

Consultation Response on Proposals for Local Government Reorganisation in Norfolk and Suffolk

Consultation response from Babergh District Council on the proposal from Babergh District Council, East Suffolk District Council, Ipswich Borough Council, Mid Suffolk District Council, and West Suffolk District Council

1. To what extent do you agree or disagree that the proposal suggests councils that are based on sensible geographies and economic areas?

Strongly agree

2. To what extent do you agree or disagree that the proposed councils will be able to deliver the outcomes they describe in the proposal?

Strongly agree

3. To what extent do you agree or disagree that the proposed councils are the right size to be efficient, improve capacity and withstand financial shocks?

Strongly agree

4. To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?

Strongly agree

5. To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?

Strongly agree

6. To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements, for example, the establishment of a strategic authority?

Strongly agree

7. To what extent do you agree or disagree that the proposal enables stronger community engagement and gives the opportunity for neighbourhood empowerment?

Strongly agree

8. If you would like to, please use the free text box to explain the answers you have provided to questions 1-7 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on this proposal.

Question 1 - Sensible geographies and economic areas

The proposal for three authorities as set out in the Case for Change for Three Councils for Suffolk best meets the criteria of sensible geographies and economic areas.

Three Councils for Suffolk would enable place-based leadership, leveraging deep local knowledge of communities and assets, continuing to include and work with town and parish councils, retaining and building on strong local relationships that already exist, enabling agile and placed-based responses that are locally relevant and meaningful to reflect the individual needs

and priorities of each area (p.45 of Three Councils for Suffolk Case for Change). Three councils will be able to achieve person centred, community rooted, outcome focused and trust-building services. One unitary council across Suffolk would break the existing strong ties communities have with their local councils and have insufficient capacity to respond to different local needs.

Delivering services at the right scale, close enough to communities to be responsive but large enough to be efficient, would be achieved through Three Councils for Suffolk. The investment in preventative and asset-based approaches are proven to deliver better outcomes at lower cost, which Three Councils for Suffolk would achieve (p.50). Smarter collaboration where it adds the most value such as emergency planning, safeguarding and waste disposal would also be achieved. System redesign that supports long term reform and sustainability, accelerated progress towards prevention and innovation, embedding a mindset of learning, adaptation and excellence across new councils would be possible through three councils, but would be lost with a single unitary council for Suffolk (p.44-46).

Through three councils, value for money will be achieved through the rightsizing of each council's workforce. Each council will have its own team of statutory and other senior officers charged with the overseeing of the leadership and delivery of high-quality council functions. These senior managers and their teams will have the necessary capacity and expertise to drive delivery and value for money across Suffolk, reducing reliance on expensive interims to cover vacancies. They will have a deep understanding of the communities within their council area and critically have the capacity to meet community needs. In a similar way, strong political leadership and engagement will be achieved through three councils compared to one. Political leaders will be more strongly connected to their local communities than they would with one council with fewer councillors. They will be able to be responsive and highly engaged with their communities, bringing their local knowledge to shape decision making that is relevant and responsive to their communities (p.48-49).

Other options were considered in the development of Three Councils for Suffolk (p.46), but these either formed authorities that were too big to drive improvement, formed imbalanced unitary councils in terms of size or did not recognise the economic area of Ipswich. The proposed three authorities that seek to create Western Suffolk, Central & Eastern Suffolk and Ipswich & Southern Suffolk however created balanced unitary authorities in terms of population and economic areas.

In terms of population size, the proposed authorities would be larger than existing current average population of unitary councils (p.47). With predicted population growth set out in the case for change, considering Government's growth targets for the region, the population of Suffolk is estimated to be over 1 million people by 2045. Each of the proposed three unitary councils would have between 322,000 and 342,000 people. 1 million people is an extremely large population size for one council. The split into three councils provides a much more typical population size for an effective unitary authority.

A move to a three unitary model offers a chance to streamline governance, consolidate functions, and unlock efficiencies. The creation of three unitaries enhances the ability to invest in prevention and early intervention, while establishing stronger collaboration with partners such as the NHS, police, charities, and community groups, ensuring better outcomes for the people of Suffolk and supporting the broader public sector reform agenda (p.54).

