

Cabinet



Please contact: Democratic Services

Please email: democraticservices@north-norfolk.gov.uk

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Monday 22nd December 2025

A **Special meeting** of the **Cabinet** of North Norfolk District Council will be held in the Council Chamber - Council Offices on **Monday, 5 January 2026 at 10.00 am.**

At the discretion of the Chairman, a short break will be taken after the meeting has been running for approximately one and a half hours

Members of the public who wish to ask a question or speak on an agenda item are requested to arrive at least 15 minutes before the start of the meeting. It will not always be possible to accommodate requests after that time. This is to allow time for the Committee Chair to rearrange the order of items on the agenda for the convenience of members of the public. Further information on the procedure for public speaking can be obtained from Democratic Services, Tel:01263 516010, Email:democraticservices@north-norfolk.gov.uk.

Anyone attending this meeting may take photographs, film or audio-record the proceedings and report on the meeting. Anyone wishing to do so should inform the Chairman. If you are a member of the public and you wish to speak on an item on the agenda, please be aware that you may be filmed or photographed. This meeting is live-streamed: [NNDC eDemocracy - YouTube](#)

Emma Denny
Democratic Services & Governance Manager

To: Cllr L Shires, Cllr T Adams, Cllr A Brown, Cllr H Blathwayt, Cllr C Ringer, Cllr J Toye, Cllr A Varley, Cllr L Withington and Cllr J Boyle

All other Members of the Council for information.
Members of the Management Team, appropriate Officers, Press and Public



**If you have any special requirements in order
to attend this meeting, please let us know in advance**

If you would like any document in large print, audio, Braille, alternative format or in a different language please contact us

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Email districtcouncil@north-norfolk.gov.uk **Web site** www.north-norfolk.gov.uk

A G E N D A

1. TO RECEIVE APOLOGIES FOR ABSENCE

2. PUBLIC QUESTIONS AND STATEMENTS

To receive questions and statements from the public, if any.

3. DECLARATIONS OF INTEREST

1 - 6

Members are asked at this stage to declare any interests that they may have in any of the following items on the agenda. The Code of Conduct for Members requires that declarations include the nature of the interest and whether it is a disclosable pecuniary interest (see attached guidance and flowchart)

4. ITEMS OF URGENT BUSINESS

To determine any other items of business which the Chairman decides should be considered as a matter of urgency pursuant to Section 100B(4)(b) of the Local Government Act 1972

5. MEMBERS' QUESTIONS

To receive oral questions from Members, if any

6. MHCLG STATUTORY CONSULTATION ON PROPOSALS FOR LOCAL GOVERNMENT REORGANISATION IN NORFOLK - A RESPONSE BY NORTH NORFOLK DISTRICT COUNCIL

7 - 38

Executive Summary	<p>Following the submission of final proposals for local government reorganisation (LGR) in Norfolk at the end of September 2025; the Government, through the Ministry of Housing, Communities and Local Government (MHCLG), is now undertaking a process of statutory consultation on the proposals, inviting key local stakeholders to comment on the three submissions made to the Government for the introduction of unitary councils in Norfolk moving forward.</p> <p>This report is a covering report, with a detailed appendix as a draft response to the Government consultation; which Cabinet is asked to agree as the Council's formal submission to the statutory consultation process.</p>
Options considered	<p>Option:1: Cabinet is asked to agree / propose amendments to the draft response (as included in this agenda) and approve its submission as the District Council's response to the statutory consultation process on Local Government</p>

	Reorganisation in Norfolk. Option 2: The Council agrees not to submit a response to the statutory consultation (not recommended).
Consultation(s)	Internal consultation has included: <ul style="list-style-type: none"> • Leader • Deputy Chief Executive • Section151 Officer • Monitoring Officer • Communications Manager
Recommendations	That Cabinet: 1. Comments on the draft response to the statutory consultation as attached as an Appendix to this report, proposes any amendments and approves its submission to Government as the Council's corporate response to the statutory consultation process.
Reasons for recommendations	To respond to the statutory consultation process being carried out by the Government in respect of proposals for local government reorganisation in Norfolk.
Background papers	The Government's statutory consultation process which can be found at - Proposals for local government reorganisation in Norfolk and Suffolk - GOV.UK

Wards affected	All
Cabinet member(s)	Cllr. Tim Adams (Leader)
Contact Officer	Steve Blatch – Chief Executive

7. EXCLUSION OF PRESS AND PUBLIC

To pass the following resolution:

"That under Section 100A(4) of the Local Government Act 1972 the press and public be excluded from the meeting for the following item of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs _ of Part I of Schedule 12A (as amended) to the Act."

8. PRIVATE BUSINESS

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Registering interests

Within 28 days of becoming a member or your re-election or re-appointment to office you must register with the Monitoring Officer the interests which fall within the categories set out in **Table 1 (Disclosable Pecuniary Interests)** which are as described in “The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012”. You should also register details of your other personal interests which fall within the categories set out in **Table 2 (Other Registerable Interests)**.

“Disclosable Pecuniary Interest” means an interest of yourself, or of your partner if you are aware of your partner's interest, within the descriptions set out in Table 1 below.

"Partner" means a spouse or civil partner, or a person with whom you are living as husband or wife, or a person with whom you are living as if you are civil partners.

1. You must ensure that your register of interests is kept up-to-date and within 28 days of becoming aware of any new interest, or of any change to a registered interest, notify the Monitoring Officer.
2. A ‘sensitive interest’ is as an interest which, if disclosed, could lead to the councillor, or a person connected with the councillor, being subject to violence or intimidation.
3. Where you have a ‘sensitive interest’ you must notify the Monitoring Officer with the reasons why you believe it is a sensitive interest. If the Monitoring Officer agrees they will withhold the interest from the public register.

Non participation in case of disclosable pecuniary interest

4. Where a matter arises at a meeting which directly relates to one of your Disclosable Pecuniary Interests as set out in **Table 1**, you must disclose the interest, not participate in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a ‘sensitive interest’, you do not have to disclose the nature of the interest, just that you have an interest. Dispensation may be granted in limited circumstances, to enable you to participate and vote on a matter in which you have a disclosable pecuniary interest.
5. Where you have a disclosable pecuniary interest on a matter to be considered or is being considered by you as a Cabinet member in exercise of your executive function, you must notify the Monitoring Officer of the interest and must not take any steps or further steps in the matter apart from arranging for someone else to deal with it

Disclosure of Other Registerable Interests

6. Where a matter arises at a meeting which **directly relates** to one of your Other Registerable Interests (as set out in **Table 2**), you must disclose the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a ‘sensitive interest’, you do not have to disclose the nature of the interest.

Disclosure of Non-Registerable Interests

7. Where a matter arises at a meeting which **directly relates** to your financial interest or well-being (and is not a Disclosable Pecuniary Interest set out in Table 1) or a financial interest or well-being of a relative or close associate, you must disclose the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest.
8. Where a matter arises at a meeting which **affects** –
 - a. your own financial interest or well-being;
 - b. a financial interest or well-being of a relative, close associate; or
 - c. a body included in those you need to disclose under Other Registrable Interests as set out in **Table 2**

you must disclose the interest. In order to determine whether you can remain in the meeting after disclosing your interest the following test should be applied

9. Where a matter **affects** your financial interest or well-being:
 - a. to a greater extent than it affects the financial interests of the majority of inhabitants of the ward affected by the decision and;
 - b. a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest

You may speak on the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation.

If it is a 'sensitive interest', you do not have to disclose the nature of the interest.

10. Where you have a personal interest in any business of your authority and you have made an executive decision in relation to that business, you must make sure that any written statement of that decision records the existence and nature of your interest.

Table 1: Disclosable Pecuniary Interests

This table sets out the explanation of Disclosable Pecuniary Interests as set out in the [Relevant Authorities \(Disclosable Pecuniary Interests\) Regulations 2012](#).

