

Introduction

1. Ipswich Borough Council (IBC) welcomes the publication of the Boundary Committee's further draft proposals for unitary local government in Suffolk and hopes that we can now progress to a speedy conclusion in the interests of all of the people of Suffolk. We fully endorse the retention of Lowestoft in Suffolk.
2. Our primary interests are that, as Ipswich rapidly grows, the town continues to have a strong council able to focus on representing the needs of its residents, businesses and community groups. It is essential that any new unitary structure is local enough to focus on the needs of Ipswich and the surrounding area but also able to provide a strong voice locally, regionally and nationally for the future. IBC will support any unitary pattern that in our opinion meets these criteria.
3. We are therefore particularly pleased that the case put forward for a strong Ipswich and Felixstowe unitary council (with the working title of North Haven) continues to be recognised as a convincing one by the Boundary Committee. Together with a coherent Rural Suffolk council, significantly bolstered by the inclusion of Lowestoft, we believe we have the right solution for the county.
4. We also note from the DCLG letter to Suffolk Coastal DC dated 17 March 2009 that the original Ipswich proposal is still an option available to the Secretary of State. We intend to revisit the case made in the light of local changes since it was last evaluated. This will take into account the effect of demographic changes (particularly population growth), the continuing programme of IBC efficiencies and the 'in aggregate' impact of developments in the rest of Suffolk.

The Case for North Haven

Broad Cross Section of Support

5. Despite being a new construct, it is clear that there is growing support from all areas of the community and from stakeholders. Of particular note is the high proportion of the support coming from within the proposed boundaries. A further highlight is the recent statement of support from a group of organisations, businesses and individuals who together represent all aspects of Ipswich life. These include: Ipswich Society; Ipswich Port (ABP); Ipswich Building Society; Ipswich Buses; Ipswich Council for Voluntary Service (ICVS); Ipswich Town Football Club; Team Ipswich; Ipswich School; Suffolk New College; Mayor of Ipswich and the Honorary Recorder.
6. Six of the seven districts in Suffolk advocate a unitary solution focused on Ipswich and its surrounding area. A number of parish councils, voluntary groups and neighbouring Essex districts have signalled their support. There is also recognition from big and small businesses that unitary government in the area will best help develop the local economy.
7. A number of other county-wide organisations have indicated that they could work with a unitary pattern based on North Haven. These include: Suffolk Police

Authority, NHS Suffolk and the Suffolk Association of Voluntary Organisations (SAVO).

Strategic leadership that is strong, effective and accountable.

8. North Haven would have a population of around 220,000 – making it the second largest unitary in the Eastern Region, larger than many London boroughs and in the top quartile of existing unitaries by size.
9. The new Council would be large enough to have real influence both regionally and nationally but local enough to understand and address the diverse needs of the area and its communities - economic growth, housing, developing the ports, improving skills, raising educational attainment, an ageing population and transport in rural areas.
10. Strategic leadership will be provided by an effective Leader and Cabinet model and accountability ensured by robust and open scrutiny arrangements. Active engagement of communities and community groups will be achieved through the development of a new Community Strategy, the creation of a new Local Strategic Partnership, the proposed neighbourhood arrangements and excellent consultation practices.
11. From an economic development perspective, North Haven has a high level of self-containment with some 80% of its working population living within the boundaries and 86% of employed residents working in the local area.
12. North Haven will bring together major existing employers like BT Adastral Park and Felixstowe Port, the established financial service centres, maritime companies and government agencies in Ipswich, the burgeoning regeneration around the Ipswich Waterfront, the future potential of Snoasis and the leisure, arts and entertainment facilities of Ipswich and Felixstowe. One Council can far better harness this potential in the best interests of the area and the region. At a time of economic downturn this argument carries even greater weight.
13. Ipswich is the economic powerhouse of the county, the fastest growing urban area in the East of England and a key member of both Regional Cities East and the Haven Gateway growth area. Without a strong voice, the town can never meet the targets for homes and jobs and help drive the region out of the current recession. IBC has taken a prominent role in the Ipswich Fights Back initiative with the development of a range of Credit Crunch support services and the publication of a Small Business Survival Kit. So much more could be achieved within a North Haven unitary.
14. Owing to its geographical location, North Haven would have very strong links with North Essex and would work closely with Colchester and Tendring Councils within the Haven Gateway (covering a population of some 650,000). This would build on the existing excellent links between IBC and these Councils.
15. On educational attainment and skills development North Haven can maximise the opportunity presented by the development of the new University in Ipswich,

Suffolk New College, the new 6th Form Centre, the schools merger in Felixstowe and the Building Schools for the Future programme.

16. North Haven will provide the ability to concentrate and deliver desired outcomes against identified and understood local needs and priorities. By way of contrast the emerging CAA analysis for Suffolk shows a lack of focus and progress on a number of the major social and economic issues confronting Ipswich.

