



LOCAL GOVERNMENT REORGANISATION

A PROPOSAL FOR A THREE UNITARY MODEL FOR NORFOLK

Prepared on behalf of:

Borough Council of King's Lynn & West Norfolk,

Breckland District Council,

Broadland District Council,

Great Yarmouth Borough Council,

North Norfolk District Council,

and Norwich City Council

[SEPTEMBER 2025]

1. Foreword: Future Norfolk - People, Place Progress

The Government's Local Government Reorganisation (LGR) agenda represents the biggest opportunity to optimise local service delivery in over 50 years. We are embracing that opportunity as we want to deliver and achieve the best outcome for Norfolk's residents and businesses.

At the heart of our proposal are three guiding / fundamental principles:

- People – Services focused on people's needs, with decisions being made closer to communities, giving a stronger voice for residents and businesses.
- Place – Services shaped by the distinct identities and priorities of our rural, coastal, market town and city communities.
- Progress – A model that is financially sustainable, adaptable and accountable, which looks to the future and involves wider public service reform.

Norfolk, as one of the largest counties in England, covers an area of more than 2,074 square miles with a population of more than 930,000 living in city, coast and countryside communities. Our proposal sets out our collective vision for the future of local government in Norfolk: The Strength of Three, built around creating three new unitary councils. Councils for each of these communities that are big enough to deliver, but close enough to residents and communities to reflect local needs, priorities, ambitions and opportunities in the years ahead and built to deliver sustainable services for the long term.

We have chosen to meet the challenge of LGR with ambition and unity, guided by evidence and shaped by the views of residents, businesses and partners across the county. We have worked collaboratively – across parties, borders, and sectors – to build the strongest possible case.

Our proposal goes beyond structures. It is about councils that are resilient, responsive and accountable. Councils that shift focus and effort towards prevention, reduce avoidable demand and adopt new partnerships where they add value. Councils which can develop a strong place-based, neighbourhood agenda in Norfolk, and help their places and communities become engines for growth as well as positive change.

We have listened, tested options and built a case grounded in evidence and engagement. We will continue to communicate clearly as we move forward so our residents, businesses, partners and staff know what will change, when and why.

We do not underestimate the challenges of change, nor the responsibility to protect vital services. We will manage change carefully, maintain service continuity and support our workforce. We are confident that our proposals present the best way forward and future for Norfolk – through a model that honours the past, meets today's needs and prepares positively for the future.



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2. Executive summary

The reorganisation of local government is a once in a generation opportunity to deliver reform, renewal and innovation in how we serve our communities and create the best path to inclusive growth and prosperity for people across the whole of Norfolk.

We are responding directly to the Government's ambition to reshape local government around local need and opportunity, unlocking a decade of renewal of our public services, economy and society and believe that three unitary councils are the best route to realise this vision and fully unleash the potential of our county.

Three unitary councils serving three distinct geographies and communities across our large and diverse county: a predominantly rural authority in the West, a predominantly rural and coastal authority, with a deep connection to inland market towns and villages in the East, and a vibrant city authority, recognising and unlocking the wider geography, and economic potential of a Greater Norwich.

We have come together as six collaborating authorities, under different political leadership and with distinct local priorities, opportunities and challenges because - together - we are united in our determination to deliver the best future for our communities and our county so that Norfolk can play its fullest part in supporting the Government's Plan for Change and the future growth and success of our country.

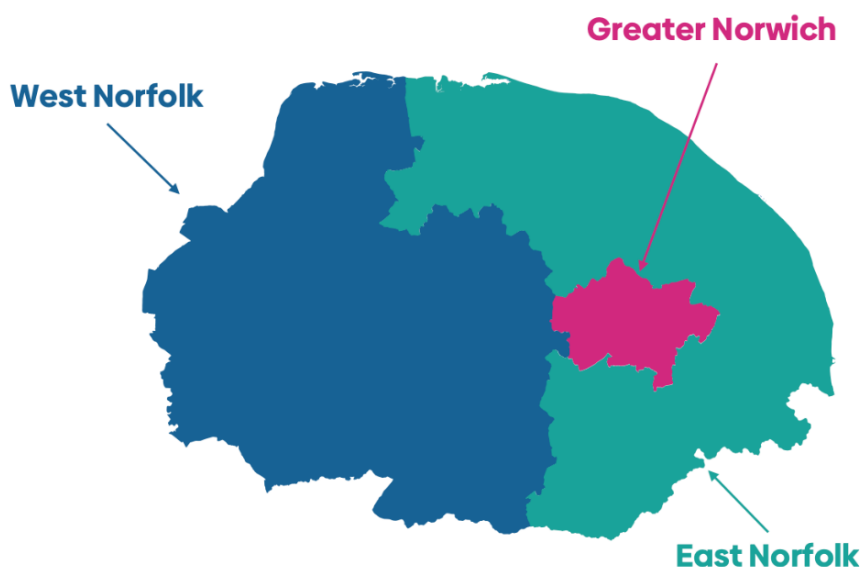


Figure 1: The three unitaries and their boundaries

Our proposal delivers:

- Three local authorities which are of significant size and scale.
- Three authorities which reflect the distinctive and meaningful geographies across our county, from city to coast to countryside.
- Three authorities which are anchored in our historic city and towns of Norwich, Great Yarmouth and King's Lynn.
- Three authorities which have economic opportunities which, partnering with our new Combined Authority, can unlock new homes, new skills and new jobs for local people.
- Three authorities whose communities are different, with distinct needs best served by locally-tailored public services.
- Three authorities which are financially sustainable, safe and legal, with real opportunities to drive efficiencies, savings and local benefit.

Norfolk, to the Power of Three

City, Coast, Countryside. Three distinctive places with different challenges, different demographics, different geographies and different opportunities. Three unitary councils of significant size and scale, each with the ability to bring something unique and important both to innovation in public service reform and to driving economic and housing growth in partnership with the new Mayoral Strategic Authority (MSA). Each new authority would be financially sustainable, each would have a significant and sizeable tax base, and each offers the opportunity to design public services that genuinely meet the different local conditions across our large county.

Our proposal is clear that the 1974 boundaries of existing districts and boroughs in Norfolk do not align to functional economies and the way our residents live their lives in 2025 in a way that would serve as a sensible basis for new authorities. Therefore, while our proposal will see five whole existing districts form the building blocks of new authorities, we have also concluded that the only way to truly engage with the spirit of the Government's approach to LGR is to split the districts of Broadland and South Norfolk. Our proposed boundaries best represent local identity, and realise the full potential of Greater Norwich, and the distinctly different economies of East and West Norfolk. Three unitary authorities create balance for the MSA and present real opportunities for Norfolk to be at the forefront of public service reform, innovation and renewal.

We recognise that the Government will be presented with alternative proposals. We believe our proposal stands apart from these as the best, most positive and optimistic option for the county, reflecting issues as they face our residents, businesses and communities today – with a hopeful outlook to what we can accomplish together in the future.

Discounted Options

We believe a single county unitary with a population close to 1 million would be too large, as the second largest council in the country after Birmingham by population, and to North Yorkshire by area, covering over 2,000 square miles. It would be too distant and remote for some residents and communities being over an hour from County Hall and will just deliver more of what our residents already receive, rather than offering an agile path to better, more preventative, locally responsive public services. Compared to a 'three' model, a single unitary would reduce accountability, create a democratic deficit, and reduce the ability to service the electorate in an effective way.

A two unitary model, based on existing district boundaries has two key weaknesses. Firstly, to create two authorities of broadly similar populations, the boundary of the suggested Western Authority would stretch across the north of the county, to the east of Norwich and just 11 miles from Great Yarmouth, with no respect to local identity, functional economies or the ability to provide services in a way that responds to local distinctiveness and local conditions. Secondly, Norwich, one of England's Fast Growth cities, would be subsumed within a predominantly rural and coastal unitary, creating a tension between competing parts of the new unitary, rather than enabling each area to focus on its own strengths and opportunities.

We have considered a three unitary model based upon existing boundaries, but we do not think this is a viable option because of fundamental shortcomings relating to suitable size, financial resilience and inability to reflect real-world economic and geographic areas in Norfolk. We therefore request to submit a modified proposal for three unitaries, based on existing district and borough boundaries.

This process is an opportunity to design fit-for-purpose authorities which can provide the strongest, most sustainable and purposeful basis for local governance in Norfolk in the twenty-first century. We do not believe that tying today's decision to an arbitrary

set of boundaries from 51 years ago is a logical or appropriate response to the scale of the task.

We therefore ask that the Government recognise that this is a proposal seeking the support of the Secretary of State for a three unitary proposal for Norfolk, that requires some modest boundary changes which our proposal advocates.

Three Unitaries of Sufficient Size and Scale

We are proposing three unitary councils that are of sufficient size and scale to stand the test of time, while also being close to their residents and communities, recognised as genuine places that residents can connect with, and with the bandwidth to genuinely respond to and empower local neighbourhoods as part of the Government's vision for local decision making. We are all proud to be part of a historic county, and our pride is as much rooted in our diversity and the differences across this place, reflecting our long history from the Hanseatic League in King's Lynn, Great Yarmouth's Charter of 1208 and England's historic former second city in Norwich.

Greater Norwich

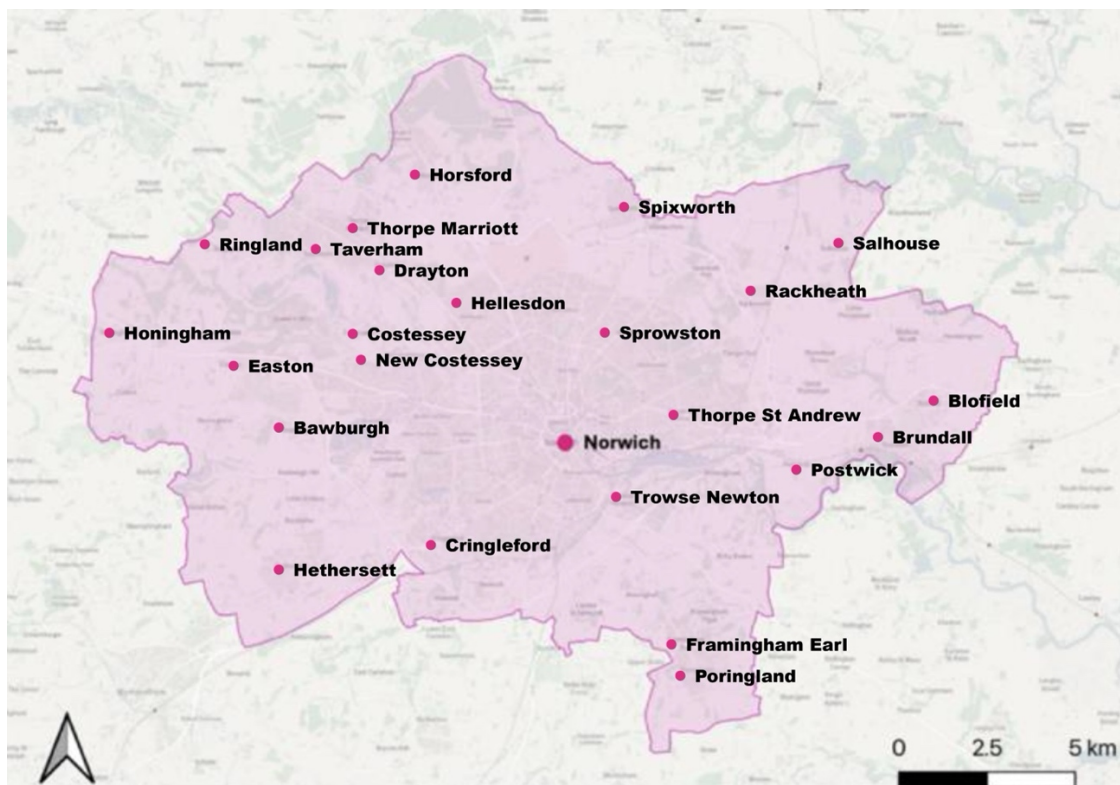


Figure 2: Map of the proposed boundaries of Greater Norwich

Greater Norwich, anchored on the historic city of Norwich, has a population of over 278,000¹ forecast to rise to over 333,000 by 2035. Greater Norwich would be the 23rd largest of the 54 existing unitary councils in the country by population and is already larger than established city unitary councils like Brighton and Hove, Kingston upon Hull, Plymouth, Southampton and York.

East Norfolk

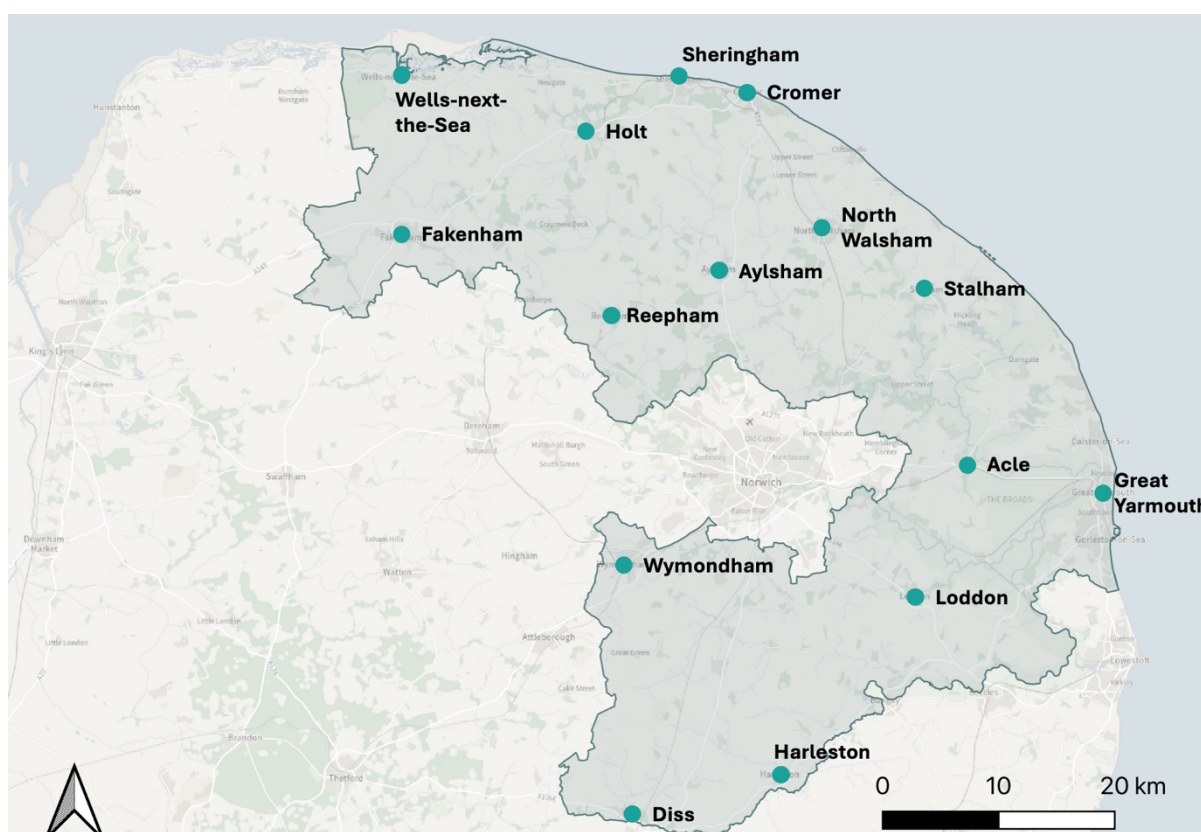


Figure 3: Map of the proposed boundaries of East Norfolk

East Norfolk, anchored in the historic town of Great Yarmouth, has a population of over 336,000 residents, forecast to rise to over 406,000 by 2035. If it was already a unitary council then it would be the 16th largest by population of the 54 unitary councils in England, larger than city unitaries like Nottingham and some single county unitaries like Northumberland and Shropshire.

¹ Based on 2021 census data. The same source applies for East and West Norfolk population figures

West Norfolk



Figure 4: Map of the proposed boundaries of West Norfolk

West Norfolk, anchored in the historic town of King's Lynn has a population of just over 300,000 residents, forecast to rise to over 360,000 by 2035. West Norfolk would be the 19th largest of the 54 existing unitary councils in the country by population and is already larger than existing part-county unitaries like Central Bedfordshire, South Gloucestershire, Medway or either of the two new Cumbria unitaries established in 2023.

