



7 May 2025

## **LOCAL GOVERNMENT REORGANISATION**

### **INTERIM PLAN FEEDBACK: NORFOLK**

To the Chief Executives of  
Breckland District Council  
Broadland District Council  
Great Yarmouth Borough Council  
King's Lynn and West Norfolk Borough Council  
Norfolk County Council  
North Norfolk District Council  
Norwich City Council  
South Norfolk District Council

#### **Overview:**

Thank you for submitting your interim plans. The amount of work from all councils is clear to see across the range of options being considered. For the final proposal(s), each council can submit a single proposal for which there must be a clear single option and geography and as set out in the guidance we expect this to be for the area as a whole; that is, the whole of the area to which the 5 February invitation was issued.

Our aim for the feedback on interim plans is to support areas to develop final proposals. This stage is not a decision-making point, and our feedback does not seek to approve or reject any option being considered.

The feedback provided relates to the following interim plans submitted by Norfolk councils:

- proposals for local government reorganisation in Norfolk by Norfolk District and Boroughs, including annexes A and B
- interim submission local government reorganisation in Norfolk by Norfolk County Council

We have provided feedback on behalf of central government. It takes the form of:

1. a summary of the main feedback points,
2. our response to the specific barriers and challenges raised in your plans,
3. annex A with more detailed feedback against each of the interim plan asks.

We reference the guidance criteria included in the invitation letter throughout, a copy can be found at [Letter: Norfolk – GOV.UK](#). Our central message is to build on your

initial work and ensure that final proposal(s) address the criteria and are supported by data and evidence. We recommend that final proposal(s) should use the same assumptions and data sets or be clear where and why there is a difference.

We welcome the work that has been undertaken across proposals to develop local government reorganisation plans for Norfolk. This feedback does not seek to approve or reject any option or proposal, but provides some feedback designed to assist in the development of final proposals. We will assess final proposals against the guidance criteria provided in the invitation letter and have tailored this feedback to identify where additional information may be helpful in enabling that assessment. Please note that this feedback is not exhaustive, and should not preclude the inclusion of additional materials or evidence in the final proposals.

In addition, William Eldon has been appointed as your MHCLG point person and is ready to engage with the whole area and support your engagement with government.

We are providing written feedback to each invitation area individually, but we will be led by you on how verbal feedback is best delivered and who is most appropriate to attend a feedback meeting.

### **Summary of Feedback:**

We have summarised the key elements of the feedback below, with further detail provided in Annex A.

1. In some of the options you are considering populations that would be below 500,000. As outlined in the Statutory Invitation guidance and in the English Devolution White Paper, we outlined a population size of 500,000 or more – this is a guiding principle, not a hard target – we understand that there should be flexibility, especially given our ambition to build out devolution, and take account of housing growth, alongside local government reorganisation. **All proposals, whether they are at the guided level, above it, or below it, should set out the rationale for the proposed approach clearly.**
2. We welcome the steps you have taken to come together to prepare your proposal, as per criterion 4.
  - a. **Effective collaboration between all councils will be crucial; we would encourage you to continue to build strong relationships and agree ways of working, including around effective data sharing. This will support the development of a robust shared evidence base to underpin final proposal(s).**
  - b. **It would be helpful if final proposal(s) use the same assumptions and data sets.**
  - c. **It would be helpful if your final proposal(s) set out how the data and evidence supports all the outcomes you have included, and how well they meet the assessment criteria in the invitation letter.**

