

Full Council - Wednesday, 24 September 2025

Documents being circulated with the County Council agenda

Document	Report in County Council agenda to which it is related
Proposed amendment to the Scheme of Delegation to Officers (Appendix 1 of the Governance Committee report) (page 3)	Governance Committee report, paragraph 1
Draft Cabinet report including Business Case for Local Government Reorganisation (Appendix 1 of the Leader and Lead Member for Strategic Management and Economic Development report) (page 5)	Leader and Lead Member for Strategic Management and Economic Development report, paragraph 1
Summary of Draft Statutory Instrument (SI): The Sussex & Brighton Combined County Authority Regulations 2026 (Appendix 2 of the Leader and Lead Member for Strategic Management and Economic Development report) (page 203)	Leader and Lead Member for Strategic Management and Economic Development report, paragraph 2
Framework for the statutory functions of Mayoral Strategic Authorities (MSAs) (Appendix 3 of the Leader and Lead Member for Strategic Management and Economic Development report) (page 211)	Leader and Lead Member for Strategic Management and Economic Development report, paragraph 2
Functions which are solely exercisable by the Mayor of a MSA (Appendix 4 of the Leader and Lead Member for Strategic Management and Economic Development report) (page 235)	Leader and Lead Member for Strategic Management and Economic Development report, paragraph 2
Sussex & Brighton Mayoral Strategic Authority – Terms of Reference (Appendix 5 of the Leader and Lead Member for Strategic Management and Economic Development report) (page 241)	Leader and Lead Member for Strategic Management and Economic Development report, paragraph 2
Proposed amendment to the Scheme of Delegation to Officers (Appendix 6 of the Leader and Lead Member for Strategic Management and Economic Development report) (page 245)	Leader and Lead Member for Strategic Management and Economic Development report, paragraph 3

PHILIP BAKER
Deputy Chief Executive

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APPENDIX 1

D. General

1. To sell, or dispose of, at the best price obtainable surplus vehicles, plant, stores and equipment, subject to competitive tenders being obtained wherever practical.
2. To approve plans of small buildings and other similar projects required for the purposes of the service concerned, except in the case of buildings or projects involving a major change in design policy or which are unique.
3.
 - (a) To authorise officers of their department to act as inspectors for the purpose of, or otherwise to enter premises and to enforce the provisions of, any enactment which it is the duty of the County Council to enforce.
 - (b) To authorise officers of their department to prosecute or defend or to appear on the County Council's behalf in proceedings before a Magistrates' Court, Family Proceedings Court or County Court.
4. Within any policy guidelines issued by the County Council, to provide services, supply goods or carry out works to others whether based in East Sussex or outside, subject to consultations with the Deputy Chief Executive and the Chief Operating Officer, as to compliance with any necessary legal and financial requirements.
5. To approve full applications by the County Council to funders in accordance with County Council's Corporate Funding Protocol.
6. To accept sponsorship deals involving the receipt by the County Council of sums between £10,000 and £100,000. NOTE: deals involving sums under £10,000 can be approved by the appropriate Deputy Director. Deals involving sums of over £100,000 require the approval of the Cabinet.
7. To charge for discretionary services on the basis that anyone who requires the discretionary service agrees to take it on those terms pursuant to section 93 of the Local Government Act 2003, subject to consultations with the Deputy Chief Executive and the Chief Operating Officer as to compliance with any necessary legal and financial requirements.
8. To exercise the general power of competence given to local authorities under section 1 of the Localism Act 2011.
9. To sign data sharing/processing agreements on behalf of the County Council.
10. Within their area of responsibility to make a discretionary grant to any organisation of up to ~~£24,999~~ and including £29,999 in any one financial year (in line with Procurement and Contract Standing Orders as set out in Part 4,

[Table 2.7a\(8\) 1.10. Procurement Type Summary Tables](#)) where there is no competitive process. In line with Procurement, discretionary grants over ~~£25,000~~[£29,999](#) should be subject to a competitive process as per the Corporate Funding Protocol. For grants that are passported (i.e. grant is received by the Council and passed on to local organisations) without a competitive process normal Departmental Delegations apply.

Report to: Cabinet

Date of meeting: 24 September 2025

By: Chief Executive

Title: Local Government Reorganisation: Proposal for a single tier of local government across East Sussex

Purpose: To seek Cabinet approval of the full proposal for a single tier of local government in East Sussex following discussion at Full Council, prior to submission to Government by 26 September 2025

RECOMMENDATIONS

Cabinet is recommended to:

- 1) Consider the business case setting out the proposal for a single unitary council for East Sussex, based on a Continuing Authority model, (Appendix 1) and approve its submission to Government by 26 September 2025;**
- 2) Agree to request Government to cancel or postpone the County Council elections scheduled to be held in May 2026;**
- 3) Delegate to the Chief Executive, in consultation with the Leader of the Council, authority to finalise and submit the business case setting out the proposal and a covering letter formally requesting the cancellation or postponement of the county elections and for the County Council to have Continuing Authority status; and**
- 4) Note the next steps in the process.**

1. Background

1.1 In December 2024 the Government published its English Devolution White Paper which, alongside setting out Government's ambitions in relation to devolution, announced a programme of Local Government Reorganisation (LGR) for two-tier council areas and some existing unitary councils. Following the publication of the White Paper, Sussex and Brighton (covering the areas of East Sussex, West Sussex, and Brighton & Hove), alongside five other areas nationally, were approved to be part of the Devolution Priority Programme (DPP). The DPP programme enabled these areas to fast-track their plans for the creation of new Mayoral Strategic Authorities and for LGR.

1.2 The Interim Plan submitted to Government in March 2025 set out the East Sussex proposal for a single unitary council on the existing County Council boundary, whilst remaining open to other options should the Government indicate flexibility in the criteria, or if residents demonstrated a clear desire for us to consider an alternative configuration.

1.3 Those areas included in the DPP were required to work collaboratively to submit to Government, by 26 September 2025, proposals for the creation of unitary councils in their area. If accepted, elections to what will become the new unitary authority would be held in May 2027 to enable the transition to vesting day on 1 April 2028. Alongside the

LGR work, the new Mayoral Combined County Authority will be created in February 2026 with elections for a Mayor taking place in May 2026.

1.4 The East Sussex District, Borough and County Council Leaders and Chief Executives meet regularly to oversee the LGR process, provide strategic direction, and ensure that work is co-ordinated. The principles of our agreed shared approach are:

- 1) This is a joint endeavour in which all Councils have a shared ambition to work collaboratively to co-design the new unitary authority, whilst acknowledging and respecting the corporate roles, responsibilities and risks of the current authorities.
- 2) We will work together to deliver proposals which are in the best interests of the whole area.
- 3) We will be evidence led.
- 4) We will learn from others' experiences of Local Government Reorganisation and Devolution.
- 5) Decisions made by all sovereign bodies until vesting day will have the interests of the future Council as an explicit consideration.
- 6) There will be full transparency over resources including transition funding and agreed allocations reflecting costs incurred.
- 7) There is a commitment to appropriate levels for decision making, engagement and local member roles including in non-parished areas.
- 8) There is a commitment to robust scrutiny arrangements in transition/formation and beyond.
- 9) A comprehensive workforce plan to provide maximum stability is to be created as a priority.

1.5 'One East Sussex', the business case setting out the proposal for a single tier of Local Government for East Sussex as a unitary council on the current footprint of the county council (Appendix 1), with Brighton and Hove City Council remaining unchanged, is underpinned by a clear evidence base. It is the only option for LGR in East Sussex that:

- Aligns with existing service delivery footprints (e.g. social care, education, public health).
- Minimises disruption to statutory services and partnerships.
- Builds on established collaboration across the six councils.
- Meets the government's population guidance and maintains a coherent geographic identity.
- Creates operational savings and avoids the substantial costs of disaggregation.

For these reasons 'One East Sussex' is the option proposed for submission to Government. The business case (Appendix 1) provides detail of the evidence base and modelling of other options. This modelling includes a two unitary option on the county footprint, which, as set out in the business case, was found to be significantly more costly due to disaggregation costs and is therefore not supported.

1.6 The proposal has been discussed by the East Sussex County Council (ESCC) Devolution and LGR Member Reference Group (11 September) and Full Council (24 September) and has been considered by the Leader as Lead Member for Strategic Management and Economic Development (15 September). Views of the Devolution and LGR Member Reference Group are set out at Appendix 2. The proposal is also being

considered and discussed by all East Sussex district and borough councils throughout September.

1.7 There has been some engagement with Brighton & Hove City Council (BHCC) as proposals have been developed. BHCC consulted in August with their residents on 4 possible options to extend BHCC's boundary to include parts of the county in Lewes District. At the time of preparing this report we are not aware of whether BHCC will be submitting a proposal to move the boundary or indeed whether they will propose a model for the whole of Sussex as suggested in their interim plan. Having evaluated the potential impact, all the options moving communities in Lewes District into Brighton and Hove are strongly opposed by the East Sussex councils. An update on the latest position will be reported at the meeting.

2. Development of the Proposal

2.1 The statutory invitation was issued to all the principal authorities in the County of East Sussex and therefore included BHCC. Government has expressed an expectation that one proposal is jointly submitted by all councils in the area of East Sussex. This issue is covered in the proposal.

2.2 In responding to the invitation to develop a proposal for LGR, the councils have had due regard to guidance from the Secretary of State as to what the proposal should seek to achieve and matters that should be taken into account in formulating a proposal.

2.3 LGR capacity funding from Government has been utilised to pay for external consultants to work with the six councils to deliver an evidence-led business case that follows Government criteria and guidance, and takes account of the outcomes from resident and stakeholder engagement, financial analysis, and the economic case for change. Consultants Roretti were jointly appointed by the six councils.

2.4 As part of the business case development the benefits, risks, costs and feasibility of a single East Sussex unitary council have been evaluated alongside other options, including BHCC consultation proposals. The business case recognises the importance of continuing to provide key services while the changes are being developed and implemented and clearly details how the six criteria set by government will be met. New authorities must:

- i. Be a single tier of local government for the whole of the area concerned.
- ii. Be the right size to achieve efficiencies, improve capacity and withstand financial shocks.
- iii. Prioritise the delivery of high quality and sustainable public services
- iv. Show how councils have sought to work together in coming to a view that meets local needs and is informed by local views.
- v. Support devolution arrangements.
- vi. Enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.

Engagement

2.5 Extensive engagement formed a key part of the process to ensure that local residents and other stakeholders views have been fully considered in the development of the proposals. This was undertaken using surveys (online and in paper form), focus groups and other face to face engagement opportunities. A significant number of key stakeholder groups, including all town and parish councils and other local public sector organisations, were also approached directly to respond to the survey. To add qualitative feedback a focus group was held in each of the five district and borough areas. This provided further, in-depth feedback from residents to inform the report. The councils each

sought to determine whether there was sufficient support from local people and other partners / stakeholders to endorse the proposals under consideration.

2.6 Care was taken to involve as many groups and communities as possible given the timescales for business case submission, including local focus groups across East Sussex and countywide User Voice Groups. It should be noted that this will not be the only opportunity for engagement – there will be further detailed and meaningful engagement with residents and stakeholders beyond the submission of the proposal which will help shape the proposed new authority.

2.7 In light of BHCC's consultation activity in August, which was notified just before launch, a specific additional consultation exercise has been undertaken by Lewes District Council (LDC) and ESCC. This was carried out to seek the views of local residents about the options for expansion being suggested by BHCC.

2.8 The survey attracted 7,472 responses, with 86 per cent preferring no changes to the current boundaries of Lewes District, increasing to 89 per cent in the areas directly affected by the proposals. Strong representations for remaining in East Sussex have been made by the town and parish councils in the areas identified for BHCC expansion, on the grounds that no credible evidence had been produced to demonstrate that residents and businesses of those areas would be better off as part of a new geography than continuing to work within existing networks and partnerships.

2.9 Letters have been received from local MPs with their views that the county of East Sussex should remain whole, supporting a countywide unitary authority for reasons of size, cost, sustainability and community identity, and noting that this is the option that makes sense geographically, socially and politically.

Working Groups

2.10 Officer working groups with representation from each of the six councils have assisted in ensuring the work was delivered within the very tight timescales required by central Government. Post-submission the working groups will shift their focus to preparing for transition. This will be on a tentative basis until Government feedback on the proposal has been received. Current working groups are finance, democratic services, assets, communication & engagement, and HR. Further groups will be set up as needed.

3. Next steps in the process

3.1 Following submission of our proposal, the Government is expected (as has been the case recently with councils in Surrey) to undertake its own statutory consultation exercise. Following the statutory consultation, the Secretary of State may seek advice from the Local Government Boundary Commission for England and may decide to implement a proposal with or without modification, or to not implement any proposal for the area.

3.2 Following the announcement of government's decision, which is anticipated to be in March 2026, the process of dissolving councils and establishing new unitary councils will begin with the laying of a structural change order (made under the Local Government and Public Involvement in Health Act 2007) before parliament.

3.3 Assuming the proposals are to be implemented, the new unitary council would be expected to take on full council roles from 1 April 2028, with the transitional arrangements to be confirmed ahead of this once secondary legislation comes into force to enable this. Elections would be held in May 2027.

3.4 The Government postponed the May 2025 elections in a number of county areas (including East Sussex) in February 2025 to help manage demands. If the proposal is accepted by Government it would mean that elections to what will become the new authority will take place in May 2027 ahead of vesting day in April 2028. Given these circumstances, rather than conducting an election in May 2026 for Councillors who would in effect serve terms of less than one year, followed by another election in May 2027 for a substantially restructured Council of 100 members, it is recommended that the Government be formally requested to cancel the 2026 election. While it is recognised that postponing the election is a significant decision and should not be undertaken lightly, the justification for last year's postponement is even more pertinent to the 2026 elections. This is due to factors such as cost (which although reduced due to the Mayoral election taking place at the same time would still be significant), the demand on limited resources, the imminent transition of the Council to a new authority, and the logistical challenges of inducting new councillors who would soon face re-election, with a notice of election expected roughly ten months after they assume office.

3.5 Elections in Hastings Borough Council are also scheduled for 2026, and bearing in mind that this organisation will cease to exist in 2028 when it transitions into the new unitary it is recommended that support be given to any decision by HBC to request that their elections are cancelled.

3.6 The implication of LGR is that ESCC in its current form will not exist from 1 April 2028 (vesting day). The Government's expectation for a new unitary council being formed on predominantly the same footprint as one of the predecessor councils is that the transition process is done through the continuing authority route. The One East Sussex proposal developed in partnership with the District and Borough Councils is predicated on the continuing authority model underpinned by strong agreement and determination from all councils that we are creating a new unitary council.

3.7 This approach requires transferring only District and Borough staff (about 2,500), contracts, and property, not the County Council's larger workforce, including school based staff (about 10,000) or assets. This minimises disruption, uses fewer resources, and lowers risks involved in moving back office systems. While it reduces transactional complexity for creating the new unitary, there is a concern that it could be seen as a County Council takeover and limit potential reorganisation benefits. However, all six councils have committed to collaboration and partnership in the interim plan, which helps address these concerns and supports the avoidance of missed opportunities.

3.8 In the event that a continuing authority model is agreed by Government following its consultation, the main transition function is initially discharged by the Implementation Executive and transfers to the Council's Executive following the 2027 elections.

3.9 Following submission of the proposal on 26 September 2025, communication and public engagement will continue with updates for residents, media work and briefings for stakeholders. Later in the year, printed information will be shared in community spaces such as libraries, leisure centres, family hubs, town halls, and there will be an opportunity to join an online public briefing session. There will be a programme of staff engagement via forums and online.

3.10 Recent guidance from the Ministry of Housing, Communities and Local Government (MHCLG) included several advice notes on the LGR process and timeline, financial decisions before LGR, and partnership working in social care in new unitary councils. The Government is clear that existing councils must be cognisant that some

decisions could fetter the future decisions of new councils and they should therefore act accordingly. Examples of such decisions given in the advice notes are:

- sale and purchase of significant assets,
- transfer of local assets,
- entering into new contracts for service delivery including IT procurement,
- major organisational restructures and changes to staff terms and conditions,
- establishing companies,
- undertaking job evaluation,
- permanent appointments to senior positions,
- changes to unplanned borrowing and the spending of reserves,
- major changes to arrangements such as the local council tax support scheme and council tax exemption scheme.

3.11 The County Council is ensuring, in the way it operates, adherence to this guidance.

3.12 All of the East Sussex councils have responsibilities under the Equality Act 2010. Any change in how public services are delivered will have the biggest impact on those most reliant on them, who are often among the most vulnerable people in society and include people sharing one or more of the legally protected characteristics. If the proposal for the establishment of a single unitary council is accepted by Government, detailed implementation plans will be created. Equality impact assessments of these will set out both how the new council will continue to ensure it fulfils its legal requirements in relation to equality, diversity and inclusion, and will also include assessments of how each of the detailed plans are likely to impact people sharing different protected characteristics. There are potential equality and inclusion benefits and challenges in relation to this proposal, but at this stage with so much uncertainty over funding, structures, process and practical implications, it is not possible to assess specific impacts with confidence, nor to define appropriate mitigating actions. However, there are a range of issues (listed at Appendix 3) that the councils are aware of the need to consider.

4. Conclusion and reasons for recommendations

4.1 In response to the Government's invitation for a single tier of local government, a proposal was developed with district and borough involvement. The six councils collaborated to create an evidence-based business case based on resident and stakeholder feedback, financial analysis, and economic considerations. This report summarises the development and recommends, for the reasons set out above and in the appendices, the proposal for a single-tier government in East Sussex.

4.2 Should the proposal and suggested timetable be accepted by Government with an election anticipated in 2027 it is recommended that the election in 2026 be cancelled due to cost, resource constraints, the upcoming transition to a new authority, and the short term that new councillors would serve before re-election.

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Chief Executive

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Local Members
All

Background Documents

- Letter from Minister of State for Local Government and English Devolution to East Sussex Council Leaders 5 February 2025 - [Letter: East Sussex and Brighton - GOV.UK](#)
- Interim Plan submitted to government 21 March 2025 - [East Sussex LGR Interim Plan](#)
- Letter from Minister of State for Local Government and English Devolution 24 July 2025 - [Local government reorganisation: letter to areas invited to submit final proposals - GOV.UK](#)

DRAFT



One East Sussex

Business Case for Local Government Reorganisation in East Sussex



Date: 10/09/2025

Prepared by: East Sussex Working Group

(Eastbourne Borough Council, East Sussex County Council, Hastings Borough Council, Lewes District Council, Rother District Council, Wealden District Council)

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1 Foreword

East Sussex stands at a decisive moment. As leaders of this diverse and dynamic county, we are united in our commitment to delivering a local democratic institution that is fit for the future and what our residents, businesses and communities need. This business case sets out our shared vision for achieving the exemplar unitary council that will help us to meet the challenges of today while unlocking the opportunities of tomorrow.

Our ambition is clear - to create a governance and delivery model that is fit for the 21st century. One that delivers high-quality, integrated public services, ensures financial resilience, and empowers local communities. In return, we expect the Government to deliver on its commitment to devolve power and funding, as well as follow through on commitments for national policy and funding reform on social care, homelessness and SEND, so that we can fully deliver on our ambitions to transform public services and boost economic prosperity.

The financial pressures facing local government should not be underestimated. This proposal is designed to support the long-term sustainability of public services in East Sussex, by reducing duplication, improving efficiency, and creating a more resilient organisation capable of adapting to future challenges. But no one should be under any illusions that sustainability would be secured by reorganisation alone. At best, it would push the financial cliff edge off by a few years, in the absence of a long-term sustainable needs-based funding settlement from Government.

This proposal is rooted in evidence, shaped by engagement, and aligned with the Government's criteria for reform. It supports the wider devolution agenda and the emerging Mayoral Strategic Authority (MSA) for Sussex. Through this alignment, East Sussex is well positioned to use our existing strong partnerships to play a leading role in driving regional growth, innovation, and inclusion; from strategic housing and infrastructure to skills, climate action, and economic development.

We are proud of East Sussex's unique identity, from its vibrant coastal towns to its rural heartlands, cultural heritage, and natural beauty. This business case is not about erasing that identity but strengthening it. Our model will ensure and enhance local voice and accountability, while enabling us to speak with one voice on the issues that matter most.



“Our ambition is clear - to create a governance and delivery model that is fit for the 21st century.”

Our vision for East Sussex

The Leaders of the East Sussex councils have worked collaboratively throughout the development of this business case and are committed to a shared vision for a single unitary council for the area. This vision sees an efficient and effective council which will serve East Sussex in a comprehensive and inclusive manner.

Building on a well-established history of close collaborative working, we recognise the economies of scale that a unitary council could bring and the stronger capacity it could have to withstand shocks in the system. The risks that adult social care, children's services and homelessness in particular can produce, through changes in demand levels that are very much outside of the council's control, are very much recognised. It is seen that a council of this size would be better placed to manage those risks and ensure ongoing resilience, whilst also joining up services more effectively, such as homelessness, to deliver better, more coordinated services for local people. By contrast, other options that were considered, specifically proposals from Brighton & Hove City Council, that would involve changing existing district boundaries, were felt to have disadvantages including substantial additional costs from disaggregating services that would greatly diminish or possibly even negate any savings from reorganisation. Disaggregation within a district boundary could result in disproportionate financial cost and risk to an even greater extent than with disaggregation of county services, with no evidence shared to date that would demonstrate that there would be any advantages to offset the risks.

Leaders also recognise the value that a new unitary council could offer in terms of providing a stronger and more unified voice to help attract investment and promote economic growth, building on a history of collaboration with each other, business leaders, housing providers, educational institutions and others. To that end, discussions are also progressing with West Sussex County Council and Brighton & Hove City Council to establish a new Sussex Mayoral Strategic Authority to which central government could devolve more powers and funding to accelerate infrastructure delivery, tackle climate change and develop the skilled workforce needed to deliver more homes, create skilled jobs and generate growth that all residents can benefit from.

However, the Leaders acknowledge that a single unitary would bring with it risk of remoteness for local residents, a concern that came through strongly in resident feedback. To counter this there will be focus on maintaining a strong sense of local community and local voice across the area. It is understood that there are significant differences across the county that can only be catered for within a new single authority if there is a strong emphasis on listening to local people, hearing local voices and an acknowledgment of the diversity and difference which makes the area so rich and vibrant.



“This vision sees an efficient and effective council which will serve East Sussex in a comprehensive and inclusive manner.”

Although it is understood that there is to be further guidance from Government on the matter of community engagement and empowerment, local representation and community-based approaches are considered by all Leaders to be of paramount importance to a successful future council. To this end, it is expected that how the local voice is heard will be a central feature of the planning of the new authority which will need further input from local people to be effectively co-designed.

Further to this, the Leaders see a vision for the future of the county which makes best use of technology and transformation to bring services closer to people. Digital solutions which are properly joined up and work for local people will be a strong feature of the new council, with the potential for every town and parish council to have access to the information they need electronically to be able to assist their local residents at point of contact. This would provide a network of ‘front desks’ across the county.

Finally, the Leaders shared vision is for a council that fulfils the potential of East Sussex as a strong, coherent whole. Through its increased, combined economic power, and in strong collaboration with the new Mayoral Strategic Authority, it will be able to help develop stronger local supply chains to support and enhance the economic wellbeing of the area.

2 Executive Summary

East Sussex is a unique place, known for its vibrant cultural heritage, spectacular countryside and coastal landscapes, and diverse local economy. The county has a distinctive blend of urban and rural characteristics which offer many opportunities and is highly valued by residents, businesses and visitors. However, it also presents practical challenges for the delivery of public services and tackling inequality, with sparsely populated areas more expensive to deliver services to and more likely to be affected by physical and digital isolation. East Sussex has a vibrant economy, supporting almost a quarter of a million jobs and generating economic output of around £9.9 billion, with growing specialist strengths in advanced manufacturing and digital technology. But relatively low productivity and infrastructure gaps are holding back achievement of its full economic potential.

It is this context that led to the six councils in East Sussex to be an early mover in responding to the Government's invitation to consider reorganisation. The councils already have a rich history of collaboration with each other as well as with partners across the public, private and voluntary sectors, to deliver high-quality public services and promote economic growth. Staff across each of the six councils have a high-level of job satisfaction and enjoy working in their current environment. They are widely committed to continuing to serve the people of East Sussex.

While the current six authorities are performing well and have a track record of achieving efficiencies through collaboration, there is a collective aspiration to deliver even more and even better for residents. Moreover, when faced with acute pressures in services such as social care, homelessness and SEND, there is also a sense that some councils may be approaching the limits of what can be achieved under their current structures, particularly in the absence of sustainable policy and funding solutions at a national level.

While local government reorganisation cannot and should not be relied on as a panacea for mounting public service challenges, the move to a unitary could offer a number of benefits consistent with the key principles set out when East Sussex councils submitted their Interim Plan to Government in March 2025:

- Achieving better value-for-money through economies of scale
- Delivering better outcomes for residents by freeing up more funding for frontline services through reduced management and overhead costs
- Tackling inequalities through scaled-up reform that shifts investment towards prevention and early intervention
- Addressing shared workforce shortages and challenges as well as developing a talent pipeline for the future
- Enhancing attractiveness to investors by providing a unified voice
- Establishing greater strategic presence and influence within Southeast England
- Creating the opportunity to secure more devolved powers and funding to unlock economic growth, deliver housing and infrastructure and tackle climate change, working with neighbouring areas

This business case sets out the preferred model for LGR for the ceremonial area of East Sussex and Brighton & Hove. This is the creation of One East Sussex - a single unitary authority covering the existing East Sussex County boundary, with Brighton & Hove City Council remaining as a separate unitary authority. This model has been developed collaboratively by all six East Sussex councils and is grounded in extensive engagement, robust financial modelling, and alignment with national policy objectives.

The preferred option also received the highest support from residents and stakeholders from across East Sussex, who recognised the potential for economies of scale to deliver better value, greater purchasing power in service contracts, reduced duplication and greater consistency in service delivery across the county. Nevertheless, there were also a number of significant reservations expressed, including the potential loss of local influence, the fear their area would be ‘forgotten’ in a single county-wide organisation and that local needs might either not be as well understood or harder to respond to in a bigger organisation.

It should also be noted that alternate proposals from Brighton & Hove City Council to extend into the boundary of Lewes District Council have been in development as part of a parallel process. While councils in East Sussex have engaged in discussions and been open in sharing data where it has been available, information on the detailed proposals being developed by Brighton & Hove City Council have been limited so a more comprehensive analysis has not been possible. Preliminary consultation on what has been known of the extension proposals were consulted on and were categorically opposed by Lewes residents surveyed. Strong representations opposing the aforementioned extension proposals have also been made by Newhaven, Peacehaven and Telscombe town councils, and Iford, Kingston and Rodmell Parish Councils. Additionally, there was a joint representation from the parish councils of the Lower Ouse and two individual Kingston Ward District councillors. Broadly these all made the case that no credible evidence had been produced to demonstrate that residents and businesses of those areas would be better off in an entirely new geography rather than continuing to work within existing networks and partnerships. Indeed, losing the areas covered in the proposed boundary changes would reduce the diversity of East Sussex’s economic mix, strip the county of its largest industrial cluster, diminish tax revenues, and weaken local supply chains .

The current proposal responds to the government’s invitation for reorganisation and reflects the shared ambition of East Sussex leaders to deliver high-quality, integrated public services, improve financial resilience, and strengthen local voice. On that basis, the preferred model offers the greatest value for money, delivering a forecast net benefit of £25 million by 2032/ 33 through consolidation, transformation, and increased income. It avoids the high disaggregation costs and duplication associated with alternative models and provides a platform for long-term reform and innovation. The intention is to design a new unitary that can, over time, increase investment in universal services, prevention and early intervention; make greater use of digital and technological innovation to deliver services that better reflect how residents live their lives and how businesses operate; and generate more economic prosperity.

However, it does not resolve the underlying structural deficit (the gap between projected income and spending needs), which is forecast to reach £226 million by 2032/ 33. Additional funding and policy reform will be required to ensure sustainability.

Alternative options, including splitting East Sussex into two unitary authorities and boundary expansion by Brighton & Hove City Council were assessed but found to be less effective. The two-unitary model is not financially viable, with a projected cumulative deficit of £619 million by 2032/ 33. The Brighton & Hove City Council expansion variants offer only marginal population gains at disproportionate cost and risk to the proposed East Sussex unitary.

This business case is not a final blueprint but a platform for constructive dialogue with government. It reflects a clear consensus across East Sussex and a commitment to co-designing a future model that delivers for residents, communities, and the wider region.

