Draft Proposal

2.4.2 We are pleased to note that analysis of this proposal demonstrates that it can meet the Secretary of State's affordability criterion.

ii) Broad Cross Section of Support

Considerations at Concept Formulation Stage

2.4.3 Babergh commented that it was critically important that any new arrangements work well for the whole of the county, even if that required some compromise to individual preferences at more local level within the county.

2.4.4 We argued that there would be inherent dangers in seeking to create an urban Ipswich unitary surrounded by a “doughnut” that could be best described as Suffolk’s “leftovers” once the boundaries of a viable Ipswich unitary had been identified, and specifically commented such a model would have little, if any, resonance for the majority of Suffolk’s residents.

2.4.5 We felt that the strongest levels of support based on historic social and cultural affinities would be likely to be for either a single unitary for the county or a two-unitary solution based on an east-west split of the county.

The Draft Proposal

2.4.6 Whilst the Boundary Committee’s proposal is not the one preferred by Babergh at the Concept Submission stage, the Council nonetheless believes that it has the capacity to work well for the whole of the county, and certainly believes that the Rural Suffolk unitary could provide a very sound basis for a unitary solution for the current Babergh area.

2.4.7 However, the Rural Suffolk concept has struggled to demonstrate a broad cross-section of support across the county during the consultation process for two simple reasons:

- i) it is not based on any concept with which Suffolk residents as a whole have any instinctive empathy, and thus has had a totally cold start during the consultation period
- ii) no-one appears to be talking constructively (or perhaps at all!) about this option across significant parts of the county

2.4.8 The chances of this concept gaining a broad cross-section of support across the county have not been helped by the fact that even the Boundary Committee’s own Report argues with more conviction for the North Haven concept than it does for the Rural Suffolk unitary. Moreover, the Report did not make any effort to articulate sound reasons why more familiar concepts, such as an east-west split (irrespective of the actual boundary for any such split) were rejected. To then compound that problem still further, the Boundary Committee Report introduced the spectre, in the form of an alternative pattern that also had merit, of the one remaining concept with which Suffolk residents could identify with most easily i.e. the single unitary for the county.

2.4.9 As such, and bearing in mind that this entire review started from looking at alternatives to the original Ipswich unitary bid, it is unsurprising that this concept has not totally succeeded in shaking off the impression that this is indeed the B-side of North Haven’s hit single!

2.4.10 To this Council’s considerable regret, the relative deficit in articulating the case for the Rural Suffolk unitary in the Boundary Committee’s Draft Proposal has been further exacerbated by the fact that the council nominated as the lead authority for developing the Rural Suffolk business case (Suffolk CC) has widely promoted its preference for a single unitary for the county, and

is supported in that preference by Mid Suffolk District Council. At the same time, St Edmundsbury BC, Forest Heath DC, Waveney DC and Suffolk Coastal DCs have been working on their own respective preferred alternatives to the Boundary Committee proposal for the area covered by the proposed Rural Suffolk unitary.

2.4.11 The effect of this is that much debate in the county during the consultation period has been focused on the single county and North Haven unitaries and on the development of alternatives to the Boundary Committee proposals. Thus, the Rural Suffolk unitary has been a neglected and very poor relation in the whole debate. Quite simply, unlike the other two unitary options referred to in the Boundary Committee's report, it has had no champion in significant parts of the county and little real attention has been given to developing this unitary concept as one in which residents in those parts of the county affected by that proposal can have confidence and belief.

2.4.12 In this Council's view, this represents a significant risk to *both* of the unitary councils proposed by the Boundary Committee. This therefore needs to be addressed with urgency and conviction if the Boundary Committee's Draft Proposal for both unitaries is to take effect with credibility and with a sufficiently broad measure of support.

iii) Strategic Leadership

Considerations at Concept Formulation Stage

2.4.13 We recognised that size was critical to the capacity of a unitary council to provide effective strategic leadership in key issues such as economic development, transport infrastructure and climate change, but that it was important to strike the optimum balance between that strategic capacity and the ability to connect meaningfully and effectively with communities and neighbourhoods.

Draft Proposal

2.4.14 We believe that the Rural Suffolk proposal has the capacity to provide strategic leadership across this very significant part of the county and in particular to articulate and promote the needs of its many diverse rural and urban communities. This Council is certainly confident in commending this model to residents in the west of Babergh district.