Subject	Description
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain. [Any unpaid directorship.]
Sponsorship	Any payment or provision of any other financial benefit (other than from the council) made to the councillor during the previous 12-month period for expenses incurred by him/her in carrying out his/her duties as a councillor, or towards his/her election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	Any contract made between the councillor or his/her spouse or civil partner or the person with whom the

	<p>councillor is living as if they were spouses/civil partners (or a firm in which such person is a partner, or an incorporated body of which such person is a director* or a body that such person has a beneficial interest in the securities of*) and the council —</p> <p>(a) under which goods or services are to be provided or works are to be executed; and</p> <p>(b) which has not been fully discharged.</p>
Land and Property	<p>Any beneficial interest in land which is within the area of the council.</p> <p>‘Land’ excludes an easement, servitude, interest or right in or over land which does not give the councillor or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners (alone or jointly with another) a right to occupy or to receive income.</p>
Licenses	<p>Any licence (alone or jointly with others) to occupy land in the area of the council for a month or longer</p>
Corporate tenancies	<p>Any tenancy where (to the councillor’s knowledge)—</p> <p>(a) the landlord is the council; and</p> <p>(b) the tenant is a body that the councillor, or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners is a partner of or a director* of or has a beneficial interest in the securities* of.</p>
Securities	<p>Any beneficial interest in securities* of a body where—</p> <p>(a) that body (to the councillor’s knowledge) has a place of business or land in the area of the council; and</p> <p>(b) either—</p> <p>(i) the total nominal value of the securities* exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the councillor, or his/her spouse or civil partner or the person with whom the councillor is living as if they were</p>

	spouses/civil partners has a beneficial interest exceeds one hundredth of the total issued share capital of that class.
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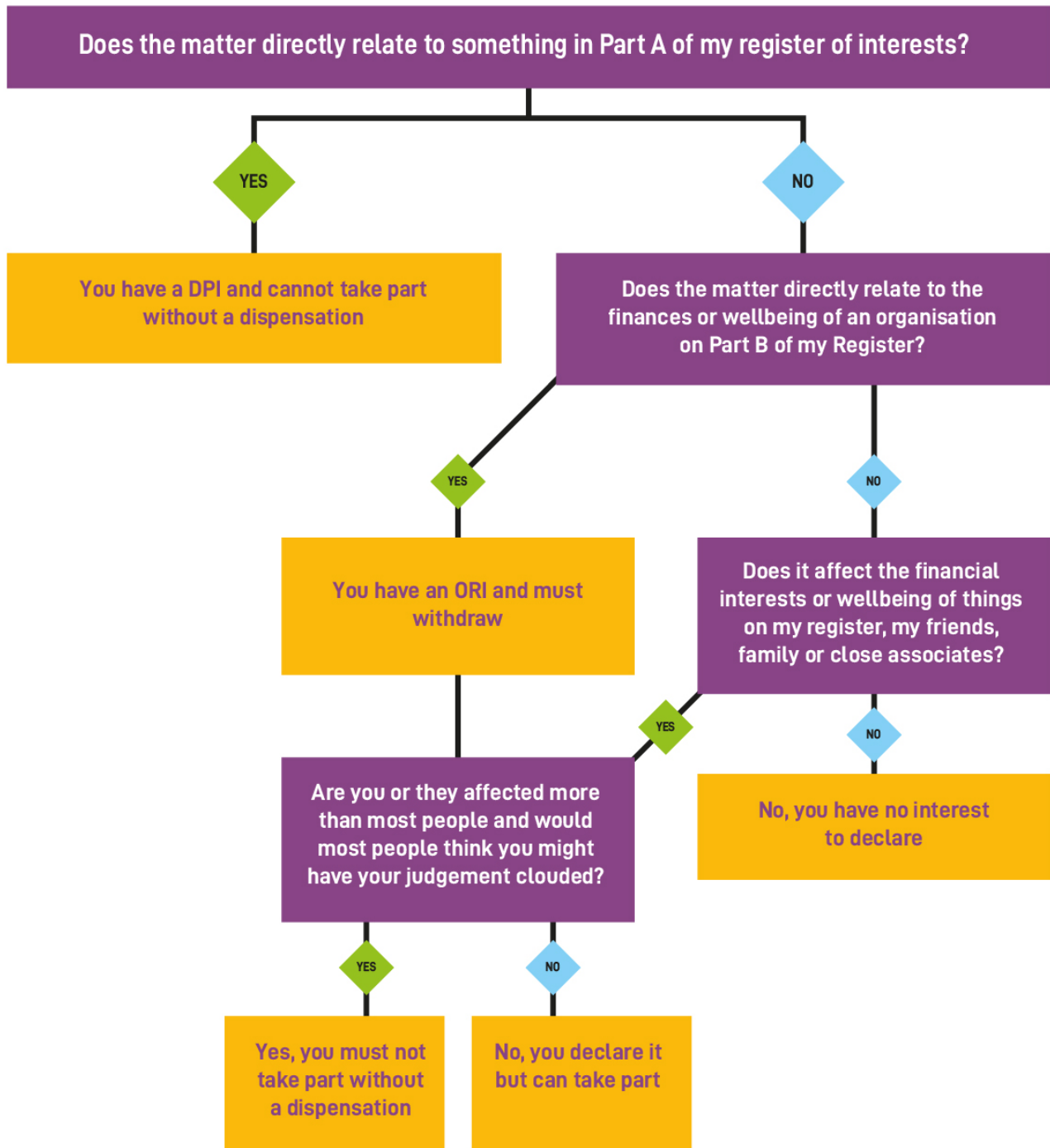
* 'director' includes a member of the committee of management of an industrial and provident society.

* 'securities' means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

Table 2: Other Registrable Interests

You have a personal interest in any business of your authority where it relates to or is likely to affect:

- a) any body of which you are in general control or management and to which you are nominated or appointed by your authority
- b) any body
 - (i) exercising functions of a public nature
 - (ii) any body directed to charitable purposes or
 - (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union)



MHCLG statutory consultation on proposals for Local Government Reorganisation in Norfolk A response by North Norfolk District Council	
Executive Summary	<p>Following the submission of final proposals for local government reorganisation (LGR) in Norfolk at the end of September 2025; the Government, through the Ministry of Housing, Communities and Local Government (MHCLG), is now undertaking a process of statutory consultation on the proposals, inviting key local stakeholders to comment on the three submissions made to the Government for the introduction of unitary councils in Norfolk moving forward.</p> <p>This report is a covering report, with a detailed appendix as a draft response to the Government consultation; which Cabinet is asked to agree as the Council's formal submission to the statutory consultation process.</p>
Options considered	<p>Option:1: Cabinet is asked to agree / propose amendments to the draft response (as included in this agenda) and approve its submission as the District Council's response to the statutory consultation process on Local Government Reorganisation in Norfolk.</p> <p>Option 2: The Council agrees not to submit a response to the statutory consultation (not recommended).</p>
Consultation(s)	<p>Internal consultation has included:</p> <ul style="list-style-type: none"> • Leader • Deputy Chief Executive • Section151 Officer • Monitoring Officer • Communications Manager
Recommendations	<p>That Cabinet:</p> <p>1. Comments on the draft response to the statutory consultation as attached as an Appendix to this report, proposes any amendments and approves its submission to Government as the Council's corporate response to the statutory consultation process.</p>
Reasons for recommendations	<p>To respond to the statutory consultation process being carried out by the Government in respect of proposals for local government reorganisation in Norfolk.</p>

Background papers	The Government's statutory consultation process which can be found at - Proposals for local government reorganisation in Norfolk and Suffolk - GOV.UK
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Wards affected	All
Cabinet member(s)	Cllr. Tim Adams (Leader)
Contact Officer	Steve Blatch – Chief Executive

Links to key documents:	
Corporate Plan:	The 2025/26 Corporate Plan Action Plan prepared in March 2025 included a specific action relating to Devolution and Local Government Reorganisation – Action 25 refers
Medium Term Financial Strategy (MTFS)	The proposals for local government reorganisation in Norfolk will require the District Council to provide some funding in support of transition costs. At the present time such costs are not budgeted for or known. Thought will be given to this as part of the 2026/27 budget process.
Council Policies & Strategies	Not Applicable

Corporate Governance:	
Is this a key decision	Yes
Has the public interest test been applied	Not Applicable
Details of any previous decision(s) on this matter	Full Council 24 th September 2025 - (Public Pack)Agenda Document for Council, 24/09/2025 18:00

1.0 Background

- 1.1 Following the publication of the English Devolution White Paper (Dec 2024) and Norfolk's inclusion in the Devolution Priority Programme (early 2025), Norfolk's county and district councils gave consideration to the options for unitary local government in the County against six criteria published by the Government.
- 1.2 Between February and September six District Councils (Breckland, Broadland, Great Yarmouth, Kings Lynn and West Norfolk, North Norfolk and Norwich City) developed a three-unitary model. South Norfolk District Council proposed and developed a two-unitary model; and Norfolk County Council proposed a single unitary authority which would cover the whole of Norfolk. All three proposals

were developed in detail over the summer period and submitted to the Government by the invitation deadline of 26th September 2025.

2.0 Current position

- 2.1 Following an initial review of the proposals during October, the Government announced on 19th November 2025 that it would undertake a process of statutory consultation inviting comments from key stakeholders and the public on the three proposals – with the consultation running across the Christmas and New Year period, and closing on Sunday 11th January 2026.
- 2.2 As an existing authority, North Norfolk District Council is invited to submit comments on the three proposals for LGR in Norfolk as part of the statutory consultation process.
- 2.3 A draft response for Cabinet's consideration is therefore attached as an appendix to this report and Cabinet is asked to propose any amendments or additions to the draft response and then approve its submission as the Council's corporate response to the consultation.

3.0 Financial and Resource Implications

- 3.1 There are no financial or resource implications for the authority in submitting a response to the statutory consultation.
- 3.2 There will however be costs associated with the implementation phase of any LGR model approved for Norfolk and this will require the District Council to provide some funding in support of transition costs. At the present time such costs are not budgeted for or known. Thought will be given to this as part of the 2026/27 budget process.