Unlocking Growth & Prosperity Across Norfolk

Our proposal ensures that the economic and housing growth opportunities across the county can be unlocked with a degree of local focus and that our new Mayoral Strategic Authority (MSA) across Norfolk and Suffolk has constituent members and partners which can ensure effective delivery of an ambitious agenda at pace.

Three councils, each with distinctive opportunities for economic growth, and already with strong plans for additional housing and regeneration, will be able to partner with

the Mayoral Combined County Authority through Mayoral Development Corporations, the development of the Local Growth Plan and the Spatial Development Strategy. This will ensure that every part of Norfolk has a voice and a strong hand in shaping a more prosperous future for all our residents, wherever they live.

A single county unitary would not have the ability to represent the interests of every part of Norfolk within the MSA. A single council would inevitably focus on a small number of “big” projects and initiatives, rather than having more local connections and an ability to respond to opportunity in every community; this would just be “more of the same” where some parts of the county have been overlooked and “left behind”. Similarly, a two unitary proposal, with Norwich subsumed in a larger authority will be pulled in competing directions, between the needs of agriculture and manufacturing in more rural areas, nationally significant clean energy along the coast and the potential of a fast-growing, university city. Our three unitary proposal would allow communities across Norfolk to have a voice and play to their greatest strengths in the strongest of partnerships.

Greater Norwich

Greater Norwich has an economy of £9.9bn, supporting 158,000 jobs and over 10,500 businesses. It is the economically dominant urban area within the new Norfolk and Suffolk Combined Authority. Since 2010 the economy of Greater Norwich has grown by 64%. However, the city economy far exceeds the constrained 1974 boundaries of the City of Norwich, with 54% of Greater Norwich’s GVA and 47% of its jobs being in the neighbouring districts of Broadland and South Norfolk where many residents live but have no say in the future of the city that they identify with. It has an international reputation, with institutions such as the Norwich Research Park and its status as a UNESCO City of Literature.

A Greater Norwich unitary, with boundary changes to bring in adjoining suburbs from Broadland and South Norfolk, but without incorporating large areas of rural Norfolk, will consolidate and unlock further, faster growth in a creative and scientific powerhouse.

East Norfolk

The Norfolk coast is at the forefront of not only an established and vibrant tourist and visitor economy underpinned by strengths in arts and culture, but also an internationally-significant clean energy cluster. Our geography spans nationally significant assets in offshore wind, carbon capture, pan-European energy

transmission, and the potential for significant hydrogen infrastructure, anchored by Great Yarmouth's Energy Coast and the Bacton Energy Hub. The success of East Norfolk is critical to the UK's energy transition and energy security. Inland, our area supports strong supply chains in manufacturing and engineering, including at the Hethel Engineering Centre. It is also characterised by protected landscapes including the Norfolk Broads National Park and North Norfolk coastline, alongside thriving market towns, and significant centres for agricultural production.

Yet these opportunities stand alongside pockets of profound deprivation and exclusion from opportunity - and frontline challenges such as coastal erosion - which could be overlooked within a much larger, more aggregated authority where East Norfolk is merged with Norwich within a single county unitary. We believe a more locally focused authority, with significant scale, can best address underlying structural challenges, unlock the potential for further growth of national importance to the climate transition and energy security agendas and help to foster more inclusive, prosperous futures for our residents.

West Norfolk

As a rural area, West Norfolk's economy is fundamentally different from the city of Norwich or the coast in the East. There is a strong industrial base in manufacturing and engineering around King's Lynn and Thetford, a concentration of Armed Forces activity, and some of England's most productive agricultural areas, enhanced by a growing Agri-Tech sector. From the Brecks and Fens to Sandringham and the coast at Hunstanton, with ancient and historic market towns, there is a strong and growing visitor economy. These economic strengths are balanced by challenges in low pay and low skills in parts of our economy. These are distinct local challenges, which necessitate boundary changes to better reflect the area's geography and economic characteristics, which in delivery will require a local response in partnership with our new Mayor and Combined County Authority.

West Norfolk is the gateway from the rest of Norfolk into Cambridgeshire, the Midlands and Lincolnshire, looking outwards into the country, whilst also connecting back to the rest of the county. This strategic connectivity and the strength of its local economic output risks being overlooked if subsumed into either a single county unitary, or a larger unitary in a two-council model, which would stretch from Thetford and Downham Market round the north of the county to the fringes of Great Yarmouth.

Innovation, Reform & Prevention in Public Services

Norfolk is a large county with a population just shy of a million people. It takes over two hours to travel by train from Great Yarmouth or Cromer to King's Lynn (via Cambridgeshire) and almost two hours from King's Lynn to Norwich via public transport. It should come as no surprise that the lives led by those in coastal communities facing the North Sea are different from those lived by people in the fast-growing city of Norwich or in market towns in the countryside like Downham Market. A one size fits all approach for almost a million people over more than 2000 square miles will always struggle to innovate and operate with agility.

Our proposal recognises the distinct demographic profiles of each area, and that each has different challenges, different opportunities and different local partnerships. Our proposal recognises, given the size of Norfolk, that many other public services and partnerships are already aligned around a place-based approach which could map well onto three new unitaries. We have three acute hospitals and Further Educational Colleges, distributed across our three proposed unitaries and the police are looking to work across three operational areas. We strongly believe that we can secure better integration and partnership through a model of three unitary councils than through any other configuration.

Others are proposing a simplistic consolidation of services – a “lift and shift”, with more of the same, as proposed for a single council or two unitary councils in Norfolk. However, we reject this approach. Instead, we are proposing a more radical response to public service reform across Norfolk based on three distinct areas: a fast-growing city – Greater Norwich, coastal and rural communities of East Norfolk, and in the gateway to Norfolk of a Western authority based around the deep countryside of The Brecks and Fens.

Our vision is one that breaks down siloed ways of working and makes the most of this moment – to shape entirely new organisations around the distinct needs of their residents, businesses and communities with Early Intervention and Prevention as a guiding principle, rather than gatekeeping until crises hit. Our detailed approach to design principles for our three proposed authorities has meant that our savings and financial resilience proposals are anchored in a detailed analysis of place, of benchmarking, data analytics and of how we can change the local system to deliver much better outcomes for our residents.

Across Norfolk we are excited, ambitious and committed to take forward a bold reform agenda which embeds a test, learn and grow approach to public services in the design of our three new authorities.

Greater Norwich

Greater Norwich is distinctly different. The population is younger, more diverse and housed more densely than the rest of the county. A sizeable graduate population co-exists with over a third of children in the city living in poverty and a 15-year life expectancy gap across the proposed authority.

As a unitary, Greater Norwich will be able to take a single, coordinated approach to addressing these inequalities – integrating public health, housing and wider resident support into one system of delivery. Decisions can be made with a deep understanding of local communities, whether in urban estates and neighbourhoods facing entrenched deprivation or in expanding suburbs where hidden need may be shaped by limited transport connections.

East Norfolk

While East Norfolk is an area that encompasses prosperous market towns within the countryside, it is an area that also includes coastal communities facing significant deprivation and exclusion. 36.4% of our households are deprived in at least one dimension and in Great Yarmouth, 23% of residents report living with long-term illness or disability.

Our ageing population, rural isolation, low skills base and persistent deprivation require a model that is flexible, preventative and rooted in place. LGR gives us the opportunity to design services that meet these needs through innovation in delivery, digital transformation and data-informed decision-making. This will mean planning flexibly for an ageing society, tackling health inequalities, expanding training and digital access, and aligning housing growth with employment opportunities. This is our growth mission: to unlock productivity, empower communities and deliver better outcomes for residents across East Norfolk.

West Norfolk

West Norfolk has an older population than the English average and overall has poorer health outcomes than the national average and higher levels of isolation and frailty.

These challenges require a bespoke and locally focused response, rather than sharing an approach with areas with very different issues.

Given West Norfolk's pressures from an ageing population, poor health outcomes and distance from acute health support, there is a need to develop an Early Intervention and Prevention offer that places ageing well at its heart. Support will be relational and strengths-based, recognising the whole picture of housing, health, work and family life. Multidisciplinary teams will coordinate responses, so residents only tell their story once, with case leadership shifting seamlessly as needs change.

Financially Sustainable Authorities

Our proposal will deliver three financially sustainable, safe and legal authorities from day one, each with sufficiently strong tax bases, with a focus on maximising the opportunity for sustainable, inclusive growth in each of the three unitaries in Norfolk.

We have taken a robust, evidence-led approach to reviewing financial sustainability, working across the county to review all available financial data and to seek to ensure a fair and equitable analysis. Our baseline 'scenario zero' of what would happen if all three unitary councils had come into being on 1st April 2025, through simple consolidation of existing budgets, without any benefits of rationalisation or public service reform, clearly identifies that all three would be sustainable, with budget surpluses or deficits within reasonable parameters.

However, once we apply the consequences of our blueprints for new operating models for the new councils and key services we are able to generate cumulative net benefits to the balance sheets of the new councils of £220m over eight years with all transition costs fully repaid early in the fourth year of the new authorities and thereafter recurring net benefits of over £49m a year. This is all before Fair Funding and Business Rate Revaluation is taken into account.

3. Introduction

Our proposal for three new unitary councils across Norfolk is set out across four core documents plus a supporting technical appendix:

- A proposal for the **three unitary model** for Norfolk, setting out why this is the best option, how it meets the Government criteria, the extensive stakeholder engagement exercise that has underpinned it, and how the three unitary councils will deliver public service reform, financial stability, and how they will be implemented.
- Three area proposals for **Greater Norfolk, West Norfolk, and East Norfolk**, describing their economic and demographic distinctiveness, how democratic representation and engagement will work, the distinct 'target operating model' for service delivery in each area, and how they will create financially resilient authorities.
- An **Appendix** that gathers together further details and analysis on each element of the proposal.

4. Assessment against government criteria

LGR government criteria	How the three unitaries proposal meets each of the criteria	Relevant section of the proposal
UNITARY LOCAL GOVERNMENT & OUR APPROACH		
A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government.	Under this proposal, a single tier of local government is achieved as three new unitary authorities are created from the current two-tier, eight authority system – an East Norfolk, a West Norfolk and a Greater Norwich. In developing this case for a three unitary Norfolk we have undertaken an options appraisal of the alternatives using the government's Local Government Reorganisation criteria to ensure we are proposing the best option for our region.	<i>Sections 4 and 5 within the area proposals</i>
Proposals should be for sensible economic areas, with an appropriate tax base which does not create an undue advantage of disadvantage for one part of the area.	Each of the three-unitary areas creates a sensible economic area with balanced tax bases across the three and each is designed to recognise the different economic roles, social needs, and service demands across Norfolk's varied geographies. East Norfolk, West Norfolk and Greater Norwich each bring distinct economic strengths, social needs, and service delivery challenges. Yet,	<i>Overview in Executive summary</i> <i>Sections 2 and 3 in area proposals</i> <i>Further details within the Boundaries section within the Appendices</i>

LGR government criteria	How the three unitaries proposal meets each of the criteria	Relevant section of the proposal
	they also share a common ambition: to build a more prosperous, equitable, and sustainable future for everyone in Norfolk.	
Proposals should be for a sensible geography which will help to increase housing supply and meet local needs.	The three-unitary model will deliver on the Government's mission to increase housing supply as it can respond to local needs but also act in a coordinated way. Devolution will add value as Growth Plans and Spatial Development Strategies will allow coordinated action, whilst the new unitaries can ensure local needs are met.	<i>Sections 3 and 4 in area proposals</i> <i>Further details within Appendix D - Boundaries.</i>
Proposals should be supported by robust evidence and analysis and include an explanation of the outcomes it is expected to achieve, including evidence of estimated costs/benefits and local engagement.	The development of the proposed service delivery models has been informed by a comprehensive engagement exercise including council members, key stakeholders, and residents across Norfolk. We have also assessed the financial implications of reorganisation which estimated the costs, savings, and income implications of the three-unitary model.	<i>Section 7</i> <i>Sections 5 and 6 in area proposals</i>
Proposals should clearly describe the single tier local government structures it is putting forward for the	Our proposal for each area sets out how the new unitary councils will have the powers, capacity and leadership at the	<i>Sections 4 and 5 in area proposals</i>

LGR government criteria	How the three unitaries proposal meets each of the criteria	Relevant section of the proposal
whole of the area, and explain how, if implemented, these areas expected to achieve the outcomes described.	optimum spatial scale and proximity to residents to respond to the challenges and opportunities of each place. This will allow people to live better lives of their choosing, reduce demand on services, and contribute to Government priorities around growth and housing.	
UNITARY LOCAL GOVERNMENT CRITERIA		
Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.	Our three-unitary councils are the right size to achieve efficiencies, improve capacity and withstand financial shocks as they deliver the optimal balance between scale and responsiveness. Our model prioritises the delivery of high quality and sustainable public services above all else. It achieves efficiencies, strengthens organisational capacity, and creates financially resilient councils capable of withstanding shocks without importing the county's existing weaknesses into a single point of failure.	<i>Section 7</i> <i>Section 6 within area proposals</i>
As a guiding principle, new councils should aim for a population of 500,000 or more.	The total population of the three unitary areas is 916,521. Greater Norwich has 278,285 residents, East Norfolk has	<i>Overview in Executive Summary</i>

LGR government criteria	How the three unitaries proposal meets each of the criteria	Relevant section of the proposal
	336,524 residents and West Norfolk has 301,712 residents.	<i>Section 3 in area proposals</i>
There may be certain scenarios in which this 500,000 figure does not make sense for an area, including on devolution, and this rationale should be set out in a proposal.	While the populations of our proposed the three unitary model are below the 500,000 figure typically cited in government guidance, our economic, demographic, and service delivery distinctiveness warrant a bespoke governance model. The case for unitarisation should not be built on strict adherence to population size, but on functional need and strategic opportunity, reflecting distinct opportunities and challenges, and the imperative to align services with the real geography of people's lives.	<i>Overview in Executive Summary</i> <i>Sections 2, 3 and 4 in area proposals</i> <i>Appendix A - Options appraisal.</i>
Efficiencies should be identified to help improve councils' finances and make sure that council taxpayers are getting the best possible value for their money.	Our proposal sets out how efficiencies can be achieved through public service reform and redesign, moving to a preventative model of service delivery which creates efficiencies through reducing cost and reducing demand. Our modelling suggests that £16m of savings will be made by year 1, rising to £56m by Year 4, at which point the cumulative savings will outweigh any upfront investment.	<i>Sections 7.1 and 7.7</i> <i>Section 6 within area proposals</i>

LGR government criteria	How the three unitaries proposal meets each of the criteria	Relevant section of the proposal
Proposals should set out how we will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.	Reorganisation creates upfront transition and disaggregation costs, but we believe these are outweighed by the scale of recurrent savings. Our modelling demonstrates that by Year 6 there is projected to be £56m recurring annual savings and a cumulative net impact of around £220m across the three unitaries. Considering the efficiencies that are possible through both reorganisation and public service reform, we expect that we will be able to meet transition costs over time from existing budgets, including from flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects.	Sections 7.5 - 7.8 and 9 Section 6 within area proposals
PUBLIC SERVICE DELIVERY		
Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.	Our three-unitary model is the optimum way to provide high-quality public services to citizens, as this provides the opportunity to design the new councils from first principles to address the distinct challenges and opportunities of each place, while providing a platform for deep transformation that can yield	Section 7.1 Section 5 within area proposals

LGR government criteria	How the three unitaries proposal meets each of the criteria	Relevant section of the proposal
	optimal savings. This will allow people to live better lives of their choosing (and so reduce demand), as well as maximising the contribution of each area to Government priorities such as prevention, growth and housing.	
Proposals should show how new structures will improve local government and service delivery and should avoid unnecessary fragmentation of services.	The proposal shows how new structures will improve service delivery, as through developing delivery models for each new unitary we have sought to avoid unnecessary fragmentation or disaggregation of key services where a joined-up approach is the optimum solution. These are set out in Section 1.9 of the proposals for each area.	<i>Section 5 within area proposals</i>
Opportunities to deliver public service reform should be identified, including where they will lead to better value for money.	Reorganisation around a three-unitary model offers the best opportunity to deliver real public service reform by addressing the distinct challenges and opportunities in each place and developing distinct operating models that provide a platform for deep transformation and reform as well as yielding optimal savings.	<i>Section 7.1 Section 5 in area proposals</i>
Consideration should be given to the impacts for crucial services such as	As part of our proposals, service delivery models have been scoped for each new unitary for	<i>Section 9</i>