Empowered citizens and communities

17. A key role for Councillors will be to act as community leaders. There will be one Councillor for approximately every 3,000 voters making for a close relationship with residents. North Haven will seek to balance the number of Councillors representing Ipswich with those for Felixstowe and the adjoining area.
18. The new Council will evolve Ipswich's nationally recognised approach to community engagement with neighbourhood forums reaching out to all communities and involving key partners and stakeholders. This has enabled the town to meet the needs of its diverse communities ranging from the well established to longstanding and new BME groups and growing numbers from Europe and the accession countries.
19. Neighbourhood areas will be devised after consultation to reflect the different communities within North Haven. In a number of areas, decision-making will also be devolved to a range of Boards and fora involving interested parties such as that currently in place for Ipswich Parks.
20. The work of existing Town and Parish Councils and community groups will be built upon to ensure citizens and communities have a strong voice in the new Council. This will provide an opportunity to realise the potential of the recent White Paper "Communities in Control".
21. There will be a menu of delegated powers and a North Haven delivery structure that supports local needs identification, local service delivery and local capacity building.
22. The new council will want to consider as a matter of urgency whether to call for a community governance review to consolidate democratic arrangements across the area.

Value for money services

23. The single tier status and size of North Haven will provide sufficient economies of scale and enable it to offer value for money services by:
- Maximising the benefits of integration between current County and District services;
 - Adopting a best value for money approach to delivery of services whether it be through in-house, third sector or private sector solutions;

- Optimising the arrangements for partnership working with other public sector and third sector organisations;
- Tailoring and targeting services to meet diverse local needs;
- An ongoing Efficiency and Business Transformation programme; and
- Progressively moving towards a commissioning model with a strong intelligent client capability.

Affordability

24. The North Haven business case demonstrated that £35m of net savings will be delivered over the first four years through for example flatter management structures, better integration of services and rationalisation of property assets. The investment necessary to set up a new council will be “paid back” within 13 months. There will be annual on-going savings of £15m. We are confident these are deliverable.

The case for a Rural Suffolk

25. Despite the lack of effective sponsorship from the County Council, a viable Rural Suffolk Unitary Council has emerged from the exercise. One result of this we believe is that the costs and savings of the option have been overplayed and underestimated respectively. Our calculations suggest that the financial case produced for Rural Suffolk shows 68% of the costs but only 37% of the savings when compared to Unitary Suffolk. This makes no sense.

26. It would be able to focus on the distinctive needs of rural areas, market towns and villages in the rest of the county providing stronger leadership and improved services. With a population of nearly 470,000 it will be able to deliver value for money services. It will be by far the largest unitary council in the East of England and amongst the top ten nationally.

27. It would encompass around 20 market and larger towns and a countryside with areas of outstanding natural beauty, a world-renowned coastline and a tremendous tourism offer. The new council would be able to focus on the distinctive needs of this area including:

- Linking market towns with their hinterlands;
- Improving rural transport and stopping the loss of rural services;
- Supporting the diversification of the rural economy; and
- Meeting the needs of its ageing population.

28. The proposal for Public Service Villages in Bury St Edmunds and Lowestoft supplemented by the Boundary Committee’s suggestion of a third in a central location will help ensure effective and consistent service delivery.

29. In terms of economic development, independent experts SQW consider that “the rest of Suffolk is sufficiently large in terms of population, households and employment to be viable economically. In particular it has a working population of around 200,000.”

The case against a unitary Suffolk.

30. With a population of nearly 700,000 covering a wide area and serving a broad range of communities and environments presenting different challenges, this unitary would be remote and would lack focus. In attempting to balance the competing demands and priorities across the county it is unlikely to be able to deliver effective community leadership.
31. In order to overcome this remoteness, it is proposed to create a number of Community Boards. There are no details that show how they would operate or how they would be designed to reflect particular local needs from urban Ipswich to coastal Southwold and across to Newmarket and Haverhill. These Boards will simply introduce another layer of government between the unitary and town and parish councils.
32. In many ways this pattern would perpetuate the failings of the current system which has contributed to many of the challenges Suffolk now faces – low skills and educational achievement, low investment in modern integrated transport networks, low aspiration, inequality and a failure to address the economic and transport needs of Lowestoft and the urban issues faced by Ipswich.
33. Whilst there will be savings, these will be offset by the inefficiencies of a large and unfocused organisation and the need for area based and coordinating delivery structures. Suffolk County Council currently has an expensive management structure that splits the county into three or more divisions for service delivery.
34. Turning to the level of support it is worth noting that, based on our analysis in October 2008 of the first consultation, a majority of the responses to the Boundary Committee were in favour of other solutions for Suffolk. This is set out in the table below.