3 Context: The invitation from Government

This business case has been developed in response to the formal invitation issued by the Ministry of Housing, Communities and Local Government (MHCLG) on 5 February 2025, and the subsequent request from the Minister of State for Local Government and English Devolution for a detailed proposal. It builds on the interim plan submitted in March 2025 and incorporates feedback received from the Government in May 2025.

The purpose of this submission is to present a clear, evidence-based case for how local government reorganisation should be done in East Sussex. It sets out the rationale for reform, the options considered, and the only viable model of a single unitary authority for East Sussex. It also outlines the methodology used to assess the proposal and seeks feedback from government to inform the next stage of development.

This business case is intended to:

- Respond to the Minister's request for a formal proposal following the interim plan.
- Provide a structured and evidence-led assessment of the case for change.
- Set out the only viable option of a single unitary authority for East Sussex, based on existing county boundaries.
- Demonstrate how the proposal meets the six government criteria for LGR
- Seek feedback from MHCLG on the direction of travel, methodology, and assumptions to support further refinement.

As mentioned, this is not a final blueprint. It is a submission designed to support constructive dialogue with government and partners. It reflects the current position of the East Sussex councils and is subject to further development through engagement, consultation, and technical analysis once the geographic boundaries are set.

Options Considered

In line with government guidance and the statutory invitation issued in February 2025, this business case considers a range of structural options for local government reorganisation. These options have been assessed against the six government criteria and reflect both local priorities and the wider regional context, including the proposed Sussex and Brighton MSA.

In response to the Government's request of East Sussex County Council and Brighton & Hove City Council to submit plans for local government reorganisation, the preferred option is a single unitary authority for East Sussex and a single unitary authority for Brighton and Hove.

The following options have been considered for East Sussex only, with consideration for options proposed by Brighton and Hove City Council to expand its existing boundary:

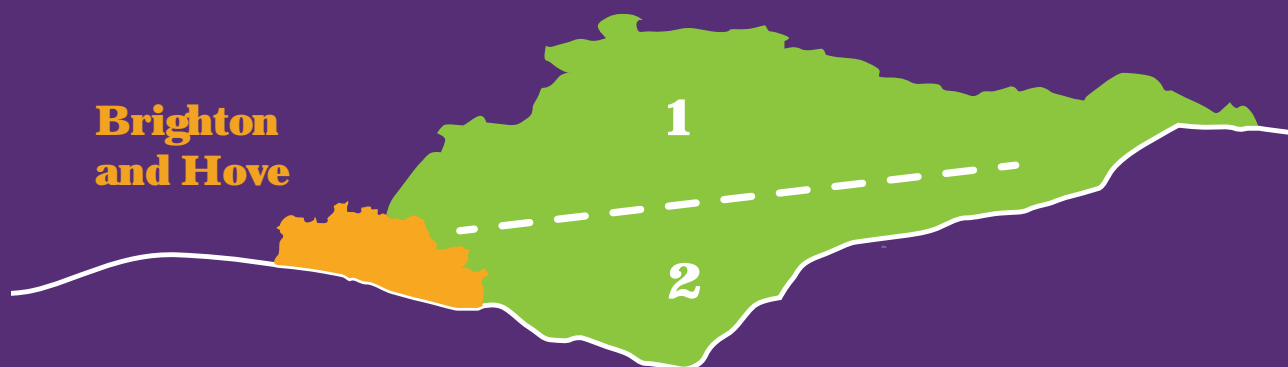
3.1.1 Option 1: 'One East Sussex' A Single Unitary Authority within the existing boundaries of East Sussex



This is the only viable model and has been jointly developed by East Sussex County Council and the five district and borough councils of East Sussex. It proposes the creation of a single unitary authority covering the existing East Sussex county boundary, with a population of approximately 555,500; whilst Brighton & Hove unitary council remains as is. The East Sussex model:

- Aligns with existing service delivery footprints (e.g. social care, education, public health).
- Minimises disruption to statutory services and partnerships.
- Builds on established collaboration across the six councils.
- Meets the government's population guidance and maintains a coherent geographic identity.
- Creates operational savings as a single authority and avoids the substantial costs of disaggregation.

3.1.2 Option 2: Two Unitary Authorities within the existing boundaries of East Sussex



This model proposes the creation of two new unitary authorities based on East Sussex's existing district boundaries, with Brighton & Hove maintaining their current boundary. The exact boundaries for this model have not been geographically modelled due to the need for boundary changes, however a full financial model has been developed. This model introduces significant risks related to service disaggregation, particularly in social care and education. It also creates population asymmetry and may reduce strategic capacity.

3.1.3 Option 3: Brighton & Hove Boundary Expansion (Four Variants)



Brighton & Hove City Council has recently consulted on a potential boundary change with four variants that would involve absorbing parts of Lewes District into an expanded unitary authority. For baselining and comparison, Brighton & Hove's current population based on its existing footprint is approximately 277,965.

These options, first presented in July 2025, include:

- 1** Brighton & Hove plus East Saltdean, Telscombe Cliffs, and Peacehaven (approximately 301,130 population).
- 2** Brighton & Hove plus East Saltdean, Telscombe Cliffs, Peacehaven and Newhaven (approximately 313,955 population).
- 3** Brighton & Hove plus East Saltdean, Telscombe Cliffs, Peacehaven and Kingston (approximately 303,117 population).
- 4** Brighton & Hove plus East Saltdean, Telscombe Cliffs, Peacehaven, Newhaven and Kingston (approximately 315,942 population).

These proposals would require boundary changes and have implications for the East Sussex footprint. In his letter of invitation to the Leaders of two-tier councils and unitary council in East Sussex to develop proposals for reorganisation, dated 5 February 2025, the Minister of State for Local Government and English Devolution stated clearly that: "boundary changes are possible, but existing district areas should usually be the building blocks for proposals. More complex boundary changes will be considered only if there is strong justification in the final bid." This guidance was subsequently confirmed in the summary of feedback on interim plans that MHCLG published as a policy paper on 3 June 2025. While East Sussex councils are committed to evaluating all relevant proposals in good faith, these options were introduced at a relatively late stage in the process. As such, it has not been possible to apply the same level of detailed analysis and scrutiny to each of these variants as has been applied to Options 1 and 2.

It is important to note that the marginal population increase achieved through these proposals ranging from approximately 23,000 to 38,000 additional residents comes at a disproportionately high cost in terms of service disaggregation, governance disruption, and financial transition. In particular, the splitting of existing social care, education, and housing delivery lines would introduce significant operational complexity and risk, especially for vulnerable residents. The financial cost of disaggregating systems, staff, contracts, and assets would be substantial, and would likely outweigh the limited strategic benefit of modest population growth.

East Sussex has a highly constrained land supply, particularly in industrial floorspace, and already leans heavily towards the healthcare, education, and retail sectors. Losing the areas covered in the proposed boundary changes would reduce the diversity of East Sussex's economic mix, strip the county of its largest industrial cluster, diminish tax revenues, and weaken local supply chains. Newhaven, Peacehaven, East Saltdean, Telscombe Cliffs, and Kingston together make an outsized contribution to East Sussex, providing nearly 7% of its population and GVA, nearly 10% of its industrial floorspace, almost 10,000 jobs and over 1,000 businesses. Newhaven anchors the county's scarce industrial and logistics base, Kingston contributes high-level human capital, and Peacehaven supplies a significant labour force. Significant investment has been made in these areas over recent years, including nearly £40m in Newhaven alone. Alongside this, concerted effort has been invested in building effective relationships with numerous partners in the area, such as the Newhaven Port Authority. Retaining these areas is therefore critical to East Sussex's economic resilience and future growth capacity.

This proposed reconfiguration would fragment the East Sussex geography, undermine existing partnerships, and complicate alignment with the emerging MSA .

3.2 Approach to this business case

This business case is structured around the six criteria set out in the statutory invitation and the December 2024 English Devolution White Paper:

1. Right size and scale
2. High-quality and sustainable services
3. Financial sustainability
4. Local collaboration and consensus
5. Support for devolution
6. Community engagement and empowerment

The methodology used to assess these criteria includes:

- Data collation: financial, demographic, and service performance data.
- Stakeholder engagement: interviews, workshops, and thematic analysis.
- Options appraisal: a scoring matrix aligned to the six criteria.
- Financial modelling: baseline and reform scenarios, including savings and transition costs.
- Risk analysis: transition risks, service disruption, and political feasibility.

3.3 Next Steps

We are seeking feedback from MHCLG on the following:

- The strength of the case for a single unitary authority.
- The robustness of the methodology and assumptions.
- The alignment with national policy and devolution objectives.
- The proposed approach to local engagement, governance, and implementation.

We welcome the opportunity to refine this proposal in partnership with government and to co-design a model that delivers for residents, communities and the wider region.

4 Government Criteria & Methodology

The Government has set out six core criteria for assessing local government reorganisation proposals. These criteria are not only technical benchmarks but also reflect the broader ambitions of the December 2024 Devolution White Paper, which emphasises the need for simplified governance, stronger local leadership, and institutions capable of delivering integrated, sustainable public services. The East Sussex proposal has been developed with these objectives at its core and in direct response to the feedback received from MHCLG in May 2025.

This section sets out a detailed explanation of the criteria used for assessing each of the unitary options for East Sussex. It also outlines the methodology used to assess the options and develop the preferred proposal, ensuring that the process has been robust, evidence-led, and transparent.

4.1 The Six Government Criteria

4.1.1 Right Size and Scale

The Government expects new unitary authorities to be of sufficient size to deliver services efficiently, achieve economies of scale, and withstand financial and operational shocks. At the same time, they must retain a coherent geographic identity and be capable of engaging meaningfully with local communities. Size and scale directly affect an authority's ability to plan strategically, manage risk, and deliver services cost-effectively. Authorities that are too small may lack resilience and capacity, while those that are too large may struggle with local responsiveness.

The proposed single authority would serve a population of approximately 550,000, which is within the optimal range identified. This model avoids the inefficiencies and high disaggregation costs associated with smaller unitary options, while remaining locally recognisable and governable.

4.1.2 High-Quality and Sustainable Services

Reorganisation must lead to improved or at least maintained service quality across all service areas. It should avoid fragmentation, support integration, and enable long-term sustainability. Publicly delivered services such as social care, education, housing, and public health are increasingly interdependent. Fragmented governance and delivery can lead to duplication, inefficiency, and poorer outcomes for residents. This business case will assess how each option supports integrated service delivery, continuity of care, and opportunities for transformation

A single authority would allow for integrated planning and delivery across adult social care, housing, education, and public health. This would reduce duplication and enable consistent service standards across the county and support a shift towards prevention and early intervention, particularly in areas such as social care and homelessness.

4.1.3 Financial Sustainability

Proposals must demonstrate a credible path to long-term financial resilience, including the ability to manage transition costs and deliver ongoing savings. Local government faces significant financial pressures meaning that any new structure must be able to balance budgets, invest in transformation, and protect frontline services.

Financial modelling shows that the single authority model offers the greatest potential for savings through back-office consolidation, shared procurement, and rationalised assets. The model avoids the high transition and disaggregation costs associated with multi-unitary options.

4.1.4 Local Collaboration and Consensus

There must be clear evidence of joint working, shared vision, and political and stakeholder support across the affected area. Successful reorganisation depends on trust, cooperation, and shared ownership. Collaboration reduces risk, builds legitimacy, and ensures that proposals reflect local priorities and are deliverable.

This proposal has been developed collaboratively by all six councils in East Sussex, with shared data, joint governance, and aligned objectives. There has been engagement across local partnerships and focus groups with cross-sections of residents in each district and borough in East Sussex, all of which has informed the design of the model and the proposed preferred option. While some differences of opinion remain, there is some consensus on the need for reform and the benefits of a single authority.

4.1.5 Support for Devolution

The new structure should support the Government's wider devolution agenda and be capable of engaging with regional governance structures such as Mayoral Combined Authorities.

Devolution is central to the Government's strategy for growth and public service reform. Local authorities must be ready to take on new powers and responsibilities. The business case will demonstrate to what extent each option aligns with the proposed Sussex MSA, and supports regional coherence, and contributes East Sussex's ability to deliver devolved functions and attract investment.

The proposed single unitary model for East Sussex aligns with the emerging Sussex MSA provides a strong, coherent partner for regional governance, capable of engaging on strategic issues such as transport, housing, skills, and climate resilience.

4.1.6 Democratic Representation and Neighbourhood Governance

New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment. A recurrent theme during resident engagement about LGR in East Sussex was that larger governance structures could lead to a loss of local representation and control, making it harder for residents to have their voices heard. Those concerns were echoed in feedback from Leaders and other elected members who fear that fewer councillors and larger wards could reduce accessibility and local accountability.

As a result, careful thought is being given to the design of both democratic representation and neighbourhood governance so that they can be genuinely responsive to local needs, as well as support the demonstration of clear local accountability. At this stage, it would not be appropriate to rush into determining the final options for either. Indeed, it is essential to consider the number of councillors and ward boundaries in tandem with neighbourhood governance, as the two need to be linked for councillors to be able to play their roles effectively and for communities to feel like they truly have a say. For example, more detailed thought needs to be given to how councillors involved in neighbourhood governance structures could have a role or a voice in the executive and scrutiny functions of the new unitary authority.

The six councils in East Sussex are agreed on principles that should underpin the development of final options for councillor representation and neighbourhood governance, set out in more detail later in this section.

Democratic representation

When councils in East Sussex submitted their interim plan in March 2025, they set out key principles to shape the work to develop a coherent new structure. Those principles signalled the importance of enhancing local democracy, local identity, transparency, accessibility, local decision making and accountability (including through scrutiny). Further consideration has since been given to shaping how democratic representation for a new unitary would be designed, with three additional principles emerging to act as tests for the future options:

1. Subsidiarity, so that appropriate decisions are taken as closely as possible to the people and communities affected;
2. Pluralist inclusive decision-making, reflecting the diversity of East Sussex's demography and geography; and
3. Local by design so that structures can secure the confidence of residents and do not feel imposed

Considerable work has already been undertaken in East Sussex to consider the practical considerations set out in the Local Government Boundary Commission for England (LGBCE) guidance. In addition, models in place across existing county unitary councils with similar geographic characteristics will be considered alongside outcomes from recent LGBCE reviews. As set out in the interim plan submitted to government, the ratios of 4,000 - 5,000 electors per councillor (similar to the models that are applied in North Yorkshire, Cornwall, Somerset and County Durham) are being carefully reviewed.

Bearing in mind the ambitious timescales set by Government and the current demands on the LGBCE, it is proposed that the initial council size for a new unitary authority in East Sussex is based on 2 councillors per county division for the anticipated election in May 2027. This equates to 100 councillors for the single unitary authority and would result in approximately 4179 electors per councillor. This is within the range set out in the Interim Proposal and in line with LGBCE guidance of between 30 to 100 councillors. It should be noted that the number of electors per councillor would increase with the Government's plan to extend the vote to 16 and 17 year-olds.

This would be followed, once the unitary council was established, by a more fundamental review when work on the decision-making arrangements for the new authority has been undertaken, to be formalised by a LGBCE review requested by the new authority. This would be consistent with the approach taken in recently unitarised areas. Such an approach would also be informed by the Government's intention, as set out in the English Devolution and Community Bill, to introduce a requirement on councils to establish effective community governance, moving decision-making closer to residents. It is noted that the Government will undertake a review as to the best way to achieve its aims. While guidance on Government's intentions regarding localised representation and neighbourhood governance is awaited, the proposal for 100 councillors ensures that the new unitary will have sufficient capacity to adequately support Government ambitions, including through potentially newly established neighbourhood area committees.

It is recognised that a proposal for 100 councillors sits at the upper end of the expected range in the LGBCE guidance for council size. This reflects the varied nature of the county and a realistic appraisal of the roles and demands of elected councillors in East Sussex. In particular, it recognises the significant challenges involved in representing areas of the county with significant deprivation and where there is rising demand for services including SEND, adult social care, and housing and homelessness support.

The formal role of a councillor within the council has also been considered in putting forward this proposal. In taking on the responsibilities of the county, district and borough councils, the new unitary authority will have an executive with greater breadth of responsibility, will require enhanced scrutiny arrangements and involve councillors in regulatory functions including planning and licensing as well as aforementioned neighbourhood governance structures. Having 100 councillors will ensure that there is sufficient capacity for the discharge of the formal duties of the council without requiring a burdensome level of work and engagement from a smaller pool of elected members. Furthermore we would anticipate that there would be a heightened level of work required in the first term of the new unitary authority as it establishes itself and its own ways of working, meaning it would be prudent during that period to have a higher number of councillors than it will likely have following an LGBCE review.

Strong and well-established partnership working arrangements in East Sussex additionally necessitates councillor representation on a wide range of outside bodies. The councils that will form the new unitary currently have 327 member appointments to approximately 208 outside bodies. While currently some of these involve appointments from more than one of the councils that will make up the new unitary, the demand and need for representation is only expected to increase through the creation of the Mayoral Strategic Authority (MSA), and the deepening integration of health and care and closer working across wider public services. This is all in the context of rising demand for services and strained public sector finances. Given the pressures and likely impacts on how services will be provided in the future it will be vital that community voices continue to be heard within larger local government structures and feed through to the Sussex MSA, and to ensure the needs and priorities of East Sussex residents remain at the forefront of decision making by the unitary and its partners.

Neighbourhood governance

The English Devolution and Community Empowerment Bill proposes to introduce a requirement on all local authorities in England to establish effective neighbourhood governance, with details of this obligation to be set out in regulations that will be made after the Bill is made an Act of Parliament. For councils in East Sussex, the matter of how best to ensure genuine and meaningful local influence over decisions in a bigger unitary authority is a priority due to the strength of feeling expressed about this issue during engagement about reorganisation, not just because it could become a statutory obligation.

Although more clarity on Government thinking in this area would be welcome following its intended review of good practice, any guidance must not be prescriptive, and no structures should be unilaterally imposed or abolished by central government. It should rest with the councils undergoing reorganisation to determine what would be most effective locally, recognising that neighbourhood governance structures need to be designed so they are valued by communities, not simply to function as a delivery mechanism for the new unitaries. Government signals about the potential role of town and parish councils in future neighbourhood governance have been ambiguous, but these should remain part of the suite of options available for consideration. This would be particularly important for areas like East Sussex which already have a number of local councils in operation.

The six councils in East Sussex have agreed the following principles to guide the assessment of future neighbourhood governance models:

1. **Building on foundations:** There are a number of existing structures to enable resident and community engagement in place across East Sussex. Those that have successful track records and local buy-in could potentially act as building blocks for a future model.
2. **Sustainability:** For any new model to work in practice and not just on paper, which is what residents rightly expect, significant investment of member and council staff time will be required. Ensuring that appropriate resourcing can be maintained over time will be critical.
3. **Fit for the future:** The new unitary will have a wider set of functions than any of the existing councils currently have so consideration needs to be given to how neighbourhood arrangements can meaningfully shape decisions and delivery in the future.
4. **Fairness:** East Sussex has a mixture of sparsely populated rural areas, market towns and continuous urban development along the coastal strip, each of which comes with its own challenges and opportunities. As a result, it may be that there would be value in allowing some variation in the structures that are set up, but there would at the same time need to be transparency and consistency in how these bodies are able to interact with the new unitary and the level of influence they are offered.

Proposed councillor ratios

As previously noted, the primary concern of those residents who responded to the consultation relating to LGR in East Sussex was that it would result in reduced local representation and that their area would be forgotten. The proposed two councillors per electoral division would mean that residents and communities continue to have more than one elected local representative, ensuring that there is an appropriate level of local representation and a degree of continuity for them through the transition period. More than one councillor per division will also allow for the increased level of casework to be shared and not fall on an individual, ensuring that councillors will continue to be effective by having the capacity to engage with community groups, local town and parish councils, and residents. This engagement is vital for councillors to have close ties with their communities and enables strong democratic representation for residents that ensures genuine neighbourhood empowerment can be delivered.

The proposal to double the number of councillors per existing county electoral division therefore offers the most effective and deliverable approach to ensuring the new unitary has adequate local representation and the capacity to manage the transition process. This approach is similar to that taken in other areas, such as Somerset, Dorset and Buckinghamshire, which had multiple Members elected to existing or only slightly adjusted former county divisions in their inaugural unitary elections. Doubling up on existing county divisions offers a deliverable approach which avoids significant disruption and risk at a time of heightened demand. This approach supports the ambitious transition timescales, is in line with Government requirements, acknowledges the volume pressure on the LGBCE due to multiple LGRs across the country, and ensures that fundamental decisions for the new authority are not made prior to the commencement of that authority.

Having regard to the most recent recommendations of the LGBCE in relation to a number of authorities and noting that the LGBCE are clear that there is no fixed electorate ratio and therefore may be outside this range, the proposed council interim size of 100 would not sit significantly above the expected number of councillors the unitary would have after a formal LGBCE electoral review had been carried out.

5. **Collaborative leadership:** Many public service outcomes are not delivered by local government alone and rely on partnerships with other public sector organisations, some of which (health and police in particular) are considering their own service footprints at neighbourhood or community level. While strict alignment of geographies may not be possible or desirable, it would be helpful to ensure there is some degree of coherence across East Sussex, which could be particularly critical to unlocking the potential of public service reform to improve outcomes and drive out costs.

It is anticipated that the preferred models to maintain public accessibility and democratic accountability as well as find the appropriate balance between the two will be set out in the final proposal for LGR in East Sussex. These are intended to reflect fair representation ratios, investment in digital and in-person engagement tools, and options for embedding local accountability into the governance framework of the new authority.

Together, these measures are designed to ensure that the new unitary council not only maintains but enhances its role as a trusted, responsive, and locally rooted institution one that reflects the diversity of East Sussex's communities and empowers them to shape their future.

4.2 Methodology

The development of this business case has followed a structured, multi-stage methodology designed to ensure rigour, transparency, and alignment with government expectations. Each stage has been informed by the criteria set out in the statutory invitation and the December 2024 Devolution White Paper, as well as feedback received from MHCLG in May 2025. The approach has been collaborative, evidence-led, and designed to support robust decision-making.

4.2.1 Data Collation

Comprehensive data was gathered from all six councils, including:

- Financial data including budgets, reserves and liabilities
- Demographic trends and forecasts across the districts and boroughs, as well as in totality
- Service performance indicators such as corporate performance, social care, housing and education
- Organisational structures and workforce data
- Capital assets registers
- Contract registers

A consistent and comprehensive dataset was essential to ensure that all options could be assessed on a like-for-like basis. It enabled the identification of service pressures, financial risks, and opportunities for integration. The use of shared data also supported transparency and trust between partners, responding directly to government feedback encouraging the use of common assumptions and datasets across proposals.

4.2.2 Stakeholder Engagement

Engagement activities were undertaken to ensure that the business case reflects the views and insights of those who deliver, use, and are affected by local government services. These activities included:

- A series of interviews with the leaders and chief executives of each of the councils to gather direct and thematic feedback
- Weekly engagement sessions and workshops with finance teams
- Resident focus groups in each of East Sussex's five districts and boroughs, collating feedback on local identity and preferred models for LGR
- Thematic analysis of feedback from residents, partners, elected members and the use of user voice groups across East Sussex

Stakeholder engagement ensured that the proposal was grounded in local feedback and informed by operational experience. It helped identify key themes such as the importance of local identity, concerns about service continuity, and support for integrated delivery. This engagement also demonstrated local collaboration and consensus, a key government criterion, and helped shape the governance and service design elements of the proposal. More detail on the feedback from resident engagement is set out in the appendix.

4.2.3 Financial Modelling

Financial modelling was undertaken to provide a robust assessment of the financial implications of reorganisation. This included:

- Establishing a baseline of current costs and revenues
- Estimating transition and implementation costs
- Projecting long-term savings from integration and rationalisation
- Modelling council tax harmonisation scenarios
- Assessing payback periods and sensitivity to inflation and demand pressures

Financial sustainability is a core government criterion. The modelling provided a clear picture of the financial risks and benefits associated with each option. It also allowed for scenario testing and stress-testing of assumptions, ensuring there is transparency of the implementation costs, payback and the long-term financial viability. It is critical to reinforce that there is not a single unitarisation option that would lead to long term financial stability in the absence of funding reform.

5 Context:

East Sussex Today

East Sussex is a unique place, known for its vibrant cultural heritage, spectacular countryside and coastal landscapes and diverse local economy. The county covers a population of 550,000 people over a geographical area of 1,725 square kilometres (660 square miles), with population density concentrated in several urban centres, three of which (Eastbourne, Hastings, Bexhill-on-Sea) represent around 43% of our total population. Significant parts of the county are also encompassed by natural environments of national and international significance, including the ancient Ashdown Forest near Crowborough, the South Downs National Park, the High Weald National Landscape, the Pevensey Levels, and 70 miles of coastline.

This distinctive blend of urban and rural characteristics offers many opportunities for our county and is highly valued by residents, businesses and visitors. However, it also presents practical challenges for the ways in which we can deliver our services and address demands or inequalities, as sparsely populated areas are more expensive to deliver services to and more likely to be affected by physical and digital isolation.

These opportunities and challenges mean it is more important than ever that we ensure our services enable a brighter future for East Sussex. We want to make the most of our local economic, cultural and natural assets to drive sustainable growth and address inequalities across the county.

5.1 Population

The East Sussex population is projected to grow by nearly 45,000 in the next 15 years, from 555,500 in 2023 to 600,300 in 2038. Most of the population growth is of residents aged 65 and over.

East Sussex has one of the oldest populations in England and is distinctive in the southeast for the age of its population. In parts of the county, one in 20 residents is aged 85 or older - the group with the highest need for social care services. Across the whole population, more than 8,000 people are aged over 90 and 213 people are over a hundred years old.

High deprivation levels rank parts of the county alongside the London Borough of Newham or Blackburn. More than 78,000 people live in areas among England's most deprived. The government's figures show that East Sussex includes the highest proportion of fuel-poor households in the Southeast England.

Population forecasts show an increase in the older population across the county but a much slower growth rate in the working-age population; in Eastbourne and Hastings the working age population is expected to decline. This trend will affect the local labour market, tax base, and demand for services. Meanwhile, Wealden is experiencing growth in both children and working age populations, for which its transport, healthcare and water service infrastructure is inadequate.



Diversity is increasing in some areas, especially among younger residents. In Eastbourne, 28% of primary school pupils are from ethnic minority backgrounds and Hastings has the highest proportion of LGBTQ+ residents at 4.6%. Despite these shifts, the county has 88.3% of the population identifying as White: British and Northern Irish.

5.2 Health and Wellbeing

There are good opportunities to live and age well in East Sussex, as reflected by the number of residents reporting a 'very good' or 'good' health status (34.4% and 42.7%, respectively). Life expectancy in the county has generally risen since the early 2000s and levels are above the national average. In 2023, women were expected to live until 83 years and men 79 years.

There are, however, indications that health and wellbeing levels vary significantly across East Sussex. While we can see higher indicators in Lewes and Wealden in terms of life expectancy and mortality rates, Hastings and Eastbourne score below the national average on mental health and frailty. Although East Sussex is overall ranked 93 out of 151 Upper Tier Local Authorities in the country on the Indices of Multiple Deprivation rank, there are significant areas of deprivation across the county. 22 out of the 329 areas measured are in the most deprived 10% nationally, with Hastings ranked as the 13th most deprived Lower Tier Local Authority out of 317 in the country. Those experiencing deprivation close to otherwise more affluent communities close by can feel significantly more enhanced levels of exclusion than might be the case in other areas. Those in our most deprived communities are more likely to be affected by social inequality and potential difficulties accessing Council and other public services.

Integrated Community Teams



Integrated Community Teams (ICTs) in each East Sussex district unite local authorities, the NHS, public health, and VCSEs to address local health and wellbeing priorities. These teams focus on:

- Simplifying access to care
- Delivering proactive, personalised, multi-disciplinary support for those with complex needs such as frailty or dementia
- Promoting prevention through collaborative actions, like encouraging physical activity

For instance, rural day clinics for mobility issues have reduced neuro outpatient physiotherapy waiting times from 76 to 25 weeks, with all service users rating their experience as 'very good'.



In East Sussex overall, 20.3% of residents identify as disabled, and adult social care demand is high with 5,329 requests per 100,000 residents. The complexity of health and care needs is continuing to increase, particularly in areas with ageing populations and rural isolation.

5.3 Children and Young People

In East Sussex, more children achieve a good level of development at the Early Years Foundation Stage than national figures. However, levels of attainment at Key Stage 2 and Key Stage 4 are below national averages. As with other data, such attainment levels at an East Sussex geography hides levels of poorer educational outcomes within some areas of the county, in particular Hastings.