LGR government criteria	How the three unitaries proposal meets each of the criteria	Relevant section of the proposal
social care, children's services, SEND and homelessness, and for wider public services including for public safety.	a wide range of public services including adult social care, children's social care and SEND, housing development and management, homelessness, and a community-based early intervention and prevention model. The proposals also consider a range of place-based and enabling services such as planning, economic development, assets, building control and highways.	<i>Section 5 in area proposals</i> <i>Appendix H - detailed Implementation Map</i> <i>Appendix I - RAID Log</i>
LOCAL ENGAGEMENT		
Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views.	Six district councils of different political control and with different priorities across Norfolk have worked together and created an engagement programme 'Future Norfolk', that has built an informed understanding of the three-unitary model, with an ambition to strengthen democratic accountability, respect local identity and deliver sustainable, adaptable public services. From the outset, we moved from early awareness-raising and listening around the three pillars— People, Place, Progress - that lead us towards a confident, coordinated presentation of	<i>Section 6</i> <i>Sections 3 and 4 in area proposals</i>

LGR government criteria	How the three unitaries proposal meets each of the criteria	Relevant section of the proposal
	views aligned within our proposal that met the Government's criteria.	
It is for councils to decide how best to engage locally in a meaningful and constructive way and this engagement activity should be evidenced in your proposal.	Six district councils of different political control came together under the Future Norfolk partnership to engage with our diverse communities of place and interest. A number of methods and strategies were specifically designed to ensure meaningful and constructive engagement, reflecting the mix of urban, rural and coastal areas. These are outlined in full in Section 5.3	<i>Section 6</i>
Proposals should consider issues of local identity and cultural and historic importance.	Issues of local identity and cultural and historical importance are important elements of 'Place', which is one of the three pillars of our engagement strategy to ensure that the proposals actively and meaningfully considered issues of local identity.	<i>Sections 6.2 - 6.4 Sections 2 and 3 in area proposals</i>
Proposals should include evidence of local engagement, an explanation of the views that have been put forward and how concerns will be addressed.	Section 6.4 provides evidence of the outcomes of the engagement programme, which included over 5,000 survey submissions, 17,800 website visitors, and a reach of nearly 500,000 on social media.	<i>Section 6.4</i>
BOUNDARY CHANGE		

LGR government criteria	How the three unitaries proposal meets each of the criteria	Relevant section of the proposal
Existing district areas should be considered the building blocks for your proposals, but where there is a strong justification more complex boundary changes will be considered.	We considered a three-unitary option that would not involve changing existing council boundaries. In developing this option, it became apparent that it has some critical limitations. This has been discounted in preference of the alternative three-unitary option - involving boundary changes for two of the seven current Norfolk districts. Whilst this would represent a one-off change of boundaries (and the associated extra work) we strongly believe it represents the right long-term LGR decision given the scale and diversity of Norfolk and how our residents live their lives in 2025, compared to 1974. We therefore believe it is worth investing in moving to a model that will be future proof and truly reflects the diverse communities of Norfolk.	<i>Overview in Executive Summary</i> <i>Rationale in section 5</i> <i>Sections 2 and 3 in area proposals</i> <i>Appendix A - Options appraisal</i> <i>Appendix D - Boundaries</i>
DEVOLUTION SUPPORT		
New unitary structures must support devolution arrangements	Our three-unitary model for Norfolk, alongside multiple unitary councils proposed in Suffolk, strengthens devolution and engagement with the Mayoral Strategic Authority by combining strategic regional	<i>Section 8</i>

LGR government criteria	How the three unitaries proposal meets each of the criteria	Relevant section of the proposal
	leadership with strong local representation. It enables balanced decision-making, supports shared priorities like infrastructure, skills, and housing, and ensures diverse voices inform regional governance. This structure fosters inclusive growth and operational resilience while maintaining local accountability and effective collaboration across both counties.	
Where no Mayoral Combined County Authority is already established or agreed then the proposal should set out how it will help unlock devolution.	The three-unitary model for Norfolk strengthens devolution by enabling balanced representation within a Strategic Authority shared with Suffolk. It supports strategic regional planning while preserving local delivery and democratic accountability. With multiple unitaries across the two counties, the model enhances collaboration, aligns with shared economic and infrastructure priorities, and ensures diverse voices inform regional decisions. This structure fosters inclusive growth, operational resilience, and a coherent approach to investment, skills, housing, and	<i>Section 8</i>

LGR government criteria	How the three unitaries proposal meets each of the criteria	Relevant section of the proposal
	transport—unlocking the full potential of Norfolk and Suffolk through coordinated governance.	
Proposals should ensure there are sensible population size ratios between local authorities and any strategic authority, with timelines that work for both priorities.	The proposed three-unitary model for Norfolk, alongside multiple unitaries in Suffolk, creates a Strategic Authority with balanced constituent councils. This structure ensures proportional representation across diverse urban, rural, and coastal populations, avoiding dominance by any single area. It reduces the current 16 councils to six, striking a balance between scale and democratic accountability. The model builds on existing collaboration and preparatory work, aligning with devolution timelines and priorities to ensure a smooth transition and effective governance from the outset.	<i>Section 8</i>
COMMUNITY ENGAGEMENT		
New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.	Specific structures for community engagement and neighbourhood empowerment have been developed for each unitary area, considering both existing town and parish councils and new democratic	Section 4 in area proposals

LGR government criteria	How the three unitaries proposal meets each of the criteria	Relevant section of the proposal
	models and forms of community representation.	
Proposals will need to explain plans to make sure that communities are engaged.	The purpose and objectives of the engagement programme aimed to build an informed understanding of the three-unitary model. These included an objective to give residents a clear understanding of the proposal's aims and benefits, with messages tailored to place while maintaining a county-wide Norfolk identity. Feedback was received that residents wanted councils that understood their place and issues and valued a connection with their elected representatives. The nature of small communities, the presence of multiple town and parish councils across large rural areas, and the need for new neighbourhood structures in unparished urban zones led to agreement that a single county-wide unitary model would result in very high councillor-to-electors ratios, which could undermine effective local engagement and democratic representation.	<i>Section 6</i>
Where there already arrangements in place it	The proposal for each new unitary sets out how existing	<i>Section 4 in area proposals</i>

LGR government criteria	How the three unitaries proposal meets each of the criteria	Relevant section of the proposal
should be explained how these will enable strong community engagement.	engagement and democratic arrangements can be retained and complement any new forms of community representation to strengthen community engagement.	

Table 1: Assessment against Government criteria

5. Discounted options

In developing our case for a three-unitary Norfolk we have compared the alternatives to ensure we are proposing the best option for residents, businesses and communities across the county. We have carried out an appraisal of these alternatives, using the Government's Local Government Reorganisation criteria that will guide decisions as to how changes will be made.

5.1 Options considered

As part of the work to develop this proposal we have considered the alternative options which might exist for Local Government Reorganisation for Norfolk. We have considered four potential options. We have defined these as follows:

Single Unitary – merge all councils into a single unitary authority that covers the whole of Norfolk.

Two Unitaries – replace the current two-tier, eight-council system with two unitary councils. A West Norfolk Council would cover the areas of Breckland District Council, Borough Council of King's Lynn & West Norfolk, and North Norfolk District Council. A Norwich & East Norfolk Council would serve the city of Norwich, Broadland District Council, Great Yarmouth Borough Council and South Norfolk Council.

Three Unitaries based upon existing boundaries – replace the current local government system with three unitary councils based upon the existing district, borough and city council boundaries. These would be Norwich (existing city council only), East Norfolk and West Norfolk.

Three Unitaries – replace the current local government system with three unitary councils with new boundaries that each cover a distinct area of Norfolk. These would be Greater Norwich, East Norfolk and West Norfolk, and are described in greater detail elsewhere in this proposal.

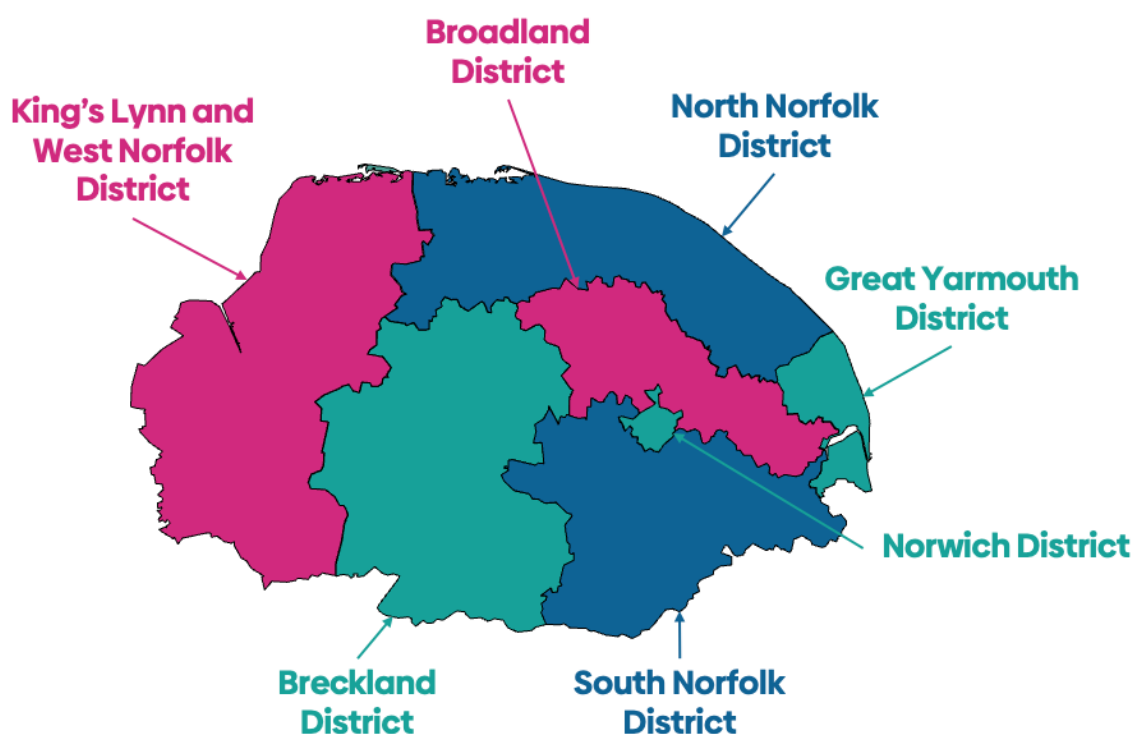


Figure 5: The councils and boundaries before LGR

5.1.1 Single unitary

Under this option the County Council and all seven district councils are amalgamated into a single unitary authority that serves the whole of Norfolk. This option is being explored in isolation, by the County Council, without any input from the seven district councils.

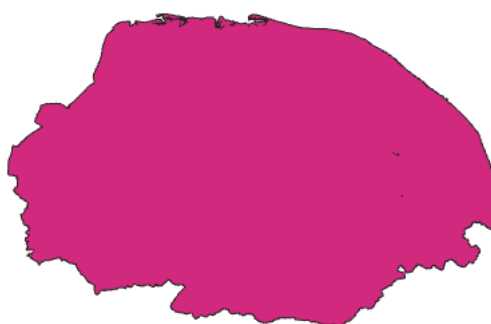


Figure 6: A single unitary covering the whole of Norfolk.

This unitary council would be responsible for delivery of the full range of local government services across a huge geography (over 2,000 square miles and 930,000 population) which has a wide range of very different needs (e.g. the urban centre of

Norwich versus rural and coastal areas). For some services such as planning this scale makes it difficult to deliver in a way which engages and responds to local communities. Although a single unitary might present the greatest opportunity to realise efficiencies through economies of scale and reduced duplication, these are believed to be marginal when considered in the grand context of a projected £200 million budget gap across all the councils – the maximum savings identified for this option is around £30 million, and only public service reform will enable any new authority(s) to stand a chance of closing the gap.

5.1.2 Two unitaries

This option would see the County Council and the seven district councils reorganised into two unitary authorities. A West Norfolk Council would cover the areas of Breckland, King's Lynn & West Norfolk, and North Norfolk. A Norwich & East Norfolk Council would serve the city of Norwich, Broadland District Council, Great Yarmouth Borough Council and South Norfolk Council.² The County Council's functions would be split between the two new unitaries. This proposal is being actively explored by South Norfolk Council.

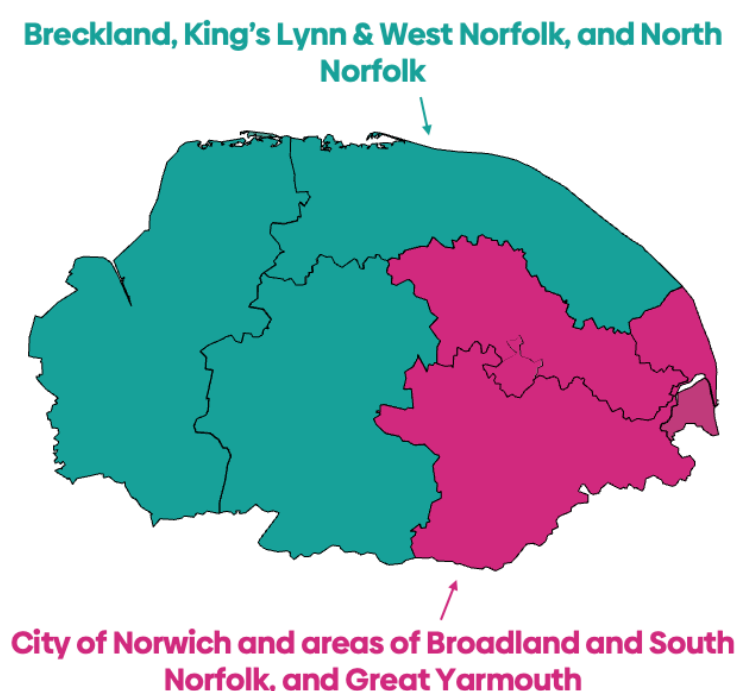


Figure 7: A two unitary council option comprising a West Norfolk and a Norwich & East Norfolk council.

² Based upon the interim plan published by South Norfolk Council

A two unitary model would have the potential to realise substantial economies of scale, but each council would still have a very broad geography, combining a diverse set of areas with very different demographics, socio-economic profiles and needs. These issues would be particularly acute for some residents and communities of the current North Norfolk district, which would be some considerable distance from decision-making structures of the West authority, when in fact they would be closer to and have a stronger relationship with parts of the East authority.

Norwich, one of England's Fast Growth cities, would be subsumed within a predominantly rural and coastal unitary, creating an inevitable permanent tension between competing parts of the new unitary, rather than enabling each area to focus on its own strengths and opportunities.

Alongside this, the two-unitary proposal also "divides" the Energy Coast sector (Bacton and Great Yarmouth) and the Broads Authority Executive area across the two unitary council areas.

5.1.3 Three unitaries aligned to current boundaries

We have considered a three-unitary option that would not involve changing existing district council boundaries (See Appendix D).