Comments from the S151 Officer:

This consultation is a significant opportunity to share the Council's views on the three proposals submitted to MHCLG for LGR. The inevitable costs of LGR are not yet defined but due consideration will be given to this demand in the 2026/27 budgeting process.

4.0 Legal Implications

- 4.1 The legal process governing local authority restructuring is set out in the Local Government and Public Involvement in Health Act 2007. Once a decision is taken on which model to implement in Norfolk, MHCLG will prepare the necessary legislation – the Structural Changes Order (SCO) – for Parliamentary approval. The SCO will establish the new single tier of local government in Norfolk and make provision to dissolve the predecessor councils.
- 4.2 SCOs place a duty on all impacted councils to consult and co-operate with each other, take any steps necessary to prepare for the transfer, and provide any information that any of those councils may reasonably request to enable the implementation of the approved model of new councils.

Comments from the Monitoring Officer

The attachment to this report sets out the proposed response by the Council to the Government's statutory consultation on local government reorganisation. A response is not obligatory, or binding upon the Council, but will enable the Council to have its views considered in the process, prior to a decision being made.

5.0 Risks

- 5.1 The Secretary of State can decide to take forward proposals that are submitted by areas with or without modification. Furthermore, the Government has the power to initiate and implement LGR, even if local councils choose not to propose changes.
- 5.2 It is therefore considered important for the District Council to submit detailed comments through the statutory consultation process which reflect the perceived strengths and shortcomings of the different proposals for unitary councils in Norfolk and the implications of each proposal on North Norfolk's coastal and rural communities.

6.0 Net ZeroTarget

- 6.1 There are no Net Zero implications for the Council in responding to this statutory consultation process.

7.0 Equality, Diversity & Inclusion

- 7.1 There are no Equality, Diversity & Inclusion for the Council in responding to this statutory consultation process.

8.0 Community Safety issues

- 8.1 **8.1 There are Community Safety issues** for the Council in responding to this statutory consultation process.

9.0 Recommendation:-

That Cabinet:

Comments on the draft response to the statutory consultation as attached as an Appendix to this report, proposes any amendments and approves its submission to Government as the Council's corporate response to the statutory consultation process.

North Norfolk District Council response to Government consultation on Local Government Reorganisation in Norfolk

Comments on a single county unitary authority for the whole of Norfolk

Question	Score	Detailed rationale for score
<p>1. To what extent do you agree or disagree that the proposal suggests a council that is based on a sensible geography and economic area?</p>	Strongly Disagree	<ul style="list-style-type: none">• Size and scale - The single county unitary proposal for Norfolk would cover more than 2,000 sq miles - making it the second largest unitary authority by area in England after North Yorkshire; and would have a population of more than 930,000 (rising to over a million by 2035), making it the second largest authority by population after Birmingham (but Norfolk is twenty times larger than Birmingham by area). This scale risks creating a remote, centralised authority disconnected from local communities.• Ignores local identity and lived experience: Norfolk does not have a single identity - it is made up of hundreds of distinct communities – with the city of Norwich; principal towns of Great Yarmouth and Kings Lynn; 24 market and coastal towns which serve as service centres based on high school catchments and GP practice areas for large rural hinterlands; and hundreds of villages and rural and coastal communities. The proposal for a single unitary authority assumes that people identify with the whole county of Norfolk, but our engagement with communities across North Norfolk shows strong attachment to the district with its particular rural and coastal character, which are very different to the issues experienced in Norwich and the “inland” west of the county.• Fails to reflect functional economic realities: Norfolk doesn’t have a single, homogeneous economy – the north and east of the County have very different challenges (e.g. significant deprivation, housing shortages, infrastructure gaps) associated with tourism, agriculture, social care and local service provision compared to the Norwich area and better-connected West with its strategic road and rail connections. A single council covering the whole county will not tailor strategies effectively to meet the diverse needs of different communities across such a large geography.• This will compound issues of economic imbalance: Under current arrangements, where Norfolk County Council has strategic responsibility for economic growth, a focus on “high growth sectors” and unequal resource allocation has seen widening inequalities, with 75% of new jobs in the County anticipated to be in the Greater Norwich area and A11 Norwich-Cambridge corridor, meaning that more peripheral rural and coastal areas have been increasingly left behind with fewer

employment and business growth opportunities and increased commuting / social change as younger people leave for better employment prospects. North Norfolk District Council is very concerned that a single large unitary authority, covering the whole of Norfolk, will be unable to focus on local area regeneration priorities.

- **Strategic planning assumptions are flawed:** The proposition that Norfolk is a “single economic area” oversimplifies reality. Travel-to-work patterns, housing markets, demographics and infrastructure, vary significantly across the County and a single unitary council would just offer “more of the same” rather than focussing on the needs of specific areas. For example, the population of the Norwich area is much “younger” (with students and young families) than rural areas of the county with more “established” populations and market towns and coastal communities which are attractive to retiring incomers which have older age profiles. Such variations in the make up of local populations leads to imbalances in the demand for schools, older people’s care and health services.
- **Will inhibit the growth potential of distinct areas of the County:** Norwich is a fast-growing, dynamic city, with complex housing, transport and infrastructure needs, that differ significantly from rural and coastal areas, such as in the East where there are significant opportunities to develop the clean energy sector of offshore wind, carbon capture and storage and hydrogen production. The proposal for a single county unitary does not set out how these different needs and challenges will be prioritised within a single, county-wide model, risking slower progress and missed opportunities for sustainable growth.
- **Risk of one-size-fits-all approach:** Norfolk’s communities, from urban Norwich to rural and coastal areas, have very different needs. A single, large, authority risks adopting policy and uniform solutions that fail to address local challenges such as rural isolation, coastal deprivation, different demographics and infrastructure gaps. The single unitary proposition has a strapline “Strong where it counts, local where it matters” and yet under current arrangements North Norfolk District Council would question the extent to which the sentiments expressed in the strapline are delivered – in that compared to other places in England Norfolk has long been overlooked for strategic investment in infrastructure (deficit of electricity capacity despite being the landfall location for vast quantities (over 8GW) of offshore generation and water scarcity); 31% of households not having access to mains gas leading to higher than average energy bills, has two district general hospitals (James Paget at Gorleston and Queen Elizabeth at Kings Lynn) at the bottom of NHS league tables and in desperate need of replacing; poorly performing mental health and ambulance trust services; and lack of investment in strategic road and rail infrastructure (need for further

investment in A47 and rail capacity into Norwich Station restricted by the single track Trowse Bridge and real capacity constraints at Ely junction); and with very under-developed “local” relationships with many communities across large parts of the county in terms of understanding local needs, engagement in project development etc – as recently evidenced by the Sheringham Bus Shelter issue - [Campaigners celebrate as Sheringham bus shelter saved - BBC News](#).

- **Contradicts principles of localism:** The proposal claims “local where it matters,” but governance will be dominated by a large central body. Mechanisms like Neighbourhood Area Committees are untested and may not compensate for loss of district-level accountability. The new Norfolk and Suffolk Integrated Care Board arrangements will also require embedding quickly in support of the NHS 10 Year Plan objectives as part of wider public service reform and North Norfolk District Council believes it is essential that a “local” approach to service provision will be required if health inequalities are not to increase further. The District Council would question the extent to which sufficient focus will be given to this issue within a large single unitary council structure.
- **Potential inefficiency and democratic deficit:** Reducing representation from 399 councillors to around 168 (or fewer long-term) will dilute local voice and increase workloads, undermining effective democratic engagement. North Norfolk District Council would question how a single unitary authority with 168 members could operate effectively – this is a larger number of elected representatives than the Scottish Parliament or Welsh Assembly; and yet would represent a (significant) democratic deficit / electoral inequality compared to the average elected member:elector ratio of the vast majority of established unitary authorities. Very large electoral wards or divisions in rural areas requiring engagement with 20+ town and parish councils would mean a huge commitment and workload for individual councillors and a “remoteness / distance” from their electorates.
- **Risks to service delivery and responsiveness:** Centralising services like housing, planning, social care and civil contingency response under one authority could lead to postcode lottery effects, slower decision-making, and reduced responsiveness to local issues. For example, civil contingency response to a storm surge events on the coast is heavily reliant on local engagement and volunteer flood wardens and concerns exist around how these resources will be developed, supported and deployed by a remote authority, with little presence on the ground in small, coastal communities. North Norfolk District Council understands that this has been seen in the recently established North Yorkshire (unitary) Council which, whilst delivering target financial savings, is