There are complex and systemic issues facing the education and children's services sector. Estimations reflect that, by 2029, the number of children and young people is expected to decline slightly by 1.4%. Demand for services and the complexity of cases continues to significantly increase, with 59.3 Child Protection Plans in place per 10,000 children aged 0-17 years. There are currently 690 looked after children. 41.6% of all children and young people aged 0-25 with Education Health and Care Plans (EHCPs) in East Sussex are placed in special schools which is over nine percentage points higher than the England average. EHCPs of SEND maintained by the Council increased by 87% from 2015 (2,645) to 2025 (4,940).

5.4 Housing Need and Supply

Across East Sussex, there is a shared vision for healthy, safe and affordable homes for all, with a focus on preventing homelessness and ending rough sleeping, and a priority on accelerating housing delivery and improved infrastructure. The imperative for this vision is clear as access to affordable and social housing is generally a challenge in East Sussex, with the average house price higher than the national average (£340,000 compared to £290,000). The cost of private rented housing also rose by up to 29% between 2019 and 2024, generally outstripping rises in earnings. In some parts of the county, homes are over 10 times the average annual earnings of residents.

High housing costs have an acute human toll. The draft East Sussex Housing Partnership Strategy (2025-2030) reports that there are currently over 1,200 households living in temporary accommodation, with some areas experiencing rates that are double the national average. The high cost of housing exacerbates the loss of young working age people to other areas with higher paying employment opportunities and/or more affordable housing, with knock-on effects for the local economy.

Housing delivery in East Sussex has not kept pace with need, remaining relatively static over the past 5 years, with a total of 9,131 net housing additions. Delivery of both market and affordable housing is not consistent in all areas, with some areas delivering at historically high levels while other areas are seeing much lower rates of delivery.

Although delivery remains lower than targets, consents remain at all-time highs (particularly in Wealden and Lewes District) so the planning system should not be seen as the exclusive or even primary blocker. In addition to constraints on land supply, build-out rates have been disappointing, informed by a number of factors not in councils' control and not addressed by reorganisation. These include higher interest rates, increasing cost of materials and labour, a lack of certainty over future affordable rent policy and the emergence of important but competing demands for

investment to meet higher safety and energy performance standards.

While there are likely to be benefits from being able to bring functions such as housing, planning, transport and social care together within one tier of local government, an enhanced partnership relationship between central government and both the new unitary and the proposed Sussex MSA will also be crucial to delivery.

This enhanced relationship would involve additional funding and powers for the unitary that would ideally be made immediately available to districts and boroughs in recognition of a shared sense of urgency about tackling the housing emergency, including:

- funding and support to ensure the timely delivery of infrastructure and utilities to encourage higher build-out rates
- powers to ensure new homes are built to a carbon neutral standard, which has the added potential to reduce household fuel bills and improve health outcomes as well as reduce the need for future spending to improve energy efficiency and stock quality
- removing the cap for housing benefit subsidy rate for local authority homelessness placements as well as fully and sustainably address the disconnect between Local Housing Allowance and private rents in East Sussex

East Sussex Housing Partnership



East Sussex Housing Partnership is an inter-sectoral collaboration involving six councils, housing providers, social services, criminal justice, public health and the voluntary and community sector. The partnership is currently finalising a shared strategy that will optimise all existing levers to help accelerate build-out and address housing need, by:

- Pulling together a pipeline of public sector assets to be brought forward for new development;
- Making the best use of existing stock, including a county-wide Empty Homes Programme drawing on shared resource;
- Enabling providers to benefit from economies of scale when planning their approach to compliance, e.g. staff training schemes;
- Expanding Local Employment and Skills Plans to build capacity in the local construction workforce, including links to Section 106 processes; and
- Developing a county-wide Supported Accommodation Strategy developed, in line with new regulations.



Partnering with Government to boost economic prosperity



Newhaven is a Channel ferry port, significant because of its international ferry links to Dieppe, the port operations, its rail connectivity with two stations, and as a place of industry in a predominantly rural area. Recognising the potential for growth in marine and maritime sector, the Government has made it one of the beneficiaries of recent initiatives.

Newhaven Unleashed

The Newhaven Enterprise Zone has been designed to act as a catalyst to support good sustainable economic growth and business resilience. Established in 2023, it has a core focus on creating employment floorspace and growing the number of skilled jobs. Grant programmes include a Low Carbon Investment Fund to support enterprises in Newhaven to develop low carbon products and/or incorporate low carbon processes or services. To date, 78 new jobs and 635 sq m of floorspace has been created or refurbished.



“Re-imagining Newhaven” Pathfinder Pilot

After Lewes District Council initially secured funding from 3 different government funds, these separate allocations have been amalgamated into one programme called the Pathfinder Pilot. The consolidated ‘Re-imagining Newhaven’ capital grant allocation of just under £37m is enabling the delivery of 12 transformational projects in the town. Completed projects include a new 3G pitch at Newhaven Football Club, and refurbishment of the Ferry Terminal building. Projects currently in the delivery phase include a new fish processing plant which allows fish landed in Newhaven to be processed, stored and distributed from the site.

5.5 Economy and Employment

As with housing, councils in East Sussex have set out a shared vision for economic prosperity in the county. Developed in partnership with Team East Sussex, the East Sussex Prosperity Strategy sets out a roadmap to 2050 for securing better opportunities and living standards for the people who live in the county, as well as to help businesses to thrive and grow.

The Strategy builds on a recognition that the economy in East Sussex is diverse, supporting 246,000 jobs and generating around £9.9 billion. It is also polycentric: Eastbourne, Hastings and Bexhill are the largest urban areas, but no single centre dominates; most of the county is rural and protected within the South Downs National Park and High Weald National Landscape. Outward connections to London, West Sussex, Kent and London and indeed on to the European continent via France (discussed in more detail in section 5.6) are also important, positioning the region

well to play a pivotal role within the wider economy of Southeast England.

The county's business landscape is also diverse: of the 23,000 enterprises, the majority are small employers. Business density and sector composition vary: most businesses are small employers and rural parts of the county account for 36% of the total business stock in East Sussex. There are growing specialist strengths in two of the sectors in the Government's Modern Industrial Strategy: advanced manufacturing and digital technology. The area's outstanding natural environment also drives demand for a thriving visitor economy, worth £5 billion annually. Finally, there is a shared view among councils and businesses that the East Sussex economy needs to both adapt to and capitalise on opportunities from climate, technological and demographic change in future.

East Sussex is an attractive place to live, but economic disparities are pronounced across the area. Productivity in East Sussex, as measured by Gross Value Added (GVA), has persistently lagged with GVA per filled job in the county at 73% of the UK equivalent. While the county has seen modest productivity growth in recent years, this has not been sufficient to significantly change the relative position. Ultimately, productivity translates into impacts on households as well as the wider economy. For example, in 2022, gross weekly earnings commanded by people working in East Sussex were around 90% of the UK average.

The Government has clearly recognised the ambition of councils and business partners in East Sussex to improve productivity and generate more growth, notably by establishing an Enterprise Zone (EZ) in Newhaven, one of only 48 in England. The EZ programme was set up by the government to drive local growth by offering a

Connect to Work



East Sussex was only the second area in the country to launch the devolved Connect to Work programme.

Connect to Work follows a supported employment model where local authorities, housing, and voluntary sectors collaborate to help people with disabilities, mental health issues, unpaid carers, and those with care experience find jobs. The programme aligns individual and employer needs through profiling, job-matching, engagement, and ongoing support.

Just weeks after work started in East Sussex, the programme started to deliver results, with 60 people referred to the service in its first seven weeks. From September, the East Sussex programme will add more delivery partners and have a greater focus on supporting those at risk of homelessness, increasing employment opportunities, reducing demand on housing.



Growth Hubs



The East Sussex Growth Hub is the first place for businesses to come for support. It provides a free service to help local businesses find information, specialist advice, funding, tools and resources to start, run or grow. The Growth Hub builds strong relationships with them all and connects them with the right support at the right time. Since April 24 it has delivered over £1m in grant funding, given over 1300 hours of business support to more than 400 businesses, delivered over 500 hours of support to start up businesses, and has made over 300 referrals to specialist advice to help them scale, innovate and export. Examples of particular success can be found in the Newhaven area where the Growth Hub has complemented regeneration activity by the Re-imagining Newhaven Board.



range of incentives to businesses, such as business rate relief and simplified planning. All business rate growth generated within the EZ is retained by the local authority to reinvest in local economic growth.

Alongside the Newhaven EZ, the Government also entered into an innovative funding arrangements with Lewes District Council to support business and jobs growth, as well as improvements to the public realm. Set out in more detail below, these initiatives can in some respects be considered precursors to the devolved powers now being offered to MSAs. This demonstrates that East Sussex has a track record of working as a trusted partner to Government, which stands to strengthen the foundations on which a new MSA would be built.

Within East Sussex, the economic activity rate (i.e. the proportion of 16–64-year-olds either in work or actively seeking work) is around 76%. This is notably lower than the average across the southeast. The employment rate is also about five percentage points below the regional average. The reasons for low activity rates are many and varied. Some people are unable to work because of ill health (and the data suggest this is a significant factor in the county). Others may be unable to work because of caring responsibilities – which becomes more likely as the dependency ratio increases. A third group may struggle to access suitable employment, for a range of reasons: skills and qualifications, a lack of opportunities to progress in the workforce to achieve their potential, or physical barriers to access (for example transport accessibility, availability and cost). East Sussex was at the vanguard of places delivering the Government's Connect to Work programme, reinforcing its trusted partner status when it comes to delivering a priority shared nationally and locally.

While there is an expectation that the new Sussex MSA would hold substantial powers and funding related to economic development, employment and skills; evidence from existing combined authorities shows that any strategic authority can only be effective if the primary authorities that become its constituent councils also operate on sensible economic footprints that enable them to discharge their

own economic, transport, housing and planning functions effectively. Particularly in the context of enormous structural change, continuity wherever possible will be particularly valued by business and developers, many of whom have had a substantial involvement in the development of the existing county-wide strategies as well as day-to-day relationships within local networks.

During the process of developing the East Sussex Prosperity Strategy, the importance of these local business networks at both town/district- and county-level was stressed, given the predominantly 'small and micro enterprise' nature of East Sussex's business base. These networks included recent sector focused coalitions of entrepreneurs (such as the tech-based Chalk consortium in Eastbourne), and active local chambers of commerce and business associations. These represent small and micro enterprises, as well as generating pride in place.

Building on the local partnerships and networks that already exist at county, district and town level within East Sussex would make it easier for a new MSA to hit the ground running when it assumes devolved responsibilities for the whole region.

5.6 Infrastructure and Access

Transport and digital infrastructure are unevenly distributed in East Sussex. All districts and boroughs in East Sussex experience net commuting outflows, although the pattern in Eastbourne is almost in balance, reflecting the town's large concentration of employment. Within the county, the largest inter-district flows are from Wealden into Eastbourne, and within the Hastings and Rother economic market area.

Connections beyond the county boundary are very important. Historically, proximity to London has been an important factor in the growth of East Sussex's coastal resorts, and today, the capital is both an important travel-to work destination and a key market for the county's leisure and visitor offer. The west of the county is also close to Crawley, Gatwick and the A23/ M23 Corridor, while to the northeast, Tunbridge Wells is an important employment hub and service centre for much of Rother and Wealden, as well as for Hastings. Rail connections run from London to Lewes, Eastbourne, Uckfield and Hastings, and east-west along the Coast from Brighton to Ashford via Eastbourne and Hastings. The strategic and main road network follows a similar pattern, with the A27/ A259 running along the coast, and the A21 and A22 running north to join the M25. The county also enjoys a number of strategic active travel links, including the South Coast and London to Eastbourne routes on the National Cycle Network. Finally, as noted earlier, Newhaven is an important light industrial centre and ferry port particularly for freight connections to France.

Rural isolation is a major barrier to service access, where 24% of rural residents cannot reach a town centre within 30 minutes. The poor connectivity and lack of public transport between rural and urban areas limits economic growth and increases the risk of isolation and loneliness among those affected, this is evidenced by Hastings having the highest rate of transport related social exclusion in the country. It also contributes to an over dependency on private cars, which in turn increases the county's emissions.

Digital connections have improved significantly in recent years: in Rother and Wealden (the two most rural districts in the county), full fibre coverage stood at 53% and 54% of premises respectively in 2023 (compared with just 6% and 17% two years earlier). However, while there are great opportunities in rural East Sussex for increased remote working and the use of digital technology to overcome relative isolation, it is important that infrastructure investment keeps pace with the economic potential.

As devolution extends across the country, new MSAs will be expected to play a substantial role in coordinating the funding and prioritisation of infrastructure across their region as the existing combined authorities currently do. The infrastructure and investment pipelines will be set out in the MSA's LTP using evidence drawn from the constituent authorities, who play a key role in developing and operationalising schemes. Constituent councils will also have substantial highway responsibilities who play a key role in developing and operationalising schemes. Constituent councils will also have substantial transport responsibilities of their own which require sustainable and predictable investment, e.g roads maintenance and active travel. This reinforces the need to ensure that each unitary operates on a geographic footprint that is sensible and coherent from a transport and economic perspective.

The commitment in the English Devolution and Community Empowerment Bill to devolve more powers and funding to local areas through MSAs is one that councils

Waste and recycling services

Case
study



All six authorities in East Sussex worked together successfully to design and deliver an easy to use and value for money recycling service for residents, after jointly assessing collection and disposal options. This and joint public information campaigns have helped increase recycling rates from 37 percent in 2019 to 46 percent in 2024.

Three of the five district and borough councils in East Sussex work together in a joint waste partnership with the aim of improving the quality and effectiveness of waste collection for residents and maximising shared opportunities between the two tiers

of waste collection and waste disposal (a county council function). The partnership jointly procured a single

contract with Biffa to provide waste collection, street and beach cleaning in 2019 – enabling efficiencies of scale and residents have seen a significant fall in missed bin collections.

The other two borough and district councils are not in the waste partnership but share most of their services and collaborate closely on waste collection and recycling programmes under an umbrella in-house service, which is branded Environment First.

Shared service plans to further improve efficiency and delivery were already being put in place before devolution and local government reorganisation were mooted. These include rationalised systems for environmental health/public protection and for planning services. These will be built on in preparation for unitarisation.



in East Sussex have already signalled that they welcome, together with West Sussex councils and Brighton and Hove City Council. Swift follow-through on the offer of an integrated settlement to the new Sussex MSA is essential to accelerate infrastructure and housing delivery. The flexible and predictable long-term funding that integrated settlements offer would provide the Sussex MSA and constituent unitaries a powerful new tool to boost market confidence in the deliverability of the development pipeline, help align housing and infrastructure delivery to enhance economic, social and environmental outcomes, and assuage resident concerns about the pressures that can come with new development.

5.7 Natural Beauty and Culture

East Sussex benefits from some of the most beautiful and historic landscapes in the country. Over two thirds of the county are under environmental protection or designated for landscape value, including South Downs National Park, 26 Local Nature Reserves and four National Nature Reserves. These protections mean that the

Financial inclusion programme



The Financial Inclusion programme facilitates collaboration between local authorities and statutory and voluntary partners throughout the county, with the aim of enhancing residents' financial wellbeing and resilience. The programme prioritises maximising resident income, promoting inclusive support, and fostering increased capacity, cooperation, and shared insight among participating organisations.

Services and initiatives developed under this partnership have contributed significant improvements in financial wellbeing for East Sussex residents, amounting to millions of pounds. For instance, the county council, together with district and borough councils,

utilised the Low-Income Family Tracker (LIFT) platform to systematically identify individuals eligible for, but not currently receiving, available support.

Between August and December 2024, these councils implemented a series of targeted benefit uptake campaigns, focusing on Healthy Start vouchers, free school meals, Council Tax Reduction, Pension Credit, and Attendance Allowance. Within just six months, through coordinated national and local campaign efforts and effective use of the LIFT platform, this strategic approach enabled residents to access an additional £1.3 million per annum.



development of housing and infrastructure is heavily constricted in some areas. The threat of climate change is rendered more urgent in the context of our environmental assets. Current estimates indicate that the sea level may rise by 1.15m by 2100, presenting a significant risk to our coastal communities.

East Sussex has a rich and unique cultural canvas which forms the backdrop for residents and visitors lives. Different things strike chords with different people but the spectacular traditions of Bonfire Night in Lewes and Jack in the Green in Hastings, the historical importance of Hastings, Battle and Rye, the landscapes of Seven Sisters and Beachy Head, Ashdown Forest and High Weald, the cultural offerings of Bloomsbury and Charleston, Towner, Glyndebourne and De La Warr Pavilion are all distinctly East Sussex and only part of the things that make us feel we belong to East Sussex. Thriving wine growers and many craft breweries are important contributors as is the unique and longstanding relationship between Newhaven and Dieppe which continues to be celebrated each year. With the rolling hills of the High Weald to the ancient woodlands of Ashdown Forest, East Sussex's rural heartlands offer a rich tapestry of heritage, community resilience, and natural beauty. These landscapes are deeply cherished by residents and visitors alike, forming a vital part of the county's identity.

5.8 Collaborative Approaches to Achieving Consistencies

Sharing resources, expertise and customer service is already second nature for all six councils in East Sussex. For example, an East Sussex procurement hub spends over £55 million a year on goods and services for Hastings, Rother and Wealden councils. One of its aims is to spend local: £4 million has been spent with local firms in the first quarter of this year alone.

Eastbourne and Lewes councils have been sharing services for a decade, with a joint operating model which has enabled annual savings of up to £2.7m. Shared service arrangements also exist across two or more councils in environmental health, legal services and building control. East Sussex County Council has also found efficiencies through former or existing shared services arrangements with neighbours Surrey and in Brighton & Hove on IT, HR and procurement and legal services.

5.9 Public service reform

The strength of the partnerships across East Sussex of councils, NHS, police, further education, businesses, independent care providers and the voluntary and community sector provide a robust and effective platform for delivering public sector reform. The pilot 'Partnerships for People and Places' with MHCLG and other departments proved effective and was highlighted as best practice evaluated by the Government. The work we have collectively done on financial inclusion (more detail below) has been very effective and our work on integrated neighbourhood teams with the NHS in East has created the operating model across Sussex.

The Joint Community Rehabilitation Service integrates NHS community therapists and council rehabilitation support workers delivering programmes to over 8,000 people each year. Health and Social Care Connect (HSCC) operates 24/7 365 days a year and provides an integrated contact centre which provides the public and professional access point for adult social care and NHS community services. It handles over 140,000 contacts each year providing triage, advice and clinical and professional triage. District and borough housing teams have embedded occupational therapists to stream DFG processes and the joint Housing Partnership, covered elsewhere, has delivered significant improvements.

This foundation of established joint working, learning and delivery will ensure the new unitary can embrace opportunities for faster public service reform with local partners in East Sussex and also make a robust contribution to the joint work at a Sussex level, especially through the MSA. Pan Sussex arrangements are well established for NHS/ Social Care, community safety, road safety and economic growth and the new East Sussex unitary will be an effective partner as new opportunities arise.

5.10 Workforce

The six councils in East Sussex all place huge importance on having staff who are well motivated, highly trained, effectively supported and engaged. The wide range of peer reviews, inspections and staff surveys demonstrate how proud our staff are to serve the people, families, communities and businesses of East Sussex. These contributions are not only recognised in external reviews but are vital in achieving successful service delivery. These successes include in the high-risk social care services for our most vulnerable people. It is important to recognise that these services operate on the existing East Sussex and District Council footprints and any disaggregation risks disruption, uncertainty, reduced retention and recruitment and increasing costs. The Government guidance clearly indicates an expectation that the transition would be done as a continuing council model of local government reorganisation. This provides significant reassurance to staff that the implementation will be streamlined and minimise the number of staff to be TUPE'd. The six councils are determined to ensure clear, timely, joined up and open working with staff and the trade unions continues to underpin the collective approach to this work.



6 Case for Change

6.1 National and Local Drivers

6.1.1 National Drivers

The Government's ambitions for local government reorganisation were reaffirmed in the English Devolution White Paper, *Power and Partnership: Foundations for Growth*, published in December 2024. The White Paper sets out a clear direction for simplifying local government structures and embedding devolution as a constitutional principle. It calls for stronger local leadership, more integrated public services, and long-term financial sustainability as the foundation for national renewal. A single unitary authority would provide the scale and coherence needed to deliver joined-up services across health, housing, education, and social care. It would also create a single point of democratic accountability, enabling clearer leadership and more effective engagement with residents and partners.

The proposal aligns with the emerging Sussex MSA, which is expected to play a key role in regional economic development, transport, skills, and climate policy. A unified East Sussex authority would be well positioned to act as a strategic partner within this structure, contributing to and benefiting from devolved powers and funding.

6.1.2 Local Drivers

Locally, the case for reform is driven by the joint desire to improved customer outcomes and value for money for residents through consolidated services to deliver holistic delivery of services whilst achieving efficiencies through economies of scale.

6.1.3 Strategic Alignment

A single unitary authority would enable whole-system planning and delivery. It would allow for the integration of housing and social care strategies, ensuring that vulnerable residents receive coordinated support. It would also improve strategic commissioning, allowing the authority to align budgets and outcomes across services and sectors.

The model supports place-based prevention and early intervention, particularly in areas such as mental health, youth services, and homelessness.

6.1.4 Benefits of Reform

'One East Sussex' offers a range of benefits that address both national and local priorities.

- **Financial savings:** The consolidation of back-office functions, rationalisation of assets, and streamlined governance are expected to deliver on savings over time, although the future single unitary option would still result in a substantial operating deficit. These resources can be reinvested in frontline services and community priorities.
- **Improved outcomes:** Integrated service delivery will lead to better outcomes for residents, particularly in interdependent areas such as social care, housing, and education. A single authority can take a holistic view of need and design services accordingly.
- **Stronger voice:** A unified East Sussex will have greater influence in regional and national decision-making. It will be better placed to secure investment, shape policy, and represent the interests of its residents.

7 Options Appraisal

7.1 Options Considered and Appraisal Criteria

This section sets out our assessment of the structural options for LGR in East Sussex. In line with the government's statutory invitation and the six criteria outlined in the December 2024 English Devolution White Paper, we have undertaken a comparative appraisal of the following options:

- **Option 1: 'One East Sussex'** - a single unitary authority maintaining the existing ceremonial area of East Sussex, with Brighton & Hove City Council remaining as is
- **Option 2: Two unitary authorities** within the existing East Sussex boundaries, with Brighton & Hove City Council remaining as is
- **Option 3: Expansion of Brighton & Hove City Council** to absorb parts of Lewes District (four variants)

Each option has been assessed against the six government criteria:

1. Right size and scale
2. High-quality and sustainable public services
3. Financial sustainability
4. Local collaboration and consensus
5. Support for devolution
6. Community engagement and empowerment

Our analysis draws on demographic, financial, and service performance data, as well as stakeholder engagement and lessons learned from other business cases submitted. The scoring reflects the extent to which each option meets the government's criteria and supports the long-term objectives of reform, including simplification, resilience, and improved outcomes for residents.

We have applied a consistent scoring framework across all options:

- 1 = Meets very few or none of the criterion's requirements
- 3 = Meets some of the requirements
- 5 = Meets most or all of the criterion's requirements

No weighting has been applied, in line with the government's guidance that all criteria are of equal importance. The scores are based on a combination of quantitative evidence (e.g. population thresholds, financial modelling) and qualitative assessment (e.g. stakeholder consensus, governance coherence).

The table below summarises the scoring across all options. A detailed rationale for each score is provided in the following section.

7.2 Summary of Options Appraisal Scoring

Criterion	Option 1: Single East Sussex Unitary	Option 2: Two Unitaries (Coastal/ Inland)	Option 3: Brighton & Hove City Council - Expansion Option
1. Right Size and Scale	5	3	2
2. High-Quality and Sustainable Services	4	3	2
3. Financial Sustainability	4	3	2
4. Local Collaboration and Consensus	5	3	1
5. Support for Devolution	5	3	3
6. Community Engagement and Empowerment	4	4	2
Total (out of 30)	27	19	12



7.3 Detailed Options Appraisal Rationale

Criterion	Option 1: “One East Sussex” Single East Sussex Unitary	Option 2: Two Unitaries for East Sussex	Option 3: Brighton & Hove City Council - Expansion Option
1. Right Size and Scale	<p>A single unitary authority for East Sussex would serve a population of ~555,000, meeting the government’s population guidance. It aligns with existing service footprints and enables strategic planning across a coherent geography.</p>	<p>The guiding principle of a 500,000 population for new authorities means this model would create asymmetry and the risk of reduced resilience.</p>	<p>The proposed expansion of Brighton & Hove into the district of Lewes would fragment East Sussex’s geography and redraw local authority boundaries. The resulting size of Brighton and Hove City Council would still be significantly under the guiding principle of a 500,000 population for any of the proposed variants. The extension into Lewes would be disconnected from existing service footprints, undermining strategic coherence.</p>

<p>2. High Quality and Sustainable Services</p>	<p>A single authority would enable integrated planning and delivery across adult social care, housing, education, and public health. It would reduce duplication, support consistent service standards, and enable a shift towards prevention and early intervention. The model supports whole-system approaches to complex challenges such as homelessness, SEND, and mental health. It also provides a platform for innovation and transformation, particularly in digital service delivery and community-based models.</p>	<p>4</p>	<p>While some integration would be possible within each unitary, the model introduces significant risks related to the disaggregation of statutory services, particularly in social care and education. Fragmentation could lead to service disruption, inconsistent standards, and increased costs. The model may also struggle to deliver consistent transformation across both authorities, particularly given the differing financial and demographic profiles.</p>	<p>3</p>	<p>This model would disrupt existing service footprints and partnerships, particularly in Lewes and East Sussex County Council. It risks fragmentation of services, loss of institutional knowledge, and reduced capacity for integrated delivery. The model does not support sustainable service transformation and may exacerbate existing inequalities in access and outcomes.</p>	<p>2</p>
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3. Financial Sustainability	Financial modelling indicates that a single authority offers the greatest potential for savings through back-office consolidation, shared procurement, and rationalised assets. It avoids the high transition and disaggregation costs associated with multi-unitary options.	4	Some savings could be achieved through consolidation within each unitary, but the model introduces higher transition and disaggregation costs. The smaller scale of each authority may limit opportunities for efficiency and increase exposure to financial shocks. The inland authority, in particular, may struggle to achieve financial resilience given its smaller population and rural geography.	3	This model would require complex boundary changes and introduce significant transition costs. It offers limited opportunities for savings and may create new financial pressures for both Brighton & Hove City Council and the remaining East Sussex authorities. The model lacks a clear path to financial sustainability and may exacerbate existing inequalities in funding and service delivery.	2
4. Local Collaboration and Consensus	This proposal has been jointly developed by all six councils in East Sussex, with shared data, joint governance, and aligned objectives. Engagement has been extensive, and while some differences of opinion remain, there is broad consensus on the need for reform and the benefits of a single authority. The model builds on existing collaboration and provides a platform for deeper integration.	5	Support for this model is mixed. Some councils have expressed concerns about the potential loss of influence or control, particularly in smaller or rural areas. The model risks creating new silos and undermining existing partnerships. It may also lead to competition rather than collaboration between the two new authorities.	3	This proposal was introduced late in the process and has not been subject to the same level of engagement or scrutiny. There is no consensus among East Sussex councils, and the model is widely viewed as a threat to local identity and service coherence. It risks undermining trust and collaboration across the region.	1

<p>5. Support for Devolution</p>	<p>A single authority would provide a strong, coherent partner for the proposed Sussex and Brighton Mayoral Strategic Authority. It would enhance East Sussex's ability to attract investment, shape regional policy, and deliver devolved functions. The model aligns with the government's devolution agenda and supports the creation of a simplified, strategic governance structure.</p>	<p>5</p>	<p>While each authority could engage with the MSA, the model risks diluting East Sussex's voice and creating inconsistencies in regional engagement. It may also complicate the delivery of devolved functions and reduce strategic coherence.</p>	<p>3</p>	<p>This model aligns with Brighton & Hove City Council's ambitions for devolution but undermines the coherence of East Sussex as a strategic partner. It may create tensions between authorities and reduce the effectiveness of regional governance. Any change to existing boundaries, however small, has a significant fixed cost in terms of time, capacity, money, and uncertainty/disruption to services, which includes staff in councils, schools and contractor organisations. This will potentially have a negative impact on vulnerable people and on tenants in council housing.</p>	<p>3</p>
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6. Community Engagement and Empowerment	<p>The model includes proposals for area committees, local hubs, and participatory governance mechanisms to preserve and enhance local voice. Engagement activities have been extensive, and representation modelling has been undertaken to ensure fair councillor-to-resident ratios. The model supports stronger accountability and more meaningful engagement.</p>	4	<p>This model could offer improved access and responsiveness by creating smaller, more locally focused authorities. In theory, this could enhance community engagement, particularly in areas where residents feel disconnected from county-level decision-making. The likely geography of the two unitaries means there is a risk that smaller or more deprived areas (e.g. Hastings) could be marginalised within a larger coastal unit, while rural areas may struggle to maintain visibility in a more dispersed inland authority. Without robust mechanisms for neighbourhood governance and cross- boundary collaboration, the model could exacerbate existing inequalities in voice and influence.</p>	4	<p>Engagement has been limited, and the model is widely viewed as top-down and externally driven. It risks alienating affected communities and undermining trust in local government. There is no clear plan for preserving local voice or enhancing democratic accountability.</p>	2

7.4 Engagement and Feedback

Resident and stakeholder engagement has been a central pillar of the development of this business case. The process has been designed to ensure that the views of residents, elected members, officers, and partners are reflected in the design and evaluation of the proposed options for LGR in East Sussex. More detailed feedback from engagement to date is set out in the appendix.