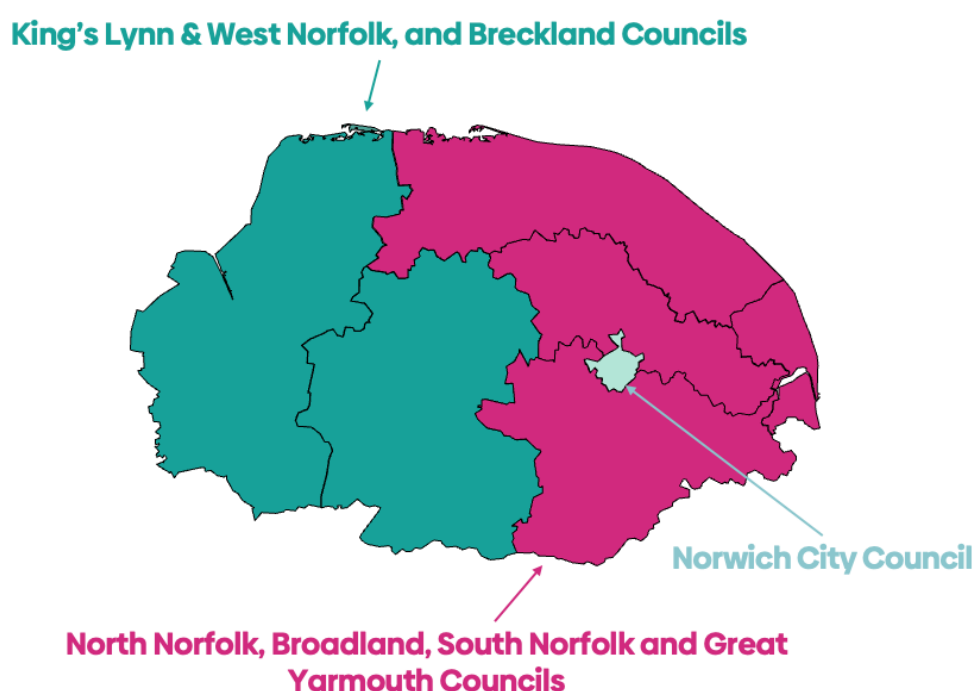


Figure 8: A three unitary option aligned to existing council boundaries.

In this option the West Norfolk unitary would span the areas currently served by King's Lynn and West Norfolk and Breckland councils. East Norfolk would span the Broadland District Council, Great Yarmouth Borough Council, North Norfolk District Council and South Norfolk Council. Norwich would remain in the existing boundaries of Norwich City Council.

This approach would tie the future of Norfolk in the 21st Century to boundaries agreed in the early 1970s. This would miss a once in a generation opportunity to get the shape of local government right, to unlock the full economic opportunity of the county, to deliver the homes we need, and public services that are preventative, efficient and effective. It would be an expensive and time-consuming process delivering a sub-optimal outcome – we owe it to our residents to strive for an outcome which is fit for purpose and future-facing.

We have therefore explored the approach of starting from the geography of the whole Norfolk, but without being defensive or self-interested in pre-existing structures and authorities as an end in themselves. Rather, we have sought to propose a model which will best meet the needs of future generations across the whole of the county, respecting the diversity of local places, economies and communities of interest. This has led to the final option, which is described below.

5.1.4 Three new unitaries with boundary changes

Our three-unitary proposal would see three new unitary authorities created from the current two-tier, eight authority system – an East Norfolk, a West Norfolk and a Greater Norwich. These unitaries largely align with existing district boundaries (except for the need to split the current Broadland and South Norfolk council areas) so each new unitary would cover areas that share common identities, needs and challenges. The split of Broadland and South Norfolk would help accommodate the growth of Norwich and the surrounding area, as well as incorporating the more rural parts of these two districts into an East Norfolk unitary council with very similar characteristics.

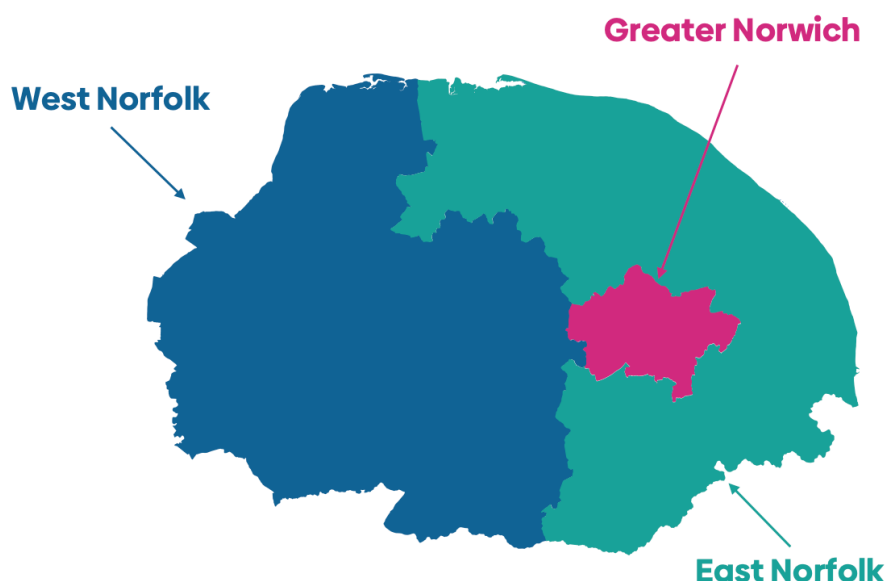


Figure 9: A three unitary drawn along new boundaries to reflect reality of areas with different geographies.

Greater Norwich is Norfolk's economic engine, a city-region with international reach, world-class institutions, and a distinctive blend of creativity, science, and civic ambition. Its influence extends beyond the historic city to include the dynamic urban fringes, incorporating world-class higher education and research institutions, and a growing digital and finance sector. The area is an international leader in life sciences, cultural innovation, the creative industries (it is a UNESCO City of Literature), and knowledge-intensive employment.

East Norfolk is the 'energy coast' with nationally significant assets in offshore wind, carbon capture and pan-European energy transmission that make it uniquely positioned at the frontline of the UK's climate transition. It also has a very strong tourism economy. It is characterised by a network of rural market and coastal towns that play a vital role as service and tourism centres, supporting surrounding communities, reducing isolation, and strengthening the area's social and economic fabric.

West Norfolk is the productive rural heartland that acts as Norfolk's gateway to the rest of the country, with resilient agri-food, advanced manufacturing and tourism sectors. It is characterised by its rural geography, with a network of market towns and an urban centre of King's Lynn.

Our proposal has been developed by six of the district councils in partnership – these are Breckland District Council, Broadland District Council, Borough Council of King's

Lynn & West Norfolk, Great Yarmouth Borough Council, North Norfolk District Council and Norwich City Council.

5.2 Appraising the options

We published a detailed options appraisal in March 2025. Since then, we have built on our initial analysis and used the criteria set out by the Ministry of Housing, Communities and Local Government (MHCLG) to appraise each of our primary options.

The table below provides the scoring of each option against the criteria. We have used a scale of 0 to 3 where 0 indicates it does not meet the criteria at all and 3 indicates that it fully meets the criteria. This scoring method aligns with the approach taken for the interim plan we published earlier this year.

<i>Criteria</i>	<i>Single unitary</i>	<i>Two unitary</i>	<i>Three unitaries on existing boundaries</i>	<i>Three unitaries on modified boundaries</i>
<i>Establishing a single tier of local government</i>	1	2	2	3
<i>Right size councils to achieve efficiencies, improve capacity and withstand financial shocks</i>	3	2	1	2
<i>Delivery of high quality and sustainable public services.</i>	1	2	1	2
<i>Strong local support and supporting local identity</i>	1	2	3	3
<i>Supporting Devolution</i>	1	2	3	3
<i>Community engagement and neighbourhood empowerment</i>	1	2	3	3
TOTAL SCORES	8	12	13	16

Table 2: Options Appraisal

A full explanation of the scoring for each option against the government criteria is set out in the appendix.

Based upon our assessment, our three-unitary proposition on modified boundaries represents the option that best meets the government LGR criteria and, most importantly, the needs of the residents and communities of Norfolk.

Our three-unitary model will provide the best balance of local representation, flexibility to tailor services to the needs of communities, and the benefits of size and scale. Greater Norwich, East Norfolk and West Norfolk authorities would represent and serve areas that have their own distinct identities, context and needs. Three unitaries represents a model of councils of a suitable scale and geography to complement, and work with, a Mayoral Combined County Authority as they can represent suitably local needs to the regional scale of an MSA.

Our three-unitary model will realise efficiencies from economies of scale, but LGR will also act as a catalyst for a radical rethink of the role of local government in Norfolk enabling public sector reform to deliver the improvements and savings required to close a substantial budget gap, which a consolidation of authorities into a single (or two) unitaries will not achieve on their own.

The three-unitary proposal has been developed in partnership between the six district councils and in consultation with strategic partners. It represents the proposal with the most support from councils, the most support from local Members of Parliament, and the most cross-party support. It is the proposal of consensus and of Norfolk, and as such represents the proposal with the strongest chance of successful implementation through broad base buy-in.

6. Stakeholder and public engagement

We ran a comprehensive engagement programme to gather insight from residents and partners ensuring proposals are grounded in evidence and local priorities. The objectives were to:

- Understand key priorities and gather insight on what matters most to communities and stakeholders.
- Provide clear information on what Local Government Reorganisation will mean and explain the aims of the proposal.
- Communicate openly and consistently, inviting feedback and explaining how views would inform proposals.
- Maintain a constructive, forward-looking tone while setting out the principles for future governance.

Our audiences were clearly defined to ensure relevance and reach, and included:

Residents across Norfolk	Messages and images tailored to place while maintaining a single county-wide identity, supported by accessible formats to ensure everyone could take part.
Key stakeholders	Town and parish councils, Members of Parliament, businesses, the voluntary and community sector, health, education, and local community leaders. Engaged on values and outcomes, to build the detail of our submission.
Council members	Engaged early to prepare them for change and build resilient organisations in the lead up to reorganisation. Equipping staff and members to explain the proposal confidently and signpost to more detailed information.

Table 3: Stakeholder and public engagement audience

We worked at two levels. Locality level: we explored how proposals would work in practice for each of the three proposed unitaries through events and partner conversations. Norfolk-wide: we captured system views through a single engagement platform, direct communication to households and a county survey.

Engagement was phased and aligned to the pillars of People, Place and Progress, starting with awareness and listening before using what we heard to shape more detailed discussion locally and across Norfolk.



Direct contact with over **304,500 households** through residents' magazines and existing council channels.



A single shared engagement platform – futurenorfolk.com – providing clear information and a dynamic survey to track views; the site recorded around **70,000 visits**.



More than **100 public and partner events** across Norfolk, from sector-focused workshops to open drop-ins, engaging almost 3,000 individuals.



In-person **engagement with over 1,500 partners** to discuss plans, gather feedback and explore new approaches.



Multi-channel outreach using print, outdoor advertising, social media and traditional media to maximise reach.



Accessible routes used throughout: Easy Read materials, paper surveys and audio-enabled web content so anyone who wished to take part could do so.

6.1 Our reach

- **Public surveys:** 5,403 public responses to surveys, with 56% of the primary Future Norfolk survey including comments—demonstrating breadth and depth of engagement.
- **Partners:** Over 2,000 engaged with, and over 1,500 met individually to discuss the proposals. Coverage includes all key sectors, public agencies, and has included collaboration across borders and with neighbouring councils.
- **Website:** 62.1k page views—sustained attention on authoritative content, including Easy Read and audio options.
- **Social media performance:** aggregate 438,310 reach/views and 4,868 click-throughs to the website.
- **Audience composition:** strongest participation from 45–64 (43%) and 65+ (32%), followed by 25–44 (23%) and under-25 (2%).
- **Geographic coverage:** responses from every district, with particularly strong volumes in key urban areas—evidencing county-wide resonance.

6.2 Headlines from our survey results

Engagement gave us a clear picture of what matters most to residents and stakeholders for the future of local government in Norfolk. The findings reflect thousands of survey responses and comments, grouped under the themes of People, Place and Progress. They show consistent priorities across these themes.

People

The results indicate that people place high importance on accountability and access to decision-makers. A large majority – around 3,600 respondents – said it is “very important” to know who their local councillors are, what they are doing and how to have a say. Fewer than 300 felt this was “not very” or “not at all important”. Nearly 3,700 people said that being able to easily contact their councillor and have their concerns listened to is “very important”, with around 800 selecting “quite important” and very few saying it was unimportant. Just over 3,600 respondents stressed that decisions should be made by people who know their community, with about 800 rating this as “quite important”. These responses show a strong expectation that councils remain visible and approachable, with clear routes for people to raise issues and understand how decisions are made.

Place

Residents placed strong emphasis on councils delivering services that reflect community needs, protect local identity and support the local economy. Meeting community needs was the most emphatic result across the “Place” questions: more than 4,200 respondents said it is “very important” that council services align with what their community currently needs, and only around 100 people felt it was “not very” or “not at all important”. Protecting history and culture was rated “very important” by 3,571 respondents, with a further 889 saying it was “quite important” and fewer than 350 saying it was unimportant. Almost 3,700 respondents highlighted that helping local businesses to succeed – including tourism, farming, logistics and local shops – is “very important”, with close to 900 more describing it as “quite important”. These findings underline that while efficiency matters, it should not come at the expense of what makes each place distinct.

Progress

Financial sustainability emerged as the single strongest concern. Over 4,300 respondents said it is “very important” that any new council can afford to provide and maintain services, with just 400 describing this as “quite important” and virtually no one rating it unimportant. More than 4,100 respondents emphasised that a new council must be run as efficiently as possible while planning for future community needs, with a further 600 saying it was “quite important”. Around 3,700 respondents highlighted flexibility as “very important” – ensuring councils can respond to changing pressures – with another 900 considering it “quite important”. These results show that residents expect councils to manage resources well, plan ahead and remain resilient in the face of change.

Comments and themes

Comments provided further insight into these priorities. Many focused on the quality of frontline services, especially adult social care, children’s services, housing, transport and waste. Service quality and delivery accounted for the largest share of comments (953, about 36%). Efficiency was another strong theme (363 comments, 14%), with repeated calls for leaner management and resources reaching the frontline. Localism and accountability featured prominently (343 comments, 13%), alongside identity and representation (368 comments, 14%), with many stressing the importance of preserving Norfolk’s diversity and avoiding dominance by any one area. A smaller set of comments raised practical risks (64 comments, 2%), such as duplication, complexity and change for its own sake. Some respondents warned that a single large authority could feel too remote, while others saw three councils as a workable compromise that reduces duplication but keeps a local focus.

Summary

Overall, the feedback shows that people value accountability and access to decision-makers, services that reflect local needs and identities, and a structure that can manage resources well, plan ahead and adapt without creating unnecessary complexity.

6.3 Headlines from partners and stakeholders

- **Public sector partners** – Many partners described how they work to geographies and areas similar to those proposed (an exception being Fire & Rescue who work over four localities). They emphasised the importance of strong local government for coordination at locality level and expressed interest in opportunities to strengthen this through reorganisation.
- **Health and care partners** – Many highlighted priorities such as accessibility, collaboration, prevention and long-term investment. Partners also referred to the need for joined-up services and tackling health inequalities. Some raised the importance of continuity during any transition, while others noted potential benefits from local delivery models.
- **Voluntary and Community Sector partners** – VCSE organisations said they want to play an active role in future governance models. They called for councils that are locally rooted, transparent and collaborative, with sustained investment in services and infrastructure to help address inequality, climate change and community needs.
- **Growth partners** – Businesses and economic stakeholders spoke about the value of consistent engagement and clarity in future arrangements. They highlighted the importance of simplicity, collaboration and a pro-development approach to support housing delivery and maintain trust during and after reorganisation.
- **Young people** – Respondents in this group said they want councils that are fair, local and accessible. They asked for clear communication through engaging channels and for investment in transport, inclusive spaces, youth services and support for disadvantaged communities.
- **Skills and education partners** – They focused on investment in young people and lifelong learning, close working with employers and providers, fair access to opportunities and joined-up pathways linking education, training and local economic priorities. There is a desire to think differently and explore new solutions that are more community focussed, particularly in addressing limited

rural transport services and long journeys to post-16 and vocational training providers.

- **Town and Parish Councils** – These councils emphasised local understanding and proactive engagement. They said they value the role of local councillors and want to retain involvement in planning processes. Some raised concerns about additional responsibilities without financial support as a possible consequence of reorganisation.

Summary

Across these groups, partners asked that existing strengths are protected and that essential services are not disrupted. They also identified opportunities for improvement, including stronger collaboration, clearer accountability and arrangements that reflect local priorities. We will seek to build upon existing strengths and engage partners in the design of new models.

6.4 How we've used feedback throughout our case

Our engagement programme has continued throughout the development of this submission, right from inception and the interim plan stage.

The information we've been receiving has fed into the design and decision making of our initial approach at each new unitary level, and then into the detail of our thinking, council configuration, and service design solutions. Where possible we've sought to test and refine solutions with partners.

7. Public service reform, efficiency & financial sustainability

7.1 Public service reform & preventative services

Local Government Reorganisation will be costly and disruptive in the short-term. Thereafter there is a choice between consolidating the current operating models with marginal gains on operating costs and realising the profound opportunity of change in which not only the structures, but services themselves, can be restructured and redesigned to best serve local communities.