		seen as remote, anonymous and distant in terms of many place-based / “people-focussed” services.
<p>2. To what extent do you agree or disagree that the proposed council will be able to deliver the outcomes they describe in the proposal?</p>	Disagree	<ul style="list-style-type: none"> Financial assumptions are highly optimistic and fragile: The proposal relies on achieving £39.8m annual savings and rapid integration of systems and processes. These figures are based on best-case scenarios and do not account for delays, cost overruns, or the complexity of harmonising operations across such a large geography. Any deviation will erode the claimed benefits and undermine service delivery. In addition, savings appear heavily dependent on reducing district-level staffing and management costs. Historically, salaries in upper tier and unitary authorities have been higher than in district authorities raising concerns over the extent to which anticipated savings through staff reductions from district authorities will deliver “real” savings relative to reduced capacity – North Norfolk District Council has concerns therefore over whether a move to a single unitary model will realise genuine savings from staffing costs or instead see salary creep upwards representing poor value for money. This raises serious concerns about whether such cuts can be delivered without undermining local service capacity and responsiveness. Early “planning” work being undertaken in respect of the implementation phase of LGR suggest that transition costs have been significantly under-estimated in the two years to vesting day at £22.4million given the staff numbers / resources which it is suggested will be required to undertake the “transition” works. No clear strategy for transformational change: While the proposal uses language about “radical reform” and “local empowerment,” it lacks any detailed plans for how these changes will be developed and embedded. The reliance on unexplained and untested mechanisms like Neighbourhood Area Committees and Integrated Neighbourhood Teams does not set out a coherent strategy for the level of transformation required. It feels that the premise of this proposal is based on delivering more of the same, which North Norfolk District Council believes will be detrimental to rural and coastal communities, resulting in more costs and inconvenience (in time and financial cost) to residents of these areas accessing council services – as is already the case for such residents accessing distant acute hospital services. Delivery risks are significant and underplayed: The proposal acknowledges risks such as democratic deficit, workforce morale, and service continuity but offers limited mitigation beyond high-level statements. There is no evidence of capacity or capability to manage these risks at the scale proposed.

		<ul style="list-style-type: none"> • Dependent on external factors: Many proposed outcomes are dependent on future collaboration with the Mayoral Combined County Authority and securing national funding. These dependencies introduce huge uncertainty and reduce the council's ability to guarantee delivery. • Promises outcomes without credible implementation detail: The proposal claims improvements in housing, transport, economic growth, and public health, yet provides little evidence of how these will be achieved beyond aspirational statements. There is no clear sequencing, prioritisation, or measurable milestones. • Fails to demonstrate how localism will be real: The proposal asserts "local where it matters," but the governance model is heavily centralised. Without proven structures or guaranteed resources for local decision-making, this ambition risks remaining theoretical. • Proposals around elected members numbers are unworkable: Proposed councillor numbers would result in a significant democratic deficit in decision making compared to many established unitary and metropolitan councils. It is clear practicalities around how council meetings would work have not been considered and there is no detail around how Area or Neighbourhood Committees, budgets, delegations etc would operate.
<p>3. To what extent do you agree or disagree that the proposed council is the right size to be efficient, improve capacity and withstand financial shocks?</p>	Strongly disagree	<ul style="list-style-type: none"> • Size does not guarantee efficiency or resilience: The proposal for a large, single unitary council for the whole of Norfolk assumes that delivery at scale will automatically realise efficiencies and withstand shocks. However, North Norfolk District Council is concerned that such large scale will introduce bureaucracy, slow decision-making, and would create distance from communities undermining responsiveness and agility. • Financial resilience claims are overstated: The business case for the single county unitary proposal suggests that size will protect against financial shocks, yet the model is heavily reliant on optimistic savings projections and workforce reductions. These savings appear to be predicated on cutting district-level staff and management which risks hollowing out local capacity rather than strengthening resilience. North Norfolk District Council believes such a model will result in a loss of detailed local knowledge and a one-size-fits-all approach which will be particularly detrimental to more rural and "peripheral" communities which are distant from the "core" of the new authority – by distance and understanding of key issues – for example how will the needs of coastal communities requiring protection through the management of coast protection infrastructure and difficult conversations around coastal transition and adaptation be afforded any kind of priority or profile in a large unitary authority structure – how will the needs

and voices of such communities be heard in a large, remote and unwieldy organisation, where the model proposes placing coastal issues in a team or structure with inland flooding? – similarly with issues such as providing adult care in rural areas (where the current County Council has closed services (such as in the modern Benjmain Court facility in Cromer) and concentrated them in distant “urban centres” where issues of access by partners and family members is difficult resulting in poorer outcomes for vulnerable people) and planning for small school rolls etc.

- **Dilution of local voices:** A single unitary council for the whole of Norfolk will inevitably reduce democratic representation and weaken local influence. Fewer councillors and centralised governance mean communities will have less say in decisions that affect them, contradicting the principles of localism.
- **Concentration of risk in one organisation:** Placing all services and financial responsibility into a single authority creates the potential for a single point of failure. If the council faces financial or operational difficulties, the entire county is exposed, with no fallback or alternative governance structure. Arguably therefore there is less risk and greater flexibility and resilience in a unitary council model that does not place “all our eggs in one basket”.
- **Evidence from other large unitary councils does not support a single county unitary approach:**
 - In Somerset the single large unitary council has failed to deliver the full savings promised in its business case, achieving less than half of the £18.5m forecast within the first two years. Reasons for this included underestimating the time and complexity required for transformation and unrealistic assumptions about cost reductions. Somerset Council now faces a £190m budget shortfall by 2029 and has required exceptional financial support from government.
 - Whilst North Yorkshire Council has delivered against the target savings anticipated for the first two years of operation, the Council is understood to have struggled to maintain positive relationships at a place-based level with local communities across its very large geography, as the Council has pulled back on much discretionary service provision – particularly tourism infrastructure and facilities, and is having to review its ability to make investments in a number of key local projects considered and promoted by its predecessor district councils. This situation, if it were to arise in Norfolk, would concern North Norfolk District Council given the importance of tourism to the North Norfolk economy.

		<ul style="list-style-type: none"> • No evidence of improved capacity or transformational change: The proposal for a single unitary council does not demonstrate how the new authority would seek to build or generate additional capability beyond what currently exists. There is no clear plan for investment in skills, systems, or infrastructure, to match the scale of the organisation, nor a credible roadmap for cultural or organisational transformation. • Bigger does not mean better for Norfolk's challenges: Norfolk's significant challenges of an ageing population, rural isolation, and pockets of coastal and urban deprivation, all require tailored, place-based solutions. A single, oversized council risks diluting focus and creating a one-size-fits-all approach that fails to meet the diverse needs the county's residents and communities.
<p>4. To what extent do you agree or disagree that the proposed council will deliver high quality, sustainable public services?</p> <p>Page 17</p>	Disagree	<ul style="list-style-type: none"> • Financial fragility undermines sustainability: The single county unitary proposal's savings plan is heavily reliant on realising savings and efficiencies through a reduction in district-level staff and management costs, rather than seeking to realise the benefits of wider service remodelling and organisational transformation. This approach, which under-values the provision of current "district" council services, risks stripping out local capacity and expertise, leaving frontline services over-stretched and unable to maintain local provision, access and quality. This is exemplified by prominent members of the County Council saying the current County Council provides 80% of local government services in the County rather than saying their expenditure accounts for 80% of all local government spending. District Councils provide many frontline universal services to all local residents eg. weekly refuse and recycling service, planning services, elections and Council tax collection, whereas apart from highways most County Council services are provided to a smaller number of residents / users with complex needs – eg adult social care, child safeguarding and protection services. Both district and county councils also provide a range of discretionary services or services used by different groups of people – eg public toilets, leisure centres, libraries, museums. If savings targets proposed in the single unitary council proposal are missed the new authority could face severe budget gaps, resulting in the need for further cuts and service reductions, which North Norfolk District Council would fear would most likely be achieved through withdrawing from the provision of place-based discretionary services which give a sense of place, quality of life and character to different communities and underpin parts of the county's significant tourism economy. • No credible plan for long-term investment: Sustainable services require ongoing investment in infrastructure, workforce development, and digital capability. The business case for the single

		<p>unitary council offers no clear roadmap for these investments, focusing instead on short-term cost reduction rather than building resilience. Local people in many parts of Norfolk value the provision of local government, particularly place-based, services which, in the context of North Norfolk, provide local character and a sense of place and underpin the vital tourism economy.</p> <ul style="list-style-type: none"> • Lack of transformational change: The proposal uses aspirational language about “radical reform” but fails to set out how cultural and organisational transformation will be embedded. Without genuine structural change, the new single unitary council risks becoming a larger, more bureaucratic version of the current system, unable to innovate or adapt. • Centralisation reduces responsiveness: A single authority covering 932,000 residents will inevitably concentrate decision-making and dilute local voices. This risks slower responses to local needs and a one-size-fits-all approach that fails to reflect Norfolk’s diverse communities, from urban centres to rural and coastal areas. There is a risk in the fundamental assumption that centralisation of service delivery will generate significant savings. In large rural counties such as Norfolk if services and service delivery is centralised without proper local access points or outreach delivery the costs of accessing services (in time and cost) passes to residents; alternatively it would be expected that larger numbers of residents in rural areas will “fall through the gaps” in terms of accessing services through issues of poor access, lack of sight by agencies. • Single point of failure: Consolidating all services into one organisation places all financial and operational risk in one place. If the council fails to achieve its savings commitments or there are failures in service delivery, then the entire county will be affected, with it being feared that the greatest impact will be felt by more rural residents and communities based upon smaller numbers of people being impacted by negative decisions. In this respect, it isn't clear the extent to which the single unitary case has been subject to any rural-proofing or impact assessment.
5. To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?	Disagree	<ul style="list-style-type: none"> • Engagement was limited and high-level: The single unitary council proposal cites online surveys and a small number of engagement events, but these were focused on broad principles rather than detailed structural options. There is no evidence that local communities were meaningfully involved in shaping the final model. • Local priorities are not reflected in the design: Residents consistently value strong local identity, accessible services, and clear accountability. A single council covering 932,000 people across more than 2,000 square miles undermines these principles by centralising decision-making and reducing democratic representation.

