

4 January 2010

Unitary Structures Team
Department for Communities and Local Government
Zone 3/J1, Eland House
Bressenden Place
London SW1E 5DU

SuffolkStructures@communities.gsi.gov.uk

Dear Sir

Structural Review of Suffolk: Advice to the Secretary of State

1. The Suffolk Preservation Society (the Society) submits the following submission in response to the Boundary Committee's report and invitation dated 9/14 December 2009. The Society has 1800 members, drawn from across Suffolk, comprising one third of all Town and Parish Councils in the county, together with 54 local amenity societies.
2. The Society has written previously to the Boundary Committee regarding this issue on the 2 April 2009, 25 March 2008 and on the 1 September 2008. For the avoidance of doubt our previous representations 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 an accessible, more accountable or efficient service in the county for local people and communities. It appears more and more that the Boundary Committee are imposing on Suffolk a model driven by short term financial imperatives, as opposed to the optimal structure for the administration and

democratic delivery of local government services. We do not accept that financial efficiencies identified in the Gershon Report (2004) '*Releasing Resources to the Front Line*' are best achieved by a move to unitary structures in Suffolk. In particular, shared back office systems and partnership working still offers significant scope to retain the local dimension of front line services whilst achieving the savings identified under the unitary models.

5. The Society acknowledges that the working practices within the current structure of local government are not perfect. We believe that there are significant achievable savings that are deliverable without compromising local front line services. We do not accept that the improvement of local Government services is best achieved by a centralised model of administration. We believe this would prove unresponsive to the diverse character of Suffolk and in particular, the large areas of dispersed rural communities that are poorly served by public transport. We believe that a two-tier model serves Suffolk and its communities well and is better placed to deliver improvements in efficiency. Furthermore, it is capable of significant improvement, without the need for wholesale replacement with all the associated upheaval, costs and disruption of public services. This approach is more easily achieved and likely to secure the improvements and efficiency savings required, whilst retaining the widespread support of the people of the county.

6. The Society reminds the Secretary of State that there is also strong support for the purpose, role and independence of town and parish councils in the county. As the foundation upon which our democracy is founded, they are a model for efficient and accountable public services; functioning effectively on limited resources and using dedicated volunteers to deliver local services. We believe that the suggested Community Boards are both unelected and are, in essence, an acknowledgement that the unitary model is flawed. It is fundamentally remote from local communities and lacks accountability. Instead, we believe that the existing Parish and Town Councils should form the basis of accountable and responsive service delivery. If duplication of services within the existing two tier model is central to the Boundary Committee's justification for unitary governance in Suffolk, then this should be addressed without the need for wholesale restructuring.

7. The Society believes that the fundamental motivation for restructuring is financially flawed and that a unitary model will inevitably serve to impoverish the quality of local services. We believe that through partnership working between the Districts and County Council and by sharing corporate services

greater savings are achievable than under the unitary models favoured by the Boundary Committee. We have not seen any transparency with regard to the transitional costs and the actual savings achievable through unified corporate structures. We believe that the savings envisaged under the unitary models must be based on significant reductions in the resourcing of front line services (effectively by significant reductions in front line staffing) and a short term raid on the financial reserves of the District Councils to finance the new unitary authorities. We believe that this approach is cynical, short sighted and unsustainable and will exacerbate the long term financial position of local government in Suffolk.

Detailed Comments on proposal for single County Unitary Authority

7. The Society believes that this model will inevitably place a greater distance between the governed and governors resulting in disengagement and powerlessness. Such a model will increase inequality of opportunity to participate in local affairs. 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. Effectively, such boards would constitute a second tier of administration. They will also need to be accountable locally. This raises a fundamental question of their size and their requisite resourcing. In short, the Society perceives that if they are to work, they will, in effect, be small-scale district councils. This undermines the whole rationale for unitary structures.