We believe that LGR in Norfolk can be a moment for public service reform where a prevention-focused model can be embedded across three distinct typologies in our city, across our coastal communities and in the countryside.

Our proposed three unitaries have been designed with a view to how each organisation can be focused on prevention, building trust and delivering growth for each authority.

There are distinctive challenges across the county footprint, be that a 15-year life expectancy difference in Greater Norwich, the highest levels of demand for statutory support in East Norfolk or housing instability in West Norfolk. An approach that simply assumes a continuation of the status quo is likely to further entrench deprivation, inequality and demand for acute services – having a negative impact on both the financial sustainability of organisations and the long-term life experiences of residents. Our NHS is changing through the Government’s 10 Year Health Plan and our council services must too.

The Government set out the case for change clearly, saying “*We can continue down our current path, making tweaks to an increasingly unsustainable model - or we can take a new course*”³. We agree, and our approach aligns with the Government’s view of how services can be reshaped and will work alongside the NHS’ move from hospital to community, analogue to digital and sickness to prevention.

³ [Executive Summary, Ten Year Health Plan](#)

Our proposed model is one that shapes organisations around the needs of residents, rather than one that expects residents to navigate around and between professionals. Services are focused on local root causes of demand, rather than simply treating needs as they arise, supported by meaningful community networks building upon existing collaboration and partnerships.

Outlined in detail in our area proposals, this is a model that places prevention at its heart, moving staff and resources from services currently dispersed across tiers of government into one cross-cutting department that can provide holistic support to residents, from children to older adults, to increase resilience and reduce demand for statutory services. This approach does not stop when a resident requires long-term support, with strengths-based, independence-focused service delivery.

We recognise that resilient communities also require resilient local economies – and core to our future model is a growth function that can deliver on the ambitions that the three unitaries have for their respective areas – from tourism and clean energy in East Norfolk, advanced manufacturing and agriculture in West Norfolk and life sciences and culture in Greater Norwich.

Our model is more than just reorganising the way services are delivered – but one that commits to achieving long-term outcome improvement for residents no matter where in the county they live.

All of this depends on solid foundations for the transition and transformation to new operating models that work with communities, empower neighbourhoods and meet the true potential of this moment of change, reform and renewal for our county.

7.2 A transparent approach to assessing financial sustainability

Our proposal will create three unitary councils which, even without the benefits of rationalisation, reform and renewal will be viable and sustainable on day one and have a pathway to greater efficiency and effectiveness in public service delivery.

We have worked from gold standard sources, incorporated a wide range of evidence on demand, need, demographics, deprivation, and service unit costs, enabling a more

nuanced assessment of income and expenditure pressures. Where such detailed information was not available, population apportionment was used as a consistent fallback.

The methodology has drawn on two principal evidence bases:

- Nationally available datasets, such as Revenue Account (RA) and Revenue Outturn (RO) forms and ONS sources, to ensure comparability with recognised benchmarks and wider sector norms.
- Data provided directly by Norfolk's councils, including revenue budgets, balance sheets, reserves and other returns from finance officers, to ensure accuracy and local relevance.

In addition, we have assessed the scale of the proposed authorities to confirm they are of sufficient size to achieve efficiencies, deliver capacity, and provide resilience. This includes benchmarking against national practice and considering the ability of each unitary to support sustainable service delivery at scale.

The financial analysis has considered the following elements in detail:

- Council tax harmonisation – testing five legally compliant scenarios, balancing affordability with long-term revenue sustainability.
- Expenditure and funding positions – establishing the structural income and cost base of each proposed authority.
- Transition costs and savings – quantifying both the one-off investment needed to establish new organisations and the permanent recurring savings from consolidation and service reform.
- Balance sheet resilience – analysing reserves, debt per capita, debt-to-asset ratios, and debt servicing against established thresholds.

Taken together, these strands provide a comprehensive and robust picture of financial viability. The results show that each of the three proposed unitary authorities would be financially sound from vesting, with capacity to manage transition, deliver structural efficiencies, and strengthen resilience over time.

On this basis, our three-unitary model is not only affordable and deliverable, but also offers the scale, resilience, and reform capacity required to underpin sustainable, high-quality public services for Norfolk.

7.3 Current financial position of Norfolk Local Authorities

To assess the sustainability of future authorities within Norfolk we have started from the financial position of all current authorities.

Authority	Net Revenue Budget (£000s)	Forecast Total Funding (£000s)	Forecast Budget Gap (£000s)	General Fund Unearmarked Reserves (£000s)	General Fund Earmarked Reserves (£000s)	Total Debt (£000s)	Total Assets (£000s)
Norfolk County Council	1,072,404	1,021,603	50,801	28,902	123,233	888,896	2,412,746
Breckland DC	19,711	18,813	898	3,562	14,320	–	137,299
Broadland DC	15,487	15,487	–	5,000	17,643	585	102,528
Great Yarmouth BC	17,099	16,378	721	5,929	10,636	144,495*	490,142
King's Lynn & West Norfolk BC	26,128	26,128	–	9,709	35,505	19,000	303,578
North Norfolk DC	23,907	23,907	–	2,205	12,363	5,000	124,495
Norwich City Council	24,933	20,850	4,083	8,250	18,420	204,444*	1,346,703
South Norfolk DC	21,152	21,152	–	6,000	25,451	24,500	162,658

Table 4: Current Norfolk Councils Financial Positions 2024/25 and Balances as at 31 March 2025

* Norwich City Council and Great Yarmouth Borough Council both operate Housing Revenue Accounts (HRA). The borrowing figures shown therefore include HRA borrowing, which explains the significant variance between their figures and those of the other districts.

Existing council budgets and pressures

Taken together, Norfolk's district councils are experiencing many of the same pressures faced by local authorities nationally – most notably, increasing demand for temporary accommodation and other demand-led services. However, the majority have responded with prudent financial management, delivering in-year underspends, replenishing reserves, and in some cases forecasting surpluses. Several districts have healthy reserve levels, minimal or no borrowing, and are setting balanced budgets for 2025/26 without over-reliance on one-off measures. While audit timeliness remains a sector-wide challenge, the underlying financial health of most districts is sound, with no immediate indicators of instability that would threaten their ability to operate effectively in a reorganised structure.

While Norfolk's district councils demonstrate broadly sound financial management and resilience, in the context of the reorganisation proposals for Norfolk their budgets are dwarfed by the scale of the County Council's.

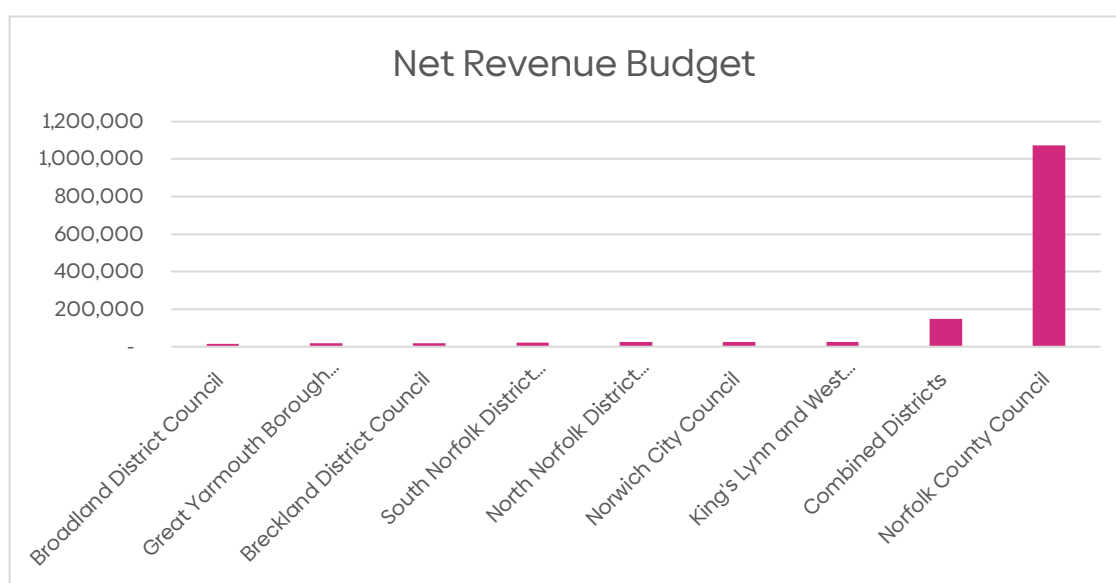


Figure 10: Net Revenue Budget (2025/26)

Given this dominance, it is essential to examine the County Council's current financial position in detail – considering both its underlying health and the significant challenges it faces.

Norfolk County Council serves a population of around 917,000, delivering 85% of all local authority spend in the Norfolk area and employing 80% of the local government

workforce. Its budget covers high-cost, high-risk services such as adult social care, children's services, and highways.

In 2024/25, the County Council faced sustained pressures in demand-driven services, with a combination of price inflation and rising service volumes driving significant overspends. While it reported a balanced outturn for the year, this position was only achieved through the use of £8.351m of reserves to offset the overspend – a measure that is not financially sustainable. The County Council's own outturn report highlights “red” risk ratings in adults', children's, communities, and environment services.

CIPFA's Financial Management Code identifies six indicators of financial stress, several of which apply directly to Norfolk County Council's current position: running down reserves, unplanned overspends, gaps in savings plans, and persistent failure to address underlying financial pressures. The County Council has identified only 34% of the savings required for 2026/27 and just 7% for 2028/29, leaving substantial unfunded gaps in its medium-term plan.

An Expenditure Control Process is in place due to overspends in demand-led services – a measure typically associated with authorities in severe financial distress. Despite significant budget growth in recent years, these overspends persist.

The County Council is forecasting a cumulative budget gap of £120.9m over its Medium-Term Financial Strategy (MTFS) period. Its strategy continues to rely on drawing down earmarked reserves – including one-off resources in 2025/26 – to balance the budget. This approach reduces financial flexibility and is not sustainable in the long term.

Service-level pressures

- **Adult Services:** Overspent by £13.386m in 2024/25, with the Purchase of Care budget under both volume and price pressure. Transformation initiatives have not kept pace with expectations, with the council itself noting that the pace of digital change has fallen short.
- **Children's Services:** High-risk overspending driven by demand pressures and rising unit costs. The July 2025 risk register records a red-rated risk for this service.

- **SEND:** The High Needs Block deficit stood at £55.878m at the end of 2024/25, increasing the negative reserve to £131.891m. The MTFS identifies this as the most significant financial issue facing the council, with escalating costs outstripping available funding. Norfolk is part of the Department for Education's Safety Valve Programme, which is a clear sign of severe financial strain and the inability to manage these pressures within existing resources.

Norfolk County Council is in a significantly more precarious financial position than the district councils. The latest 2025–26 monitoring report projects a £11.25m overspend on the General Fund Revenue Budget. It is running down reserves, operating with large and persistent overspends in key statutory services, and carrying substantial unfunded budget gaps into future years. Its position is unsustainable without fundamental changes – making it the weak link in the Norfolk local government system and a major risk factor in any proposed single-unitary model.

Across Norfolk, all local authorities have received disclaimed audit opinions in recent years, in some cases for multiple consecutive years. Any new unitary authorities will need to work closely with their auditors to restore assurance and rebuild confidence in financial reporting. Most district councils are currently operating with balanced budgets or only small forecast gaps, supported by reasonable reserves and low or manageable levels of debt.

Norfolk County Council is the clear outlier, with a £50.8m in-year forecast budget gap - more than ten times the largest district gap - debt approaching £889m, and a high reliance on earmarked reserves to manage ongoing service pressures. This imbalance means that a single unitary dominated by the County Council's finances would inherit a structural fragility from Day 1, undermining the financial resilience of the whole system.

7.4 Why a three-unitary model is the best financial choice for the future

Our three-unitary model delivers the optimal balance between scale and responsiveness. It prioritises the delivery of high quality and sustainable public services above all else. It achieves efficiencies, strengthens organisational capacity, and

creates financially resilient councils capable of withstanding shocks – without importing the County Council's existing weaknesses into a single point of failure.

Experience shows that when very large organisations fail, the consequences are amplified. Norfolk County Council's troubled implementation of the Oracle ERP system in 2022 – which left staff receiving incorrect pay for six months – is a case in point. Birmingham City Council's well-publicised difficulties with its Oracle finance system had similarly severe knock-on effects, with delays to Early Help payments for families. In both cases, sheer organisational scale magnified the problem and extended the harm.

Our case for three unitaries rests on building organisations that are both resilient and responsive. Norfolk's scale and diversity mean that a single county-wide body would concentrate risk in one fragile structure, importing the County Council's existing weaknesses and leaving residents exposed to failure at a single point of control. By contrast, three unitaries distribute responsibility, contain financial risks within smaller systems, and create councils that are closer to their communities and better able to design services around local need. This approach aligns with the Government's wider commitment to fiscal devolution and local accountability, ensuring that decisions about tax, spending, and public service reform are made at the level where they can have the greatest impact.

To test the robustness of this model, we constructed a baseline income and expenditure position for East Norfolk, Greater Norwich, and West Norfolk using the 2025/26 Revenue Account (RA) forms. All major funding and cost lines were analysed in detail across the eight existing councils, with the County Council's budgets subject to particular scrutiny given their materiality. Funding streams were apportioned according to the best available data – including demand, demographics, unit costs, and tax base information – while expenditure was split in line with patterns of need and service use.

Where no reliable data existed, we used a simple population-based approach. In some cases, the County Council's data provision was incomplete or inconsistent, but our methodology ensured that allocations were applied transparently and consistently.

The resulting notional income and expenditure positions are set out below:

£m (2025/26)	East Norfolk	Greater Norwich	West Norfolk
Revenue	657.42	531.84	573.36
Expenditure			
Revenue Income	(660.60)	(525.46)	(584.05)
Net Position	+3.18	-6.38	+10.69

Table 5: Income and expenditure positions

These figures are not a forecast of what the new authorities would ultimately look like, but a snapshot of what would happen if the current county and district budgets were simply divided between three unitaries, based upon the current year's expenditure. They do not assume any public service reform, efficiencies, or council tax harmonisation – all of which would be central features of the transition.

Despite this, in this baseline both East Norfolk and West Norfolk begin in surplus, with £3m and £10m respectively, providing a relatively strong platform for financial planning. Greater Norwich would see a notional £6m deficit. However, according to NAO and MHCLG guidance, a council is generally considered higher risk when a budget gap exceeds 5% of net expenditure. At just 1.2%, Greater Norwich's budget gap is well below this threshold and would be regarded as low risk, and very much within the normal range for a local authority.

The variation in income and expenditure across the three authorities reflects underlying demographic, social, and economic differences. East Norfolk contains a higher proportion of schools and school-aged children, driving up school-related funding, alongside larger cohorts of working-age and older adult social care users. Greater Norwich records the highest levels of deprivation in the county: 42% of the 76 most deprived LSOAs in Norfolk fall within its boundaries. This is reflected in its relatively higher share of Revenue Support Grant.

Greater Norwich's notional budget gap exemplifies the type of pressure that national reforms such as the Fair Funding Review are designed to address. With the lowest tax base of the three authorities and the highest deprivation, it stands to benefit from a needs-based settlement. Research by the Institute for Fiscal Studies (IFS) indicates that urban shire districts such as Norwich are likely to gain significantly under Fair Funding 2.0 once it is introduced.

This reinforces the key point: budget pressures are not unique to Greater Norwich or West Norfolk, nor do they render the three-unitary model unviable. In fact, contrary to the County Council's view, West starts from the strongest relative position. The challenge for all three authorities is to use reorganisation as an opportunity for genuine public service reform – designing fit-for-the-future councils with value for money, efficiency, and sustainability at their core.

7.5 Aggregation, disaggregation & transition

Norfolk currently has eight councils: seven district councils and one county council. Our proposal replaces these with three new unitary councils. To achieve this, two types of structural change need to happen:

1. Aggregation – merging the services of the seven districts into three new unitaries.
2. Disaggregation – splitting the services of the County Council (and, uniquely, also Broadland and South Norfolk, which straddle more than one of the proposed new boundaries) into three.

Alongside these two structural changes is a transition process, which includes setting up programme delivery teams, creating shadow authorities before vesting day, and preparing the groundwork for service and system integration. The shadow authorities will also need to determine a path for council tax harmonisation, so that residents across the new unitaries pay consistent rates.