7.4.1 Engagement Activities

Engagement has taken place through a range of channels, including:

- An online survey for resident consultation across the county.
- Weekly working groups with officers from all six councils.
- Interviews and workshops with council leaders and chief executives.
- Focus groups with residents across all five districts and boroughs.
- An online survey for stakeholders across the county
- Targeted engagement with user voice groups
- Regular engagement with Brighton & Hove City Council representatives, plus engagement with a West Sussex representative to ensure transparency
- Finance engagement and working sessions.

A separate consultation for Lewes residents also took place related to the proposals by Brighton & Hove City Council to extend the authority boundaries. 7,472 residents responded to the Lewes consultation survey, with overwhelming opposition (86%) to make a change to the Lewes district boundary.

Strong representations opposing the aforementioned extension proposals have also been made by Newhaven, Peacehaven and Telscombe town councils; and Iford, Kingston and Rodmell parish councils. Additionally, there was a joint representation from the parish councils of the Lower Ouse (Kingston, Iford, Rodmell, Northease, Southease and Piddinghoe) and two individual Kingston Ward District councillors. Broadly these all made the case that no credible evidence had been produced to demonstrate that residents and businesses of those areas would be better off in an entirely new geography rather than continuing to work within existing networks and partnerships. More detail on the results of the Lewes-specific survey is set out in the appendix.

7.4.2 Residents Survey

A survey was available to residents across East Sussex over May and June 2025. The survey gathered over 5,500 responses across East Sussex and revealed strong engagement across diverse demographic groups.

Broadly, 9 out of 10 residents identified at least one benefit associated with having just one single council across the area covered by East Sussex County Council and all five District and Borough Councils. The most common potential positive with this proposal was cost savings – comments referred to savings made through ‘economies of scale’, ‘greater purchasing power for service contracts’ and ‘staff reductions’.

delivery across the county’ and ‘reduced duplication’.

Concerns included:

- ‘our area would be forgotten’ by a single, county-wide council.
- a new council wouldn’t ‘understand their area well enough’
- East Sussex was too big an area for a single unitary

Key themes that related to the process of change and were not specific to any one suggestion were:

Loss of local representation:	Larger governance structures could lead to a loss of local representation and control, making it harder for residents to have their voices heard.
Impact on services:	Proposed changes could negatively impact local services.
Administrative efficiency:	Some respondents are sceptical about the efficiency and cost savings of the exercise.
Skepticism and caution:	Some prefer to maintain the current system or make only minor adjustments.

7.4.3 Weekly working groups

Since the inception of the LGR programme, officers from all six East Sussex councils have participated in weekly working group meetings. These sessions have provided a structured forum for joint planning, data sharing, and the co-development of key components of the business case. In addition to regular meetings, a series of thematic workshops have been held to review and refine core content, including financial modelling, governance design, and service integration strategies.

This collaborative approach has ensured that the business case reflects a shared understanding of local priorities and challenges, and that all councils have had an active role in shaping the preferred model.

In the spirit of regional collaboration, the East Sussex working group has also engaged regularly with representatives from West Sussex County Council and Brighton & Hove City Council.

7.4.4 Interviews with council leaders and chief executives

As part of the development of this business case, a series of one-to-one conversations were held with council leaders and chief executives from all six constituent authorities. These discussions provided candid, strategic reflections on the opportunities, risks, and design considerations for a future unitary authority. While views varied across geographies and political perspectives, several consistent themes emerged.

Local Identity & Representation

- **Strong attachment to place:** Leaders and CEXs consistently emphasised the importance of local identity, particularly in areas like Hastings, Eastbourne, and Wealden. There is concern that a larger unitary could dilute this.
- **Democratic deficit fears:** Fewer councillors and larger wards could reduce accessibility and local accountability.
- **Town and parish councils:** Seen as vital to preserving local voice, but concerns exist about their uneven capacity and unclear future role.
- **Area committees:** Proposed as a solution, but met with scepticism about their effectiveness and whether they would be genuinely empowered.

Financial Health & Redistribution

- **Divergent financial positions:** Wealden is financially strong and investing in legacy infrastructure; Hastings, Eastbourne, and Rother face acute pressures
- **Concerns about redistribution:** Wealthier councils fear their reserves may be used to plug deficits elsewhere.
- **Legacy liabilities:** Risks from capital projects, housing companies, and cultural assets (e.g. De La Warr Pavilion) were raised.
- **Desire for transparency:** Leaders want clear frameworks for how resources will be pooled and allocated.

Governance & Future Design

- **Desire for empowered councillors:** Councillors with more strategic roles was a common aspiration.
- **Mixed views on governance models:** Some support for area committees; others see them as tokenistic or overly parochial.
- **Need for clarity:** On the roles of ward councillors, town/parish councils, and how local voice will be embedded in the new structure.
- **Design for purpose:** Strong consensus that governance should be built around outcomes, not inherited structures.

Community Engagement & Trust

- **Desire for co-design:** Councillors want to shape the new authority, not be absorbed into it.
- **Asset retention:** Communities are concerned about losing control of local assets and services.

Housing & Infrastructure

- **Temporary accommodation crisis:** Especially acute in Hastings, Eastbourne, and Rother.
- **Council-led housebuilding:** Lewes and Wealden are actively investing, and fear this momentum could be lost.
- **Infrastructure delivery:** Frustration with delays in highways and planning integration; desire for stronger links between planning and transport.
- **Place-based investment:** Wealden in particular is focused on legacy infrastructure and community empowerment.

Transition & Organisational Culture

- **Staff morale and retention:** Concerns about TUPE, job losses, and cultural clashes.
- **Systems integration:** IT, HR, and finance systems vary widely; some councils are already aligning in anticipation.
- **Cultural differences:** Varying levels of ambition, innovation, and risk appetite between councils.
- **Desire for shared vision:** Leaders want to move beyond structural debate and start designing the “council of the future.”

7.4.5 Public focus groups: summary of findings

A series of facilitated focus groups were held across East Sussex to explore residents' views on local government reform. While not statistically representative, these sessions provided valuable qualitative insights into public hopes, concerns, and expectations.

7.4.5.1 Openness to reform, but concerns about scale

Most participants were open to the idea of a unitary authority in principle, recognising potential benefits such as:

- Clearer accountability
- Reduced duplication
- Strategic service integration
- Cost savings

However, concerns were consistently raised about the potential loss of local identity, reduced access to services, and diminished influence over decision-making. These concerns were often linked to the perceived scale of a new authority, rather than opposition to the unitary model itself.

7.4.5.2 Local identity and representation

Participants strongly identified with their local towns, villages, and communities rather than with the county as a whole. There was concern that a larger authority could dilute this sense of place and reduce the visibility of smaller or rural areas.

There was also concern that councillors in a larger unitary would represent more people, making them less accessible and less rooted in local knowledge. Some participants called for councillor- to-resident ratios to remain similar to current district and borough levels.

7.4.5.3 Services and outcomes

Residents expressed a desire for reform to lead to tangible improvements in services, particularly in social care, housing, education, and environmental protection. There

However, there was scepticism about whether structural change alone would deliver better outcomes. Some feared that the reorganisation could become a distraction from core service delivery or lead to further cuts.

7.4.5.4 Financial concerns

While many hoped that a unitary model would reduce duplication and deliver savings, there was concern about the cost of transition and the risk that savings would be absorbed by statutory pressures (e.g. adult social care).

There was also concern about the potential sale of local assets and the redirection of discretionary spending away from local priorities.

7.4.5.5 Governance and decision-making

Some participants welcomed the potential for stronger local leadership and more empowered councillors under a unitary model. Others feared a loss of local democracy, particularly if councillors became more remote or if independent voices were squeezed out.

There was support for devolving more powers to town and parish councils, but also confusion about their current role and capacity.

7.4.5.6 Boundaries and geography

There was no single preferred model for new boundaries, but some clear patterns emerged:

- Strong opposition to being joined with Brighton & Hove City Council.
- Support for the current East Sussex footprint as the least disruptive option.
- Interest in a rural/coastal split, particularly in Wealden and Hastings.
- Some support for a federated model (especially in Hastings), allowing for local identity to be preserved within a larger structure.

7.4.5.7 Transition and legitimacy

Participants raised concerns about the pace of change, the level of public awareness, and the legitimacy of the process. Some called for a public vote or wider consultation before decisions were made.

There was also concern about the potential loss of local knowledge if experienced staff and councillors left during the transition.



7.4.6 Stakeholder online survey

As part of the wider engagement, a five-week consultation was conducted with key stakeholders across the county, with the largest group of respondents being town and parish councils.

Key Findings

What stakeholders value in a new council:

- The top priority for stakeholders was the delivery of high-quality services that work well.
- Other important values included good access for residents, clear and honest decision-making, and value for money.

Perceived benefits of a single council:

- The most frequently cited benefit was that a unitary authority would be simpler and less confusing for both residents and professionals.
- Cost savings were also commonly mentioned as a potential advantage.
- These views aligned with feedback from the resident's survey. Concerns about a single council:
 - The most significant concern was the loss of local connection and identity, particularly among town and parish councils.
 - Stakeholders also feared a decline in service quality, especially during the transition period.
 - Again, views aligned with feedback from the residents survey. Alternative boundary suggestions:
 - A minority of stakeholders proposed alternative geographies, with a coastal/rural split being the most common.

Notable contributions from key partners:

- Sussex Police highlighted the need to maintain local partnership working and warned of restructuring impacts on policing.
- East Sussex Fire & Rescue Service emphasised the opportunity for investment and the importance of retaining the Combined Fire Authority model (East Sussex and Brighton and Hove).
- Town and Parish Councils expressed concern about increased responsibilities without additional funding, the risk of being overwhelmed by contacts, if the unitary can't cope with the volume and as mentioned throughout concerned about the loss of local voice.
- NHS Sussex (ICB) advocated for joint commissioning with the VCSE sector and stressed the importance of maintaining local engagement to meet diverse health needs.

7.4.7 Targeted engagement with user voice groups

As supplementary engagement, we engaged directly with four key service user groups to gather their perspectives and concerns. These sessions aimed to ensure that the voices of young people, older residents, citizens, and migrant communities were meaningfully included in shaping the future of local governance. The table below presents a thematic analysis of the feedback collected sharing cross-cutting themes that emerged.

Feedback themes	
Local Identity & Representation	All groups expressed concern about losing local identity and representation in a larger authority.
Equity & Inclusion	Rural areas, older people, youth, and migrants were all highlighted as at risk of being overlooked.
Access to Services	Physical access (hubs), digital exclusion, and tailored services were recurring concerns.
Voice & Participation	Strong calls for meaningful engagement and structured feedback mechanisms.
Funding & Resources	Concerns about fair distribution and adequate funding, especially for vulnerable groups.
Learning & Best Practice	Desire to learn from other councils and build on existing strengths.

8 Financial Modelling and Assumptions

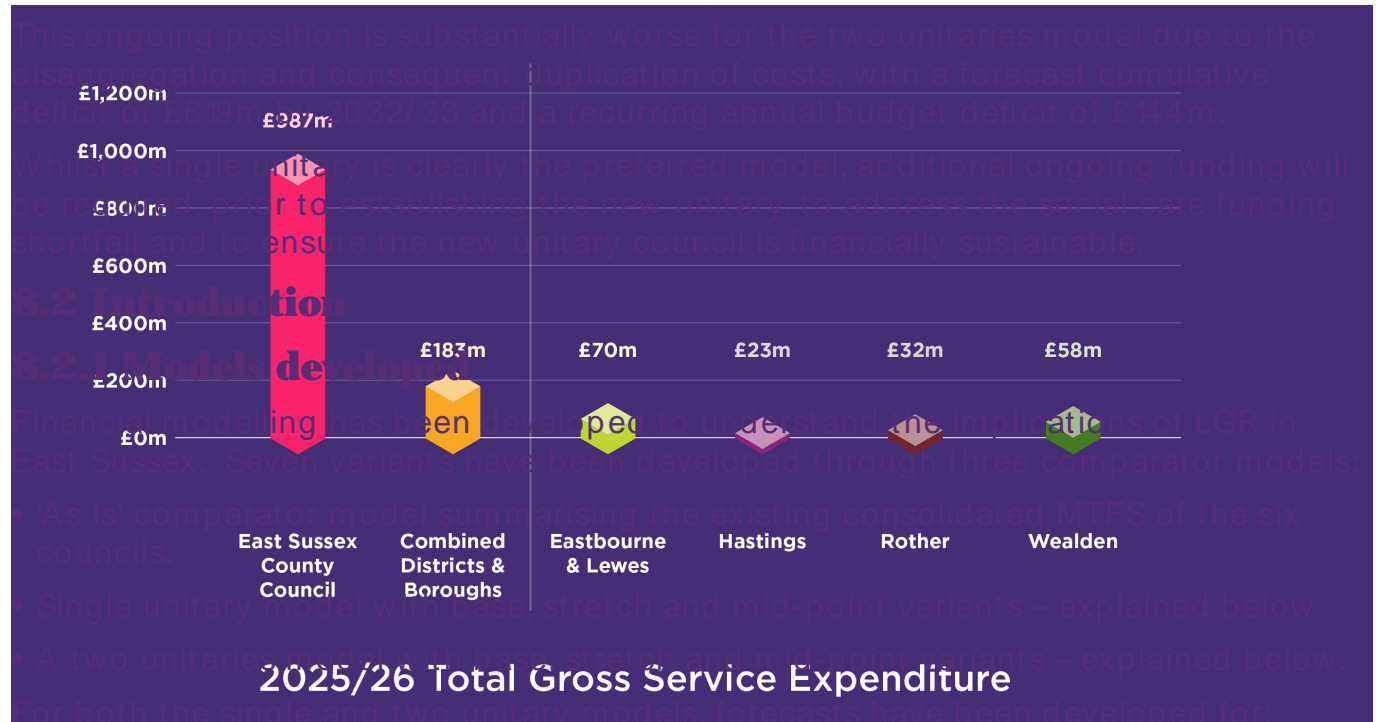
8.1 Summary

The financial modelling undertaken forecasts that, compared to the 'as-is' model, the 'One East Sussex' single unitary will generate cumulative savings of £64m by 2032/33 with £25m annual recurring savings.

In contrast, the two unitaries model is forecast to incur a net cumulative additional cost of £329m by 2032/33 with £59m annual additional recurring costs.

We have not been able to do a detailed assessment of the Brighton & Hove City Council expansion as we do not know which of the four models consulted upon is the preferred option.

Despite the positive financial benefits of establishing the single unitary, this does not address the ongoing social care funding shortfall and consequently, without additional funding to address this, the single unitary model forecasts that all reserves will be depleted, with a cumulative deficit of £5m in 2028/29 increasing to £226m by 2032/33 and an annual recurring structural budget deficit of £61m.



- A **'base'**, low risk, model with prudent estimates of potential savings and higher implementation costs.
- A **'stretch'**, higher risk, model with more ambitious, higher value, but achievable, savings and lower implementation costs.
- A **'mid-point'** model which is the average of the base and stretch models, consequently representing a balance between prudence and ambition.

This financial narrative is based on the one unitary and two unitaries mid-point models and comparison with the 'as-is' model.

The financial modelling has been developed from 2025/26 through to 2032/33. This assumes that 2027/28 is an implementation year for new the unitary(ies) and 2028/29 is the first year of the new council(s). During the following five years, transformation activity is expected to be completed with 'steady state' (the point at which the new authority(ies) are fully established and reaching maturity) achieved by 2032/33

The work on the financial modelling for this business case is being done in the context of the Government reviewing the Fair Funding allocations, resetting Business Rates, simplifying grants and consulting on Temporary Accommodation funding. The prospect of multi-year funding settlements and simplified grants are very welcome but some aspects of the consultation – particularly the reduction in relative need from older people to working age adults, the council tax equalization not based on current local returns and the impact of the business rate reset has the potential for significant reductions. Given the demographics, the impact of the cost reductions in the NHS and in future as Sussex and Surrey Integrated Care Systems combined and a need to tackle perceived significant overfunding, also may bring significant pressure. It is not possible at this stage to anticipate the financial impact on the new unitary but it is important context in which the implementation will occur.

Models for three or more unitaries have not been considered as these would exacerbate the issues of the two unitaries model and would not be financially viable.

As LGR progresses and further details are understood, including government policy updates, it will be necessary to revisit these forecasts and revise the modelling to reflect known changes.

8.2.2 Brighton & Hove City Council expansion proposals

It has not been possible to undertake detailed financial modelling to consider the implications of the option(s) proposed by Brighton & Hove City Council to expand the existing council's footprint.

The range of options proposed by Brighton & Hove City Council include consideration (despite MHCLG guidance to the contrary) of adjusting the boundaries to include existing areas of Lewes District Council. The four options considered equate to a maximum of 36,000 Lewes residents transferring into an expanded Brighton & Hove City Council. This equates to 36% of current Lewes residents.

Extensive detailed work would be required to attribute actual and budgeted County Council and Lewes District Council costs and income to the areas transferring and to ensure an equitable approach that does not disadvantage either authority.

For some areas of spend where services are provided universally (consistently and equally to all locations and residents), the allocation of costs to the areas proposed to transfer to Brighton & Hove City Council could be based on simple area percentage allocations. However, for the major cost areas including adults and children's social care, in order to allocate these costs to the areas proposed

to transfer, this would necessitate a case-by-case review of client data and detailed analysis of every Children’s and Adult social care record, in order to allocate costs to the transferring locations. Further work would also be required to allocate grants and income across the areas proposed to transfer.

The transfer of physical assets and the services being delivered from these would also require detailed analysis, recognising that whilst a physical asset may be located in a transferring area, the service provided would likely benefit other residents across a much wider location, parts of which would not be included in the transfer.

This disaggregation effort would be disproportionately disruptive and expensive for both councils and their residents, with no recognisable financial benefit. As noted in the table at section 7.3, this option would disrupt existing service footprints and partnerships, risking fragmentation of services and have additional fixed costs fixed cost in terms of time, capacity, money, and uncertainty/ disruption to services, which includes staff in councils, schools and contractor organisations. This will potentially have a negative impact on vulnerable people and on tenants in council housing.

8.3 Overview and Context

The chart below shows the planned £1.171billion gross service spend of the six councils in 2025/26 (Eastbourne and Lewes figures are combined). This chart also illustrates the difference in scale between the county, with annual spend of £1billion and the five districts / boroughs with a combined spend of £183m.



[illegible]

2	025/26 County Spending	
	Communities, Economy & Transport	
Children's Services	£10m	Governance Services
	£35m	Public Health
	£987m	Centrally Held Budgets
Business Services		
	Adult Social Care	

2025/26 District & Borough Spending

Centrally held budgets

£23m

Waste

£8m

Planning & Building Control

£3m Other

£4m Parking Services

Customer Services

Environmental

Government Services

Ec Dev & Culture

Revs and Bens (incl Hsg Benefits)

Leisure & Wellbeing

Housing (GF only)

Business Services

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used as the basis for developing the financial model.

The MTFS total service expenditure for each authority was analysed into the following cost categories:

- Staff:
 - Senior management
 - Front office
 - Service delivery
 - Support functions
- Premises costs
- ICT Costs
- All other costs

The six MTFS statements have been combined into a single, consolidated MTFS - the 'as-is' model - and this has been extrapolated through to 2032/33 using average inflation rates for each spend and income category. This time period covers five years after creation of the new unitary, allowing adequate time for initial consolidation, followed by longer term transformation and achieving steady state by 2032/33.

8.5 Cost/Benefit Analysis Modelling

8.5.1 Summary of modelling

The table below summarises the costs and savings forecast from implementing the single unitary and two unitaries models over the period 2025/26 to 2032/33. The main elements of change modelled are:

Implementation:	The implementation / transition programme and related costs required to deliver the change and establish a new target operating model for the unitary council(s).
Disaggregation:	The costs of dividing and delivering county services across two new unitary councils.
Reorganisation:	The savings opportunities immediately available, in the short-term, from combining, rationalising, consolidating and eliminating duplication across the councils.
Transformation:	The longer-term opportunities available from increased scale and combining complementary functions to enhance service provision and reduce net costs.
Funding & Resources	Concerns about fair distribution and adequate funding, especially for vulnerable groups.
Learning & Best Practice	Desire to learn from other councils and build on existing strengths.

The table below shows the net effect of these costs / savings across the period 2025/26 to 2032/33 and the resultant return (or loss) on investment.

Implementation cost	68.456	68.456
Disaggregation cost		338.717
Total costs	68.456	459.964
Reorganisation benefit	(47.591)	(43.061)
Transformation benefit	(40.508)	(12.665)
Total Savings	(88.099)	(55.725)
Cumulative net cost / (benefit)	(19.642)	404.238

*it has not been possible to assess the Brighton & Hove City Council Expansion model for reasons outlined earlier in this section

This demonstrates the single unitary implementation programme generates a positive return on investment of £20m by 2032/33 whereas the two unitaries model forecasts a net programme cost of £404m by 2032/33.

The above calculation only considers the changes in costs / savings resulting from unitarisation and does not consider the underlying revenue budget.

Taking the underlying budget into consideration, compared to the 'as-is' model, the single unitary is forecast to generate cumulative savings of £64m by 2032/33 with £25m annual recurring savings.

In contrast, the two unitaries model is forecast to incur a net cumulative additional cost of £329m by 2032/33 with £59m additional annual recurring costs.

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The above costs and benefits are considered in further detail in the following sections.

8.5.2 One-off implementation and transition costs

The one-off cost of implementing the transition programme has been modelled and is summarised in the table below. Implementation costs have been profiled to 2032/33 and do not include pay awards or inflation and are assumed to be funded through PWLB borrowing over 20 years.

Redundancy & early retirement	4.666	3.595
Implementation & Programme	30.308	338.717
IT Consolidation & transformation	22.050	54.975
Branding & Comms	1.750	1.750
Shadow / continuing authority(ies)	0.720	1.026
Creation of new council(s)	0.875	1.750
Closedown of old councils	0.694	0.694
Elections to shadow / continuing authorities	1.760	2.000
Contingency	5.634	9.99
Total implementation & Transition	68.456	121.246

*it has not been possible to assess the Brighton & Hove City Council Expansion model for reasons outlined earlier in this section

The implementation programmes are assumed to commence in 2026/27 and conclude in 2032/33 delivering the consolidation, rationalisation and transformation of all legacy district/borough and county services. The modelling for a new single unitary council has been predicated on East Sussex County Council operating as a continuing authority to minimise disruption while a new organisation is being designed and put in place. This model for handling the transition to a new organisation complies with guidance in the 'Anatomy of a structural changes order' circulated by MHCLG on 4 August 2025. The resultant unitary council(s) will deliver modern, digitised, efficient, value for money, best practice services with improved resident outcomes. The forecast implementation and transition costs are described

Implementation & programme: The cost and profile of the potential additional resources required to deliver the required consolidation and transformation programme have been forecast. The model assumes that initial design stages of the programme would be mobilised from April 2026. Programme resourcing peaks during 2028/29 and ends in 2032/33.

IT consolidation & transformation: This forecast reflects the cost of consolidating and rationalising multiple, duplicate ICT systems and infrastructure and also the technology costs of supporting the broader transformation programme to streamline and optimise services.

Branding & communications: This provision has been included for the anticipated branding and resident communications work required to launch the new unitary council(s).

Shadow / continuing authority(ies): This forecast assumes that during 2027/28, each shadow / continuing authority will employ a Chief Executive, ~~two senior officers and a~~ Leader, Deputy Leader and three Cabinet Members.

Creation of new council(s): This forecast is an allowance to cover potential legal costs and design of governance arrangements, including the constitution, for the new council(s).

Closedown of old councils: This forecast is an allowance to cover closedown of the legacy councils, including final accounts, external audit and legal costs.

Elections to shadow / continuing authorities: This forecast is for the potential one-off cost of elections to the shadow / continuing authority(ies). Ongoing unitary council election costs are included elsewhere in the model.

Contingency: A contingency, estimated at 10% of total implementation and transition costs, has been included to fund potential unknown costs and to reflect the inherent risk in delivering a programme of this nature and scale.

8.5.3 Disaggregation costs

The two unitaries model includes estimated cost increases incurred through the division and duplication of county functions and consequent loss of economies of scale.

As county council annual spend is c£1bn, a relatively small percentage cost increase, through duplication and diseconomies of scale, generates a significant financial impact.

Some disaggregation costs could potentially be reduced through establishing and / or extending shared services. However, the modelling reflects a prudent approach, recognising that decisions regarding shared services would be for the new unitary(ies) and therefore assumes that sovereignty will prevail, with each new unitary maintaining separate functions.

Disaggregation costs have been forecast and profiled as shown in the table below and are described in the following section. The forecast £68m 2032/33 annual disaggregation cost shown below is an additional recurring annual cost.

	2022/23	2023/24
	£m	£m
Staffing (Excluding tiers 1-4):		
Front office	0.124	0.612
Service delivery	6.440	31.773
Support functions	0.701	3.459
ICT disaggregation	21.263	111.628
Other non-staffing	27.315	131.785
Total Disaggregation Costs	67.908	338.717

Senior Management: These are the costs of enhancing and duplicating the top of existing county management structures across two unitaries to ensure adequate management structures. There is a corresponding saving arising from substantially reducing the existing management structures. However, this is shown separately as senior management staffing saving within the reorganisation savings (detailed below).

Elected Members: This reflects the additional cost of Special Responsibility Allowances incurred by maintaining two sets of Members across the two unitaries. There is a corresponding saving arising from an overall net reduction in Members from consolidating the six councils into two unitaries. However, this is shown separately as the Members saving within the reorganisation savings (detailed below).

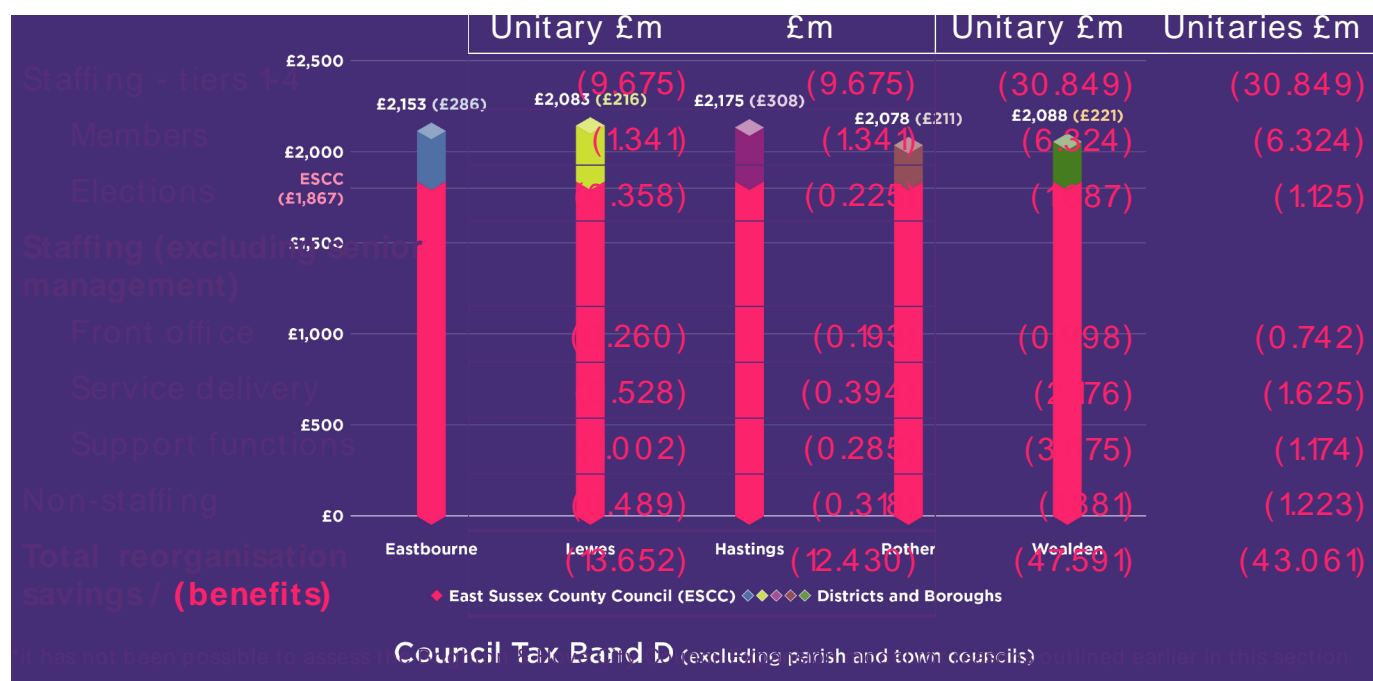
Staffing (excluding senior management): The model assumes that by disaggregating staff (below senior management) across two unitaries, this will result in the need to duplicate some activities / posts and this will result in increased staff costs. For front office, service delivery and support staff, this increase has been estimated in the range of 2% to 4%, with a mid-point of 3% included in the table above.