8. In terms of the financial arguments and supposed benefits of this structure, the Society is sceptical about the proposed savings. In particular, the proposals lack transparency, in terms of the service delivery model on which the financial case (both transitional and normative) is based. We are concerned that a considerable reduction in front line staffing will result in those service areas traditionally performed by the districts. Not only would this adversely impact on services, but moreover, would have a significantly harmful impact on the local economies of the host market towns. A significant part of the local economy of these host towns is directly or indirectly derived from the second tier authorities. Furthermore, the unitary model is dependent on the establishment and successful operation of Public Service Villages (PSV) as local service providers and Community Boards. The capital and revenue costs of delivering both the PSV's and the Community Boards in an effective way have been seriously underestimated. The Boards will require major servicing and human resources to deliver their decisions etc. The status of the Boards will also be confusing to the general public.

9. A single unitary authority would essentially make strategic decision making significantly more remote from communities and people and thereby less accountable. It would serve to disenfranchise communities from the political process and isolate rural communities from essential services. It would disproportionately affect those reliant on public transport, especially the elderly and less affluent.

10. The Boards also have the potential to undermine the role and function of town and parish councils. The proposals could have built upon the existing roles of the traditional Town and Parish Councils in decision making and the proposals fail to build upon these established and efficient democratic institutions.

Detailed comments on Two-Unitary pattern: Ipswich and Felixstowe authority and Rural Suffolk authority

11. The Society reiterates that it sees no real rationale for the creation of Ipswich and Felixstowe unitary authority (I&F). 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 the I&F authority 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&F authority appears to fly totally in the face of the rationale for the single unitary authority option. The two large urban areas would dominate the County. The delivery of services to the rural communities would be costly and inefficient being divorced from the major urban centres to which they are inextricably related. A two authority solution that divorces the major urban centres of the County from their rural hinterland would create inbuilt fundamental financial problems. In particular, the rural authority would suffer from a long term revenue deficit.

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

Conclusions

14. The Society sees no advantages or significant justification for the changes proposed which warrant the total abolition of the existing structure of local

government in Suffolk. In our opinion, the current system should be retained and modified to make it more efficient and effective. **Retaining the current structure is therefore the Society's favoured option. The Society asks that this is now formally considered by the Secretary of State.**

15. The Society does not believe that the ultimate cost of establishing comprehensively any new unitary structure has yet to be fully calculated nor presented in a transparent manner. When it is, it considers the costs will increase and outweigh any potential savings unless significant cuts in front line services are intended. We anticipate that the actual costs of the new structure might be even greater than the existing structure, when implemented. Furthermore, the actual cost to the rural economies of our market towns has yet to be factored in to any such cost-benefit analysis.

16. The representations received are not based on adequate information for Consultees to formulate an informed response. In particular, the financial case for restructuring has not been robustly justified. The rationale for either unitary pattern is thin, tentative and in many instances unsound. The centralisation of services and decision making will inevitably disadvantage the most vulnerable sections of the community.

17. The formation of Community Boards will not provide an effective surrogate for the existing District Councils. The substitution of an elected and accountable body by an appointed and unelected Board is nonsensical and runs counter to our democratic tradition. Fundamentally, any restructuring should reinforce the role, function and purpose of Town and Parish Councils. As the grassroots of local government, these locally elected bodies are best placed to represent local people and ensure that they are at the heart of local decision making.

18. The Society respectfully requests that the Secretary of State dismiss the proposed unitary structures in favour of a reformed two tier system for the reasons set out above.

Yours sincerely,

Simon Cairns
Director

John Denham MP – Secretary of State for Communities and Local Government

Cc Suffolk MPs

Cc Suffolk Town and Parish Councils

Cc SPS/CPRE Suffolk Branch members

Cc Suffolk Amenity Societies

Cc Suffolk Authority Chief Executives and Leaders

Cc SALC

Cc CPRE Norfolk

Cc CPRE EoE

Cc Media Consultants