Aggregation

Aggregation means merging the seven district councils into three. This involves bringing together both frontline resident services and back-office functions.

Frontline services include:

- | | |
|--|----------------------------------|
| • Waste collection | • Care and Repair service |
| • Housing and homelessness | • Leisure and cultural services |
| • Local planning | • Public open spaces |
| • Planning enforcement | • Beaches and resort services, |
| • Housing allocation and Housing Standards | • Crematorium and cemeteries |
| | • Electoral services |
| | • Localised economic development |

- Revenues and Benefits, including council tax
- Coast protection and adaptation
- Civil contingencies
- Licensing
- Environmental health
- Community safety and neighbourhood nuisance
- Careline

Back-office functions include:

- Finance
- HR and workforce planning
- IT systems
- Property
- Procurement
- Governance
- Audit
- Democratic services (Member support and Committee administration)
- Legal services
- Property services
- Communications and media management
- CCTV

The aggregation process creates opportunities to rationalise systems, harmonise terms and conditions, consolidate council-owned companies, and make more efficient use of property and assets.

Disaggregation

Disaggregation means splitting up the services currently provided at the county level so that they can be delivered by the three new councils. It also includes dividing the services of Broadland and South Norfolk across the new unitary boundaries.

Disaggregation covers a wide range of functions, including:

- Children's services and SEND
- Adult social care
- Education and youth justice
- Highways, transport and infrastructure
- Libraries, museums, arts and records
- Waste disposal and recycling centres

- Trading standards and public health
- Business support, economic growth, tourism and the visitor economy
- Environmental protection, planning (minerals and waste), and nature recovery

The largest and most complex areas of disaggregation are children's services, adult social care, and education. These are also the areas where demand pressures are driving the biggest budget gaps, which makes it critical to redesign them within fit-for-purpose unitary structures. The three unitary councils will maintain a partnership approach to museums, working together during the implementation phase to agree an approach which best supports our local heritage.

Transition

The transition process ensures that change is managed effectively. It includes:

- Redundancy and early retirement programmes.
- Establishment of programme delivery teams.
- Creation of shadow authorities.
- Closing down existing councils and transferring staff, assets, and services.
- Designing harmonisation plans for council tax.

Significant further detail on the approach to disaggregation, debt, reserves, DSG and council tax harmonisation is set out in the appendices.

7.6 Moving beyond a baseline to reformed public services

Local Government Reorganisation (LGR) is not just about redrawing boundaries. It involves two distinct but interconnected changes. First, the consolidation of eight existing organisations into three. Second, and more importantly, the transformation of those three new councils into agile, efficient, and future-ready authorities.

Our proposal addresses both challenges head on. It not only creates three new authorities but designs them deliberately as fit-for-purpose organisations, structured around the future needs of Norfolk's residents and communities rather than the legacy of existing arrangements.

This distinction matters because Norfolk is not a homogenous area. It is a county of contrasts: a dynamic urban core in Norwich, extensive rural and coastal areas in East and West, and communities experiencing significant deprivation alongside pockets of economic strength. A single, centralised authority cannot reflect or respond to this diversity with agility. Three unitaries, by contrast, allow for bespoke financial and service strategies: Greater Norwich can leverage population density and growth to generate income; East can prioritise resilience, prevention, and community-based care; West can invest in connectivity and rural service models.

Our modelling started from a “no reform” baseline. This is not the end state, but the starting point from which public service reform would be delivered. Each new authority would be equipped to implement reform programmes tailored to its context, drawing on evidence from other local government reorganisations where smaller unitaries have achieved efficiencies through digital integration, streamlined management, and targeted commissioning. Crucially, this avoids the bureaucracy and inertia that have held back overly large, centralised councils.

Our service design methodology was started with an understanding of the demand for services. This including rigorous analysis of data from local authority and nationally available sources to ensure a detailed understanding of where each unitary will need to target interventions to improve outcomes and reduce cost.

The rare opportunity presented by our proposal to design services afresh enables them to be aligned with national best practice. This includes each authority being designed to have optimised digital pathways, as appropriate to enable accessibility and efficiency. In addition, a new cross-cutting directorate will be established in each authority, responsible for proactive prevention across all demand-led services, including homelessness prevention, adult social care and children’s social care, ensuring a whole system approach to reducing avoidable demand.

Once the future service models were developed and agreed, tailored to the unique needs of each unitary as set out in the area proposals and appendices, our focus shifted to implementation and financial sustainability. Close collaboration between workstreams meant that benefits and costs could be allocated appropriately, avoiding duplication and ensuring a robust financial case.

As a result of this work, anticipated financial costs and benefits can be considered across the following categories:

Theme	Description	Total Cost/Benefit (£m)
Delivering unitarisation	A once-in-a-generation opportunity for transformation requires significant investment and resources to deliver planned innovation and savings. These are costs associated with delivering the transition to three unitaries (e.g. project teams, external support, etc.)	33.2
Investment in new capacity	As the unitaries deliver new services, investment in specialist capacity is required to enable statutory service delivery and deliver long-term innovation. These are costs associated with investment in additional staff (both management and specialist) and systems to deliver disaggregated services such as social care.	58.5
Investment in digitally enabled services	Investment in new technologies to ensure effective request resolution for residents and enable staff to spend more time on complex work, and less on administrative activities. These are costs associate with transformation and public service reform programmes.	34.3
Efficient & effective workforce	Establishing new service areas that bring together teams from different organisations and functions, reducing duplication of roles and enabling a more effective service experience for residents without requiring compulsory redundancies through a phased and careful approach to implementation. This includes savings from aggregating services.	(145.5)
Efficient & effective processes	Streamlining processes through consolidation of organisations, reduced duplication of processes and contracts, and the effective use	(122.9)

Theme	Description	Total Cost/Benefit (£m)
	of technology, ensuring value for money for residents.	
Innovation in service delivery	A service model that delivers true public service reform, resulting in fewer residents requiring long-term support from services and those that do being able to receive the least acute form of support, designed in partnership with residents and the authority's partners. This includes savings from improved demand management and early intervention and prevention.	(95.8)

Table 6: Categories of financial costs and benefits over an eight-year period.

Our approach to delivering savings is not based on incremental 'salami slicing' savings which provide short-term benefit to the detriment of long-term resilience. Instead, our focus is on redesigning services to address root causes of demand, adopting council-wide preventative approaches and embedding a 'test, learn, deliver' approach that enables continuous improvement and innovation.

This approach ensures that savings are sustainable and are achieved alongside improved outcomes, as well as equipping the three authorities with the ability to adapt to changing local needs over time.

7.7 The financial case: costs and benefits over 8 years

Reorganisation creates upfront transition and disaggregation costs, but these are outweighed by the scale of recurrent savings.

Costs	
Total one-off investment	£96m
Recurring additional costs	£6m
Benefits	
Total recurring savings	£56m (by 2033/34)
Cumulative savings (over 8 year period)	£220m
Net position	
Net financial impact	£220m
Break-even point	Year 4 (2031/32)

Table 7: Summary of the financial implications for unitarisation and public sector reform of the proposal

Our eight-year profile shows how the new unitary model pays back quickly and delivers a permanent reduction in Norfolk's structural deficit.

Year	Financial Year	One-Off Costs (£m)	Recurring Costs (£m)	Recurring Savings (£m)	Net Impact (per annum) (£m)	Cumulative Net Impact (£m)
0	2026/27 to 2027/28	-34	0	0	-34	-34
1	2028/29	-18	-6	16	-9	-43
2	2029/30	-27	-6	34	+1	-42
3	2030/31	-14	-6	45	+25	-17
4	2031/32	-3	-6	51	+41	+24
5	2032/33	0	-6	53	+47	+71
6	2033/34	0	-6	56	+49	+121
7	2034/35	0	-6	56	+49	+170
8	2035/36	0	-6	56	+49	+220

Table 8: Eight-year unitary costs and savings profile

Our modelling assumes one-off transition costs of around £34m in the two years before vesting, followed by £18m in Year 1, £27m in Year 2, and £14m in Year 3. These costs reflect shadow authority set-up, ICT migration, and redundancy programmes. They also incorporate investment in fundamental organisational redesign, recognising that proactive transformation is required to consolidate functions and modernise service delivery. As before, the approach prioritises natural wastage and vacancy

management in reducing staffing levels, with compulsory redundancies used only where unavoidable.

Considering the efficiencies that are possible through reorganisation, we expect that areas will be able to meet transition costs over time from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest-to-save projects. These costs would be funded by all councils (including the County Council).

In addition, the model recognises ongoing recurring costs of around £6m per annum from service disaggregation and system duplication.

Savings build progressively. In Year 1, £16m is released from early staffing reductions and service rationalisation. This increases to £34m in Year 2 and £45m in Year 3 as structural efficiencies are realised. These savings are not automatic: they depend on ambitious service consolidation, management delayering, and radical process change. The model therefore assumes a front-loaded pace of transformation that accelerates efficiencies, albeit with higher disruption in the early years. By Year 4, full organisational and staffing savings of £51m are embedded, rising to £56m annually from Year 6 onwards.

On this basis, the payback point is reached in Year 4 (2031/32), when cumulative savings outweigh the upfront investment. By Year 8, the model delivers £49m of recurring annual savings and a cumulative net benefit of around £220m.

When costs and savings are apportioned across the three unitaries, a consistent pattern emerges. All three – Greater Norwich, East Norfolk, and West Norfolk – carry early deficits in Years 1 and 2 as transition costs outweigh savings. From Year 3 onwards, however, the picture shifts decisively. Each authority moves into annual surplus: £7m in Greater Norwich, £10m in East Norfolk, and £8m in West Norfolk. By Year 4, cumulative payback is achieved across the board, with each unitary moving firmly into the black.

From that point forward, surpluses stabilise at recurring levels of £15m in Greater Norwich and West Norfolk and around £19m in East Norfolk. By Year 8 (2035/36), cumulative benefits total £66m, £67m, and £88m respectively – more than £220m combined across the county.

This sharply contrasts with the County Council’s “minimal change” model, which assumed £34m of transition costs against just £36m of recurring savings, essentially delivering no meaningful payback. Even their single-unitary “best case” – £36m in annual savings – falls well short of the nearly £60m in combined annual efficiencies delivered by the three-unitary model by Year 3.

In other words, while all three new authorities face an initial period of adjustment, the proposed structure embeds sustainable savings early and generates sufficient recurring surpluses to eliminate Norfolk’s structural deficit entirely by Year 7 (2034/35). We do not suggest that reorganisation alone is a panacea – demand pressures will still require further reform. But unlike the “minimal change” approach, the three-unitary model creates a platform for embedding public service reform, delivering sustainable efficiencies, and avoiding reliance on Exceptional Financial Support. In short, it delivers payback within four years locally and closes Norfolk’s £200m structural gap within seven years – a far stronger trajectory than the County Council’s own assessment.

7.8 Long-term scale & sustainability

Criterion 2 requires that a unitary authority be of sufficient scale to deliver efficiencies, build capacity, and remain resilient to financial shocks. We believe our proposed unitaries are optimally sized for success. Based on a projected 1% annual growth in tax bases from 2025/26, the estimated Band D tax bases for 2028/29 are:

Proposed Authority	Band D Tax Base
East Norfolk	129,789
West Norfolk	109,941
Greater Norwich	94,095

Table 9: Estimated Band D Tax Base in 2028/29

For context, there is clear evidence that existing unitaries are able to operate successfully with tax bases significantly smaller than those we propose. For example, Rutland Council manages with just 16,293 Band D equivalents (2025/26), and Herefordshire Council with 72,816. North Northamptonshire, which was only recently reorganised, operates with 115,847.

Although Greater Norwich is the smallest of our proposed unitaries, its compact, urban nature offers greater revenue potential from parking charges, housing rents, and

business rates, with additional upside from planned housing and economic growth, and lower service delivery costs for waste and recycling collection services through urban concentration.

All three proposed authorities exceed 90,000 Band D equivalents, a reasonable lower threshold for long-term financial sustainability. We therefore consider them well-sized to deliver high-quality, sustainable public services while retaining the flexibility to adapt and invest in local priorities.

Capital

The viability of capital investment is not determined by the size of the sponsoring authority but by the quality of planning, governance, and delivery. There is no requirement to fully disaggregate the County Council's capital programme as part of a move to a three-unitary model. The County Council's assertion that disaggregating its capital programme would "hinder ambition" and reduce economies of scale overlooks the reality that many major schemes are already delivered by district councils, often in partnership arrangements. Pooled budgets, combined authority programmes, and joint procurement arrangements enable councils of all sizes to achieve economies of scale without relying on a single, centralised administration.

Our three new unitaries, like every other council with social care responsibilities in the country, will continue to pursue demand management schemes. They will do so with the added advantage of greater agility and the public service reform potential outlined in the Blueprints section of our proposal. There is no barrier to neighbouring unitaries collaborating on major schemes. Indeed, such cooperation can be more agile, with clearly defined project agreements replacing the competing internal priorities that can delay decisions within a single large authority.

The transition to three unitaries would not prevent the continuation of shared projects – whether in highways, schools, or demand management schemes. In fact, neighbouring unitaries could agree targeted project delivery frameworks that retain the benefits of scale while increasing agility and local accountability. Smaller organisations are often better placed to align capital spending with local priorities, unencumbered by competing internal demands from unrelated services.

The County Council's own track record shows that scale does not automatically translate into delivery. In 2024/25, it reported capital programme slippage of £224.5 million – a figure that underlines how even small delays have outsized financial consequences in a programme of this scale. It also set a capital budget of £445.5 million for 2024/25, despite delivering only £244 million in 2023/24 – an 82% increase that was never realistic. Such consistent overprogramming and reprofiling present a misleading picture of delivery capacity; prudent budget setting would align with prior-year outturn. The County Council's own outturn report acknowledges the need to “right size” its capital programme to reflect actual delivery trends.

Smaller, financially sound unitaries can still collaborate on large projects where this makes sense, while maintaining tighter governance over delivery. With focused priorities and direct accountability, they can sequence investment to meet local demand, ensure realism in capital budget setting, and preserve the benefits of joint delivery without the inefficiencies and risks inherent in an oversized authority. Careful transition planning will ensure that current schemes remain viable and that planned benefits are not eroded.

7.9 Council tax harmonisation

In two-tier areas such as Norfolk, the total council tax bill for a household is made up of charges levied by a number of precepting bodies, each with distinct responsibilities and precept-setting powers. The total amount payable reflects the combined precepts of:

- Norfolk County Council
- District or Borough Councils
- Parish or Town Councils (where applicable)
- The Police and Crime Commissioner

These precepts vary by geography. In a reorganisation scenario, the district and county precepts are merged into a single unitary authority precept. This requires *harmonisation* – aligning all residents in the new authority so that they pay the same council tax for the same services. Without harmonisation, households would continue paying different rates for identical services.

To account for this, there are regulations governing council tax harmonisation:

- The authority must ensure that the annual increase in its amount of council tax is not excessive either in each predecessor area or in relation to the average tax across the new area in any year until harmonisation is achieved – for a unitary authority the referendum limit is 5%.
- Council tax harmonisation can be phased over a period not exceeding 7 years from the date of reorganisation (in this case vesting day would be 1 April 2028).

Error! Reference source not found. below sets out the 2025/26 Band D council tax precept and tax base for each billing authority within Norfolk.

Local Authority	Band D (£)	Tax Base
King's Lynn and West Norfolk BC	152.87	56,676
South Norfolk	175.00	54,097
Broadland DC	134.91	49,789
Breckland DC	118.53	47,690
North Norfolk DC	173.52	45,024
Norwich City Council	306.11	39,166
Great Yarmouth BC	192.49	31,567
Norfolk County Council	1,755.63	324,009

Table 10: Band D rate and Tax Base 2025/26

There is clear variation in district-level precepts across the county – reflecting the different priorities and circumstances of each council. In 2025/26, the difference between the lowest district precept (Breckland, £118.53) and the highest (Norwich, £306.11) is £187.58 for a Band D household. These variations reflect historic local policy decisions, differing service demands, and demographic and economic factors within each area.

We have modelled five different council tax harmonisation scenarios to assess the financial impacts. Each scenario represents a different strategy for aligning Band D charges within each proposed unitary authority from vesting day (assumed to be 1 April 2028) through to full convergence by 1 April 2035. We have compared these against a baseline scenario in which no reorganisation occurs. These scenarios are summarised in the table below.