ICT Disaggregation: This forecast assumes existing county council ICT costs would be duplicated and bolstered to achieve self-sufficiency for each unitary after exiting the current Orbis arrangement.

Other non-staffing: This forecast assumes there will be inefficiencies, duplication and diseconomies of scale by splitting existing county non-staff spend across two unitaries. This cost has been estimated in the range of 2% to 4%, with a mid-point of 3% included in the table above.

8.5.4 Reorganisation benefits / savings

Combining the six separate authorities into a single unitary or two unitaries will require initial reorganisation and consolidation activity and the potential savings have been forecast and profiled. The cumulative savings to 2032/33 are summarised in the following table and described in further detail below. The table also details the 2032/33 in-year recurring savings to demonstrate the permanent annual ongoing benefit.



Senior Management: This is the net saving achieved from reducing existing management structures, less costs of the additional management and enhanced salaries to ensure there is adequate management resourcing in the new unitary council(s).

Members: This savings reflects the net effect of establishing the appropriate number of Councillors with a county-wide interest in the new unitary(ies), whilst reducing overall numbers.

Elections: This saving is the forecast net effect of undertaking county-wide unitary Councillor elections whilst removing legacy district and borough Councillor elections.

Staffing: Savings have been forecast for each category of staff (front office / service delivery / support functions) to reflect the immediate efficiencies available from consolidating staff across the districts / boroughs and county.

Non-staffing: Savings have also been forecast for non-staff costs to reflect the immediate efficiencies available from consolidating costs..

Cumulative reorganisation savings for the one unitary model total £48m by 2032/33 with an annual recurring saving of £14m. Cumulative savings for the two unitaries model are lower at £43m, with an annual recurring saving of £12m.

8.5.5 Transformation benefits / savings

Using unitarisation as a catalyst for service improvement, savings opportunities are available in the medium to long-term from exploiting the synergies of combining district/borough and county functions. These savings assume fundamental and radical service redesign, including the consistent adoption of best practice and integrating services to realise benefits from increased digitisation, automation and early intervention and prevention.

These transformation savings / benefits have been forecast and the cumulative figures to 2032/33 are summarised in the table below and described in the following section. The table below also details the 2032/33 in-year recurring savings to demonstrate the permanent annual ongoing benefit of these savings.

Transformation savings / benefits	2032/33 In-year & recurring							Cumulative to 2032/33	
			One Unitary	Two Unitaries				One Unitary	Two Unitaries
			£m		£m			£m	£m
Staffing (excluding senior management)			(£37m)						
Front office			(£49m)		(0.464)			(2.528)	(1.522)
Service delivery			(£58m)		(0.620)			(3.631)	(1.997)
Support functions			(£68m)		(0.751)			(8.327)	(2.420)
Non-staffing			(£85m)		(0.831)			(17.280)	(2.100)
IT rationalisation	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	
				(1.892)		(0.946)		(5.494)	(2.747)
Property - office estate				(0.549)		(0.274)		(1.083)	(0.542)
Income - influenceable				(0.578)		(0.357)		(2.165)	(1.337)
Forecast annual budget deficit									
Total transformation savings / (benefits)									

*it has not been possible to assess the Brighton & Hove City Council Expansion model for reasons outlined earlier in this section

Staffing (excluding senior management): Savings have been forecast for each category of staff (front office / service delivery / support functions) to reflect the potential transformational efficiency savings available from further rationalising staff across the districts / boroughs and county as services are redesigned to maximise the opportunities and benefits of unitarisation.

Non-staffing: Savings have also been forecast for non-staff costs to reflect the longer-term transformational efficiency opportunities available from rationalising costs across the districts / boroughs and county as services are redesigned to maximise the opportunities and benefits of unitarisation.

IT Rationalisation: This forecasts the potential saving achievable from rationalising and combining legacy district and borough ICT non-staff costs into a consolidated unitary ICT function(s).

Property – office estate: This forecast saving is not location specific but reflects the potential reduction in legacy district and borough accommodation costs as staff and functions are rationalised onto a reduced accommodation footprint.

Influenceable income: Potential income increases from non-statutory fees and charges have been forecast to reflect the potential opportunity for standardising fees across the districts and boroughs.

8.5.6 Other modelling considerations

Council Tax Harmonisation

Council tax charges across the five districts and boroughs vary, although the County Council element is constant. The existing council tax band D charges must be harmonised to a single rate within seven years of establishing the new unitary council(s).

Decisions regarding timescales for harmonisation and future council tax charges will be a matter for the new unitary council and have not been considered in detail, but it is expected that, to maintain and maximise council tax yield, and ensure the most equitable approach for residents across the new unitary council(s), council tax harmonisation would be completed within a reasonable period.

The chart below shows the current variation in band D charges across the five districts and boroughs.

The model assumes that maximum council tax increases, within the referendum limit, will be applied annually and in the first year of unitarisation, the 5% referendum threshold will be applied to the whole local authority element of the council tax.

The council tax support schemes will also require standardisation across the new unitary council(s) and this will also be a matter for the new unitary council(s) to decide.

Consultations: Fair Funding Review / Business Rates Reset / Council Tax administration

The government launched the Fair Funding Review 2.0 consultation in June 2025. Any potential impact of the review is yet to be confirmed and, consequently, has not been reflected in the model. The modelling undertaken does not incorporate forecasting for the impact of future government policy changes, population growth and demographic changes or potential future increasing resident demand from, for example, adult's and children's social care, home to school transport, homelessness, temporary accommodation.

8.6 Modelling the MTFS and forecast annual budget

The above analysis focusses on the potential costs and savings generated from implementing unitarisation but does not specifically consider the underlying MTFS position.

The modelling undertaken also forecasts the potential impact on the MTFS and projects the combined reserves of the councils. This modelling is summarised below.

The cost / savings adjustments described above have been applied to the 'as-is' combined MTFS to forecast the projected MTFS position for the new unitary council(s).

The forecast annual budget deficits from the three MTFS statements for the 'as-is', one unitary and two unitary options are summarised in the chart below.



The 'as-is' MTFS includes a £19m annual budget deficit in 2025/26 (funded from reserves). This is forecast to increase to £48m in 2028/29 and £85m in 2032/33.

The one unitary model also forecasts an increasing annual budget deficit, but due to the net savings achieved from unitarisation, the annual budget deficit increases at a lesser rate following unitarisation, with a forecast £61m budget deficit in 2032/33, reflecting an ongoing recurring saving of £24m compared to the 'as-is' model and cumulative saving of £64m by 2032/33.

The two unitaries model forecasts an increasing annual budget deficit due to the additional disaggregation costs that are greater than the realisable savings. This results in an annual ongoing budget deficit in 2032/33 of £144m. This further demonstrates that the two unitaries model is not financially viable.

8.7 Impact of Social Care Costs

The 'as-is' model forecasts a £49m combined annual deficit for the six councils in 2028/29 and is comprised of £38m county council deficit and £11m district and borough council deficit.

The county council deficit of £38m is wholly attributable to the underfunding of social care costs and unitarisation does not address this nor introduce the additional funding required to ensure the ongoing financial sustainability of social care.

Extrapolating further, the forecast 'as-is' 2032/33 £85m annual budget deficit comprises £77m county council deficit attributable to social care underfunding, and £8m deficit relating to districts and borough councils.

In order to achieve future financial sustainability, it is imperative this historic social care funding shortfall is addressed through additional ongoing funding, otherwise the county council will require exceptional financial support within the next two years.

8.8 Summary and Conclusions

8.8.1 'One East Sussex' Single Unitary for East Sussex option

The single unitary model provides the greatest value for money, maximising efficiency opportunities, standardisation and minimising the costs of transition and disaggregation. This option improves existing county council economies of scale and reduces net costs compared to the 'as-is' model.

However, without additional funding to address the existing social care budget shortfall, the single unitary model is not a financially sustainable option. Additional ongoing funding is required to achieve financial resilience and viability.

Depending on the outcomes of the fair funding review and the dedicated schools grant statutory override, the forecast position could be accelerated and exacerbated and require earlier additional funding to ensure ongoing financial sustainability prior to the creation of the new unitary.

8.8.2 Two Unitaries for East Sussex option

The two unitaries model is not financially viable due to the disaggregation costs far outweighing any savings. The two unitaries model also fails to payback implementation costs.

Specific boundaries have not been considered for the two unitaries model, as with existing district and borough boundaries (as preferred by MHCLG) there is no

equitable way to divide the population of East Sussex in equal populations across two unitaries other than, at best, a 33% / 67% split.

The two unitaries model significantly reduces savings, introduces substantial disaggregation and duplication costs and an increased transition and implementation cost.

The two unitaries option is financially unviable as disaggregation costs significantly outweigh any savings and increases the annual budget deficit rapidly, resulting in new unitary councils that would exhaust all reserves in their first year of existence, with an exponentially increasing structural budget deficit.

8.8.3 Expanded Brighton & Hove City Council option

The proposal to expand the existing footprint of Brighton & Hove City Council is not a viable option.

[REDACTED] Id be incurred as, in addition to transferring a small proportion of legacy county and district / borough staff to the expanded Brighton & Hove City Council, it would also be necessary to increase some Brighton & Hove City Council staff grades to reflect increased responsibilities and new areas / locations.

There would also be diseconomies of scale across non-staff spend as legacy contracts for supplies and services would be novated and /or terminated and relet.

The implementation effort / cost required to achieve this transfer would be significant and wholly disproportionate with no recognisable benefits for residents.

In addition to the cost of implementation, this would be hugely disruptive for all councils involved and unnecessarily further drain essential scarce capacity during the broader, more significant and beneficial, implementation programme to deliver the preferred one unitary East Sussex model.

9 Implementation Plan

9.1 Overview

Delivering LGR in East Sussex will require a carefully phased, collaborative, co-designed implementation programme. Over the long term, the aim is to create a new organisation that invests more in prevention, early intervention and universal services; better harnesses digital and technological innovation to improve how services are delivered and accessed; leverages its asset base and purchasing power to secure both better value for money and more influence over the market; and can be resilient in the face of the climate emergency and future shocks. But that cannot happen overnight. Of paramount importance is the need to ensure that the new unitary authority is safe, legal, and operational from vesting day while respecting that the democratic mandate for future transformation will come after the new unitary has started electing its own councillors.

Moreover, the new organisation will be built while a new Sussex MSA is also being designed. As there will be a number of overlapping functions (e.g. housing and planning, economy and skills, and transport), there will be a need to consider how the strategic and constituent authorities can play distinct but complementary roles as their respective operating models are being developed. This parallel process has no blueprint or precedent. When earlier combined authorities were being designed, their constituent councils were generally in steady state and their officers able to play a significant role, even if their own capacity was overstretched. In future, constituent authorities will be designing themselves while collaborating on the design of their MSA while facing workforce reductions and turnover. Given a financial context that has already squeezed the corporate functions that would normally lead on organisational design to prioritise frontline services, the challenge of resourcing both unitary and MSA design without additional government support should not be underestimated.

This will require a significant change programme that ensures financial sustainability and continuation of services as well as looking to the future and ensuring together we can improve outcomes for residents.

This section outlines the proposed implementation approach, including governance, programme structure, key phases and critical dependencies. It reflects lessons from

landscape of East Sussex.

9.1.1 Implementation objectives

- Ensure continuity of statutory services from day one.
- Minimise disruption to residents, staff, and partners and provide smooth transitions where there may be changes to how services are delivered
- Establish a single, coherent governance and operating model.
- Harmonise systems, policies, and processes across legacy councils.
- Deliver early wins and build momentum for transformation
- Embed local voice and accountability in the new structure
- Support staff through change with clear communication and engagement.
- Align with the emerging Sussex & Brighton MSA.

9.1.2 Longer-term transformation objectives

pride and improve the public realm

- Reduced spending on acute services by investing more in prevention and early intervention to secure better resident outcomes
- Application of digital and technological innovation to enable the development and delivery of services that better reflect the way residents live their lives and the way businesses operate
- To generate more economic prosperity by presenting an even more united voice and reduce any barriers to growth from real or perceived fragmentation or friction

9.1.3 Indicative Implementation timeline

Indicative Implementation timeline		
1. Statutory consultation on reorganisation proposals	Q4 2025 – Q1 2026 (Government guidance indicates consultation will run from November 2025 to January 2026)	Communications and resident engagement
2. Mobilisation and design planning	Q4 2025 – Q1 2026	Programme governance, early engagement, risk mitigation, and transition planning.
3. Transition	Q2 2026 – Vesting Day (April 2028)	TUPE and workforce planning, service continuity, ICT and systems integration, finance and HR harmonisation, branding, and communications.
4. Future proofing	Vesting Day – 2029	Strategic redesign of services, digital transformation, estate rationalisation, and delivery of long-term benefits.

9.1.4 Programme Governance

Implementation will be delivered through a robust programme delivery approach with an appropriate level of oversight and governance. This means establishing a clear and well understood decision-making framework supported by a risk register, and benefits realisation plan. Trade Unions and partners will also be engaged with as part of activity.

9.1.5 Key Workstreams

Democracy, Legal & Governance	Structural Change Orders, constitution drafting, electoral planning, and governance design. This would also include the induction of members.
Finance	Budget setting, council tax harmonisation, reserves strategy.
People & Culture	TUPE planning, pay and grading review, organisational design, staff onboarding and engagement.
IT & Digital	Systems mapping, data migration, cyber security, and digital service design.
Assets, Estates & Commercial	Property rationalisation, asset transfer protocols, facilities management and procurement alignment.
Communications and engagement	Branding, resident communications and public engagement.
Service Continuity & customer service	Mapping critical services, identifying risks, and ensuring safe delivery on vesting day.
Partnerships	Maintaining and developing partnerships within East Sussex and across the region
Locality Working	Community networks, town and parish councils and community engagement.

9.1.6 Implementation and Transition Costs

Initial modelling suggests that implementation and transition costs will be £68m, depending on the pace of integration and the extent of transformation. These costs will cover programme management, ICT investment, legal and HR support, transitional staffing and other factors set out in the table in paragraph 8.5.2.

A detailed financial plan will be developed in partnership with MHCLG, with a request for transitional funding to avoid drawing down on local reserves.

9.1.7 Risks and Mitigations

Risk	Mitigation
Service disruption	Early continuity planning and dual running where necessary
Staff retention	Clear communication, early appointments, and retention incentives
Cultural misalignment	Joint values framework and organisational development
ICT failure	Phased integration and robust testing
Reputational risk	Transparent engagement with residents and partners

9.1.8 Detailed Timeline and Milestones

November 2025	Launch of statutory consultation on LGR proposal (s)	The Secretary of State is required to consult any council affected that has not submitted the proposal, as well as any other persons considered appropriate, before a proposal can be implemented.
Autumn 2025	Government Order to postpone county and Hastings borough elections (TBC)	Postponement is being requested by the relevant councils.
January 2026	Close of statutory consultation	Government guidance has not committed to a specific date.
March 2026	Government decision on which proposal to be implemented	Based on current Government timeline, subject to Parliamentary approval.
May 2026	Mayoral Election	Hold Mayoral elections for the new MCCA.
May 2026	Legal Orders Drafted	Begin drafting Structural Change Order (SCO) in consultation with MHCLG.
June 2026	Programme Mobilisation	Establish Programme Board and confirm governance structure.
June 2026	Programme Plan Finalised	Publish detailed implementation roadmap and risk register.
August 2026	Staff Engagement Launch	Begin formal staff engagement, information and TUPE planning.
August 2026	Baseline Data Consolidation	Complete mapping of services, contracts, assets, and workforce.
September 2026	ICT Systems Audit	Complete audit of digital infrastructure and begin integration planning.

October 2026	Draft Constitution	Begin drafting new constitution and governance framework.
November 2026	Council Tax Harmonisation Modelling	Finalise modelling scenarios and begin public communications.
March 2027	Structural change order made and Implementation Teams appointed	These must be set up no later than 21 days after the structural change order comes into force
June 2027	TUPE Consultation Begins	Begin formal consultation with staff and unions.
December 2027	Service Continuity Plans Signed Off	All critical services have continuity plans in place.
May 2027	Elections	Hold elections
January 2028	Branding and Communications Rollout	Launch new branding, website, and resident communications.
February 2028	Budget Approved	Approve first unified budget for the new authority.
March 2028	Final Testing and Readiness Review	Conduct final readiness checks across all workstreams.
April 2028	Vesting Day	New unitary authority becomes operational.



10.2 Conclusion

This business case presents a compelling, evidence-based proposal for LGR in East Sussex. It reflects a shared vision across all six councils and is rooted in the principles of financial sustainability, service integration, and community empowerment.

The preferred 'One East Sussex' model of a single unitary authority for East Sussex offers the strongest platform for transformation, based on the existing district and borough Council boundaries. It enables whole-system thinking and delivery, allowing for the integration of services such as housing, social care, education, and public health. This will lead to improved outcomes for residents, particularly in areas of high need, by reducing duplication, enabling earlier intervention, and supporting more strategic commissioning.

While the financial modelling highlights a long-term structural deficit, it also shows that, when social care is excluded from consideration, the case for a single unitary becomes more compelling. The model delivers a positive return on investment, aligns with national policy, and positions East Sussex to play a leading role in regional growth and devolution.

We recognise that reorganisation alone is not a single solution to East Sussex's financial position. Sustained financial sustainability will require fairer funding allocations, transitional support, and continued innovation. However, this proposal provides a clear and credible path forward that is deliverable, locally supported, and designed to meet the needs of East Sussex's communities now and in the future.

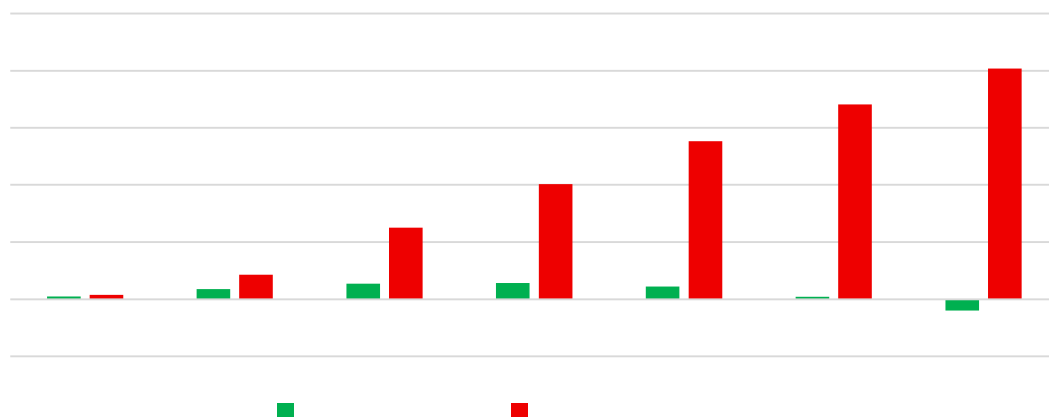


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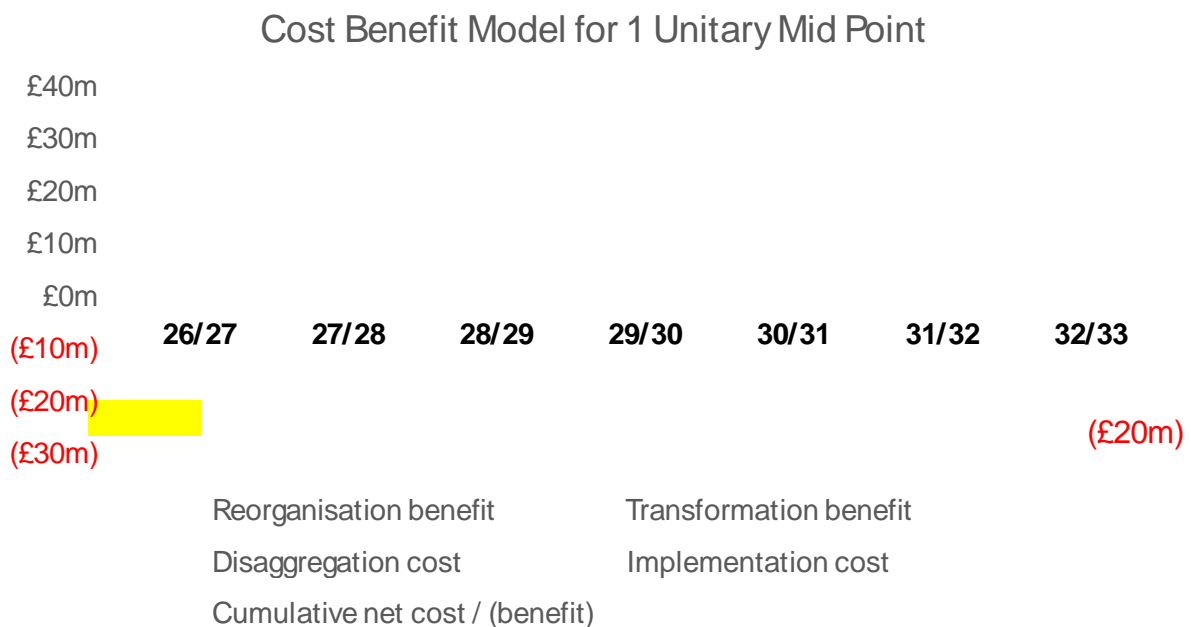
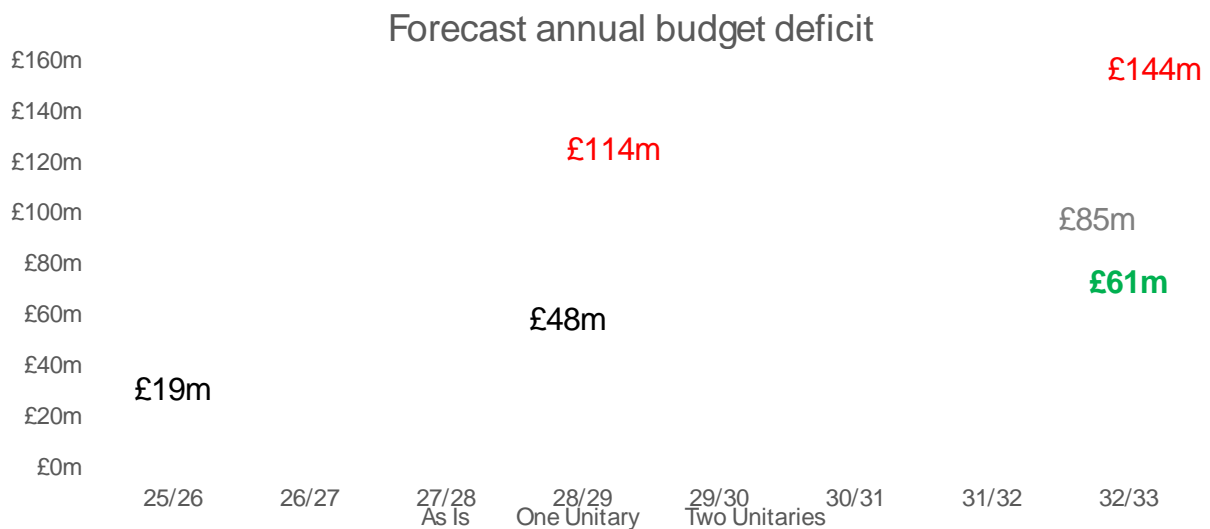
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NB – This appendix is sfill in development and further documents will be added before cabinet meefings



1 Options considered

1.1 Financial modelling for a single unitary and two unitaries across East Sussex



Cost Benefit Model for 2 Unitaries Mid Point



1.2 Brighton & Hove City Council expansion; information received (assuming to be received 11th Sept?)

This section sets out links to correspondence and other supporting information received related to Brighton & Hove City Council's proposal for an expansion of their boundary.

Brighton & Hove City Council Option Maps - Based on ONS and OS Open Data (Annex 1)

- Response from MHCLG on how to manage B&H options
- Response to Brighton & Hove City Council's proposal
- Engagement activity and communication with Brighton & Hove City Council
- Understanding of alternative options in Haslings

1.3 Understanding of Hastings Options

Local Partnerships produced analysis on options for consideration by Hastings Borough Council.

2 Government Criteria

2.1 Detailed breakdown of six statutory criteria

The Government set out [criteria](#) for unitary local government in an annex to the letter of [invitation](#) that was sent to the Leaders of councils across East Sussex and Brighton & Hove City Council on 5 February 2025.

2.2 Feedback on interim plan

On 7 May 2025, the Government wrote to the chief executives of East Sussex County Council, Eastbourne Borough Council, Hastings Borough Council, Lewes District Council, Rother District Council, Wealden District Council, and Brighton & Hove City Council to provide [feedback](#) on the interim plans submitted.

2.3 Summary of feedback to all 21 areas invited to submit proposals for LGR

On 3 June 2025, the Government published a summary of the [feedback](#) provided to the 21 areas in England invited to submit proposals for Local Government Reorganisation on their interim plans.

3 Context

3.1 Key statistics and sources (demographic insights pack): population, health, housing, economy, infrastructure

An independent review of key demographic, economic and other data related to the six councils that collaborated on this business case is set **out in the** East Sussex Insights pack. (Annex 2)



3.2 English Devolution White Paper

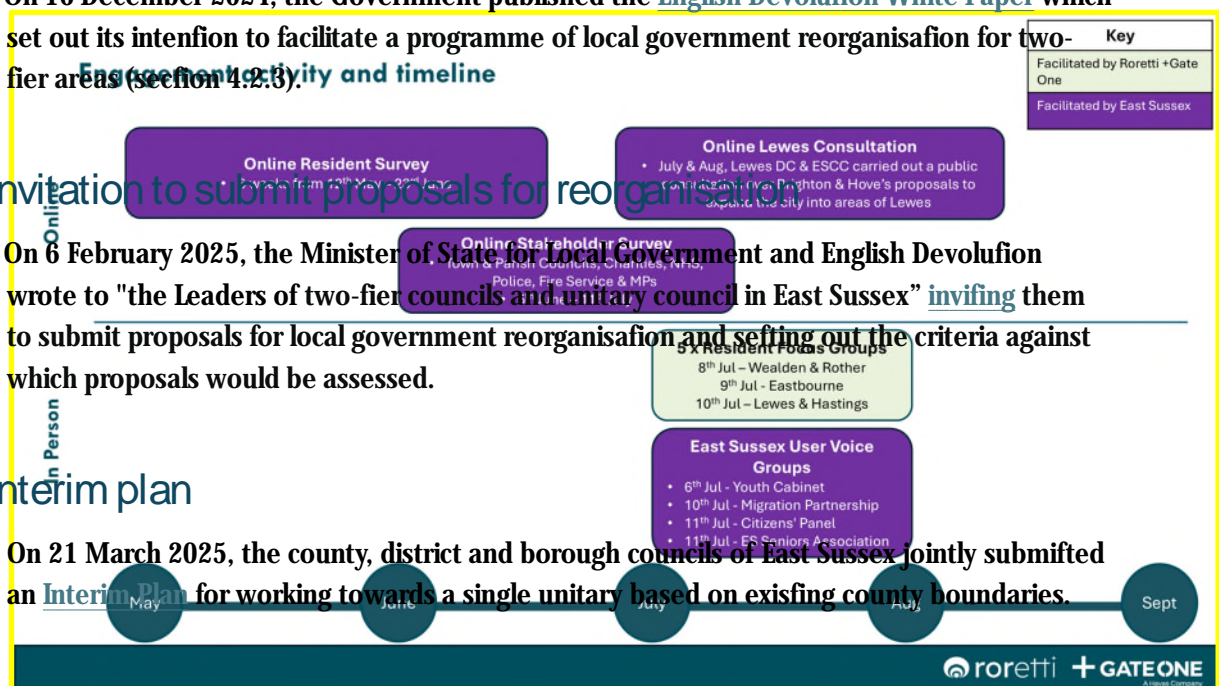
On 16 December 2024, the Government published the [English Devolution White Paper](#) which set out its intention to facilitate a programme of local government reorganisation for two-tier areas (section 4.2.3).