- d. **You may wish to consider an options appraisal that will help demonstrate why your proposed approach in the round best meets the assessment criteria in the invitation letter compared to any alternatives.**
3. The criteria ask that consideration should be given to the impacts for crucial services such as social care, children's services, SEND and homelessness, and for wider public services including for public safety (see criterion 3). **For all options where there is disaggregation, further detail will be helpful on how the different options might impact on these services and how risks can be mitigated. We would also welcome more detail on the benefits and challenges around Children's Social Care, SEND services and schools. By way of example, this may include more detail on the proposition of a Children's Services Trust in the District and Borough interim plan and other such models.**
  4. We welcome the intention across options to align local government reorganisation closely with ongoing devolution programmes as per criterion 5. **Further detail would be welcome on how the preferred new structures would support arrangements for the proposed Norfolk and Suffolk Mayoral Strategic Authority (MSA) (as per criterion 5),** in terms of how benefits of mayoral devolution will be achieved for local communities. In this regard it will be helpful for proposal(s) to have regard to the model of unitary government that is proposed across the whole Norfolk and Suffolk area, and we welcome your intention to collaborate with partners to create proposal(s) that will enable a sensible solution for both areas in the context of the MSA.
  5. We recognise that you are considering a range of options for unitary local government. We note that these are interim plans, and that you intend to further assess, refine, and consider the options presented. The criteria ask that a proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government. **Your final proposal(s) should establish a clearly defined footprint for the preferred model of single tier government across the Norfolk geography.** Proposal(s) should be supported by robust evidence against the criteria in the 5 February invitation letter and detail the geographical boundaries for each proposed council area.

### **Response to specific barriers and challenges raised**

Please see our response below to the specific barriers and challenges that were raised across the submissions.

#### **1. Process**

You asked government to provide further information of the assessment process for final proposals. We will assess final proposals against the criteria in the

invitation letter. Our aim for this feedback is to support areas to develop final proposals that address these criteria and are supported by data and evidence.

You also asked whether the HMT Green Book methodology would be used in the assessment of proposals. As stated above, the proposals will be assessed against the criteria, however, the Green Book methodology may be a helpful approach to considering your proposal(s) and setting out your evidence and justifications.

## **2. Protection of civic and ceremonial arrangements**

You raised the issue of protection for historic and civic responsibilities in Norfolk. The Government recognises the importance of local historic and ceremonial rights to local communities and will ensure these are protected after any reorganisation of local government. We will work closely with local leaders to ensure that such rights and privileges are identified and preserved either through general regulations which apply to reorganisation exercises or supplementary and consequential secondary legislation.

## **3. Engagement**

We note your point that findings shared should be considered transitional and interim until public engagement can be undertaken. Expectations on engagement and consultation are in the invitation letter. It is for you to decide how best to engage locally in a meaningful and constructive way with residents, the voluntary sector, local community groups, neighbourhood boards, parish councils, public sector providers, such as health, police and fire, and local businesses to inform your proposals.

Once a proposal has been submitted it will be for the Government to decide on taking a proposal forward and to consult as required by statute. The Secretary of State may not implement a proposal unless she has consulted with other councils affected by it and any other appropriate person. We are happy to engage further on these consultation requirements and the likely process for areas undergoing reorganisation in due course.

## **4. Capacity funding support**

We note that securing funding to further develop your full plan will be essential. £7.6 million will be made available in the form of local government reorganisation proposal development contributions, to be split across the 21 areas. Further information will be provided on this funding shortly.

In terms of transitional costs, as per the invitation letter, 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. We note the estimate of your transition costs and comment further on this in the table below.

## **5. Future of urban areas in two-tier areas**

We welcome the thinking you have done about the future of urban areas in your interim plan, including the boundary of the City of Norwich. Your final proposals should set out the evidence for a preferred option for a single tier of local government that you believe will be in the best interest of the whole area.

## **6. Boundary Changes**

We note your desire to develop unitary councils that reflect the current major economies and communities of Norfolk, and that some of your proposals may lead to boundary changes.

As the Invitation sets out, boundary changes are possible, but that “existing district areas should be considered the building blocks for proposals, but where there is a strong justification more complex boundary changes will be considered.”

The final proposal must specify the area for any new unitary council(s). If a boundary change is part of your final proposal, then you should be clear on the boundary proposed, which could be identified by a parish or ward boundary, or if creating new boundaries by attaching a map.

Proposals should be developed having regard to the statutory guidance which sets out the criteria against which proposals will be assessed (including that listed above).