The footprint of Three Councils for Suffolk also aligns with other public sector bodies' footprints including Policing Command Area and the Community Policing Area being split into West, East and South teams; Suffolk Fire and Rescue split into North, South and West teams; and Health teams covering the North East, West and Ipswich & East (p.38-40).

The proposals under Three Councils for Suffolk make best sense to the economic areas for Suffolk (p.26-38). The economic areas in Suffolk are distinct, and a coalescence of industries, expertise and knowledge exists in the three identified unitary councils. These are:

- Western Suffolk – advanced manufacturing and engineering, agri-tech sector and other small and medium sized enterprises along A14 growth corridor, horse racing industry, part of Cambridgeshire functional economic area and housing market area, and Cambridge to Norwich tech corridor.
- Ipswich and Southern Suffolk – connects the wider Ipswich economic area including finance, insurance, technological excellence, creative services and port-related activities.
- Central and Eastern Suffolk – clean energy, shipping, tourism and agri-tech.

These economic areas are distinct and need to be recognised as such to make sure the policy set through local government best serves delivery of economic ambition set out in the Government's Industrial Strategy.

Question 2 - Delivering outcomes identified

The Case for Change for Three Councils for Suffolk gives evidence of how three, smaller unitaries would be able to deliver improvements in health, education, employment and wellbeing and drive better outcomes for all residents. It gives evidence of how working together to understand and meet local needs will be achieved. A single unitary would give a centralised structure that overlooks local differences and priorities, it would lead to weaker local partnerships due to broader, less targeted engagement and would be less responsive to emerging local issues or community voices. (Appendix 2 of Three Councils for Suffolk Case for Change)

A multi-unitary model is founded on a deep understanding of what Suffolk's different places, communities and economies need. A one unitary approach risks the continuation of the status quo, a greater degree of remoteness from communities and higher numbers of children relying on one authority for support. For example, the closer community trust and ties of the three unitary approach, alongside the right community support provision, will ensure that the relationship is in place to encourage more kinship care.

In order to successfully deliver improvements in health, education, employment and wellbeing for and with residents, councils need to be deeply rooted in local places, and close enough to their communities to be responsive to specific contexts and needs. A council of over 1 million residents by 2045 could not be deeply rooted in local places or able to respond to its communities' needs.

Question 3 - Efficient, improve capacity and withstand financial shocks

The proposed three unitary model for Suffolk presents a financially sustainable and operationally efficient solution to the challenges facing local government in Suffolk. With a payback period of under 4.5 years, it offers a powerful value for money case under Government Criterion 2 and aligns with national expectations for resilient and efficient public service delivery.

Beyond core savings of £14 million (net) annually, the model forms a strong foundation for long-term financial and service resilience. The creation of three unitaries enables focused local leadership, supports economic growth, and is underpinned by community-centred service delivery. Crucially, it enhances the ability to invest in prevention and early intervention, while establishing stronger collaboration with partners such as the NHS, police, charities, and community groups, ensuring better outcomes for the people of Suffolk and supporting the broader public sector reform agenda.

The review of current Adult Social Care and Children's services performance across Suffolk, by independent advisors SCIE (Social Care Institute of Excellence) and Peopletoo, identified further

potential savings opportunities in addition to the annual core savings of £14 million. The review identified a range of Adult Social Care and Children's Services that are costing more than or performing worse than the "nearest statistical neighbour average" for councils of the size being proposed. The review demonstrated that current care costs in Suffolk are significantly higher than those achieved in unitary authorities of similar sizes to those proposed with the three council model.

Bringing service cost and performance in line with the nearest neighbour average, through more localised services, has been identified as a key opportunity that could save £67.5 million annually. It would be for the new councils to decide how to reinvest this additional saving into further preventative services. However, at headline level the total savings opportunity between the core savings of £14m and the additional £67.5m brings the total of available savings to £81.5m per year from year 6 while achieving average cost and performance in important areas of Adult and Children's Service and having a positive impact on vulnerable people.