3.3 Invitation to submit proposals for reorganisation

On 6 February 2025, the Minister of State for Local Government and English Devolution wrote to "the Leaders of two-tier councils and unitary council in East Sussex" [inviting](#) them to submit proposals for local government reorganisation and setting out the criteria against which proposals would be assessed.

3.4 Interim plan

On 21 March 2025, the county, district and borough councils of East Sussex jointly submitted an [Interim Plan](#) for working towards a single unitary based on existing county boundaries.



3.5 East Sussex Prosperity Strategy

In September 2024, the County Council and Team East Sussex, the county's business-led strategic advisory economic growth board, published this [Strategy](#) setting out an economic review of the area and a blueprint how councils and other partners East Sussex can secure better opportunities and living standards for the people who live in the county, and can help businesses to thrive and grow.

3.6 East Sussex in Figures

This [briefing](#) sets out key data about the economic performance of East Sussex.

3.7 East Sussex Housing Partnership Draft Strategy

From 1 June to 22 August 2025, the East Sussex Housing Partnership consulted on a draft [Strategy](#) aimed at improving housing in East Sussex and support the five local housing authorities' individual strategies, as well as guide future service planning and opportunities to secure additional funding. An updated Strategy will be presented to the District and Borough council cabinets over autumn and winter 2025.

3.8 State of the County

The State of the County [report](#) sets out the policy and financial context within which the County Council is working.

4 Engagement and Partnerships

4.1 Initial resident survey and stakeholder survey commissioned by all councils, including Lewes DC consultation on B&H extending the authority boundaries

This [East Sussex LGR engagement activity](#) slide pack (Annex 3) provides a summary of key consultation and engagement activity related to the three options covered in the business case.

4.2 Ministerial correspondence

Links to parish and town council representations about the Brighton & Hove City Council expansion option are set out below.

Telscombe Town Council (Annex 4)

Kingston Parish Council (Annex 5)

Rodmell Parish Council (Annex 6)

Peacehaven Town Council (Annex 7)

Newhaven Town Council (Annex 8)

Iford Parish Meeting (Annex 9)

Parishes of the Lower Ouse (POLO) (Annex 10)

4.3 Brighton & Hove City Council Consultation on expanding the city

Brighton & Hove City Council consulted on [options](#) to expand its city boundaries between 25 July and 25 August 2025. These options are relevant to this business case as they involved merging with local government wards to the east of the city (Lewes).

4.4 Focus group insights report

A summary of feedback from focus groups conducted by consultancy Rorefti, partnered with Gate One is set out in this section. (Annex 11)

4.5 User Voice group insights report

A summary of feedback from focus groups involving four service user voice groups conducted in July 2025 is set out in this section. (Annex 12)

4.6 Engagement timeline and activities

A timeline and snapshot of key engagement activities is set out in this section.

5 Financial Modelling

More detailed information on the data and assumptions used for financial modelling of the options considered in this business case are set out in this section.

5.1 Financial Modelling Assumptions & Variants

Unitary Transition Assumptions – Detailed Summary

Each of the constituent councils has provided draft Medium-Term Financial Strategy (MTFS) figures covering the period from 2025/26 to 2028/29. These figures have been extrapolated to 2032/33 to support long-term financial modelling and scenario planning for the proposed unitary transition. The extrapolation assumes consistent trends in expenditure and income, adjusted for inflation and anticipated structural changes. These inputs form the baseline for assessing the financial sustainability and potential efficiencies of both the single and dual unitary models.

Category	Assumption	Explanation	Base Model	Stretch Model	Inflation
Elections	Members doubled to 100	More councillors means higher election costs	+20% cost	No increase due to efficiencies	3% annually
	First election in 2027/28	New unitary council starts elections in 2027/28, then every 4 years	Included	Included	—
	Two Unitary Model cost	Two councils cost more, but fewer wards reduce cost	Doubled then reduced to 75%	Reduced to 50%	3% annually
	PCC, Parliamentary, By-elections	These elections costs stay the same	No change	No change	—
	Election	One-off cost for setup election	Included as implementation cost	Spread over 4 years	—
Councillors / Members Allowances	Members increase from 50 to 100 for a single unitary option (2 councillors per divisions)	More councillors need more budget	—	—	—

	Member allowances budget	Budget increases for more roles and responsibilities	+80%	+70%	—
	D&B allowances	District & Borough budgets removed	100% saving	100% saving	—
	Two Unitary Model SRAs	Special roles cost more in two councils	+£154k	+£154k	3% annually
Property Savings	County estate retained	County buildings stay in use	No savings	No savings	—
	D&B estate consolidation	Fewer buildings needed after merging	Savings applied to total estate	Based on Rother figures	—
	Disposal/mothballing costs	Not included in model	Not included	Not included	—
Top Tier Staffing	CEX, COO, Deputy CEX salaries	Adjusted for size of new council	+10%	—	3% annually
	Two unitary model salaries	Smaller scale means slightly lower pay	-10%	—	3% annually
	Executive Directors (5 incl. Housing) for single unitary	New structure includes 5 directors	Adjusted salary	Adjusted salary	3% annually
	Heads of Service for D&B functions	New roles to cover district functions	3 @ £120k	3 @ £100k	3% annually
	Support Service Heads uplift for single unitary	Pay increase for broader responsibilities	15 @ £15k	—	3% annually
	Assistant Directors uplift for single unitary	Pay increase for broader responsibilities	15 @ £15k	—	3% annually

Summary of key forecast figures	D&B top-tier role reduction for single unitary	Reducing duplicate senior roles	As is £m	60% reduction One Unitary £m	100% reduction Two Unitaries £m
Total one-off implementation and transition costs			-	68.456	121.246
Cumulative disaggregation cost to 2032/33	Single unitary Stretch uplift cost	Reduced cost for pay increases	-	-	338.717
2032/33 Annual recurring disaggregation cost			-	-	67.908
2032/33 Annual recurring cost / (benefit)			-	(24.661)	58.952
Net cumulative cost / (benefit) to 2032/33			-	(63.716)	329.291
2028/29 Cumulative (reserves) / deficit			1.466	5.273	89.981
2032/33 Cumulative (reserves) / deficit			290.078	8226.382	619.369
2032/33 Annual budget deficit			85.479	60.809	144.422

5.2 Transition and Transformation Costs

This appendix outlines the methodology and assumptions underpinning the financial modelling of transformation, implementation, and transition costs associated with the creation of a new unitary authority (or authorities). The model supports strategic decision-making by providing a detailed cost forecast across multiple scenarios.

Purpose of the Model

The model estimates the financial implications of transitioning from a two-tier local government structure to a unitary model. It includes:

	One Unitary £m	Cumulative to 2032/33 Two Unitaries £m
Implementation cost	68.456	121.246
Disaggregation cost		338.717
Total Costs	68.456	459.964
Reorganisation benefit	(47.591)	(43.061)
Transformation benefit	(40.508)	(12.665)
Total Savings	(88.099)	(55.725)
Cumulative net cost / (benefit)	(19.642)	404.238

Key Cost Categories

1. Redundancy & Early Retirement

- Forecasted based on displaced staff profiles and average pension strain costs.
- Assumes 80% of displaced staff receive redundancy in base models, 60% in stretch models.
- Costs are phased in line with staff off-boarding and transformation timelines.

2. Implementation & Programme Delivery

- Includes programme management, PMO, change management, service design, legal, HR, finance, and communications.
- Costs reflect both internal redeployment and external consultancy
- Delivery resources are phased over quarters to align with transformation milestones.

3. IT Consolidation & Transformation

- Covers system integration, rationalisation, and digital enablement.
 - Costs vary significantly between 1U and 2U scenarios due to scale and complexity.
- 4. Branding & Communications**
- Includes rebranding, resident communications, and stakeholder engagement.
 - Assumed flat cost profile with minor variations between scenarios.
- 5. Setup**
- Covers staffing (Leader, Deputy, Cabinet Members, Chief Exec, senior officers) and operational costs post-election in May 2027.
 - Costs differ between 1U and 2U based on structure and staffing levels.
- 6. Creation of New Councils & Closedown of Old Councils**
- Legal, constitutional, and audit costs for establishing new entities and winding down existing ones.
 - Based on benchmarks from other local government reorganisations.
- 7. Elections**
- Election costs included as implementation costs.
 - Ongoing election costs and savings are modelled separately.
- 8. Contingency**
- Applied across all categories to account for unforeseen costs.
 - Varies between base and stretch models.

Modelling Assumptions

- **Inflation:** 3% annually applied to salaries and allowances.
- **Staffing:** Top-tier staffing structures are adjusted for scale and scope, with uplifted salaries and new roles added.
- **Efficiencies:** Stretch models assume greater efficiencies in delivery and staffing reductions.
- **Capital Receipts:** Office estate disposals are factored into loan repayment models.
- **Loan Modelling:** Public Works Loan Board (PWLB) 20-year repayment profiles are included, with equalised annual repayments for comparison.

5.3 Council Tax Harmonisation

This section outlines the approach and assumptions used in modelling council tax harmonisation across the constituent authorities in East Sussex, as part of the transition to a unitary structure.

Purpose of the Harmonisation Model

The harmonisation model aims to assess the financial and practical implications of aligning council tax rates across the new unitary authority area. It supports strategic planning by:

- Estimating the impact on council tax yield
- Identifying areas with significant variance from the proposed unitary Band D rate
- Evaluating the feasibility of harmonising rates within referendum thresholds

Data Sources and Assumptions

- The model is based on data from the East Sussex budget book

- Band D council tax rates (excluding parish precepts) and tax base figures are used to calculate current yields.
- A hypothetical 4.99% increase is applied to model harmonisation, reflecting the referendum threshold for unitary authorities.
- The weighted average Band D charge across East Sussex is calculated to be **£2,107.54**, with harmonisation targeting **£2,212.70**.

Key Findings

- Harmonisation in a single year would result in **Rother and Wealden** exceeding the referendum threshold if treated as districts.
- However, newly reorganised councils under Local Government Reorganisation (LGR) may be **exempt from referendum limits in their first year**, allowing for full harmonisation.
- The model shows that harmonisation would result in increases ranging from **£37.96 (Haslemere)** to **£135 (Rother)**, with percentage changes between **1.75% and 6.5%**.
- Additional income is generated by applying a 4.99% increase to district and borough rates in 2028/29 instead of the standard 2.99%.

Policy Considerations

The harmonisation strategy must:

- **Maintain overall council tax yield** to support the financial sustainability of the new authority.
- **Balance fairness and administrative simplicity**, minimising duplication and resident dissatisfaction.
- **Reflect the impact of parish and town council precepts**, which are currently excluded from the model.

5.4 Social Care Funding Shortfall

This section outlines the financial pressures facing East Sussex County Council (ESCC) in relation to Adult Social Care (ASC), Children's Social Care (CSC), Home to School Transport (HTST), and Special Educational Needs and Disabilities (SEND). These pressures are presented separately from the main business case to highlight the scale of the challenge that LGR alone will not resolve.

Overview of Social Care Funding (2025/26)

In 2025/26, ESCC is forecast to receive approximately £159 million in grant funding across ASC, CSC, HTST, and SEND. Key components include:

- Social Care Grant: £59.6m
- Improved Better Care Fund: £21.8m
- ASC Market Sustainability & Improvement Fund: £11.3m
- Dedicated Schools Grant – High Needs Block (SEND): £71.5m
- Children & Families Grant: £3.2m

- Unaccompanied Asylum Seeking Children: £2.9m
- Home to School Transport: £0.98m (rolled into RSG)

Despite this funding, the net revenue expenditure for social care services is forecast to rise significantly over the MTFP period:

Year	Net Revenue Expenditure (£m)	Annual Deficit (£m)
2025/26	434.2	10.8
2026/27	464.3	24.6
2027/28	494.9	29.5
2028/29	526.7	38.6

These deficits are after accounting for all known grants and income and reflect the growing demand and complexity of care provision.

The financial pressures in social care are driven by:

- **Demographic growth:** Increasing numbers of older people and children with complex needs.
- **Inflationary pressures:** Rising costs of care provision, staffing, and placements.
- **Policy and statutory duties:** Expanding responsibilities without commensurate funding.
- **Limited flexibility:** Many grants are ring-fenced or pass-ported, reducing scope for reallocation.

While LGR may deliver efficiencies in corporate services, property, and governance, it cannot address the structural funding gap in social care. The challenge is systemic and requires national policy reform, sustainable funding settlements, and potentially new models of care delivery.

Implications for the Business Case

- The main business case focuses on services outside social care, where LGR can deliver meaningful savings and transformation.
- The social care MTFP is presented separately to ensure transparency and realism in financial planning.
- The business case must acknowledge that additional funding or policy change will be required to address the social care shortfall.

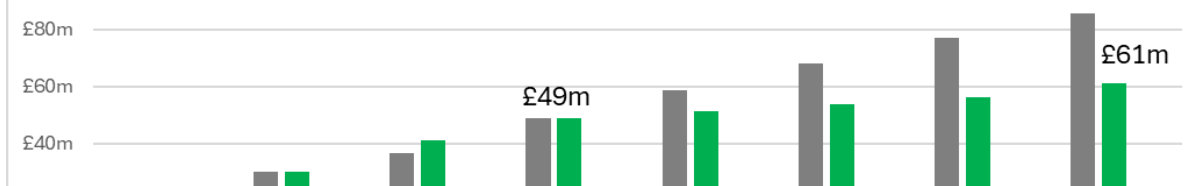
5.5 Disaggregation Modelling

Explanation of forecast disaggregation costs at £68m per annum, steady state

General Comments

- Disaggregation costs have been forecast for two unitaries in total – separate costs have not been identified for unitary one and unitary two.
- Disaggregation costs are shown as gross figures (not net of savings) – savings are shown separately.
For example: Savings from reducing D&B management are shown separately. Savings from reducing D&B ICT functions are shown separately.

Forecast annual budget deficit			
Senior Management	11.748	57.962	£12m cost is based on duplicating the existing top 4 management tiers of the county (and their PA support) in a second unitary council. An additional cost has been included to reflect the addition of 3 ADs to manage legacy D&B services. A cost reduction has also been included to reflect that each of the two unitaries will be smaller than county with reduced management responsibilities / salaries.
Members	0.318	1.499	The existing county cost for Members' Special Responsibility Allowances will be duplicated in the second unitary council.
Staffing (Excluding senior management):			Staff costs will increase by an average of 3% as a result of disaggregation. This cost will arise as specific dedicated posts will need to be duplicated in each authority.
Front office	0.124	0.612	For example, this could include: Senior Social Work Practitioner, Head of Virtual School, Children's Safeguarding lead.
Service Delivery	6.446	31.773	
Support functions	0.701	3.459	
ICT Disaggregation	21.263	111.628	ICT Disaggregation costs have been provided by the County COO. This forecast is based on the COO's knowledge of deconstructing ORBIS and more advanced discussions / planning that is underway to disaggregate Surrey's ICT costs. The forecast assumes that existing County ICT costs are bolstered to create an independent (separate from ORBIS) function and then duplicated in the second unitary



				council. The £21m PA reflects a mid-point that includes a discounting factor to avoid overstating costs.					
Other non-staffing	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	Non-staff costs will increase by an average of 3% as a result of diseconomies of scale and re-negotiation during contract novation and relets. The largest spend areas are Adults and Children's social care. These markets are fragile and providers will exploit the opportunity to increase costs during contract re-negotiations. Other contracts maybe negotiated at reduced rates, but an average 3% increase has been assumed across all non-staff spend on supplies and services.
				■ Existing combined Districts & County base model ■ 1 Unitary					
				338.717					
Total Disaggregation costs									

Explanation of the Two Scenarios

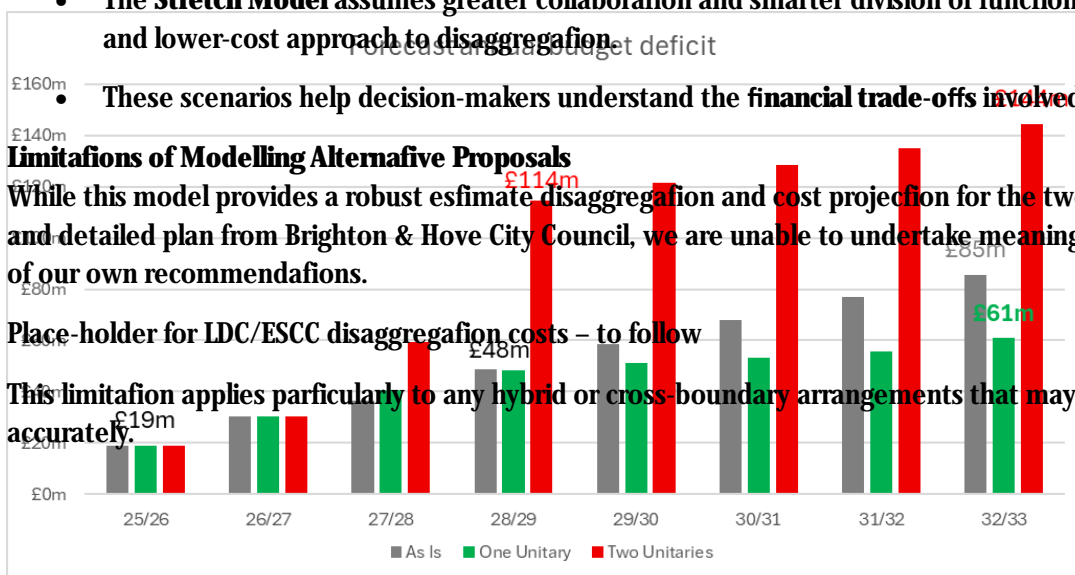
- The **Base Model** assumes full duplication of services and systems with minimal efficiencies. It represents a high-cost scenario where each new authority operates independently.
- The **Stretch Model** assumes greater collaboration and smarter division of functions, reducing duplication and overheads. It reflects a more efficient and lower-cost approach to disaggregation.
- These scenarios help decision-makers understand the financial trade-offs involved in pursuing a two-unitary structure.

Limitations of Modelling Alternative Proposals

While this model provides a robust estimate disaggregation and cost projection for the two-unitary structure, it is important to note that, without a clear and detailed plan from Brighton & Hove City Council, we are unable to undertake meaningful modelling of alternative proposals that fall outside the scope of our own recommendations.

Place-holder for LDC/ESCC disaggregation costs – to follow

This limitation applies particularly to any hybrid or cross-boundary arrangements that may be suggested but lack sufficient operational detail to cost accurately.

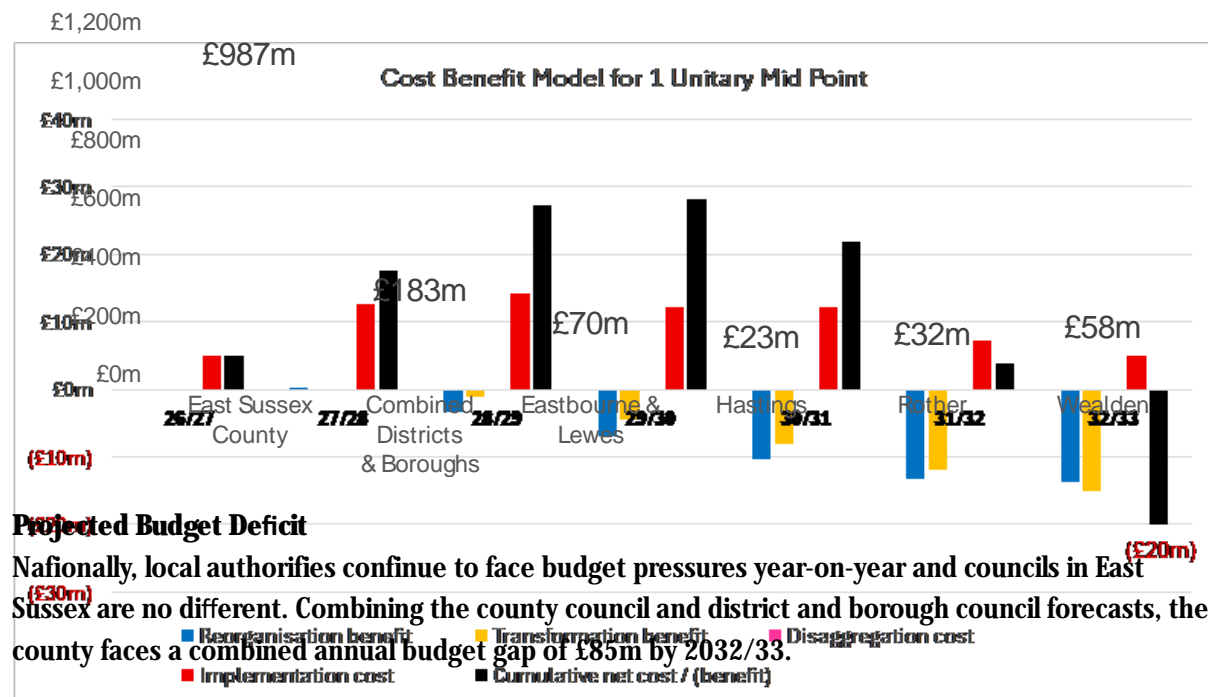


5.6 Supplementary charts and tables

Current Expenditure in East Sussex

This financial year, the five district and borough Councils in East Sussex are projected to spend £183m combined, with the county council projected to spend £987m. This is a combined spend of £1.17bn in the county for 2025/26.

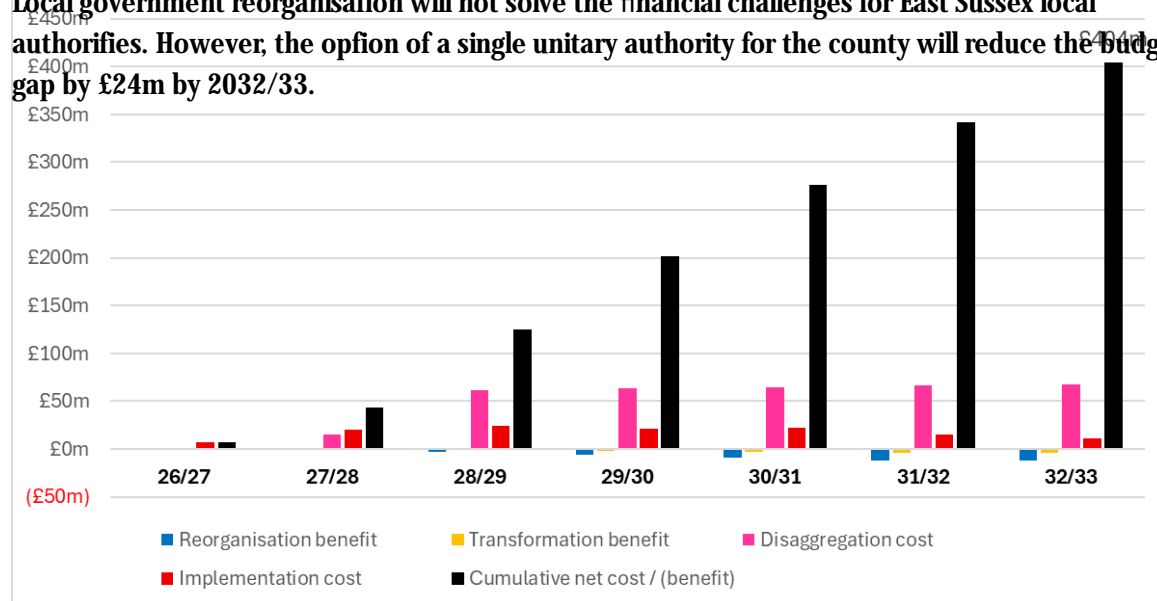
2025/26 Total Service Expenditure



Note: we have combined all the councils' financial plans into one consolidated base budget. For comparison purposes, we have broken down costs into categories such as (senior management, service delivery, front office (customer-facing staff), support functions (HR, finance, etc.), ICT (technology), premises, and all other costs. This helps us see where money is being spent and where savings might be possible.

Forecast Annual Budget Deficit: Single Unitary Authority for East Sussex

Local government reorganisation will not solve the financial challenges for East Sussex local authorities. However, the option of a single unitary authority for the county will reduce the budget gap by £24m by 2032/33.



Note: this model takes into account savings that can be achieved from combining certain services that are run by each of the district and boroughs and the county council where applicable. Savings are typically achieved in staffing, technology (e.g. ICT) and organisational processes.

Forecast Annual Budget Deficit: Two Unitary Authorities for East Sussex

If the county was to be run as 2 unitary authorities, additional costs would be incurred from 'disaggregation' of high-cost services run by the county council (e.g. children's services, adult services) and not achieving the full savings opportunities from combining existing county, district and borough council services into a single unitary authority (as per the previous slide). The annual budget deficit would grow to £144m by 2032/33 under this option.

Programme Costs and Benefits of a Single Unitary Authority for East Sussex

There is a cost to implementing a single unitary for East Sussex as opportunities to bring services and functions into a single organisation are achieved. By 2028/29, opportunities from reorganisation and transformation emerge with benefits outweighing the disaggregation and implementation

programme costs from 2031/32 onwards and cumulative £20m of net benefits being achieved by 2032/33. There are no disaggregation costs as high-cost services such as social care remain under a single unitary authority.

Implementation cost: The estimated cost of delivering a change programme to initially consolidate the six councils and subsequently rationalise and transform services.

Disaggregation cost: The costs of duplication and diseconomies of scale that result from splitting county functions into two new unitaries. For example, social care.

Reorganisation benefit: The short-term saving achievable from combining, consolidating and de-duplicating six councils into one (or two) new unitary council(s).

Transformation benefit: The longer-term benefit that can be realised from rationalising, bringing together and/or transforming the six councils including digitisation, automation and early intervention and prevention.

Cumulative net cost / benefit: The total of programme implementation and disaggregation costs, less the savings achieved from reorganisation and transformation. This shows whether the programme results in a net cost or net saving.

Programme Costs and Benefits of Two Unitary Authorities for East Sussex

By contrast, the programme cost benefit analysis shows that costs of two unitary authorities for East Sussex far outweigh the benefits. This is largely driven by the disaggregation of social care into two unitary authorities from a single unitary authority. The cumulative programme net cost is £404m by 2032/33 vs a net benefit of £20m of a single unitary authority.

5.7 Risks & Mitigations

The risks and mitigations outlined here are intended to support informed decision-making and provide assurance that financial resilience and adaptability have been built into the planning process. They also highlight areas where further engagement with government and partners will be essential to ensure a successful and sustainable transition.

Risk Area	Description	Mitigation Strategy
Disaggregation Costs	The financial impact of separating services, systems, and staffing under a two-unitary model may be greater than anticipated, particularly in IT and non-staffing areas.	Use stretch modelling to test sensitivity; phase implementation to allow for adjustments; explore shared service arrangements where appropriate.
Uncertainty Around External Proposals	In the absence of a clear and detailed proposal from Brighton & Hove City Council, it is not possible to undertake robust financial modelling of alternative cross-boundary arrangements.	Focus modelling on the recommended options within East Sussex; clearly state scope limitations; remain open to future modelling if formal proposals are received.
Social Care Funding Pressures	The structural funding gap in Adult and Children's Social Care is not resolved by LGR and may continue to grow without national reform.	Present social care pressures transparently; engage with government on funding reform; maintain prudent reserves and contingency planning.

Governance and Election Costs

Costs associated with establishing new governance structures, including elections and member allowances, may exceed initial estimates.

Include these costs in implementation planning; apply stretch modelling to identify efficiencies; align governance design with streamlined service delivery.