If a decision is taken to implement a proposal, boundary change can be achieved alongside structural change. Alternatively, you could make a proposal for unitary local government using existing district building blocks and consider requesting a Principal Area Boundary Review (PABR) later. Such reviews have been used for minor amendments to a boundary where both councils have requested a review – such as the recent Sheffield/Barnsley boundary adjustment for a new housing estate. PABRs are the responsibility of the Local Government Boundary Commission for England who will consider such requests on a case-by-case.

**ANNEX A: Detailed feedback on criteria for interim plan**

<p>Identify the likely options for the size and boundaries of new councils that will offer the best structures for delivery of high-quality and sustainable public services across the area, along with indicative efficiency saving opportunities.</p> <p>Relevant criteria:</p> <p>1c) 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.</p> <p>&amp;</p> <p>2 a-f) - Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.</p> <p>&amp; 3 a-c) Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.</p>	<p>We welcome the initial thinking on the options for local government reorganisation in Norfolk and recognise that this is subject to further work. We note the local context and challenges outlined in the proposals and the potential benefits that have been identified for the options put forward. Your plans set out your intention to undertake further analysis, and this further detail and evidence, on the outcomes that are expected to be achieved of any preferred model, would be welcomed.</p> <p>You may wish to consider an options appraisal against the criteria set out in the letter to provide a rationale for the preferred model against alternatives.</p> <p>For your final proposal(s), each council can submit a single proposal for which there must be a clear single option and geography and as set out in the guidance we expect this to be for the area as a whole; that is, the whole of the area to which the 5 February invitation was issued.</p> <p>Where there are proposed boundary changes, the proposal should provide strong public services and financial sustainability related justification for the change.</p> <p>Proposals should be for a sensible geography which will help to increase housing supply and meet local needs, including future housing growth plans. All proposals should set out the rationale for the proposed approach.</p> <p>Given the financial pressures you identify it would be helpful to understand how efficiency savings have been considered alongside a sense of place and local identity.</p> <p>We recognise that the options outlined in the interim plans are subject to further development. In final proposal(s) it would be helpful to include a high-level financial assessment which covers transition costs, and overall forecast operating costs of the new unitary councils.</p> <p>We will assess final proposals against the criteria in the invitation letter. Referencing criteria 1 and 2, you may wish to consider the following bullets:</p> <ul style="list-style-type: none"> <li>• a high level breakdown, for where any efficiency savings will be made, with clarity of assumptions on how estimates have been</li> </ul>
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	<p>reached and the data sources used, including differences in assumptions between proposals</p> <ul style="list-style-type: none"> <li>• information on the counterfactual against which efficiency savings are estimated, with values provided for current levels of spending</li> <li>• a clear statement of what assumptions have been made and if the impacts of inflation are taken into account</li> <li>• a summary covering sources of uncertainty or risks, with modelling, as well as predicted magnitude and impact of any unquantifiable costs or benefits</li> <li>• where possible quantified impacts on service provision, as well as wider impacts.</li> </ul> <p>We recognise that financial assessments are subject to further work. Referencing criterion 1 and 2, the bullets below indicate where further information would be helpful across all options:</p> <ul style="list-style-type: none"> <li>• data and evidence to set out how your final proposal(s) would enable financially viable councils across the whole area, including identifying which option best delivers value for money for council tax payers</li> <li>• further detail on potential finances of new unitaries, for example, funding, operational budgets, potential budget surpluses/shortfalls, total borrowing (General Fund), and debt servicing costs (interest and MRP); and what options may be available for rationalisation of potentially saleable assets</li> <li>• clarity on the underlying assumptions underpinning any modelling e.g. assumptions of future funding, demographic growth and pressures, interest costs, Council Tax, savings earmarked in existing councils' MTFS</li> <li>• financial sustainability both through the period to the creation of new unitary councils as well as afterwards</li> <li>• We would welcome more information on how each option would deliver high-quality and sustainable public services or efficiency saving opportunities</li> </ul> <p>For proposals that would involve disaggregation of services, we would welcome further details on how services can be maintained where there is fragmentation, such as social care, children's services,</p>
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	<p>SEND, homelessness, and for wider public services including for public safety.</p> <p>Under criteria 3c you may wish to consider:</p> <ul style="list-style-type: none"> <li>• how each option would deliver high-quality and sustainable public services or efficiency saving opportunities.</li> <li>• what would the different options mean for local services provision, for example: <ul style="list-style-type: none"> <li>• do different options have a different impact on SEND services and distribution of funding and sufficiency planning to ensure children can access appropriate support, and how will services be maintained?</li> <li>• what is the impact on adult and children's care services? Is there a differential impact on the number of care users and infrastructure to support them from the different options?</li> <li>• what partnership options have you considered for joint working across the new unitaries for the delivery of social care services?</li> <li>• do different options have variable impacts as you transition to the new unitaries, and how will risks to safeguarding to be managed?</li> <li>• do different options have variable impacts on schools, support and funding allocation, and sufficiency of places, and how will impacts on school be managed?</li> <li>• what are the implications for public health, including consideration of socio-demographic challenges and health inequalities within any new boundaries and their implications for current and future health service needs. What are the implications for how residents access services and service delivery for populations most at risk? How will public health expertise and intelligence be embedded?</li> </ul> </li> </ul> <p>Further detail would be welcomed on the opportunities you have noted for wider public service reform and how this may be enabled by the options.</p>
<p>Include indicative costs and arrangements in relation to any options including planning for future service transformation opportunities.</p> <p>Relevant criteria:</p>	<p>Where they have been provided, we note the estimate transition cost range of £19m to £32m. In the final proposal, we would welcome further clarity on the assumptions and data used to calculate the transition costs and efficiencies.</p> <p>We welcome initial thinking on the service transformation and back-office efficiencies referenced. In all final proposals further detail would be helpful on</p>