		<ul style="list-style-type: none"> • Slow and generic responses to local issues: Norfolk is one of the largest counties in England and as such the challenge felt by residents in one area differ significantly from that of another. These challenges include rural isolation, coastal and urban deprivation, and infrastructure gaps which require tailored, place-based solutions. A large, centralised council risks imposing one-size-fits-all policies and being too slow to respond to urgent local problems, compounding existing inequalities. • Consultation did not test appetite for scale: There is no indication that Norfolk residents support the creation of one of the largest unitary councils in England. Feedback emphasised simplicity and local voice, not a model that risks diluting both. • Mechanisms for localism are unproven: The proposal relies on Neighbourhood Area Committees and Integrated Neighbourhood Teams to deliver local engagement, but these are conceptual and lack detail on resourcing, governance, or decision-making powers. Such arrangements are untested in Norfolk and would require a very significant change to engagement and devolved decision-making to the systems operated by the current County Council, including relationships with established town and parish councils, local business and third sector organisations which perform key roles at a local community level.
6. To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements, for example, the establishment of a strategic authority?	Disagree	<ul style="list-style-type: none"> • One voice for Norfolk risks being ignored: A single unitary council covering the whole of Norfolk would create only one voice for Norfolk within a Mayoral Combined County Authority. If priorities clash with Suffolk or the Mayor's agenda, Norfolk's interests could easily be sidelined, leaving communities with little influence over regional decisions. • Does not reflect Norfolk's economic geography: Norfolk is not a single, uniform economic area. It has distinct economic geographies, housing markets, and travel-to-work patterns. For example, Norwich's urban economy operates very differently from rural West Norfolk or coastal communities like Great Yarmouth and North Norfolk. • Fails to address Norwich's growth challenges and strategic positioning: Norwich is a fast-growing, dynamic city with complex housing, transport, and infrastructure needs that differ significantly from rural and coastal areas. The single unitary proposal does not explain how these urban priorities will be championed within a single unitary council when negotiating with a mayor, whose focus may lean toward wider regional agendas. This risks Norwich's growth ambitions being diluted or deprioritised in favour of competing priorities.

		<ul style="list-style-type: none"> • Potential loss of strategic economic advantages: Norfolk’s Energy Coast and offshore renewables sector are nationally significant with huge potential to support the UK’s energy security and transition through decarbonising existing gas processing and transmission operations, development of carbon capture and storage capability and the production and transmission of hydrogen. A single unitary council covering the whole of Norfolk risks diluting focus on these assets by forcing a one-size-fits-all approach and spreading officer and financial resources too thinly, rather than enabling tailored strategies for different economic areas. • Centralisation undermines local empowerment: Devolution is intended to bring decision-making closer to communities, yet the proposal for a single unitary council does the opposite. It reduces democratic representation and concentrates power in a remote authority, weakening the ability of local areas to shape strategic priorities. • Creates dependency and vulnerability: Placing all local government functions into one organisation risks creating a single point of failure. If the single unitary council faces financial or operational difficulties, Norfolk’s ability to engage effectively with the strategic authority will be significantly weakened and undermined.
<p>7. To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?</p>	<p>Strongly disagree</p>	<ul style="list-style-type: none"> • Centralisation undermines local voice: A single unitary council covering 932,000 residents and a geography of more than 2,000 sq miles will inevitably concentrate decision-making at the centre. This would reduce democratic representation and accountability making it harder for communities to influence decisions that affect them and for local outcomes. • Unproven mechanisms for localism: The proposal relies on Neighbourhood Area Committees and Integrated Neighbourhood Teams to deliver local engagement, but these are conceptual and lack detail on governance, resourcing, or real decision-making powers. Without a clear governance framework and devolved or delegated funding, these structures risk being tokenistic. • Distance from communities: Norfolk’s geography is large and diverse, spanning from urban Norwich to rural West Norfolk and remote coastal communities. A distant, centralised council will struggle to understand and respond quickly to local priorities, especially in areas with unique challenges like rural isolation or coastal deprivation. • Risk of slower, generic responses: Local empowerment requires flexibility, agility and speed. A large, bureaucratic council will impose uniform policies and processes, making it harder to tailor solutions to neighbourhood needs. • No guarantee of neighbourhood budgets or influence: While the proposal mentions devolved budgets supporting neighbourhood area committees, there is no clear commitment to scale,

draft

		<p>timing, or accountability. Without guaranteed resources, neighbourhood empowerment remains aspirational rather than real.</p> <ul style="list-style-type: none">• Contradicts what residents value: Engagement feedback across all three proposals put forward emphasised local identity and strong local representation as being important to local residents and communities. This proposal for a large, single unitary covering the whole of Norfolk delivers the opposite; it would result in there being fewer councillors, centralised governance and reduced local autonomy.
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Comments on two unitary authorities for Norfolk

Question	Score	Detailed rationale for score
<p>1. To what extent do you agree or disagree that the proposal suggests councils that are based on a sensible geography and economic area?</p>	Disagree	<ul style="list-style-type: none"> Overly large and impractical geographies: The proposed two unitary council model would see the creation two unitary councils – neither of which would have a sufficient degree of “focus” on key issues. <ul style="list-style-type: none"> The proposed Norwich and East Norfolk unitary covering the current Broadland, Great Yarmouth, Norwich City and South Norfolk council areas with a combined population of 528,000 in 650 sq miles; would take in the fast-growing and dynamic city of Norwich; the resort and port town of Great Yarmouth with some entrenched issues of deprivation; and the more affluent suburban and rural populations of Broadland and South Norfolk. This unitary would seem overly large and have a very diverse population and range of issues to support and address risking a lack of focus on key opportunities and challenges – ie there is a risk politically and at an officer level of being spread too thinly. The proposed West and North Norfolk unitary covering the current Breckland, Kings Lynn and West Norfolk and North Norfolk council areas would cover a very large geography over more than 1400 sq miles and have a combined population of just over 400,000 people. This unitary council would take in very different areas with parts of the existing Breckland and Kings Lynn and West Norfolk areas with their economies being focussed on logistics, defence and food production being relatively well-connected by road and rail to the south and west, whilst much of the north coast is remote, poorly connected and over-dependent on tourism. The communities served by this proposed unitary are highly dispersed and rural raising some real issues of cost and viability in delivering services over such a large area with no critical mass or concentration of population to offset costs of more rural service delivery. Fails to deliver truly local decision-making: The scale of the two councils proposed by the two-unitary proposal risks creating authorities that would be distant from residents, weakening local accountability and responsiveness, bringing together very different communities which lack coherence in terms of identity and local decision-making. While smaller than a single unitary, these councils would still centralise power far from rural and coastal communities. <ul style="list-style-type: none"> In terms of the proposed Norwich and East Norfolk unitary, the City of Norwich is a very different place and community to the coastal port and resort town of Great Yarmouth – in terms of its local economy, opportunity and demography. Whilst many people in the rural

communities of Broadland and South Norfolk might look to Norwich for employment, they have different outlooks and expectations to the more suburban communities of those same (existing) local authorities which form the urban footprint of the Norwich built-up area, but yet which lie “outside” of the current Norwich City Council area – highlighting the extent to which the city is under-bounded by virtue of the local government system put in place in 1974. The two unitary proposal does nothing to achieve a focus on those very different issues, challenges and opportunities and runs the risk of holding back the growth opportunities which exist in Norwich and down-playing the challenges of deprivation and perceptions of Great Yarmouth, whilst at the same time not giving sufficient focus to the renewable energy opportunities of the coast / Great Yarmouth. It is also difficult to understand how the needs of the rural and market town populations across this large area would be reflected relative to the more urban priorities of Norwich and Great Yarmouth.