	Milestone	Description	2025			2026				2027	
			Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2
End Sep 2025	Proposal Submission (DPP Areas)	Councils submit proposals for reorganisation.									
Nov-25	Launch of Statutory Consultation	Secretary of State consults affected councils and other stakeholders.									
Autumn 2025	Postponement Order for Elections (TBC)	Government may postpone county and Hastings borough elections.									
Early 2026	Close of Statutory Consultation	No fixed date; expected early in the year.									
Mar-26	Government Decision on Proposal	Decision on which proposal to implement; may affect councillor terms.									
May-26	Mayoral Election	Election for the new Mayoral Combined County Authority (MCCA).									
May-26	Drafting of Structural Change Order (SCO) Begins	Draft SCO in consultation with MHCLG.									
May-26	SCO Published & Implementation Executive Established	Legal mandate to manage transition; must reflect political balance and include all councils.									
May-26	Appointment of Implementation Teams	Must be completed within 21 days of SCO coming into force; includes officers from county and districts.									
Jun-26	Programme Mobilisation	Establish Programme Board and governance structure.									
Jun-26	Programme Plan Finalised	Publish roadmap and risk register.									
Aug-26	Staff Engagement Launch	Begin formal staff engagement and TUPE planning.									
Aug-26	Baseline Data Consolidation	Map services, contracts, assets, and workforce.									
Sep-26	ICT Systems Audit	Audit digital infrastructure and begin integration planning.									
Oct-26	Draft Constitution	Begin drafting governance framework.									
Nov-26	Council Tax Harmonisation Modelling	Finalise scenarios and begin public communications.									
Dec-26	TUPE Consultation Begins	Formal consultation with staff and unions.									
Feb-27	Service Continuity Plans Signed Off	All critical services have continuity plans in place.									
06-May-27	Elections	Elections									
May-27	Implementation Executive Disbanded	Responsibility transfers to newly elected Executive.									
May-27	Branding and Communications Rollout	Launch new branding, website, and resident communications.									
Jun-27	'One East Sussex' Council Established	Oversees transition and prepares for Vesting Day.									
Feb-28	Final Budget Approved	First unified budget									
Mar-28	Final Testing and Readiness Review	Final readiness checks across all workstreams.									
01-Apr-28	Vesting Day	Unitary authority becomes operational.									

- Engagement with governance groups directly involved in business case (e.g. Leaders, CExs, ESFOA)
- Resident and partner engagement as agreed
- Follow-up meetings as required specifically related to the business case development

- forums e.g. HR
- Responding to govt feedback (if required)**
- Developing responses to any questions or requests for further information



6 Implementation

6.1 Gantt chart of timeline

NOW

NEXT

LATER

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A Hines Company

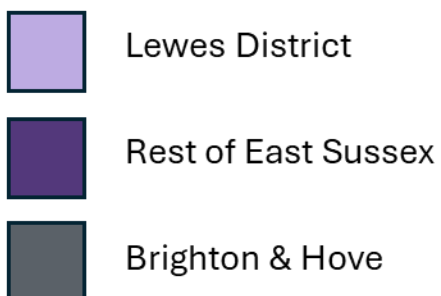
A preliminary timeline of the implementation process is set out in this section.

6.2 Now Next Later

A framework for understanding the three broad phases of activity involved in local government reorganisation is set out in this section.

6.3 Other

Key More information on the Voluntary, Community and Social Enterprise (VCSE) sector across East Sussex is available on the East Sussex VCSE Alliance [website](#)



Key



Lewes District



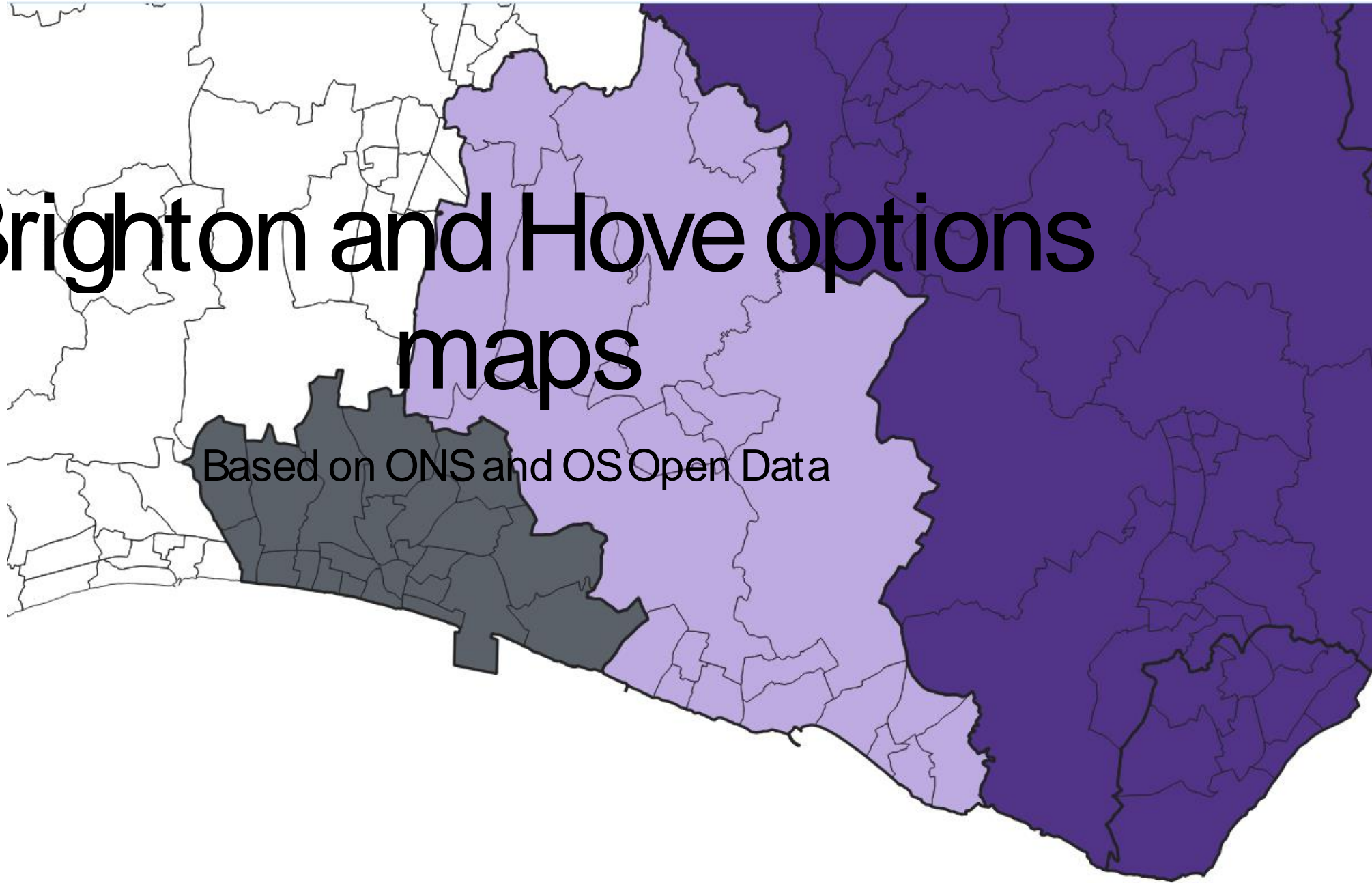
Rest of East Sussex



Brighton & Hove

Brighton and Hove options maps

Based on ONS and OS Open Data



Current boundaries

Key



Lewes District



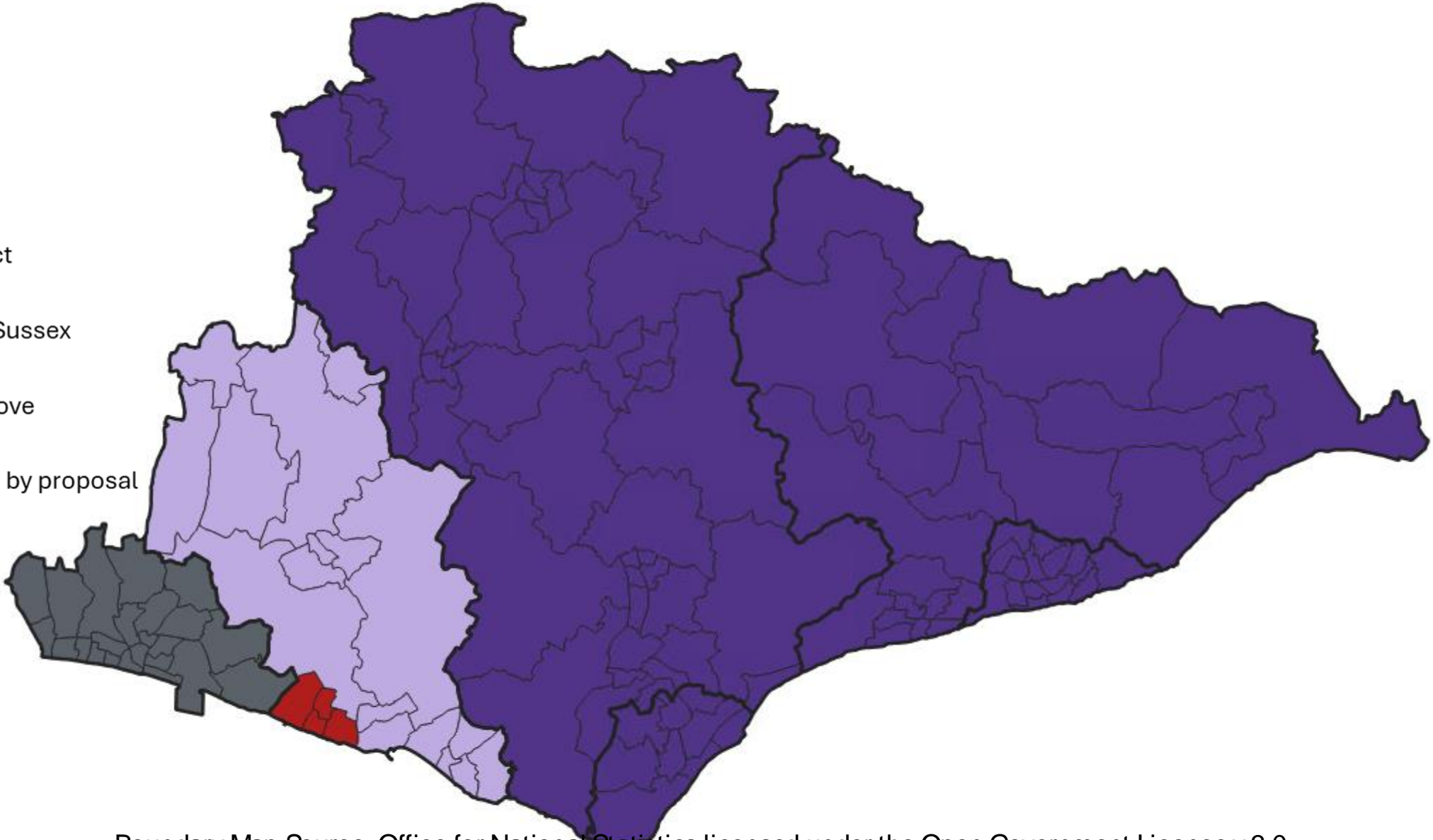
Rest of East Sussex



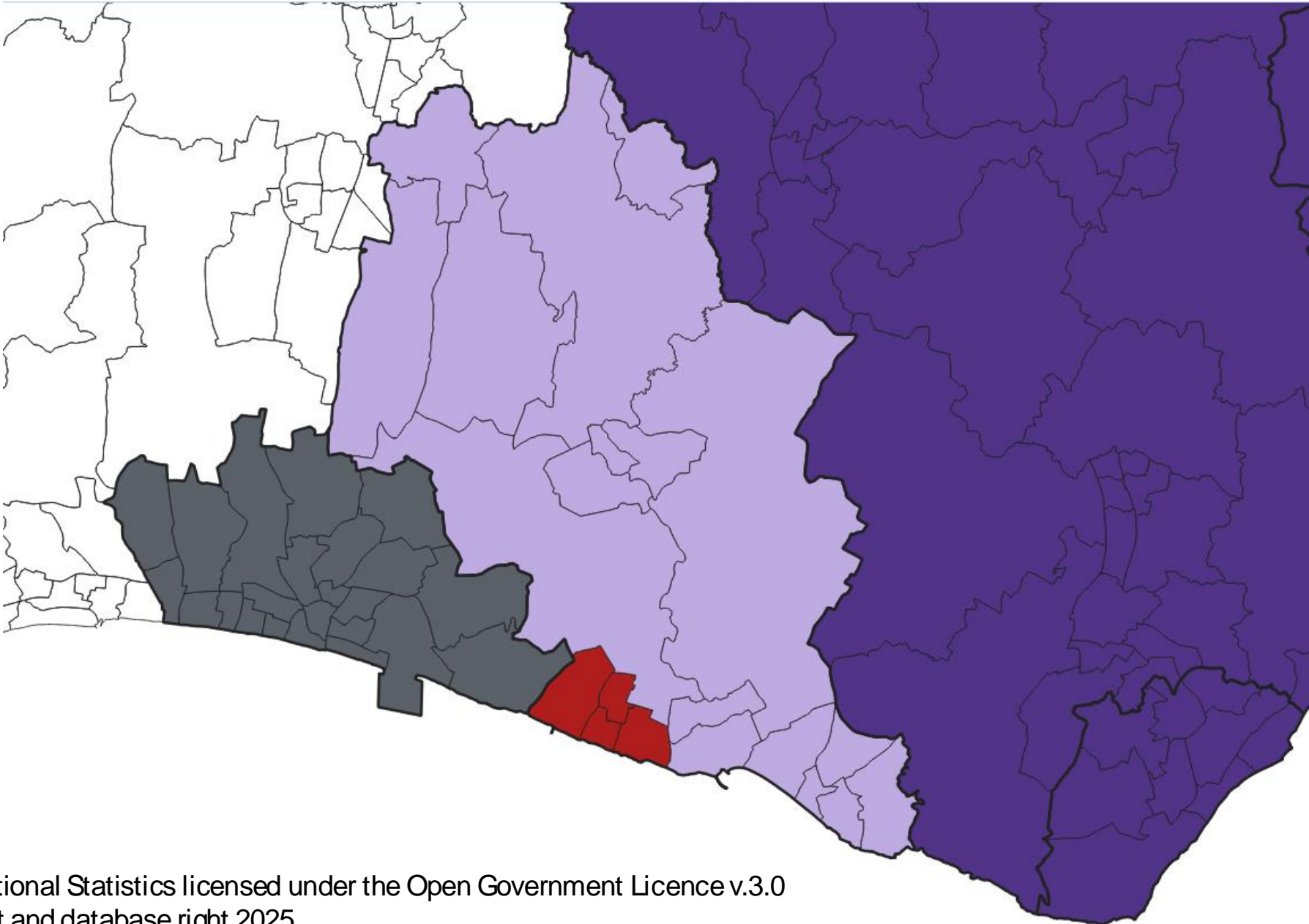
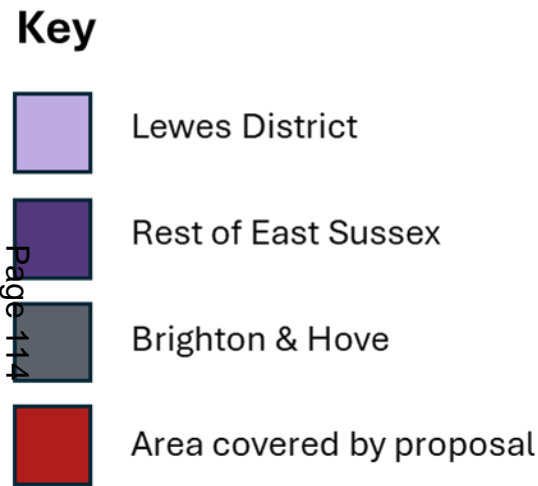
Brighton & Hove



Area covered by proposal



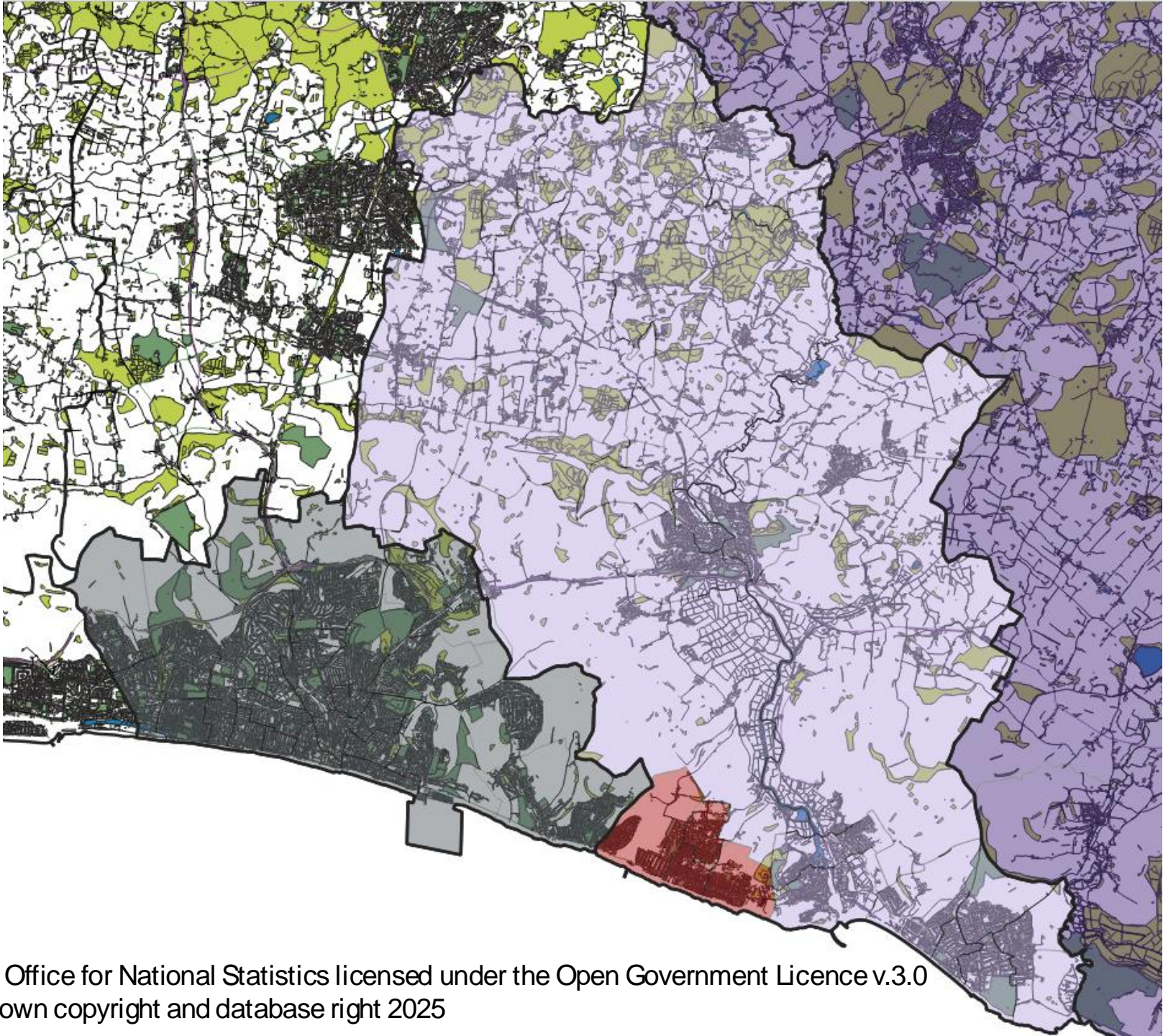
Current boundaries



Option 1 – East Saltdean,
Telscombe and Peacehaven





Key

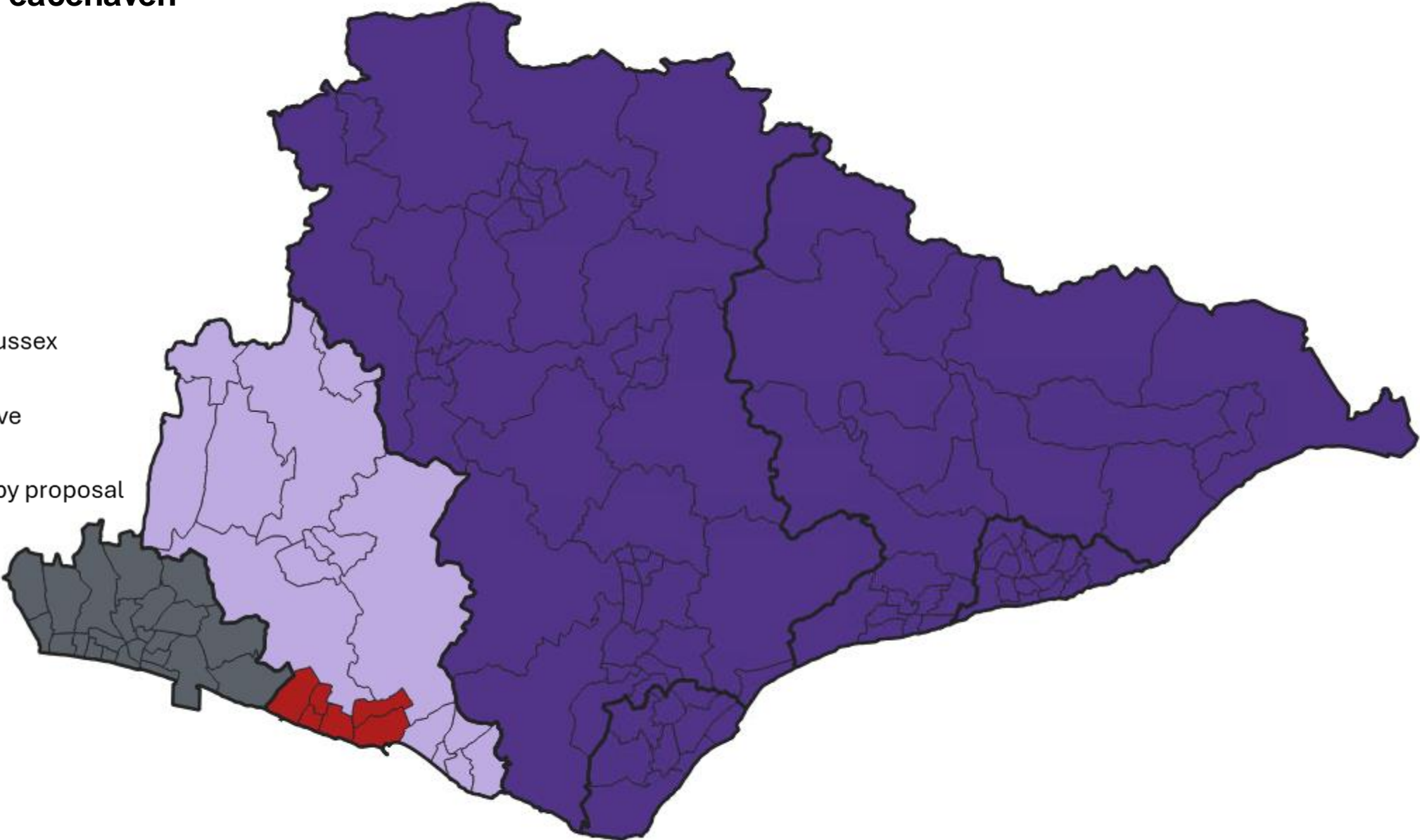
-  Lewes District
-  Rest of East Sussex
-  Brighton & Hove
-  Area covered by proposal



Option 1 – East Saltdean,
Telscombe and Peacehaven

Key

-  Lewes District
-  Rest of East Sussex
-  Brighton & Hove
-  Area covered by proposal



Option 1 – East Saltdean, Telscombe and Peacehaven

Key



Lewes District



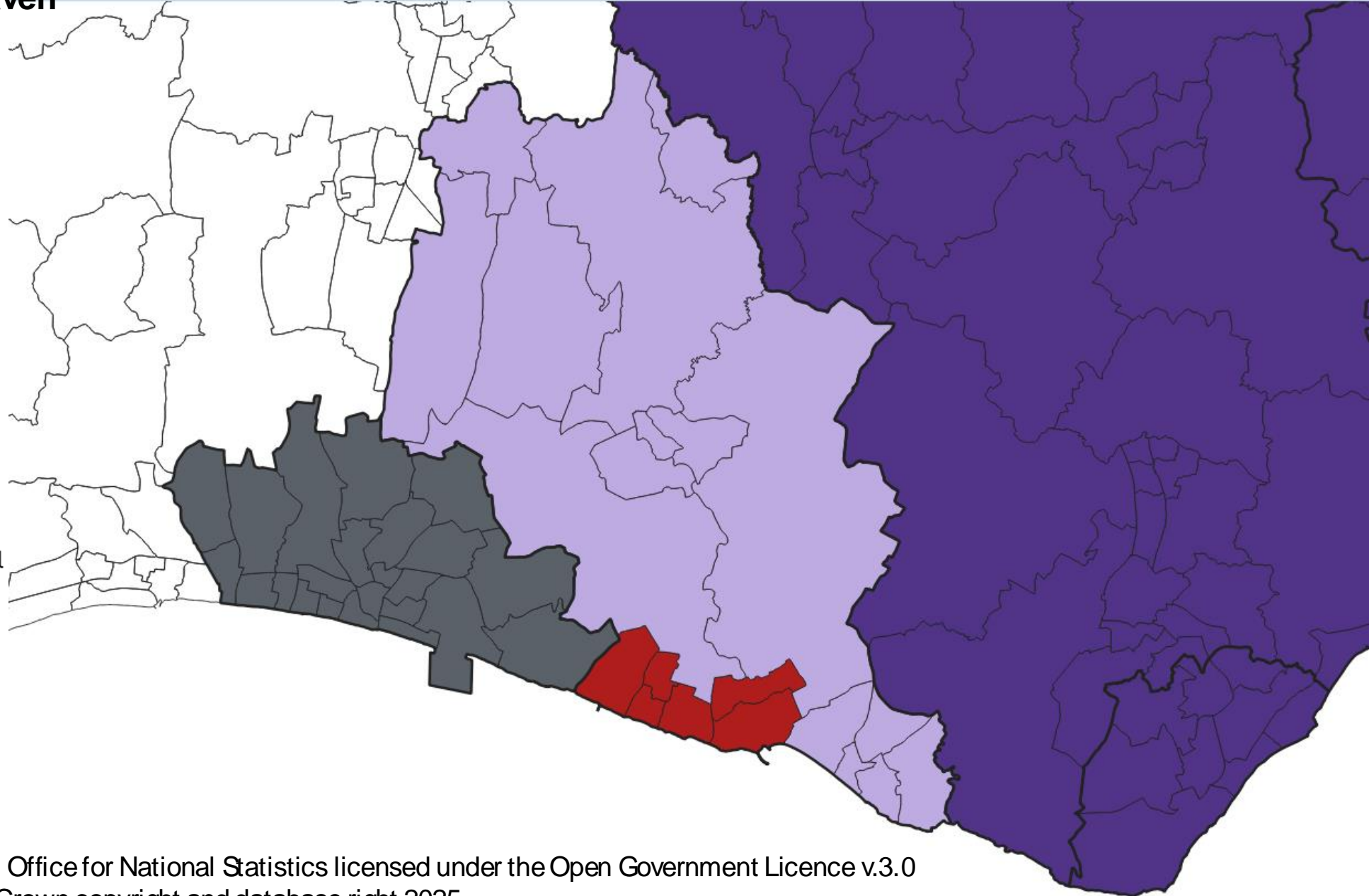
Rest of East Sussex



Brighton & Hove



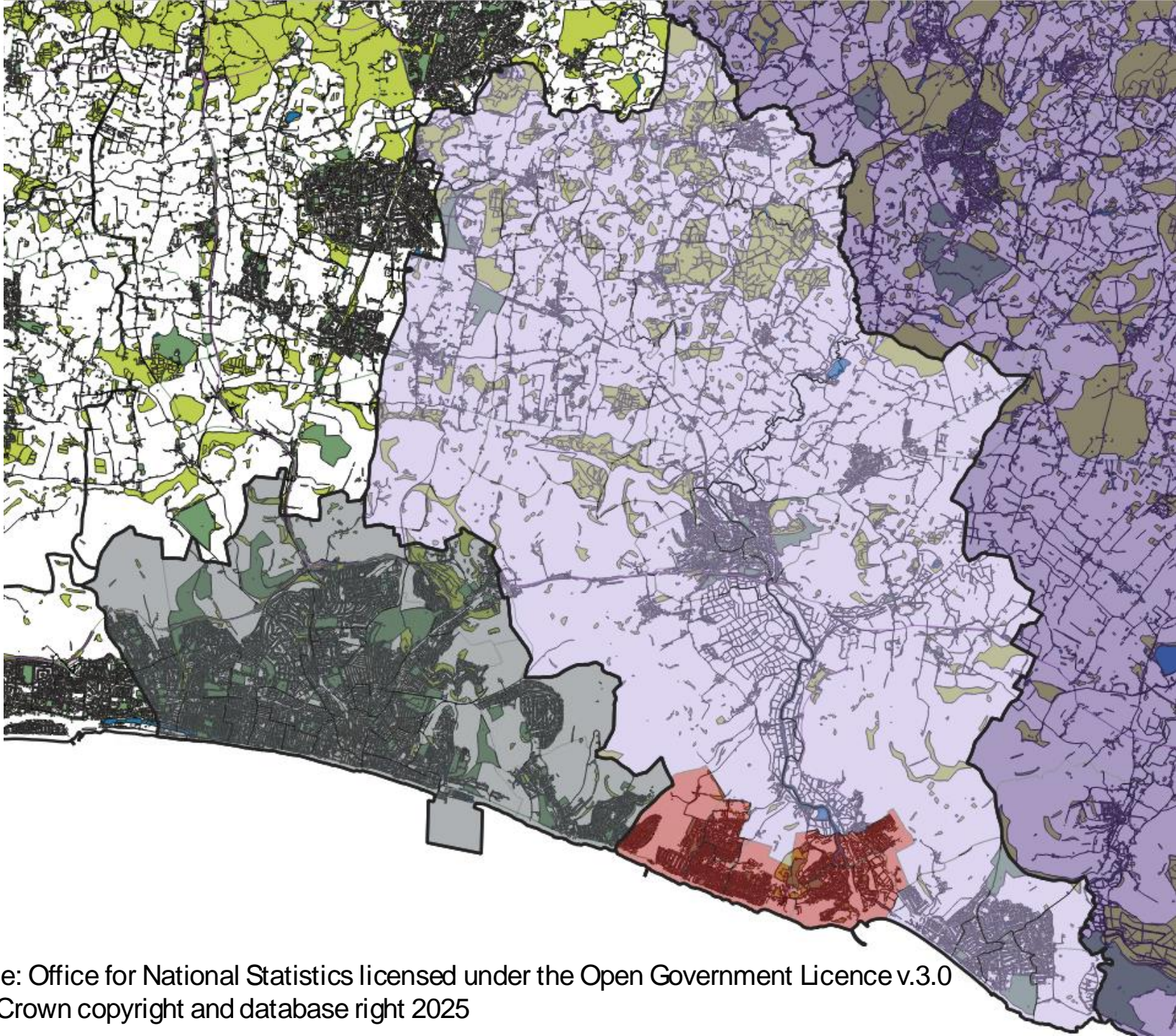
Area covered by proposal



Option 2 – East Saltdean,
Telscombe, Peacehaven and
Newhaven

Key

-  Lewes District
-  Rest of East Sussex
-  Brighton & Hove
-  Area covered by proposal