<p>2d) Proposals should set out how an area 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</p>	<p>these and other potential service transformation opportunities and invest-to-save projects from unitarisation across a range of services - e.g. for front line services, and whether different options provide different opportunities for back-office efficiency savings.</p> <ul style="list-style-type: none"> <li>• within this it would be helpful to provide detailed analysis on expected transition and/or disaggregation costs and potential efficiencies of proposals. This could include clarity on methodology, assumptions, data used, what year these may apply and why these are appropriate</li> <li>• detail on the potential service transformation opportunities and invest-to-save projects from unitarisation across a range of services -e.g. consolidation of waste collection and disposal services, and will different options provide different opportunities for back-office efficiency savings?</li> <li>• where it has not been possible to monetise or quantify impacts, you may wish to provide an estimated magnitude and likelihood of impact</li> <li>• summarise any sources of risks, uncertainty and key dependencies related to the modelling and analysis</li> <li>• detail on the estimated financial sustainability of proposed reorganisation and how debt could be managed locally</li> </ul> <p>We note the estimate of the transition costs outlined in the plan and your note about the financial challenges that councils are facing. It would be helpful if detail on the councils' financial positions and further modelling is set out in detail in the final proposal.</p> <p>We welcome the joint work you have done to date and recommend that all options and proposals should use the same assumptions and data sets or be clear where and why there is a difference (linked to criterion 1c).</p>
<p>Include early views as to the councillor numbers that will ensure both effective democratic representation for all parts of the area, and also effective governance and decision-making arrangements which will balance the unique needs of your cities, towns, rural and coastal areas, in line</p>	<p>We welcome the commitments to preserve representation of place for communities and to tailor arrangements based on local characteristics and needs.</p> <p>New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment. Additional details on how community will be engaged specifically how the governance, participation and local voice will be addressed to strengthen local</p>