2.4.15 It is fair to say, however, that the prospect of a strategic headquarters in Bury St Edmunds is likely sit reasonably comfortably with residents in the west of Babergh district who already look to that town for many of their key services. They will perhaps therefore perceive more readily than residents in, say, Halesworth or Leiston that Rural Suffolk's "strategic leaders" understand their needs and have the motivation to meet these.

2.4.16 On that basis, we would urge the Boundary Committee to carry on working beyond the consultation period with those councils and residents who

have not yet been convinced of the merits of this proposal. Without this, the Draft Proposal as a whole could be in serious jeopardy.

iii) Neighbourhood Empowerment

Considerations at Concept Formulation Stage

a) General Observations

2.4.17 Please see section 2.2 (iv) (a)

b) Rural Suffolk

2.4.18 We indicated our expectation that a two-unitary solution for the county had the capacity to score highly in relation to neighbourhood empowerment arrangements, and this remains our view.

Draft Proposal

2.4.19 We are confident that a Rural Suffolk unitary has the same capacity in principle as the North Haven unitary to secure effective neighbourhood empowerment arrangements, subject to resolution of the issues and concerns already referred to. Indeed, the development of such arrangements would in themselves provide significant mitigation to these concerns.

iv) Value for Money

Considerations at Concept Formulation Stage

2.4.20 We considered that a two-unitary proposal was likely in principle to provide the capacity for good value for money.

Draft Proposal

2.4.21 We believe that, being one of two proposed unitary councils, we can be confident that the proposed Rural Suffolk unitary has the capacity to provide good value for money.

3. ALTERNATIVE PATTERN

3.1 The One Suffolk Unitary

Considerations at Concept Formulation Stage

3.1.1 Whilst Babergh expressed its preference for a two-unitary county based on an east-west split, the Council's second preference at that stage was for a single unitary for the county. We believed that there were some finely balanced arguments between these two unitary patterns and therefore suggested in our submission that these two concepts be the subject of detailed objective comparative analysis and consultation.

Draft Proposal

3.1.2 Bearing in mind the Council's desire to see an objective comparative analysis of these two patterns of unitary arrangements, we were initially pleased to see that the Boundary Committee's Report proposed a two-unitary arrangement but also identified a pattern of unitary government involving a single unitary for the county that the Boundary Committee considered also had merit. We believed that this would go some way to achieving Babergh's desired outcome of an objective comparative analysis of a two and one unitary option during the consultation period.

3.1.3 It is therefore a matter of considerable regret to this Council that the potential value of this approach has been diminished and to some extent discredited by naming Suffolk CC as the lead authority to develop the business case of both the substantive proposal by the Boundary Committee for a Rural Suffolk unitary and the "with merit" option of a single unitary for the county.

3.1.4 The known and much publicised preference of the County Council is for a single unitary solution and therefore, predictably, much of that Council's energy before and during the consultation period has been directed towards promotion of the single unitary to the detriment of the Boundary Committee's Draft Proposal and, as referred to earlier, the Rural Suffolk unitary in particular.

3.1.5 Whilst not proposing this particular form of unitary pattern, the Boundary Committee's Report invited respondents to also consider this pattern in responding to its Draft Proposal. Having carefully considered the Draft Proposal, the Council notes and shares the Boundary Committee's view that the single unitary pattern of governance would not meet the Secretary of State's five criteria as well as the two unitary councils now proposed, and we do not wish to seek to persuade the Boundary Committee to re-open those arguments on which it has apparently already satisfied itself.

3.1.6 In any event, the Council is increasingly concerned that a single unitary pattern would provide Suffolk County Council with the opportunity to manage the transition to unitary arrangements as more of a take-over of the district and borough councils than a genuine fresh and exciting new start for a brand new council, thereby replicating old practices rather than designing and driving forward new ones.

3.1.7 Neither Ipswich BC nor any other council would have that opportunity within the Boundary Committee's Draft Proposal, and this is to be welcomed. In our view, the less any one existing council has the opportunity to behave as if little or nothing has changed, the better the chances of much needed radical reform of local government in Suffolk.

3.1.8 When these considerations are added to the fact that we believe that the Boundary Committee's Draft Proposal is in any case a more exciting prospect

for Suffolk than the single unitary arrangement, this Council believes that there is a powerful argument for rejecting the prospect of a single unitary arrangement in Suffolk and would urge the Boundary Committee to do so.