Status Quo / No change	415
One Suffolk	652
North Haven/ Rural Suffolk	141
Other Unitary Pattern e.g. 2 or 3	243
Opposed to One Suffolk	49

We believe that since October 2008 as awareness of the business cases has increased, there is stronger support for North Haven and Rural Suffolk.

Comments on the Boundary Committee's findings

35. In this section we make some comments on the Boundary Committee's (BC) findings and observations in the order they appear in the report.
36. In paragraph 2.7 the level of Town and Parish Council support for the status quo is noted. We believe that much of this may be attributable to the drawn out nature of the process to date rather than the underlying merits of the case for unitary government.

Two Unitary Pattern

37. Concerns have been expressed over the potential fragmentation of services with a detrimental impact particularly in rural areas (para 2.9). We believe that in practice the improved ability of smaller unitaries to focus on and tailor services to meet local need will give rise to higher quality services. We can find no evidence that rural areas will be deprived of service or will prove to be more costly to serve than under the current model.
38. The BC have noted the strong views expressed that an Ipswich and Felixstowe authority will be able to take advantage of the role played by the Haven Gateway and on the need to ensure the prosperity and local economy of Ipswich (paras 2.9 and 2.17). This argument is one of the main planks of the North Haven case. North Haven will bring a clear focus on this issue whereas a Unitary Suffolk solution risks dilution in the face of a number of competing economic development priorities
39. BC acknowledge a desire for decisions on e.g. development control and licensing to be taken at local level (para 2.13). This supports the arguments for smaller unitaries. The North Haven business case made suggestions on how planning arrangements would operate – these fully accord with this desire. In contrast Unitary Suffolk arrangements could be unwieldy.
40. Para 2.14 identifies concerns about the democratic deficit from a reduction in the number of authorities and members. The two model scores strongly here with a higher proportion of members to voters and residents than is proposed for Unitary Suffolk with greater capacity to serve communities and fulfil statutory functions. The North Haven case emphasises the role of councillors as community leaders with associated powers and responsibilities. Neighbourhood arrangements will bring together unitary, town and parish councillors to optimal effect. Removing the two tier structures will increase clarity and accountability to residents.
41. The BC report comments received that a larger authority may be better placed to deliver specialist services due to economies of scale (para 2.16). It should be pointed out that many of the responses in this area came from County Council employees e.g. for Archaeology Services. Whilst not essential, North Haven may well look for joint or shared service delivery options for specialist services where

they make good business and operational sense. This is consistent with the BC clarification statement on partnership working given later in the report (para 2.46)

42. Para 2.16 also suggests that a larger authority may be better placed to deliver personal care services to vulnerable people and that there are risks inherent in transition. There has been no evidence produced to justify this assertion. The North Haven business case presented sound CYP and ASC proposals developed by senior professionals building on current County Council practice and adopting nationally recognised emerging best practice. Many unitary authorities of much smaller size including London boroughs deliver these services very effectively. We will have robust transition plans in place with the emphasis on service continuity and believe we will have the full cooperation of the County Council and existing providers during this process.
43. The BC emphasise that structures, systems, processes for community engagement should be two-way (para 2.35). This is a feature of the North Haven submission. We have outlined how community engagement and empowerment would work and shown how communities can influence local service design and decisions and how two way communication and consultation will be achieved. The proposals we have made are grounded in recognised good practice and fully meet the criteria listed in 2.37
44. The BC attaches importance to the ways in which the new authorities propose to relate to town and parish councils (para 2.39). The North Haven business case showed how town and parishes would be integrated into the proposed neighbourhood arrangements. A sound foundation is provided by the proposed menu of delegated powers; recognising that the level of delegation will be driven by the appetite of the parish. This is allied to a commitment by the new council to provide resources for capacity building.
45. We acknowledge and welcome the number of comments emphasising the viability and strengths of the cases for both North Haven and Rural Suffolk.
46. We are pleased that the BC recognise the economic interdependence of and linkages within the North Haven area in terms of employment, commerce, retail, culture, leisure and events and acknowledge that there will be no detrimental impact on the economy of the rest of Suffolk.
47. It is however vital that the economic benefits should not be overemphasised at the expense of the other considerations like strategic leadership, community empowerment, service delivery and value for money.
48. The BC has indicated that a community governance review of Ipswich would be beneficial (para 4.42). The new council will want to consider as a matter of urgency whether to call for a community governance review to consolidate democratic arrangements across the area.
49. We are disappointed that the report does not properly recognise the strength of the neighbourhood arrangements proposed for North Haven (paras 4.43 – 4.46). Our proposals are detailed and fully resourced and costed. They have been developed

based on current good practice with the key objective of delivering and supporting community empowerment.