<p>with the Local Government Boundary Commission for England guidance.</p> <p>Relevant criteria:</p> <p>6) New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.</p>	<p>engagement, and democratic decision-making would be helpful.</p> <p>In final proposal(s) we would welcome detail on your plans for neighbourhood-based governance, the impact on parish councils, and thoughts about formal neighbourhood partnerships and area committees.</p>
<p>Include early views on how new structures will support devolution ambitions.</p> <p>Relevant criteria:</p> <p>5a-c) New unitary structures must support devolution arrangements.</p>	<p>Further detail would be welcome in all plans on how the proposed new structures would support arrangements for the proposed Norfolk and Suffolk Mayoral Strategic Authority (MSA).</p> <p>We would recommend collaboration and data sharing with partners across the proposed Norfolk and Suffolk MSA area, to work towards local government reorganisation proposals that will enable a sensible solution for both areas in the context of the proposed MSA.</p> <p>Across all proposals, looking towards a potential future MSA, it would be beneficial to provide an assessment that outlines if there are benefits and disadvantages in how each option would interact with an MSA and best benefit the local community, including meeting devolution statutory tests.</p> <p>It may be beneficial to demonstrate how governance arrangements within proposal(s) have been developed in consultation with Suffolk local authorities.</p> <p>More detail would be welcome on the implications of the various local government reorganisation options for the timelines and management of devolution across the Norfolk and Suffolk area.</p> <p>While we cannot pre-judge devolution decisions, we are happy to discuss further any eventual transition period as the new unitary authorities and potential MSA are established.</p> <p>We would welcome continued engagement with the Police and Crime Commissioner, Members of Parliament and wider local stakeholders as you continue to develop your proposal(s).</p> <p>To note, an MSA is the same as a Mayoral Combined Authority or Mayoral Combined County Authority.</p>

<p>Include a summary of local engagement that has been undertaken and any views expressed, along with your further plans for wide local engagement to help shape your developing proposals.</p> <p>Relevant criteria:</p> <p>6a-b) new unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.</p>	<p>We welcome the engagement undertaken to date in alignment with criterion 6. We also welcome and encourage the intention for wider engagement during the development of final proposal(s).</p> <p>It is for you to decide how best to engage locally in a meaningful and constructive way with residents, voluntary sector, local community groups and councils, public sector providers, such as health, police and fire, and local businesses to inform your proposal.</p> <p>For any option for two or more unitary councils, you may wish to engage in particular with those who may be affected by disaggregation of services. It would be helpful to see detail that demonstrates how local ideas and views have been incorporated into any final proposal.</p>
<p>Set out indicative costs of preparing proposals and standing up an implementation team as well as any arrangements proposed to coordinate potential capacity funding across the area.</p> <p>Relevant criteria:</p> <p>Linked to 2d) Proposals should set out how an area 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.</p>	<p>We welcome initial cost estimates where these have been provided, and note the estimate of £200,000 to £300,000 for the preparation of final proposals.</p> <p>We would welcome further detail in your final proposal(s) over the level of cost and the extent to which the costs are for delivery of the unitary structures or for transformation activity that delivers benefits.</p> <p>In terms of transitional costs, as per the invitation letter, 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.</p> <p>We note about the financial challenges that many councils are facing. It would be helpful if detail on the councils' financial positions and further modelling is set out in detail in the final proposal(s).</p> <p>£7.6 million will be made available in the form of local government reorganisation proposal development contributions, to be split across the 21 areas. Further information will be provided on this funding shortly.</p>
<p>Set out any voluntary arrangements that have been agreed to keep all councils involved in discussions as this work moves forward and to help balance the decisions needed now to maintain service delivery and</p>	<p>We welcome the ways of working together you have outlined in the interim plans (see criteria 4).</p> <p>Effective collaboration between all councils will be crucial; areas will need to build strong relationships and agree ways of working, including around effective data sharing.</p>

<p>ensure value for money for council taxpayers, with those key decisions that will affect the future success of any new councils in the area.</p> <p>Relevant criteria:</p> <p>4 a-c) 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.</p>	<p>This will enable you to develop a robust shared evidence base to underpin final proposals (see criteria 1c).</p> <p>We recommend that final proposals should use the same assumptions and data sets or be clear where and why there is a difference.</p> <p>We would expect the final proposal(s) to have regard to the proposed Mayoral Strategic Authority area and/or neighbouring invitation areas where proposals overlap.</p>
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