- Similarly, the proposed West and North Norfolk authority proposes bringing together very different communities across a very large geography (more than 1400 sq miles) – ie those which look as much outwards to the south and west of the county as they do back into Norwich and the East – and yet the focus for much of the existing North Norfolk district in terms of acute health services, high order retail and leisure services and transport connections – particularly to the east of Cromer (ie North Walsham and Stalham) would be to look to Norwich via principal roads (A140, A1151 and B1150) and the Norwich to Sheringham rail line. This proposal also compromises opportunities to strengthen and develop working arrangements for the clean energy coast (as Bacton and Great Yarmouth would be in different authorities) and the opportunity which exists to bring the majority of the most sensitive landscapes and environments of the Broads Authority Executive area under one unitary authority area.
- **Fails to reflect functional economic realities:** Norfolk doesn’t have two local economies or economic areas – the economy of Norwich, which has strengths in financial services, research and innovation, creative industries and as a regional centre for retail and leisure offerings; is very different to that of Great Yarmouth, with a much narrower local economy which is over-dependent on tourism and local services and has, as yet, unfilled prospects of significant economic opportunities associated with the port and the clean energy sector. A unitary council covering Norwich and East Norfolk will not be able to tailor strategies effectively to meet the diverse needs of its different (city, resort and port town and suburban and rural) communities. At the same time, the proposed West and North Norfolk unitary authority would not have any clear

focus economically – the opportunities for clean and renewable energy at Bacton would not be joined up with those same opportunities in Great Yarmouth; there would be a lack of focus on a clear tourism market or product and issues of connectivity and access to strategic road infrastructure for some agricultural and food processing businesses would be significant for some companies in the east of the current North Norfolk district compared to those in the south and west of the proposed West and North Norfolk unitary authority.

- **Will inhibit the growth potential of distinct areas of the County – particularly Norwich:** Norwich is fundamentally different from the rest of the proposed Norwich and East Norfolk council. Norwich is a fast-growing, dynamic city, with complex housing, transport and infrastructure needs, which extend beyond the existing city council boundary into the adjoining suburban communities which form “the city”. It has a dense urban footprint with unique economic drivers including finance, research and development, higher education while the surrounding proposed East Norfolk area is dominated by rural and coastal communities with very different issues and priorities. Grouping these together risks diluting focus and creating conflicting agendas. The “urban growth” issues which Norwich would wish to address differ significantly from those in Great Yarmouth and the rural areas of the current Broadland and South Norfolk districts, which require different consideration, policy response and focus.
- **Geography remains artificial in places:** The very large and dispersed rural and coastal geography of the proposed West and North Norfolk unitary council would present very significant challenges and for many communities in the existing North Norfolk District Council area the proposed new “council” and policy-makers and decision-takers would be seen as being very “remote” from communities on the ground – travel distances from North Walsham to Kings Lynn would be almost 60 miles, or an hour and a half by road and with no direct public transport connectivity. The proposal itself admits that the North Norfolk boundaries may need future refinement acknowledging that the model does not fully reflect natural economic or community patterns from the outset and would potentially involve further disruptive and costly boundary revisions in the future. The proposal does not therefore meet the Government criteria in respect of using existing district council areas as building blocks and would deliver sub-optimal outcomes for some North Norfolk communities and is not transparent in suggesting to the Secretary of State that a modified proposal is made.
- **This will compound issues of economic imbalance:** Under the two-unitary proposal North Norfolk District Council would be concerned of a significant imbalance between the relative growth opportunities of the Norwich and East Norfolk unitary authority relative to the West and

		<p>North Norfolk authority – the latter of which would have significantly fewer opportunities to grow or diversify its economy into “high value added” sectors. North Norfolk District Council therefore believes that this two-unitary proposal would result in greater inequality in economic growth and employment opportunities across the County, with the more rural and remote coastal areas being increasingly left behind, with fewer employment and business growth opportunities and increased commuting / social change as younger people leave for better employment prospects in the Norwich and East Norfolk authority or indeed south into Suffolk and Cambridgeshire.</p> <ul style="list-style-type: none"> • Strategic planning assumptions are flawed: The proposition that Norfolk has two distinct economic areas, housing market areas and landscape character areas is not supported by any significant evidence base. Travel-to-work patterns, housing markets, infrastructure and landscape character areas (particularly with respect to The Broads Executive area and cliffed coastal frontage) vary significantly across the two proposed unitary council areas and wouldn’t allow sufficient focus on the needs of specific areas. • Public engagement priorities not fully met: Residents said they want stronger local identity and decision-making. Two large councils would dilute “local” voices in such large authorities and risk creating governance structures that feel remote and bureaucratic
<p>2. To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?</p>	<p>Disagree</p>	<ul style="list-style-type: none"> • Scale still undermines local responsiveness: Each proposed council is very large (covering 650 and 1,400 square miles and 530k and 400k populations). This size issue makes it difficult to deliver the “locally tailored, community-led” services promised. Rural and coastal communities will remain remote from decision-making. • Savings depend on optimistic assumptions, not guaranteed efficiencies: The proposal claims £72m savings in 2028/29 rising to £90m in 2029/30, largely from “service optimisation” and “early intervention.” These are reliant on cultural change and demand reduction, which are unlikely to be achieved in such an ambitious timescale. • Demand management savings are high-risk: The largest projected savings come from reducing demand in social care and SEND through prevention strategies. Evidence shows these savings take years to materialize and depend on strong local networks which will be harder to build in councils of larger scale. • Public priorities not fully addressed: Residents want stronger local identity and decision-making – particularly in place-based services which make and give character and identity to “places”. This is especially true in coastal communities where local authorities provide key tourism assets and infrastructure (promenades, piers, theatres, beach lifeguards, additional

		cleansing services, maintenance of public gardens and provision of public toilets) which underpin their local economies. Two large councils would centralize power far from communities, making it unlikely that outcomes around “empowered neighbourhoods” will be achieved.
3. To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?	Disagree	<ul style="list-style-type: none"> • Councils remain too large and remote: Each proposed authority covers large geographies (the proposed West and North Norfolk unitary would cover over 1,400 square miles) and diverse communities of interest which would make it difficult to deliver the local responsiveness and agility needed for efficient decision-making. Rural and coastal communities would feel disconnected from leadership and decision-making under this proposed two unitary model. • Size does not guarantee efficiency: The two-unitary proposal assumes bigger councils deliver economies of scale, but efficiency depends on service design and culture, not just footprint. Large, complex organisations often face slower decision-making and higher overheads. • Financial resilience claims are optimistic: Projected savings rely heavily on ambitious demand reduction and early intervention strategies, which take years to materialise and are difficult to achieve consistently. This creates uncertainty about whether the councils can truly withstand financial shocks. North Norfolk District Council would be particularly concerned whether the proposed West and North Norfolk unitary council would be “financially sustainable” given its extensive rural geography, dispersed population and aged demographic. • Capacity challenges remain: Councils of this size will need to balance strategic planning with local delivery across very diverse geographies and communities. Successfully managing urban growth areas alongside issues faced by remote rural and coastal communities risks stretching resources and weakening focus. For example, the current North Norfolk District Council has statutory coastal management and protection responsibilities for 26 miles of vulnerable eroding cliffed coastline and it is difficult to understand the relative importance and understanding of such issues within large and remote councils where the “coast” will comprise just a (very) small part of their wider responsibilities and face “competition” for capital and revenue budgets. • Better outcomes require smaller, more locally focused councils: Norfolk’s diversity means a more granular structure would provide stronger local leadership and accountability, while still enabling collaboration on strategic issues.
4. To what extent do you agree or disagree that the proposed councils will	Neither Agree or Disagree	<ul style="list-style-type: none"> • Promises are aspirational, not guaranteed: The two-unitary proposal relies on an ambitious approach to early intervention and prevention to reduce demand for costly services. While these might have merit and be sound in theory the timeline for implementation is hugely ambitious and

<p>deliver high quality, sustainable public services?</p>		<p>highly likely to be subject to significant slippage, making the outcomes and achievement of savings highly uncertain.</p> <ul style="list-style-type: none"> • Scale creates delivery challenges: A unitary council covering over 1,400 square miles of rural and coastal communities will need to manage very different service needs from dense urban Norwich. This diversity and the size of the proposed unitaries makes it harder to deliver locally-focused service interventions that address Norfolk's many diverse challenges which are driven by its geographic and economic landscape. • Financial pressures threaten sustainability: The model assumes savings will fund service improvements, but those savings depend on optimistic projections. If they fail to materialise, services could face cuts rather than enhancements. • Local accountability diluted: High-quality services depend on strong local engagement. Councils of this large size risk weakening the connection between decision-makers and communities, reducing the ability to tailor services effectively
<p>5. To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?</p>	<p>Neither Agree or Disagree</p>	<ul style="list-style-type: none"> • Engagement was broad but not deep: The proposal cites 804 survey responses and 446,000 campaign impressions, but this is a small sample compared to Norfolk's population of over 930,000. It is unclear whether this reflects fully local views or delivers the local accountability people want. The evidence provided does not justify strong confidence this will be achieved. North Norfolk District Council is concerned that there has been no real engagement or consultation with residents, communities and businesses in the east of the current North Norfolk District which would be geographically "remote" from the majority of the proposed West and North Norfolk unitary authority and who, it is implied, might be subject to future change by being incorporated into the proposed Norwich and East Norfolk authority at some point in the future. Such a proposal would further disadvantage these communities which would have very different issues than the "rest" of the proposed Norwich and East Norfolk council as they are highly rural and coastal in their structure and the issues they face. "Moving" a further (estimated) 30,000 people from the proposed West and North Norfolk unitary into the Norwich and East Norfolk council at a date in the future would also widen the imbalance of population between the two proposed unitary authorities with the West and North Norfolk unitary then having approx 370,000 population whilst the Norwich and East Norfolk authority would have a population approaching 560,000 – this would see the creation of two very unbalanced and unequal authorities. North Norfolk District council believes that the two-unitary proposal is not compliant with the Government's criteria in that it isn't proposing a "modified proposal" to the Secretary of State.