3.1.9 We would finally add that these arguments are another compelling reason for the Boundary Committee to seek resolution of the concerns about the proposed Rural Suffolk unitary in the north of the county. We would express our fervent hope that the single unitary would not become the default position in the absence of an acceptable unitary solution to run in parallel with the North Haven unitary.

4. LOWESTOFT

Considerations at Concept Submission Stage

At the Concept Submission stage, we made it clear that the Council did not support the “Yartoft” concept. We also expressed our belief 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.

4.1 The Draft Proposal

4.1.1 We would still support the retention of Lowestoft within Suffolk unitary arrangements. However, if it is to be included within Norfolk unitary arrangements, we do question whether its inclusion in a single unitary for Norfolk is either logical or workable.

4.1.2 Whilst we would not presume to comment in general terms on arrangements for Norfolk, we would question how well and effectively the pressing needs of Lowestoft would be met in a vast unitary county of some 900,000 residents with their diverse and, at least in some cases, equally pressing needs.

4.1.3 Nor do we claim to have given any detailed consideration to the Lowestoft issues, so the comments that follow are merely observations.

4.1.4 We were somewhat surprised to see no apparent coherence between the proposals for Norfolk and those for Suffolk. Whilst not advocating the inclusion of Lowestoft in Norfolk’s unitary arrangements, we would comment that the Two Unitary Authority Pattern A (including a unitary council for Norwich, Lowestoft and Great Yarmouth, together with another unitary for the rest of Norfolk) identified in the Boundary Committee’s report as having merit, would appear to be a better arrangement in principle than the Boundary Committee’s Draft Proposal for Norfolk.

4.1.5 It would appear to better mirror the Draft Proposal for Suffolk, thereby giving greater coherence to the overall proposals, and would in our view also

be likely to serve the residents of Lowestoft better with its sharper focus on the largely urban needs of these three towns.

4.2 The Possible Inclusion of Lowestoft in Suffolk Unitary Arrangements

4.2.1 Whilst we warmly welcome in principle the possibility that Lowestoft might be retained in Suffolk's unitary arrangements, we do question whether this could be achieved without amendment to other aspects of the Boundary Committee's Draft Proposal.

4.2.2 The inclusion of Lowestoft would fundamentally alter the balance and skew much of the rationale of the Rural Suffolk proposal to the extent that we would question the credibility and viability of the proposition.

4.2.3 Whilst we would accept that a single unitary pattern for Suffolk would readily be able to absorb the inclusion of Lowestoft, we have already argued why we would not now wish to see that particular pattern of unitary government is Suffolk. That view would not change even if this were proposed as the easiest vehicle by which Lowestoft could be retained in Suffolk's unitary arrangements.

4.2.4 We therefore return to the recommendation we have already made that the Boundary Committee engage with urgency in discussions with councils affected by the Rural Suffolk proposal, in particular those in the north of the county. To those discussions should be added the question of how best Lowestoft could be included in a revised Draft Proposal for the county if it is, indeed, the Boundary Committee's wish to make such a recommendation to the Secretary of State.

4.2.5 We are aware that other councils are working on proposals for a three unitary arrangement for the county, involving councils for North Haven, West and East Suffolk. Lowestoft could self-evidently be the main town in the East Suffolk proposal.

4.2.6 In order to support the inclusion of Lowestoft in Suffolk's unitary arrangements, Babergh might well be able to support such a proposition, subject to the precise boundaries being proposed and to being satisfied that this model still met the Secretary of State's affordability criterion.

4.2.7 We would, however, also suggest that a two-unitary arrangement on an east-west split, with all of the North Haven area (as amended in our proposal at section 2.3) included in the east could represent an even better and more cost-effective vehicle for Lowestoft's inclusion in Suffolk's unitary arrangements. We accept that this would diminish to some extent the focus of that unitary on the North Haven area, but we do not believe it would fundamentally damage that concept. In any event, we believe that this would still represent a better solution for the North Haven area than a single unitary for the county.

4.2.8 We would be very happy to play our full part, together with the Boundary Committee and Suffolk colleagues in developing any aspect of such alternative proposals as a vehicle for the inclusion of Lowestoft in Suffolk's unitary arrangements.

September 2008

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