

21 April 2009

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

Dear Sir

Structural Review of Suffolk: Further Draft Proposals

1. The Suffolk Preservation Society (the Society) submits the following submission in response to the Boundary Committee's invitation dated 2nd April, 2009. The Society has 1800 members, drawn from all corners of Suffolk, made up of one third of all town and parish councils in the county, as well as 54 amenity societies.
2. The Society has written previously to the Boundary Committee regarding this issue on the 25th March 2008 and on the 1st September 2008. For the avoidance of doubt both those letters form an integral part of this submission.

General Comments

3. The Society fully supports the retention of Lowestoft within Suffolk and its administration, for local government purposes, from within the county.
4. The Society is unconvinced that any unitary local government structure will deliver a better, more effective or efficient service in the county for local people and communities. There is no evidence that there is a real understanding of the needs of Suffolk and its people being reflected in the draft proposals. It appears more and more that the Boundary Committee are imposing on Suffolk a model for the administration and delivery of local government which ignores the real issues, problems and opportunities in the rural county. The proposals appear also to have no regard to the factual

evidence that the rural county still works on the basis that those market towns, of what ever scale and size, service their hinterland and rural communities. It is at this level that decisions of all types relating to service delivery in local government are best made. This suggests therefore that the current model for local government may therefore be the best for the county.

5. The Society would be the first to acknowledge that the current structure of local government is not perfect. But it believes, as do the majority in the county, that overall it services Suffolk, its communities and people well. Furthermore, it is capable of being improved, without the need for wholesale replacement with all the associated upheaval, costs and disruption. Such a way forward is more likely to secure the improvements required, have widespread support of the people of the county, be easier to achieve and deliver an improved service at reduced costs. Perhaps some fine tuning between the existing local authorities implemented by a series of face to face open and creative discussions with local people is all that may be necessary. It could achieve this without any of the disadvantages and uncertainties of the proposal now put forward.

6. The Society would draw the Committee's attention to the fact that there is also strong support for the purpose, role and independence of town and parish councils in the county. This has not come across in any stage of the Review nor does it in the proposals. They are all too often the unsung heroes of local government, reliant on limited resources and dedicated volunteers to deliver local services.

Detailed Comments on Pattern A – County Unitary Authority

7. The Society is concerned that this model will only have the potential to work successfully with strong Community Boards which have significant powers, responsibilities, decision making and funding delegated to them. They will also need to be accountable locally. But this raises a fundamental question of their size and the resources with which they will need to work. In short, the Society sees that if they are to work, they will, in effect, be small-scale district councils, which then raises the question of why change the existing structure?

8. In terms of the financial arguments and supposed benefits of this structure, the Society is sceptical about the proposed savings because it feels that the costs of delivering the Community Boards in an effective way has seriously been underestimated both initially and in terms of future running costs. The Boards will require major servicing and human resources to deliver their decisions etc. Their existence might also be confusing to the general public.

9. One of the major problems with this proposal/option is that it is most likely to take strategic decision making on a variety of services further away from communities and people. It fails to empower people and in fact has the potential to do the very reverse. It would enable more of the top down model of decision making and less of the critically important bottom up working, so essential to the county.

10. The Boards also have the potential to undermine the role and function of town and parish councils. The published proposals say little about the role of this essential part of local government. This is unfortunate. Will Community Boards take powers and responsibilities away from the traditional town and parish councils? If they do not, what precisely will be the role of town and parish councils in the new structure?

Detailed comments on Pattern B – Two Unitary Authorities: Ipswich and Felixstowe and Rural Suffolk

11. The Society reiterates that it sees no real rationale for the creation of Ipswich and Felixstowe Unitary Authority (I&FUA). The Haven Gateway Partnership (HGP) offers a suitable vehicle, subject to some changes, for influencing decision making in the area. The supposed synergies between economic objectives of the HGP and those of an I&FUA are at best tenuous, and limited. There are no synergies in other aspects and delivering quality local government is more than just delivering economic objectives.

12. In addition, the creation of the I&FUA appears to fly totally in the face of the rationale in the Boundary Committee proposal for the Patten A option/structure. The two large urban areas would dominate the authority and rural communities would have little power, influence on decision making and expenditure in their area. There would likely be perhaps naturally, a massive centralisation of services.

13. In respect of the Rural Suffolk Unitary Authority (RSUA), the Society sees the same issues and problems as detailed in paragraphs 7 to 10 inclusive above.

Conclusions

14. The Society sees no major or significant justification or advantages for the changes proposed which warrant the total abolition of the existing structure of local government in Suffolk. It takes the view, as it believes do the majority in the county, that the current system should be retained and modified to make

it more efficient and effective. **Retaining the current structure is therefore the Society's and the people of Suffolk preferred option. The Society asks that this is now formally considered.**

15. It does not believe ultimately that the cost of establishing comprehensively any new unitary structure has yet to be fully calculated. When it is, as with other similar cases/counties like Cornwall, it considers the costs will increase and any potential savings will disappear. The reality is that in the end the new structure might even cost more than the existing structure as it is implemented.

16. There is nothing in the new structure for the communities and people of Suffolk. They have not said they even want the current structure abolished as they have never been asked the question. In that respect the current review and consultation remains fundamental flawed and will always be so.

17 The rationale for either pattern is thin, tentative and in many instances unsound. It will lead to a centralisation of decision making and will fail to empower people.

18. But most of all it is the role, function and purpose of town and parish councils which remains in the balance in this review. Yet it is this level of local government which is best placed to represent local people and ensure that they are at the heart of deciding what happens and what decisions are made in their name.

Yours sincerely,

Richard Ward
Director

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