		<ul style="list-style-type: none"> • Local priorities identified, but not fully addressed: Residents highlighted improved services and stronger local decision-making as top priorities. The proposed two unitary councils are still of quite significant scale which risks leaving rural and coastal communities particularly feeling remote from decision-makers. • Local identity concerns remain: While the two unitary proposal claims to preserve local identity, grouping Norwich with rest of East Norfolk combines very different communities and priorities. It is feared that this will dilute local voices and create tensions between urban, coastal and rural needs. • Evidence of listening is limited: The proposal references engagement themes but does not clearly demonstrate how feedback shaped the final boundaries or governance model. Key concerns such as avoiding remoteness appear unresolved.
6. To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements, for example, the establishment of a strategic authority?	Agree	<ul style="list-style-type: none"> • Avoids the “one voice” risk but still lacks strong local representation: Two councils would give Norfolk more than one voice in a Mayoral Combined County Authority, reducing the risk of being sidelined. However, each council still represents very large, diverse areas and economies, meaning local priorities could still be lost in regional negotiations. • Partially reflects economic geography: While better than a single council, the proposal still groups very different economies together. Norwich’s urban economy and growth pressures particularly, sit alongside rural and coastal priorities in one authority, creating competing agendas and therefore a lack of focus on the real opportunities which are believed to exist around financial services, bio-science research and development, creative industries and clean energy. • Urban challenges risk being diluted: Norwich’s housing, transport, and infrastructure needs are complex and fast-moving. In a council covering both Norwich and Great Yarmouth, these priorities could be diluted by rural and coastal issues, weakening the city’s strategic positioning. • Local empowerment remains limited: Devolution is meant to bring decisions closer to communities. Two councils are an improvement on one, but they still centralise decision-making far from many towns and villages, leaving rural communities with limited influence over strategic priorities that impact them significantly.
7. To what extent do you agree or disagree that the proposal enables	Disagree	<ul style="list-style-type: none"> • Councils remain too large and remote: The two proposed unitary councils serve large populations and geographies making meaningful engagement difficult. Communities in rural and

<p>stronger community engagement and gives the opportunity for neighbourhood empowerment?</p>		<p>coastal areas will still feel disconnected from urban (in the case of Norwich and East Norfolk) and remote / distant (in the case of West and North Norfolk) decision-makers.</p> <ul style="list-style-type: none"> • Promises of neighbourhood empowerment lack substance: The two-unitary proposal outlines proposes the establishment of Community Boards and new Town/Parish Councils, but provides little detail as to how these structures would work and risk being tokenistic without real decision-making power or resources. • Urban-rural divide undermines local voice: Norwich’s priorities will dominate in the proposed Norwich and East Norfolk council, leaving Great Yarmouth and smaller towns and villages with limited influence. Similarly, rural West and North Norfolk communities will struggle to shape decisions in such a large governance footprint. • Engagement mechanisms unclear: The proposal does not explain how residents will influence strategic decisions or how neighbourhood-level input will be embedded in planning and service delivery.
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Comments on three unitary authorities for Norfolk

Question	Score	Detailed rationale for score
<p>1. To what extent do you agree or disagree that the proposal suggests councils that are based on a sensible geography and economic area?</p>	Strongly Agree	<ul style="list-style-type: none"> • Distinct geographies reflected: The three proposed unitaries (including modified boundaries for the proposed Greater Norwich authority) reflect real-world patterns of how people live, work, and travel, rather than boundaries set in 1974. This ensures the proposed councils are rooted in genuine communities (city, coast, countryside). • Functional economic areas: Each unitary is designed around coherent economic zones: <ul style="list-style-type: none"> ◦ <i>Greater Norwich:</i> A fast-growing city-region and economic engine with strong knowledge, creative, and life sciences sectors. ◦ <i>East Norfolk:</i> The “Energy Coast,” with nationally significant assets for UK energy security, natural gas, offshore wind, carbon capture; and one of the UK’s largest tourism destinations. ◦ <i>West Norfolk:</i> A productive rural heartland making a significant contribution to UK food security with agri-tech, advanced manufacturing, and strategic connectivity to key UK markets and population centres (particularly in the South and Midlands regions). • Balanced tax bases and sustainability: The model creates three authorities with robust and balanced tax bases, avoiding undue advantage or disadvantage for any area and ensuring financial resilience for the future. • Supports housing and growth: Logical boundaries enable coordinated housing delivery and infrastructure planning while responding to local needs through Growth Plans and Spatial Development Strategies. • Respects local identity: The three unitary proposal considers the cultural and historic importance of the three key conurbations in Norfolk anchoring councils in Norwich, Great Yarmouth, and King’s Lynn and protecting distinct rural, coastal, and urban identities.
<p>2. To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?</p>	Strongly Agree	<ul style="list-style-type: none"> • Clear, evidence-based design: The three unitary proposal is grounded in robust analysis of demographics, service demand, and financial sustainability, ensuring each council is fit-for-purpose from day one. • Financial resilience and efficiency: Modelling shows cumulative savings of £220m over eight years, with breakeven by Year 4 and recurring annual savings of £49m, enabling reinvestment in frontline services.

		<ul style="list-style-type: none"> • Tailored service models: Each unitary will implement bespoke operating models aligned to local needs (urban deprivation and deep inequalities in Greater Norwich, coastal challenges in East Norfolk, and rural isolation in West Norfolk) rather than a one-size-fits-all approach. The different demographics and populations of the three proposed unitary councils require different approaches - for example planning the provision of additional school places in Greater Norwich and managing “surplus” school places in some communities in the proposed East Norfolk unitary council area where high second and holiday home ownership and people retiring to the area means the area has fewer young people and families; and also the provision of adult social care services which in Norfolk is highly centralised, creating real issues of access for rural communities in the proposed East and West Norfolk unitary authorities. • Focus on prevention and innovation: All three councils will embed early intervention and prevention strategies, reducing demand for acute services and improving long-term outcomes for residents based on the particular context and needs of the residents of their respective areas. • Significant capacity for transformation: The proposal includes investment in digital services, streamlined processes, and workforce integration, ensuring each of the councils can modernise and deliver high-quality, sustainable services tailored to the specific needs of their areas. • Strong local engagement: Over 5,000 survey responses and 100+ engagement events demonstrate that the design reflects community priorities, increasing the likelihood of successful implementation. • Alignment with strategic growth: The three councils would be positioned to unlock housing, infrastructure, and economic opportunities through partnership with the Mayoral Combined Authority, supporting inclusive growth across all parts of Norfolk – which would be more difficult in terms of prioritisation in a single or two unitary model. • Broads Authority Executive Area: The three-unitary proposal would place the vast majority of the Broads Authority Executive area – including the majority of the most sensitive landscape and ecological areas and areas at risk of greatest change through rising sea levels, saline incursion and tidal locking within a single unitary authority area – i.e the East Norfolk unitary, allowing stronger collaboration and efficient engagement and service delivery practices to be adopted.
3. To what extent do you agree or disagree that the proposed councils	Strongly Agree	<ul style="list-style-type: none"> • Optimal balance of scale and local responsiveness: Each proposed unitary has a population between 278,000 and 336,000, each being large enough to achieve efficiencies but small enough to remain close to and reflect the needs of their communities.

<p>are the right size to be efficient, improve capacity and withstand financial shocks?</p>		<ul style="list-style-type: none"> • Meets Government criteria for resilience: While below the 500,000 population guideline, the three unitary proposal justifies this with strong evidence of functional need and strategic opportunity, ensuring councils which would be able to deliver sustainable services without a democratic deficit through large councillor:elector ratios. • Financial sustainability from day one: Baseline modelling shows all three councils start in a viable position, with projected cumulative savings of £220m over eight years and recurring annual savings of £49m. • Avoids single-point failure risk: A single county unitary would concentrate financial and operational risk in one structure. Three councils distribute risk and create more resilient organisations. • Capacity for transformation: Each council will have sufficient tax base and organisational scale to invest in digital innovation and preventative service models. • Supports efficiency without remoteness: The three unitary model avoids the inefficiencies and democratic deficit of a “mega-council”, while still enabling economies of scale through shared procurement and collaboration.
<p>4. To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?</p>	<p>Strongly Agree</p>	<ul style="list-style-type: none"> • Designed for transformation: The three unitary proposal would establish councils built to deliver modern, preventative, and integrated services. Investment in digitally enabled services and streamlined processes will improve accessibility, reduce duplication, and free resources for frontline delivery. • Prevention-focused model: Each unitary will embed early intervention strategies across social care, housing, and health, tailored to the particular demographic and social needs of their residents and communities, reducing demand for costly crisis services and improving long-term outcomes. • Tailored to local needs: Service delivery models would be bespoke and tailored to meet the specific needs of each area (urban deprivation in Greater Norwich, coastal challenges in East Norfolk, and rural isolation in West Norfolk) ensuring relevance and effectiveness. • Integration with partners: The model aligns with NHS reforms and other public services, enabling joined-up delivery and better co-ordination across health, education, and community support. • Financial sustainability underpins quality: Robust modelling shows recurring annual savings of £49m and cumulative benefits of £220m by Year 8, ensuring all three councils could maintain and improve services without compromising quality.