Question 4 - High quality and sustainable public services

Three unitary councils in Suffolk are well-placed to deliver high quality, sustainable public services, as they will continue to tailor services to the local circumstances and contexts of their places, and to harness the capacity of local organisations, communities and residents to continue to maximise the effectiveness of delivery.

At the same time, the creation of three new organisations gives an opportunity to 're-set' partnerships and relationships, and to drive innovation, by redesigning arrangements

In order to deliver high quality, sustainable public services, future unitaries will need to perform particularly strongly in the delivery of 'High Demand Statutory Services', for example, social care and homelessness.

The work by the Social Care Institute for Excellence, Peopletoo and Mutual Ventures highlighted in the Three Councils for Suffolk Case for Change demonstrated how three, small unitaries would offer a focus on prevention, integration and place-based services in Adult Social Care. They would be able to manage future demand through locally driven preventative approaches across all Adult Social Care service activities and reducing long-term care costs. They would fully embed place-based and local community delivery models (working closely with the voluntary sector and the NHS) thereby improving our ability to tailor services to local needs and local capacity and in turn deliver a better, more sustainable workforce model. Three councils would also further develop and enhance the strategic commissioning model and approach to market management to deliver more efficient and effective, local care and support services.

In Children's Services, three councils would enable focus on early help and community support, with fewer layers of management and more local commissioning. Three unitaries would maintain a close focus on local communities to promote early help and community support and maintain quality and oversight by ensuring that leaders are close to practice, building local strategic relationships and ensuring that strategic outcomes are implemented at a local level. Finally, three councils would develop strategic commissioning approaches and capital spending programmes to ensure that sufficiency, value and outcomes are achieved in key areas including school places, SEND placements and local provision.

Question 5 - Informed by local views and meet local needs

The District and Borough case for change clearly articulates the findings of the survey that was held from May to late July 2025. The findings of local engagement for Three Councils for Suffolk as shown on p.89 of the Case for Change highlight:

- Concerns about a single unitary council being too large to understand and deliver on local priorities across the county and too large to innovate and improve services.
- There are concerns about the scale of a single unitary and its risk profile.
- There is hesitancy from communities surrounding Ipswich about being within the same council area as the County Town. This appears mostly based on myths about Council Tax increases, that housebuilding will be so extensive that surrounding towns and villages become joined on to Ipswich, community identity, and the County Town taking priority for spending.
- There is a strong sense that councils with a smaller footprint will deliver better outcomes for residents and businesses as relationships will be stronger. Rural communities in particular are concerned about being overlooked.
- There is scepticism about predicted cost savings.
- There is concern that there will be too few councillors to cover the workload and ensure proper representation of community needs.

The district and borough survey findings support the final submission in that three unitaries better represent the communities and businesses that they serve. Three unitary councils will be more responsive to the communities they serve, with better local knowledge retained to enhance the functionality of new unitary authorities. Local views also expressed concern at the democratic representation of one council, and that it would not be able to properly represent community needs. Three Councils for Suffolk responds to this concern ensuring communities will have a voice that can be heard by their local authority.

Question 6 - Supporting devolution arrangements

The District and Borough case for change sets out clearly on pages 98-103 how three councils in Suffolk would support the forthcoming Mayoral Strategic Authority ('MSA') in delivering the Government's devolution agenda. It makes clear that multiple unitary authorities would represent and champion place at a more local level than one single voice representing each county if a single unitary for each was pursued.

A three council model would also provide more balanced representation for each county within the MSA and enable richer debate, representation and decision-making

The case for change identifies success criteria for strong Mayoral authorities and describes how each of these would be met by having a plurality of representation from across Suffolk as opposed to a single representative.

The Three Councils case for change also highlights how a model of three councils would have greater operational resilience and senior officer capacity to prioritise the new projects emerging as a result of Mayoral investment in the county, something that is overlooked by the single unitary case for change.

Question 7 - Community engagement and neighbourhood empowerment

The Case for Change for Three Councils for Suffolk seeks to empower our communities and partners. Enabling stronger community engagement and neighbourhood empowerment is considered to be wider than just engaging with Town and Parish Councils. The role of local government is sometimes stepping back to allow empowered communities to lead (p.105). The model proposed seeks to build on strong foundations already in place across Suffolk, for example the Community Help Hubs in East Suffolk where staff work collaboratively with vulnerable residents, or the partnerships with health services to engage with people with lived experiences. Alignment over time with health, police, voluntary sector organisations and engagement with businesses will strengthen community engagement.