50. We would wish to understand the basis on which the BC's financial advisors have adjusted the figures presented in the North Haven business case without any analysis or discussion of how services are to be delivered. We believe these changes significantly underestimate the financial case. As we emphasised in the clarification round we felt our original assumptions were conservative. This was confirmed by the validation work undertaken by our performance improvement partners Northgate Kendric Ash that demonstrated the potential for greater savings. We very much viewed the Securing the Future savings that have been disallowed as a reasonable measure of probable ongoing efficiencies. As stated earlier we are confident that we can deliver the original level of savings. **These should be recognised in any ongoing affordability assessment.**
51. We note the references to the lack of sponsorship in the financial assessment of the Rural Suffolk case and the adjustments that have been made to presumably compensate for this.
52. We have separately challenged how two Low Risk assessments for North Haven and Rural Suffolk (including Lowestoft) in the previous evaluation can be changed to a Medium Risk under the in aggregate rule (para 4.26).

Unitary Suffolk Pattern

53. A significant amount of support for a countywide unitary is reported in para 2.8. Our analysis shows that the level of support is outweighed by the numbers who are opposed to a One Suffolk option or who prefer other solutions. Obviously that opposition is fragmented between two, three smaller unitary and status quo proponents. It is inevitable that there will be some inertia support for a council based on current boundaries.
54. The BC acknowledge that Ipswich aspirations and needs might not be met in a countywide authority (para 2.9) and that area based structures must address the needs and provide focus for conurbations (para 2.41). The proposed Unitary Suffolk arrangements for Ipswich do not in our view address these fundamental concerns. The proposals for Ipswich are confusing and lacking in substance. It is unclear how they will address the urban problems identified.
55. The BC pose the question whether the size and disparate make-up of the county is conducive to a single authority (para 2.15). We firmly believe that the two unitary pattern as currently proposed is better able to understand and respond to the needs of its particular communities as outlined above.
56. The need to ensure the prosperity and local economy of Ipswich is emphasised (para 2.17). North Haven will bring a clear focus on this issue whereas a Unitary Suffolk solution risks dilution in the face of a number of competing economic development priorities

57. Supporters believe that Unitary Suffolk will streamline bureaucracy and provide a clear delivery structure (para 4.7). We believe this to be at odds with the reality of a large unfocused organisation requiring area based delivery structures and inefficient coordination activity. Our analysis also shows that there is typically an additional officer tier in the current County structures and no proposals to remove it for a unitary council.
58. One Suffolk brings together existing communities building a cohesive response to the challenges facing the county as a whole (para 4.8). We would fundamentally disagree with this analysis, it does not reflect the fact that so broad an area with its diverse communities faces a wide range of challenges leading to difficulties of prioritisation and service delivery. This is evidenced by past failures on both urban and rural issues at a County level.
59. The BC do however recognise that a Unitary Suffolk must demonstrate that it is not too large to engage and empower and would represent a range of rural and urban areas which differ markedly in their socio-economic make-up (para 4.14). We believe this to be the crux of the issue and the current proposals haven't adequately demonstrated how that engagement and empowerment will be achieved. The comments in 55 above also apply here.
60. We note that the BC welcomes the prospect of Community Boards (para 4.15). We would reiterate our previously submitted comments about the confusion surrounding the proposals for Ipswich, the one-size-fits-all approach and the risk that Community Boards add another layer of government between the unitary and town and parish councils. It is interesting to see that a supportive parish council says
- “We are very concerned that the Boundary Committee have chosen to show increased support for Community Boards even though their structure is yet to be determined we have no guidance yet as to how they would work best for Suffolk”
- In addition the Suffolk Preservation Society observe that
- “The Boards also have the potential to undermine the role and function of town and parish councils. The proposals say little about the role of this essential part of local government.”
- It is our understanding that the emerging experience from new county unitaries such as Cornwall illustrates the difficulties of putting in place this kind of structure and making it work efficiently and effectively.
61. Whilst recognising the danger that the county's major town has lost its voice, the BC consider that a designated portfolio holder would provide strategic leadership (para 4.20). We do not accept that the Unitary Suffolk proposals would offer that voice and doubt whether a dedicated portfolio holder would be practicable or would provide the leadership and influence necessary to tackle Ipswich's urban and infrastructure issues and maximise its economic development potential when set against the many competing demands and priorities of the rest of Suffolk.

Conclusion

62. Ipswich has achieved rapid economic growth through its own efforts working with regional partners such as EEDA, GO East and Arts Council East. We are convinced that Ipswich and the surrounding area would benefit greatly from having a strong locally based unitary council.
63. In conclusion, IBC remains firmly in favour of the two unitary pattern B. In our view and for all the reasons outlined above, only this solution can deliver effective local government for both Ipswich and the people of Suffolk as a whole.