		<ul style="list-style-type: none"> • Evidence-led and engagement-driven: Service design would be informed by extensive engagement with residents and partners, ensuring priorities reflected real community needs and expectations.
<p>5. To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?</p>	Strongly Agree	<ul style="list-style-type: none"> • Extensive engagement programme: Over 5,403 survey responses, 100+ public and partner events, and direct contact with 304,500 households show strong public involvement. • Broad stakeholder input: Town and parish councils, MPs, businesses, voluntary sector, health and education partners all contributed, ensuring diverse perspectives shaped the proposal. • Clear alignment with community priorities: Feedback emphasised accountability, local identity, and financial sustainability which are core principles embedded in the design of the proposal. • Place-based approach: Each unitary reflects distinct local needs: <ul style="list-style-type: none"> • Greater Norwich: Tackles urban deprivation and housing pressures and promotes key economic opportunities in high growth sectors of finance, bio-science R&D, creative industries. • East Norfolk: Addresses coastal challenges, energy sector growth, and rural isolation. • West Norfolk: Focuses on ageing population, connectivity, and rural service delivery. • Strong political backing: Supported by 8 out of 10 Norfolk MPs, demonstrating broad democratic and cross-party endorsement. • Support from town and parish councils:- The three unitary proposal envisages maintaining and building upon existing relationships with town and parish councils where relationships are strong in terms of local policy development (Neighbourhood Plans), rural exceptions housing developments, discretionary service provision of place-based services.
<p>6. To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements, for example, the establishment of a strategic authority?</p>	Strongly Agree	<ul style="list-style-type: none"> • Strengthens regional governance: The three-unitary model creates balanced representation within the Norfolk & Suffolk Mayoral Combined County Authority (MCCA) - avoiding dominance by any single area and ensuring urban, rural, and coastal voices are heard. • Enables strategic planning with local delivery: The three councils will focus on local service delivery while the MCCA would handle regional priorities like transport, housing, skills, and infrastructure and this model will align local needs with strategic investment. • Locally informed delivery: the proposal for three unitary councils will provide the skills, resources, and local knowledge needed to support the MCCA's commissioning model, ensuring effective delivery of major projects.

		<ul style="list-style-type: none"> • Strong geographies for economic growth: Each unitary reflects a defined functional economic area, enabling coherent collaboration on regional priorities such as clean energy, agri-tech, and housing, but ensuring they are shaped for successful local delivery. • Aligns with Government's devolution agenda: The model meets Local Government Reorganisation criteria by creating councils that can partner effectively with a strategic authority to unlock investment and accelerate growth.
<p>7. To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?</p>	Strongly Agree	<ul style="list-style-type: none"> • Designed for local accountability: The three-unitary model provides greater democratic accountability than the other proposals, ensuring residents can easily identify and contact their local elected members and make their voices heard. • Neighbourhood-level structures: Each proposed council will deliver specific locally shaped frameworks for community engagement, including enhanced roles for town and parish councils and new democratic models for unparished urban areas. • Reflects feedback on visibility and access: Engagement findings show residents value knowing their councillors and having decisions made by people who understand their community. • Closer decision-making: Councils will operate at a scale that allows decisions to be made nearer to communities, improving responsiveness and trust. • Empowers local identity: The model respects cultural and historic importance, anchoring councils in Norwich, Great Yarmouth, and King's Lynn while supporting neighbourhood-level influence.
<p>This proposal is accompanied by a request that the Secretary of State considers boundary change. To what extent do you agree or disagree that the proposal sets out a strong public services and financial sustainability justification for boundary change?</p>	Strongly Agree	<ul style="list-style-type: none"> • Unlocks Greater Norwich's growth potential: Adjusting the existing district council boundaries between Norwich City Council and the Broadland and South Norfolk Councils to take in immediately adjacent suburbs of the city would allow Norwich to expand beyond its current constrained (1974) boundaries to incorporate key suburbs and economic hubs that already identify as being part of the city. This would enable the city to grow uninhibited, supporting housing delivery, infrastructure, and its role as Norfolk's economic engine. • Aligns with functional geographies: Moves away from arbitrary historic lines to create councils that reflect real communities and economic patterns of the residents they support. • Improves service delivery: The proposed boundary changes within the immediate area of Norwich would allow each of the three unitary councils to design services around the specific needs of their

		<p>residents rather than presenting a one-size-fits-all approach without reference to local context, demographics etc.</p> <ul style="list-style-type: none"> • Financial sustainable: Modelling shows all three councils would be viable from day one, with cumulative savings of £220m over eight years and recurring annual savings of £49m. Ensuring that all have tax bases of a suitable size that will continue to grow and support them in the longer term. • Avoids structural weaknesses: Prevents importing Norfolk County Council's financial fragility and significant debt profile into a single authority, reducing risk and improving resilience. • Supports housing and infrastructure growth: Logical boundaries enable coordinated planning for homes and transport that meet the needs of the local communities and address significant social demographic challenges. • Responds to engagement feedback: Residents and stakeholders supported a council model that reflects local identity and functionality, leading to the limited boundary changes that are being proposed in the immediate Norwich area but not proposing more extensive and radical changes involving risks of service aggregation / disaggregation. • Strong political backing: Supported by 6 out of the 8 Norfolk Councils and 8 out of 10 of Norfolk's MPs, reinforcing confidence that these changes are necessary and future-proofed.
<p>Comments on the complementarity of this proposal with proposals for local government reorganisation in Suffolk</p>		<ul style="list-style-type: none"> • Synergy with proposals made for three unitary councils in Suffolk: Whilst it is acknowledged that Suffolk has a smaller population (760,000 people) than Norfolk (932,000 people) and that proposals made by the district councils in Suffolk for three unitary councils will be at the smaller end of what Government might deem viable or sustainable; there are strong synergies between the three unitary proposals in the two counties. <ul style="list-style-type: none"> • East Norfolk / East Suffolk – these councils both share significant economic and structural / place-based similarities – with significant employment and economic opportunities in the clean / renewable energy sector and large strategic (energy) infrastructure projects; a strong tourism offer; a large resort and port town (Great Yarmouth and Lowestoft) with a concentration urban deprivation and extensive rural hinterlands with a patchwork of market and coastal towns acting as service centres but with housing pressures driven by large numbers of second and holiday homes. Significant issues with coast protection and adaptation policies, and issues of relatively poor connectivity both within and beyond the two council areas due to their coastal locations and poor road and rail connections,

- **Greater Norwich / Greater Ipswich** – these councils both share similarities in being the principal city or town in the respective counties with urban concentration within restricted historic boundaries and significant growth pressures being accommodated in adjoining suburban communities / areas. Concentration of employment in high order public services, health, retail, leisure offerings, financial and professional services, research and development (Norwich Research Park and Adastral Park, Martlesham) with good strategic road (A11 / A14) and rail access (East Anglian mainline) and rural rail lines, and championship football clubs!
- **West Norfolk and West Suffolk** – these councils have similar economic structures with a concentration of employment in the agri-tech and food processing sectors, defence and logistics sectors and have (in the context of Norfolk and Suffolk) good strategic road and rail connections to Cambridge, the Midlands and South via the A10, A11, A14. Whilst the two councils serve large, dispersed rural communities the principal towns of Bury St Edmunds, Kings Lynn, Thetford, Haverhill, Stowmarket and Newmarket are of larger population and scale than many towns in the proposed East Norfolk and East Suffolk unitary areas.
- **Relationships with the proposed Norfolk and Suffolk Combined Mayoral Authority** – a three unitary council model in both Norfolk and Suffolk would support and engage well with the emerging Mayoral Combined Authority. The three unitary council model outlined for the two counties above would challenge traditional Norfolk and Suffolk rivalries / perceptions as the “paired” model of similar unitary councils in the two counties based on similar economies, urban / rural character and demographics would ensure that the mayoral authority would take decisions based upon strongly evidenced business cases and not on the basis of “who shouts the loudest”, urban priorities or through “backing-winners” which might otherwise see coastal and rural areas left behind.
- **Inclusive growth:** North Norfolk District Council strongly believes that each of the two counties adopting a three unitary council model will present the best opportunity for residents and communities across Norfolk and Suffolk, through the Mayoral Combined Authority, to move forward positively, ensuring that everyone can share in the benefits of future balanced growth with no-one “being “left behind”.

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