The key foundations proposed by Three Councils for Suffolk for neighbourhood governance and empowerment include; working with what exists, inclusive participation by default, widening audiences and partnerships, ensuring the approach is proportionate to the topic, recognition and value to deepen democracy and civic participation and transparency, honesty and trust (p. 165-170). This is a hugely more responsive approach to community engagement than top-down models.

Community engagement and neighbourhood empowerment will be strengthened through a focus on place-based, data driven community partnerships, thematic forums and assemblies, digital tools to enable engagement, capturing community conversations and devolved place-based and topic-based budgets.

Three Councils for Suffolk have the local understanding, foundations and mechanisms in place to ensure that the proposals will enable stronger community engagement and neighbourhood empowerment than one authority.

9. This proposal is accompanied by a request that the Secretary of State considers boundary change. To what extent do you agree or disagree that the proposal sets out a strong public services and financial sustainability justification for boundary change?

Strongly agree

10. If you would like to, please use this free text box to explain your answer to question 9.

Three Councils for Suffolk would enable the delivery of strong public services and financial sustainability. Through taking existing deep local knowledge of communities and assets, agile and placed-based responses will be achieved that are locally relevant and meaningful, reflecting the individual needs (p.45).

Creating one unitary council across Suffolk would disrupt the strong ties between communities and their local councils at a time when there are significant improvements needed in local government outcomes, such as improvement of key services such as Adults and Children's services. Ensuring local government works well, with greater cost effectiveness through reduced long-term demand, would be achieved through Three Councils for Suffolk.

Consideration has been given to how new unitary authorities could be created using existing local authority boundaries, but this would not reflect the geographies and economic areas of Suffolk. For example, creating two unitary councils with Ipswich and East Suffolk being joined into one, and Babergh, Mid Suffolk and West Suffolk being combined into a second unitary council. This created imbalanced unitary councils and did not recognise all of Ipswich's economic area. Or creating two unitary councils with either Ipswich's current or an expanded footprint, with the rest of the county forming a second unitary. This proposal created an imbalance in unitary sizes and would not work for wider Suffolk. Alternative models for creating three unitary authorities using existing footprints would lead to three very different sized unitary councils and also would not have recognised Ipswich's economic area which extends beyond its current administrative boundaries.

The proposals under Three Councils for Suffolk make best sense to the economic areas for Suffolk (p.26-38). The economic areas in Suffolk are distinct, and a coalescence of industries, expertise and knowledge exists in the three identified unitary councils. These are:

- Western Suffolk – advanced manufacturing and engineering, agri-tech sector and other small and medium sized enterprises along A14 growth corridor, horse racing industry, part of Cambridgeshire functional economic area and housing market area, and Cambridge to Norwich tech corridor.

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These economic areas are distinct and require recognition of that distinction to make sure the policy set through local government best serves delivery of economic ambition set out in the Government's Industrial Strategy.

The proposed three unitary model for Suffolk presents a financially sustainable and operationally efficient solution to the challenges facing local government in Suffolk. With a payback period of under 4.5 years, it offers a powerful value for money case under Government Criterion 2 and aligns with national expectations for resilient and efficient public service delivery. Value for money will be achieved through the rightsizing of each council's workforce into three councils. Each council will have its own team of statutory and other senior officers charged with the overseeing of the leadership and delivery of high-quality council functions. Along with their officers, they will have a deep understanding of the communities within their council area and critically have the capacity to meet the needs of communities. In a similar way, strong political leadership and engagement will be achieved through three councils compared to one. Political leaders will be more strongly connected to their local communities than they would with one Council with less councillors. They will be able to be responsive and highly engaged with their communities, bringing their local knowledge to shape decision making that is relevant and responsive to their communities (p.48-49).

Question 11. I confirm that I have not included any information that identifies an individual in the free text boxes.