Importantly, this analysis does not make a recommendation. The five scenarios presented are intended to illustrate a range of legally compliant options and their

potential fiscal impact. It will be for each shadow authority, once established, to determine its preferred approach to harmonisation based on its local context, policy priorities, and political judgement.

#	Name	Description
1	Low to Max	All Band D charges within a new unitary are raised to match the highest 2027/28 Band D among its predecessor districts, subject to the statutory 5% cap. Once harmonisation is reached, annual increases continue at the maximum permitted level.
2	High to min	All Band D charges are immediately aligned to the lowest predecessor district rate of 2027/28. This delivers instant uniformity but results in substantial reductions for higher-charging areas. From this reduced base, Band D increases by 5% annually.
3	Weighted Average on Day 1	The initial Band D charge is set to the weighted average of predecessor district rates for 2027/28, adjusted for their respective tax base sizes. This avoids any first-year increase above the statutory 5% cap. From this starting point, Band D then rises annually at 5%.
4	Weighted Average plus 5% on Day 1	Building on the weighted average approach, this method applies a 5% uplift in the first year – the maximum permissible.
5	Harmonisation Within the 5% Predecessor Authority Cap	Band D charges are set in the first year at the lowest predecessor rate plus 5%, ensuring no area exceeds a 5% increase.

Table 11: Council Tax Harmonisation Scenario summaries

We set out the detailed analysis of what each of these scenarios would mean for the three new unitary councils within the appendix.

The modelling demonstrates that council tax harmonisation is a complex but manageable challenge, with different approaches carrying distinct fiscal and political trade-offs. No single pathway is universally optimal, and it will be for each new authority to weigh financial resilience against local priorities when determining its

approach.

What is clearer, however, is the structural dimension. The three-unitary model stands out as the only option in which more than one harmonisation pathway delivers positive revenue outcomes. This provides greater flexibility for future decision-makers, as well as a closer alignment between local tax bases and local accountability. By enabling each unitary to make choices that reflect the circumstances of its communities, the three-unitary model offers Norfolk the best opportunity to balance financial sustainability with democratic responsiveness.

8. Devolution

8.1 Norfolk and Suffolk devolution

Following the Publication of the English Devolution White paper in December 2024 and its invitation for areas across England to express their interest in joining the Devolution Priority Programme (DPP) aimed at establishing mayoral combined county authorities in 2026, it was confirmed that Norfolk and Suffolk were part of the DPP in February of this year.

Since then, Norfolk and Suffolk County Councils have been working to establish the new Norfolk and Suffolk Mayoral Combined County Authority (MCCA) with a proposed vesting day in Spring 26 (TBC) and mayoral elections in May 26.

This work is overseen by a Sponsoring Board made up of officers and elected Members from both County Councils and includes Norfolk and Suffolk district political and officer representation. Under this sits a Programme Board which includes Norfolk and Suffolk district officer membership and oversees a wide number of thematic working groups which also include officers from Norfolk and Suffolk districts.

This already demonstrates the benefits the districts have brought to establishing the Mayoral Strategic Authority in terms of providing additional capacity and capability at every level of the established governance framework. It also provides context to the level of commitment provided and the collaboration needed to effectively stand up a Mayoral Combined County Authority.

The establishment of the Mayoral Combined County Authority is a shared priority for both the county and district councils across Norfolk and Suffolk. We are all committed to ensuring its benefits are realised as soon as possible, and the strong collaboration already in place will only enhance and strengthen the opportunities devolution will bring.

Norfolk's Fire and Rescue Service will also move to the new MCCA. Under our model three unitary councils in Norfolk will become constituent members of the authority with a direct and close working relationship with the Fire and Rescue Service. As set out in this proposal, our unitaries will work closely with partners to ensure a prevention-based

approach to public services and will develop these in detail during the implementation phase so that they respond to the needs and requirements of partners.

8.2 Devolution priorities across Norfolk and Suffolk

Both county and district councils across Norfolk and Suffolk are working together for devolution to enhance our regional economic growth and productivity. By collaborating, there is already greater local control over decision-making and priority setting across the two counties. This partnership will continue to unlock the potential of the region by using shared resources and addressing common challenges.

Our approach to Local Government Reorganisation will provide multiple constituent authorities to support the Mayoral Strategic Authority in delivering across Norfolk and Suffolk, ensuring there is a truly connected regional picture with strong anchor institutions that can be both a significant economic influence, but be rooted in the place. This allows for multi-unitary authorities to represent and champion place at a more local level than one single voice representing each county if a single unitary for each was pursued.

Norfolk and Suffolk devolution is focused on:

1. Economic growth and productivity: boosting local economies and attracting investment and working in partnership with Norfolk and Suffolk Business Boards to develop comprehensive joint strategies.
2. Logical geographies and economies: a connected set of local geographies with a strong economic identity enabling local delivery and an ability to come together on a proportionate basis to leverage these economic strengths for the benefit of the region.
3. Physical assets and infrastructure: improving transportation networks and infrastructure to enhance connectivity and support growth.
4. Employment and skills: ensuring that residents can use the full potential of their skills in driving productivity and growth.
5. Coherent planning and housing: developing a housing offer that maximises growth, allows logical place-based development and better supports people's health and wellbeing.
6. Action on flood risk: creating a fully integrated approach to flood and coastal management and devolution of flood and coastal erosion risk management.

7. Finance: greater local autonomy creating a system that is more locally self-sufficient.

There is a clear need to drive innovation across the public sector and bring a strong voice for our largest economic centres of Norwich and Ipswich, while also reflecting the role of our other major towns and their economies, our coastal and market towns and rural areas in supporting these seven strategic priorities.

Establishing a mayoral strategic authority between Norfolk and Suffolk will bring economic calibre and clout, creating an economic entity on a similar scale as city regions such as Liverpool City Region (which has 6 constituent authorities) and Greater Manchester (which has 10 constituent authorities) noting the more rural and dispersed population than the predominantly urban nature of these two referenced mayoral combined county authorities. This further underlines the need for a greater local and place-based representation through multi-unitaries as constituent members to ensure a true strategic picture for Norfolk and Suffolk is genuinely understood by the new mayoral combined county authority.

8.3 Strategic planning with local delivery

A mayoral combined county authority across Norfolk and Suffolk will operate across multi-unitaries taking on functions that require a wider strategic regional perspective. These will include management of our growth plan and associated place funding, managing the integrated settlement and the investment fund, transport (including public transport – particularly important within a rural environment) and local infrastructure, strategic and spatial planning including the strategic elements of housing, skills, public safety, environmental management, economic development and regeneration, and health, wellbeing and public service reform.

The role of the mayoral combined county authority will allow unitary authorities to focus on local service delivery, drawing on their deep understanding of local communities' needs and strengths. By working together on joint initiatives and neighbourhood-led schemes, unitary authorities can build upon connection to place and drive health and wellbeing benefits.

8.4 Strong decision-making in the strategic authority

A three-unitary model in Norfolk, balanced with a multi-unitary model in Suffolk under one mayoral combined county authority combines the benefit of strategic regional leadership, local democratic responsiveness and operational resilience.

It provides balanced representation around the combined authority table across diverse areas such as coastal, rural and urban economies, and political perspectives. In addition, this structure offers Norfolk and Suffolk the opportunity to harness complementary strengths of each area and address unique challenges with shared solutions, ultimately delivering balanced and inclusive growth across the whole region.

We currently have 16 councils across Norfolk and Suffolk, the two models presented by Norfolk and Suffolk proposes this is streamlined across the two county boundaries and therefore entails a significant reduction which represents a constructive balance between scale and efficiency and democratic deficit which we believe supports strong decision-making.

Devolution enables the mayoral combined county authority to take responsibility for strategic transport and infrastructure planning and delivery, ensuring that these are developed around economic functionalities and not county administrative boundaries. For example, a rail investment strategy that supports upgrades to Ely junction combined with targeted road infrastructure upgrades on major trunk roads like the A47, A10 and A17 would significantly improve the movement of freight across the region. In addition, the delivery of a regional energy plan that addresses grid infrastructure constraints and transmission challenges could significantly accelerate housing and business growth.

Bringing together the economies of Norfolk and Suffolk under one mayoral combined county authority fosters a shared identity and purpose supporting civic pride, more stable governance and stronger leadership. This structure ensures all types of communities are represented and eliminates policy bias towards only urban, coastal or rural priorities.

We understand what has made some regional authorities successful and these lessons align with our own three unitary model, for Norfolk and the similar three unitary model being proposed by Suffolk district partners.

8.5 Local Government Reorganisation criteria

In terms of the Local Government Reorganisation criteria, Devolution has quite rightly been highlighted as one of the six key criteria and requires any business case to outline how the new unitary structures will support devolution arrangements and where there are no arrangements in place, how the new unitary structures will help unlock devolution.

Proposals should also ensure that there are sensible population size ratios between local authorities and any strategic authorities with timelines that work for both priorities. We believe that the specifics within these criteria are met by our three unitary proposal and support the wider multi unitary proposals when considering Norfolk districts' own Local Government Reorganisation proposals.

The table below provides further evidence of how our proposal meets these criteria and provides additionality in supporting the future success of our mayoral combined county authority.

Strategic Benefits of Multi Unitaries	Opportunity
Representation of Place	The Norfolk & Suffolk Mayoral Combined County Authority will cover an area of approximately 3,500 square miles with a population of about 1,700,000 residents. The area is predominantly rural, interspersed with urban centres including the city of Norwich, and defined by a rapidly changing coastline presenting significant environmental and infrastructural challenges. It is important the complexities of this combined area can be appropriately represented by the Mayoral Combined County Authority. Multiple constituent authorities will provide strong anchor institutions that can represent and champion place at a

Strategic Benefits of Multi Unitaries	Opportunity
	more local level than one single voice representing each county if a single unitary for each was pursued. It will also mean that smaller businesses will have a better conduit for their views to be heard by the Mayoral Combined County Authority by having a more locally available unitary to engage and build relationships with, and that can then represent their views. The proposed three unitaries in Norfolk will give a voice to a wider range of communities and interests, representing urban, rural and coastal needs, while preventing a dominance in any one single area. Our past achievements and successes through collaboration are grounded in having several voices, constructive challenge, enhanced scrutiny and local stakeholder representation at the table, as evidenced by our previous effective New Anglia Local Enterprise Partnership. A multi unitary model will ensure this approach is continued.
Capacity and Capability	The Norfolk & Suffolk Mayoral Combined County Authority will be a commissioning strategic authority; through this model it will have limited resource and capacity to deliver programmes of work without the support of external organisations. Multiple unitaries presents the opportunity to ensure there is capacity, skills and capability in the wider system to deliver the strategic priorities of the Mayoral Combined County Authority responding neatly to this proposed commissioning model. The proposed three unitaries in Norfolk will bring a diverse skill set, local knowledge and capacity to effectively

Strategic Benefits of Multi Unitaries	Opportunity
	support the Mayoral Combined County Authority and enable wider joint investment and coordination on issues such as transport, housing and skills.
Governance, enhanced local representation and democratic legitimacy	The establishment of multi-unitary authorities ensures a broader and more balanced representation of diverse places and populations. With a multi unitary approach being presented by both the Norfolk and Suffolk districts there will be more “voices at the table” creating a distributed leadership and delivery model, increasing the overall capacity in the system to address and manage complex issues. Scrutiny functions are better resourced and diversified which will improve transparency, safeguard against conformity bias, and provide effective and safe challenge. This will also ensure a fair, inclusive and democratic approach to decisions is achieved alongside helping to prevent the risk of consensus driven decision making. Spreading decision making across multiple unitary councils encourages ownership of outcomes and each authority can hold others (and the mayor) to account, further improving transparency.
Scrutiny	A mayoral combined county authority with multiple unitaries enhances the ability of the system to scrutinise policy and performance effectively. Rather than a single scrutiny panel operating at distance, multiple unitary authorities can contribute layered and diverse oversight; each bringing unique perspectives based on local experience. This strengthens transparency, embeds continuous challenge, and ensures decision making at the MCCA level is subject to robust, evidence-based review. It also enables clearer escalation routes, peer accountability and improved public confidence in how power is exercised.

Strategic Benefits of Multi Unitaries	Opportunity
	This reduces the risk of unchecked power concentrated in the hands of the mayor or one or two dominant authorities.
Risk (including Financial)	The more stakeholders involved in decision making are likely to reduce risks associated with poor governance including decision making, lack of oversight and or political bias. Shared scrutiny makes it harder for risky or one-sided decisions to pass unchecked and encourages different perspectives in risk assessment and mitigation planning. Furthermore, multi-unitaries will spread any financial risks that the constitute authorities may have to absorb if there is a lack of financial management within the Mayoral Combined County Authority itself, reducing the risk of severe financial impact if that risk is spread across a multi unitary model.
Trust in Institutions	A more balanced multiple unitary structure within a mayoral combined county authority fosters greater public confidence by ensuring decisions are made closer to the people they affect. When residents see their communities reflected in the make-up of regional governance, and experience services that understand and respond to local context, it builds trust in institutions. Visibility of local leadership, coupled with fairer representation across diverse places, reassures communities that no area is being left behind or overshadowed. Crucially, public confidence is not just a by-product of good governance, it is a prerequisite for long term democratic legitimacy, civic engagement and policy compliance. A model that feels accessible, equitable, and responsive creates the conditions for shared

Strategic Benefits of Multi Unitaries	Opportunity
	ownership of regional priorities and stronger public backing for change.

Table 12: How the new unitary structures will support devolution arrangements

9. Implementation map

9.1 Introduction

Implementing LGR is complex, time-consuming, and challenging. No council within Norfolk has undertaken a transformation programme of this nature in recent history. This implementation plan, which will be refined over time, sets out how we will prepare effectively, resource appropriately, and deliver on schedule to create three distinct unitary authorities, each designed to reflect the unique needs of the communities they will serve.

LGR presents the biggest change that local government in Norfolk will have faced in a generation. It is a massive opportunity for the county, with the potential to realise benefits for our residents and communities and set up three distinct unitary authorities that are better placed to respond to complex challenges at a local, regional and national level.

However, capitalising upon this opportunity needs a considered and realistic approach. We have thought carefully about how we can deliver LGR in a way that safeguards critical services but allows us to bring about the change that will realise the benefits of this programme.

Given the level of ambition and desire to enact radical reform it is imperative that district, borough and city councils manage implementation to ensure this is followed through.

9.2 Approach

Underpinning our approach is a set of guiding principles that are set out in the diagram below.

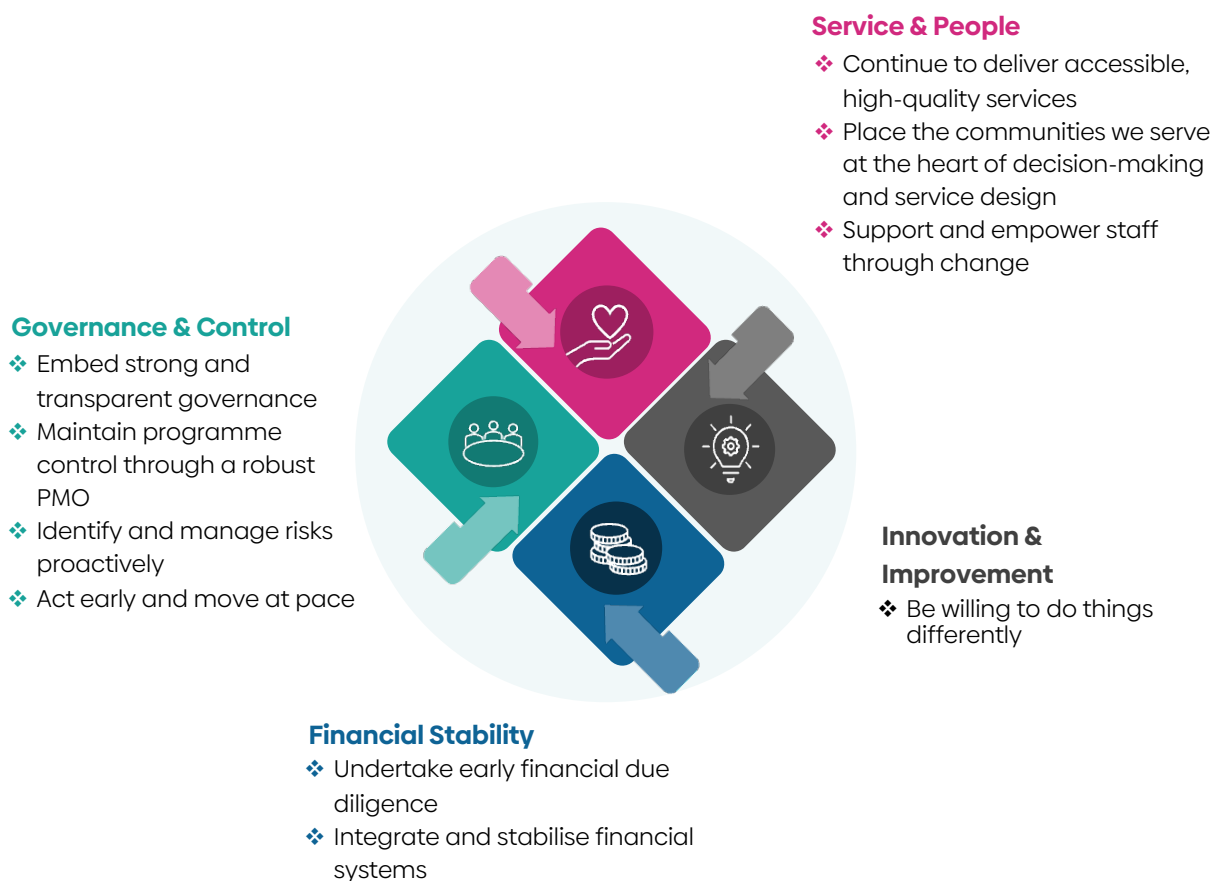


Figure 11: Guiding Principles

Implementing LGR will involve a great deal of change, more than can be delivered between now and the likely vesting day, in April 2028. Therefore, we have developed an implementation approach that will support us to both ensure we establish three new unitary councils that are ‘safe and legal’ and set the foundations for ambitious programme of reform that will deliver the benefits of LGR for our residents and communities.

We see this change as falling into one of three categories. Firstly, there is the change that is essential to having three new, functional organisations on day one (a ‘safe and legal’ council) – this includes their constitutions, safe transfer of social care services, and full staffing structures, amongst others.

Secondly, there are some foundational changes that will set up the new unitaries to hit the ground running with a comprehensive transformation and public service reform programme – this includes setting up the portfolio governance, Programme Management Office (PMO), and other enablers that will help drive change.

Finally, there are the longer-term changes that don't necessarily need to be implemented by vesting day (although it will be desirable and we will endeavour to include as many of these as possible) but will realise the benefits of moving to a three-unitary model. These three types of change are reflected in our implementation approach, with the 'essentials' prioritised for the first two phases of the plan.

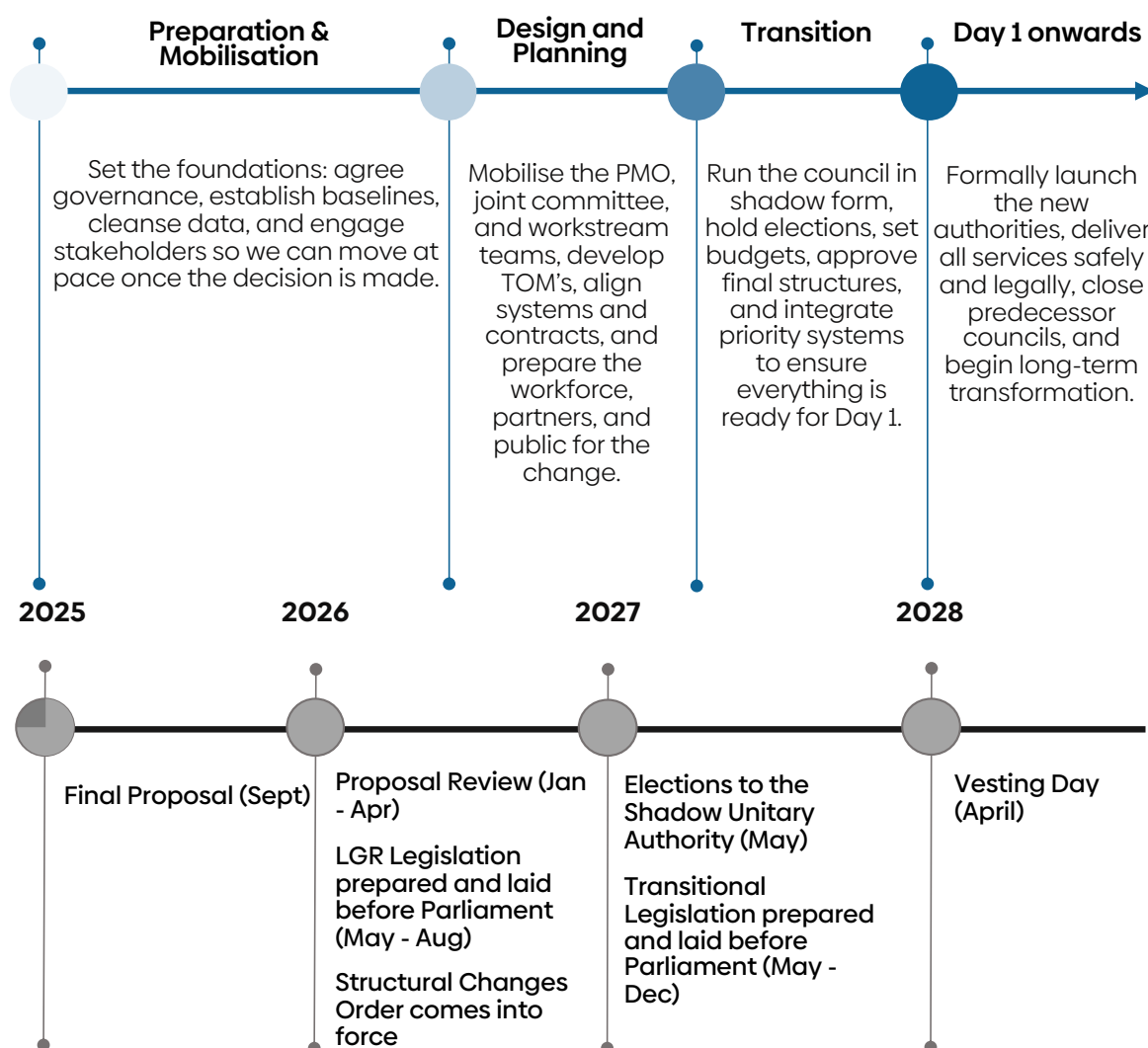


Figure 12: Implementation Approach

We've broken our implementation approach into four phases to account for what we will be able to do at each point in the government timetable, and for the considerations we've outlined above.

- **Phase 1 – Preparation and mobilisation:** The period up until the announcement on the preferred LGR option. This phase focuses on laying the groundwork so that we are ready for day one.
- **Phase 2 – Design and planning:** This is the period immediately after announcement where we set up the infrastructure for the programme and begin detailed design and planning of the transition.
- **Phase 3 – Transition:** Once the Structural Changes Order (SCO) is passed, either Shadow Authorities or Implementation Executives will be established. It will guide the work to prepare the new unitaries for vesting day.
- **Phase 4 – Day 1 onwards:** The new unitaries go live. With the foundations in place to ensure that all services can be delivered safely and legally, each authority will be positioned to deliver a portfolio of transformation to realise the full benefits set out in this proposal.

Within this, alongside the main components of each unitary authority blueprint, there are several cross-cutting elements that are integral to successful transition to the new model.

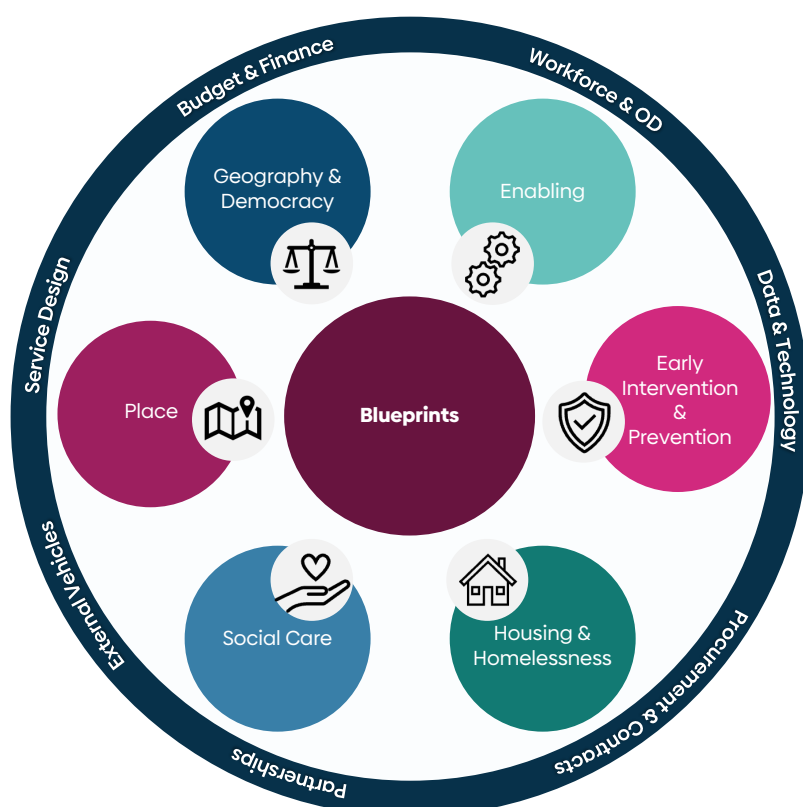


Figure 13: Cross-cutting Themes

These are:

- **Democracy and governance:** Developing the constitutions, establishing the leadership to steward the new organisations and running the elections for new councillors who will govern the unitaries. This also includes setting up shadow council arrangements as part of the transition
- **Service design:** Developing the detailed future operating models that lay out how each service within each new authority will work
- **Budgets and finance:** Apportioning the existing budgets to each new unitary in a fair and transparent way, as well as dealing with other key financial policies such as council tax harmonisation
- **Workforce and organisational change:** Supporting the existing officer workforce with the changes and staff transfer to the new organisations. This will also entail other workforce considerations such as union engagement, staff consultation, redeployment issues, and culture and practice changes
- **Data and technology:** Ensuring that all data we hold is accurate and complete, before it is safely transferred to the correct unitary. Managing the systems which hold this data and support service delivery falls within this element.

- **Procurement and contracts:** Identifying which contracts are novated to each unitary. This may involve contract variations and negotiations with suppliers, as well as preparation for decommissioning and re-procurement.
- **Partnerships:** Ensuring that the strong working relationships with partner organisations are maintained, as well as setting up new arrangements that align with both unitary aspirations and regional goals.
- **External delivery bodies:** Councils have set up a variety of delivery vehicles (arm's length companies and joint ventures) to support strategic objectives. We will need to work through decisions around the future of these vehicles and ownership of them.

9.3 Creating the conditions for success

Successful delivery of LGR depends upon setting up the right conditions for the programme. There are several elements that we will put in place prior to launch. We will set up governance and reporting arrangements that meet MHCLG requirements. We will set up a Programme Management Office (PMO) to develop and implement critical programme infrastructure (methodology, reporting, tools, etc.). We will also invest time in developing a detailed programme plan and resource and assemble teams that have the capabilities and capacity to deliver.

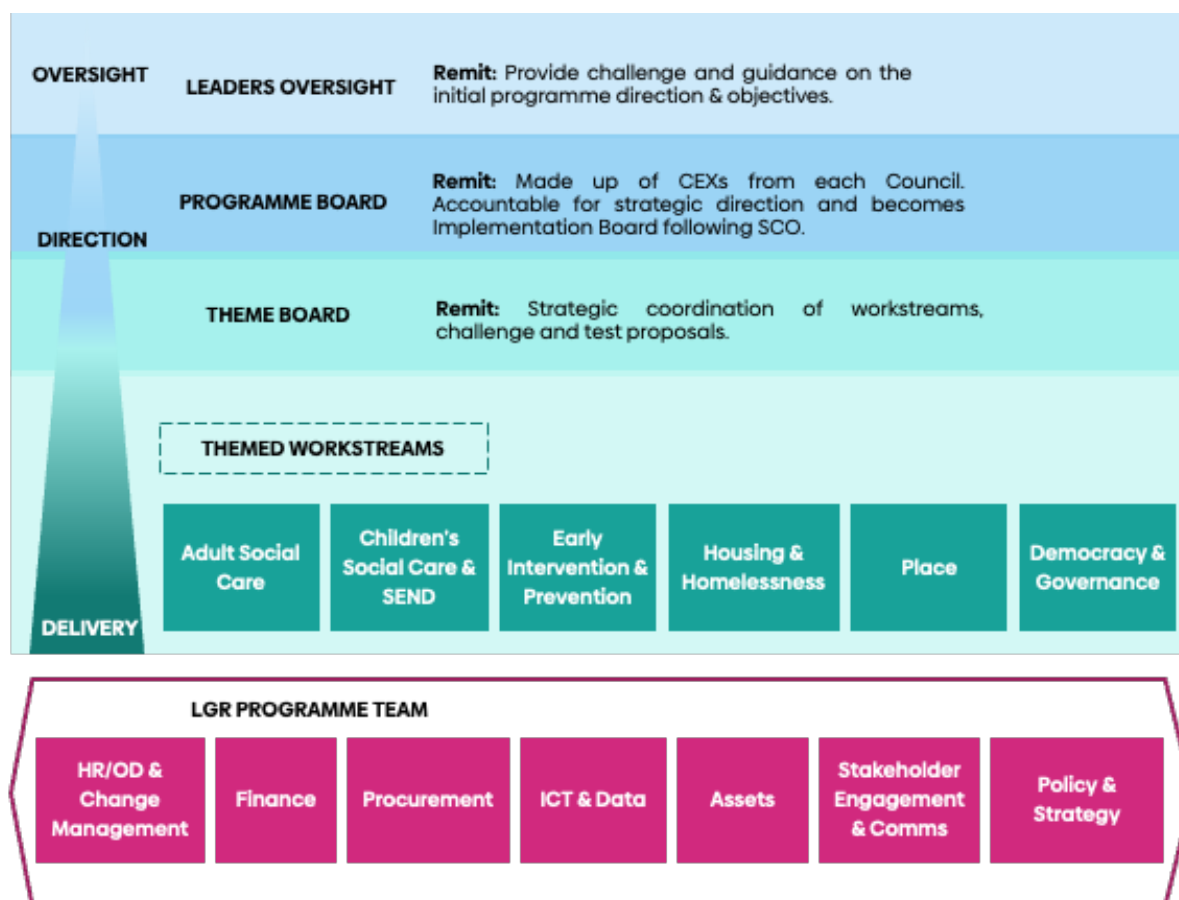


Figure 14: LGR programme governance and structure that we will adopt.

A strong, coherent governance framework will underpin the implementation of the three unitary authorities. Our approach ensures political oversight, strategic leadership, and operational delivery are aligned, with clear roles and responsibilities at each level. Governance will build upon the joint working approach established during the business case development, becoming progressively more formalised through mobilisation, design, and ultimately the Shadow Authority period.

At the top level, a Leaders Oversight Board will provide collective political challenge, direction, and assurance on the programme's overall objectives. Alongside this, a Programme Board, comprised of all current Chief Executives, will hold responsibility for strategic alignment, risk management, and oversight of interdependencies across organisations. Once the SCO takes effect, this body will formally transition into the Implementation Boards / Joint Committees, accountable for driving delivery up to the formation of the Shadow Authorities.

Finally, we've sought to learn from those councils that have recently gone through the process, applying good practice where this has been successful and is likely to work in our local context, and building in lessons of what could have gone better. We have looked to changes elsewhere (particularly the new unitary authorities of Cumberland and Westmorland & Furness in Cumbria, and Bournemouth, Christchurch & Poole / Dorset, as well as North Yorkshire) to understand what worked, capture lessons learned and identify the key steps to ensure we deliver the changes and realise the benefits of LGR.

As part of the development of both the new unitaries blueprints and this implementation plan, we have carried out risk, assumption, issue and dependency (RAID) assessments. The detailed RAID log can be found in the Appendix.