Option 2 – East Saltdean,
Telscombe, Peacehaven and
Newhaven

Key



Lewes District



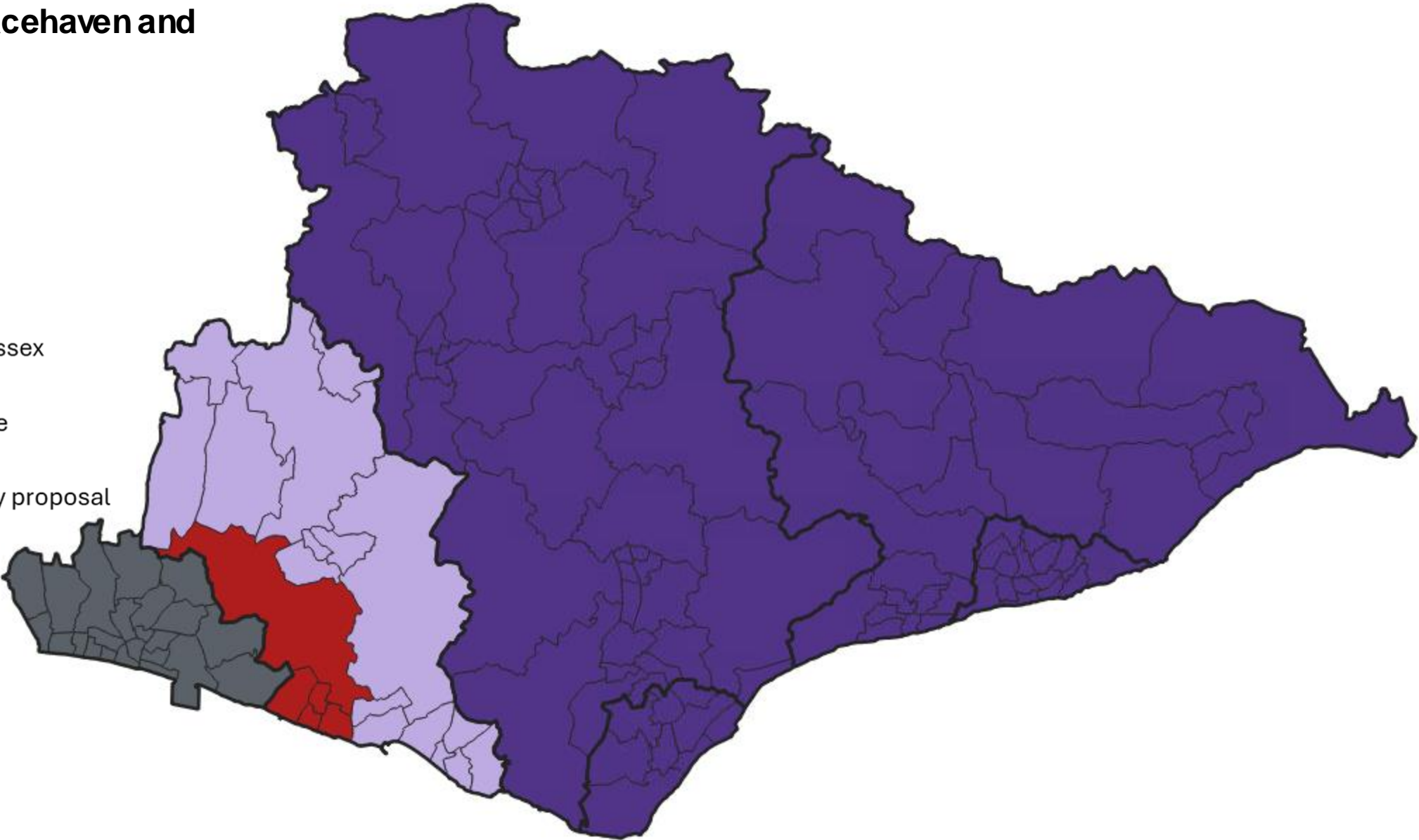
Rest of East Sussex



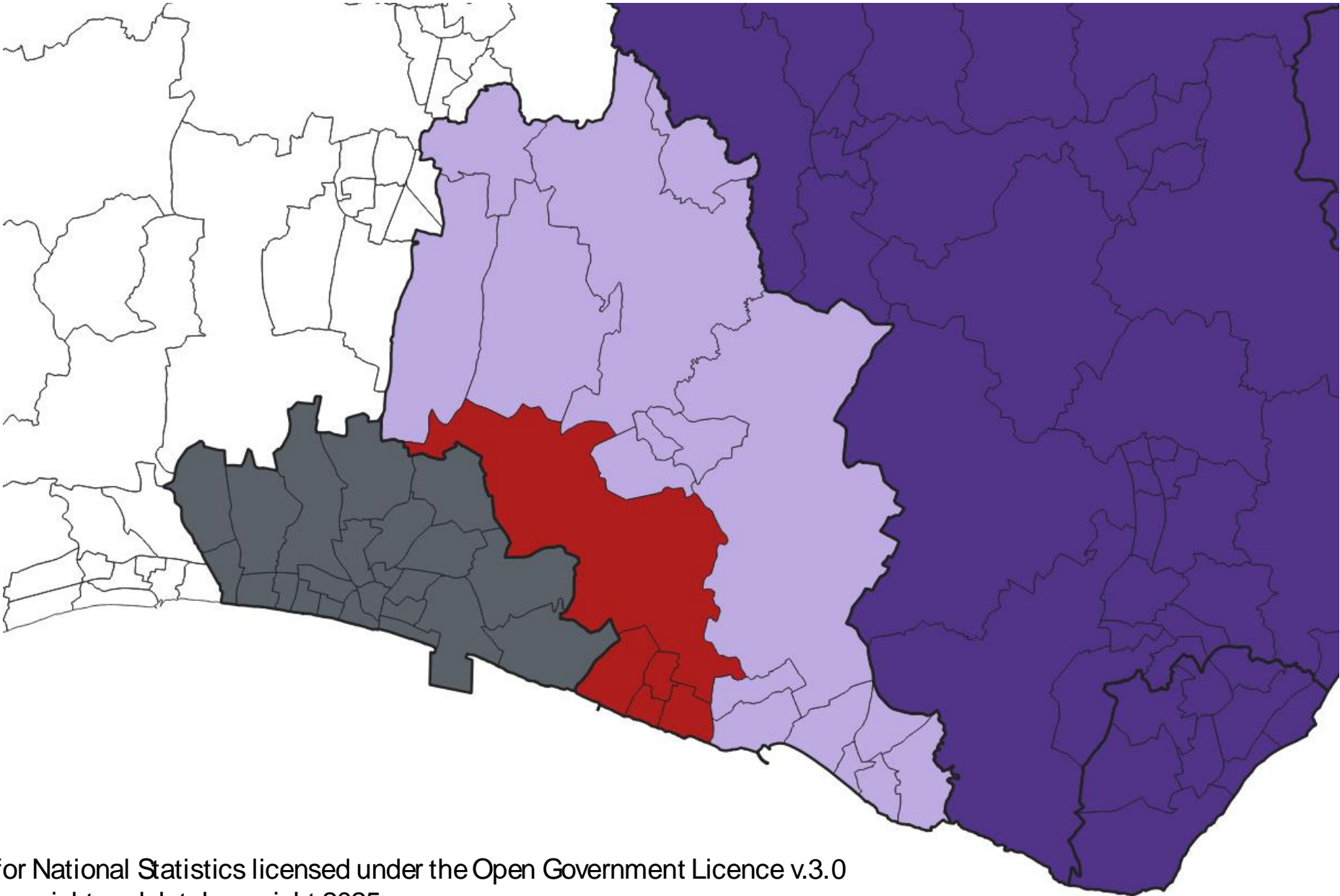
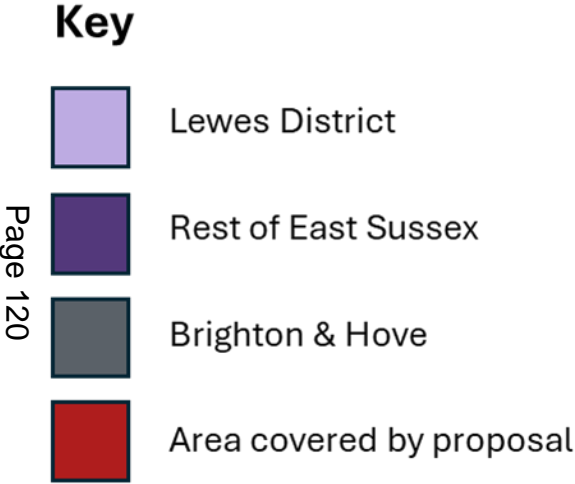
Brighton & Hove



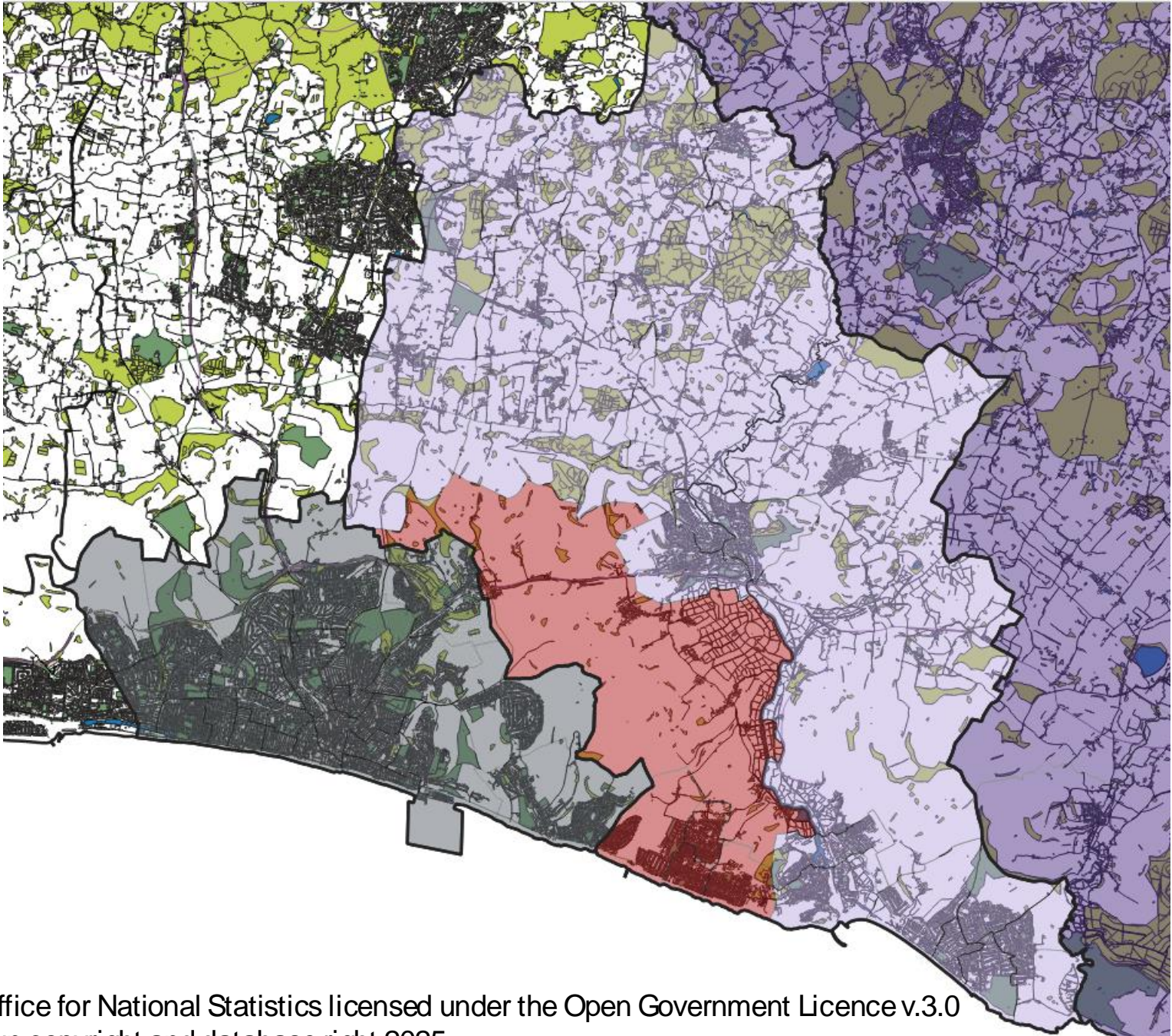
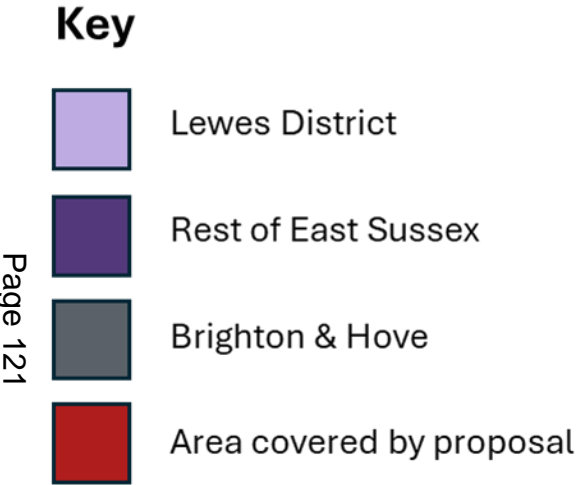
Area covered by proposal



Option 2 – East Saltdean,
Telscombe, Peacehaven and
Newhaven



Option 3 – East Saltdean,
Telscombe, Peacehaven and
Kingston



**Option 3 – East Saltdean,
Telscombe, Peacehaven and
Kingston**

Key

Lewes District

Rest of East Sussex

Brighton & Hove

Area covered by proposal

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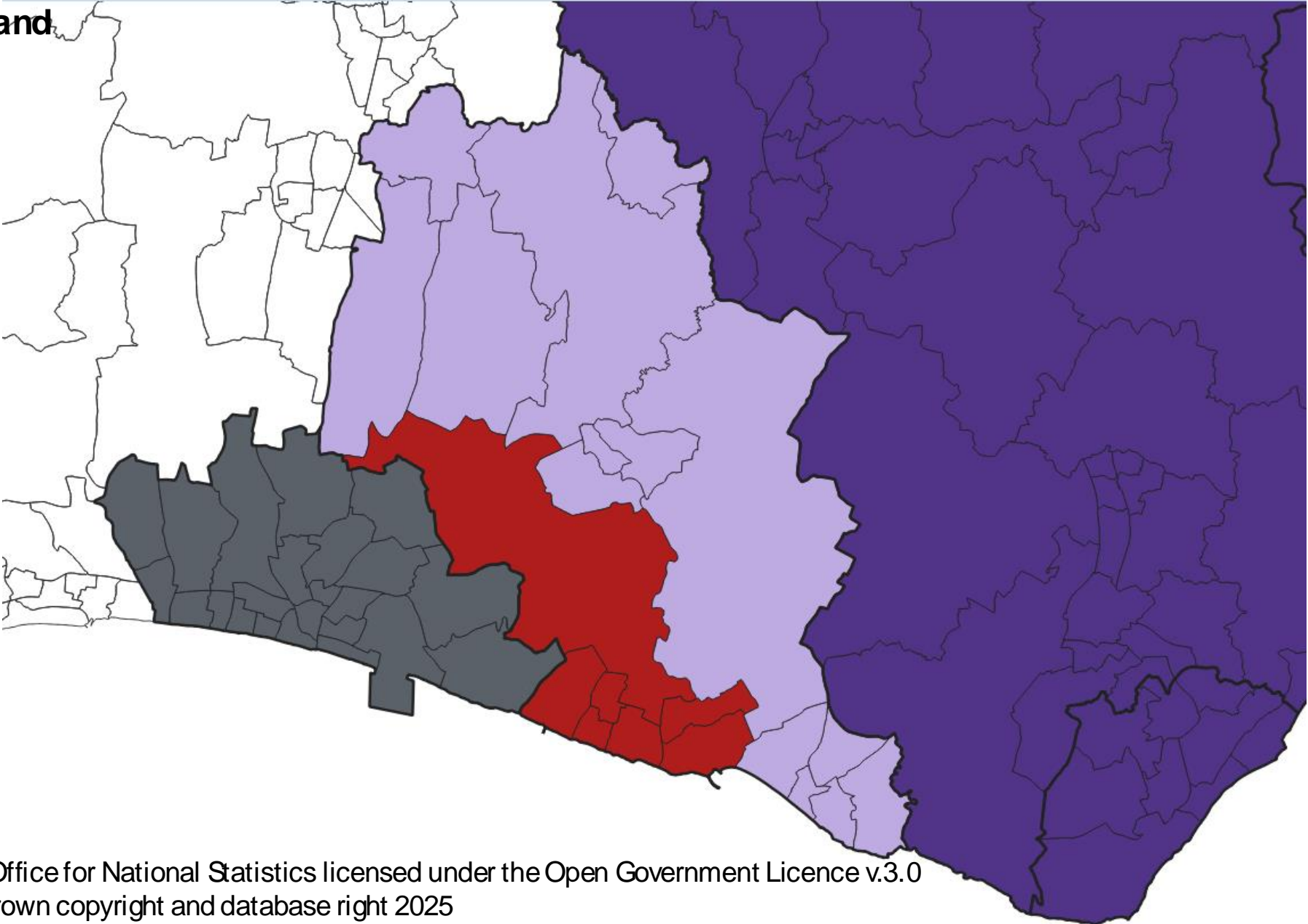
A map of East Sussex showing administrative boundaries. The map is divided into four main color-coded regions: Lewes District (light purple), Rest of East Sussex (dark purple), Brighton & Hove (dark grey), and the Area covered by proposal (red). The red area is located in the south-west of the map, adjacent to Brighton & Hove and the Lewes District. The map also shows numerous smaller, uncolored administrative boundaries within the larger regions.

Boundary Map Source: Office for National Statistics licensed under the Open Government Licence v.3.0
Contains OSdata© Crown copyright and database right 2025

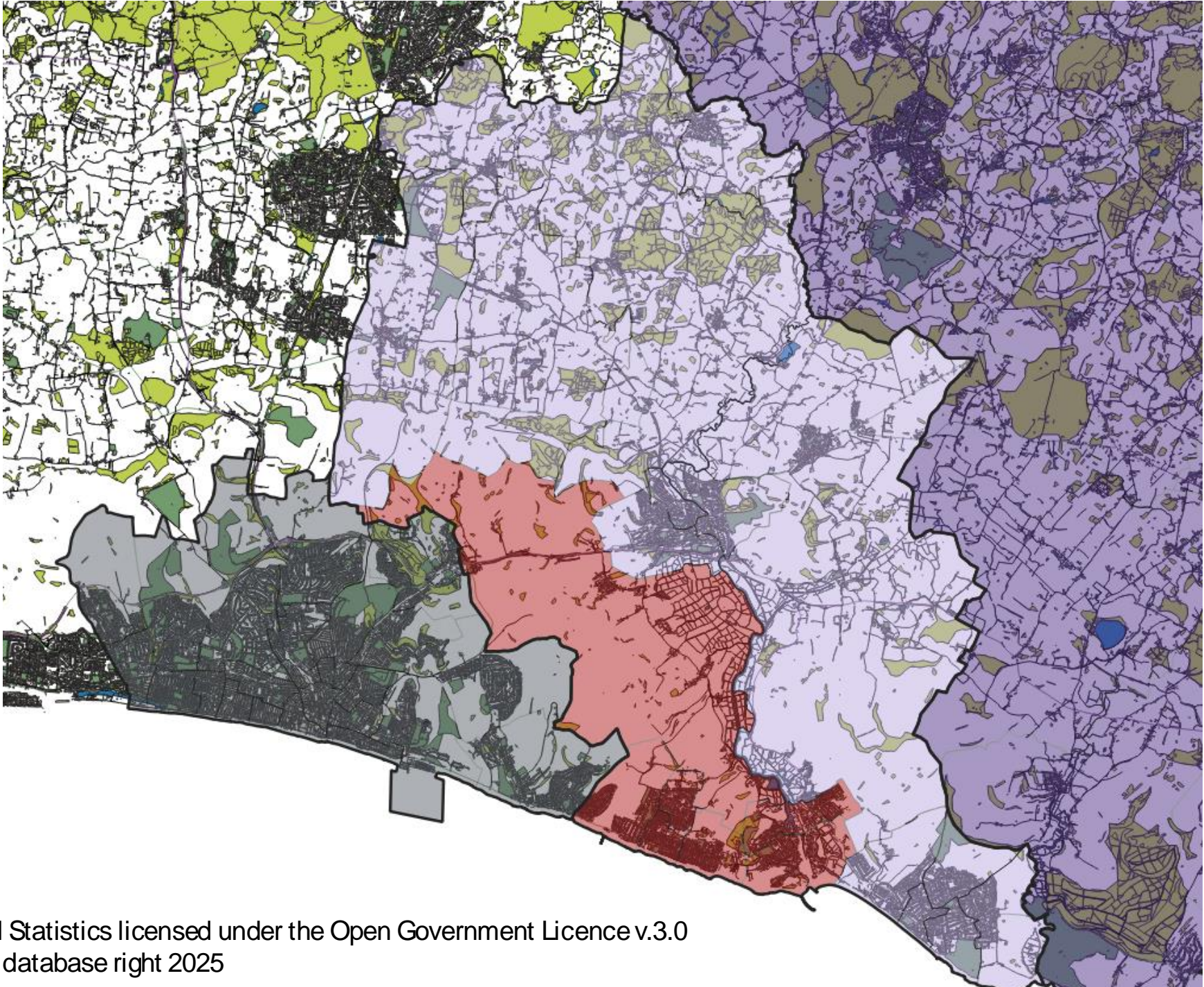
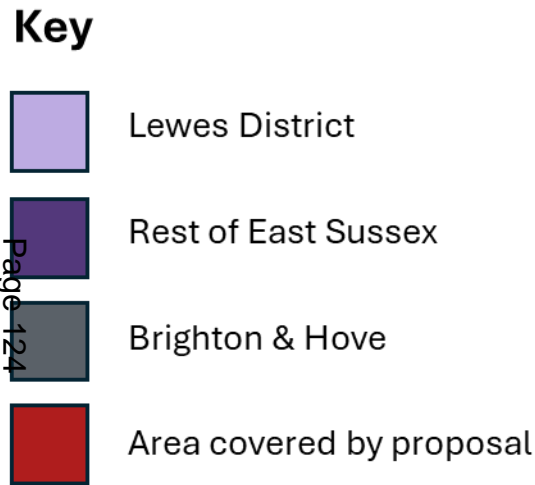
**Option 3 – East Saltdean,
Telscombe, Peacehaven and
Kingston**

Key

-  Lewes District
-  Rest of East Sussex
-  Brighton & Hove
-  Area covered by proposal



Option 4 – East Saltdean,
Telscombe, Peacehaven,
Newhaven and Kingston





Option 4 – East Saltdean,
Telscombe, Peacehaven,
Newhaven and Kingston

01

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East Sussex Insights pack

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Introduction

The purpose of this report is to provide an analysis of the population characteristics across East Sussex, with a focus on local authority level insights that inform service planning, policy development, and transformation in the context of local government reorganisation.

The findings are designed to inform strategic planning, policy development, and service transformation as East Sussex County Council explores a transition to a single-tier unitary authority.

Ageing Population

- East Sussex has one of the oldest populations in England, with 26.5% aged 65+ and 1 in 20 residents over 85.
- Rother leads with 32.5% aged 65+, while Hastings has the youngest demographic profile.

Housing and Temporary Accommodation

- Over 1,100 households are in temporary accommodation across the county with Eastbourne and Hastings under acute pressure.
- Housing affordability and quality remain persistent challenges.

Health and Social Care Demand

- High levels of frailty, disability (20.3%), and mental health needs.
- Adult social care demand is significant, with 10,195 people in receipt of long-term support (2024).

Transport and Access

- Rural isolation and high car dependency (e.g., 88% car ownership in Wealden) indicates limited access to services.

Economic Disparities

- GVA per hour varies widely from £31.40 in Hastings to £33.90 in Wealden.
- Highlights the need for place-based economic strategies.

Diversity and Inclusion

- While the county is predominantly White British (88.3%), diversity is increasing among younger populations, especially in Eastbourne.
- Hastings has the highest proportion of LGB+ residents (4.6%).

Strategic Implications for LGR

1. Demographic and Geographic Complexity

- East Sussex has a significantly older population, with high concentrations of residents aged 65 and over, and 85 and over.
- Rural geography and economic disparities are likely to increase the cost and complexity of delivering services across the county.



Population needs vary widely, from ageing and isolated communities in Rother and Wealden to younger, more diverse, and deprived populations in Hastings and Eastbourne.

A future governance model must integrate services like housing, social care, and transport while remaining responsive to local differences.



- Financial viability varies across districts and boroughs. Wealden maintains strong reserves, while Hastings and Eastbourne face significant financial pressures.
- A unitary authority must manage these disparities transparently to ensure fair resource distribution and avoid perceptions of inequity.

4. Trade-Offs in a Constrained Budget Environment

- Budget constraints will likely force difficult decisions, especially around discretionary services.
- Non-statutory services such as leisure, culture, green spaces, and community assets are often the first to face cuts, despite their role in prevention and wellbeing.
- Reducing these services could lead to long-term costs, particularly for vulnerable populations.



5. Preserving Local Identity and Engagement

- Strong local identities and civic participation are deeply rooted in districts such as Lewes and Wealden.
- A larger governance structure risks diluting this engagement unless mechanisms are built in to preserve local voice and accountability.



'ruitment challenge'



'gagement deficit'



Council Demographic Insights

East Sussex County Council



Demography



Older population:
26.5% aged 65+ (vs.
18.7% in England).
1 in 20 residents are
over 85



Mixed place:
7 years variation in life
expectancy between most
and least deprived areas and
ESCC is largest employer



Infrastructure is limited
as access to town centres
within 30 minutes is not
possible for 24% of
residents

Service Delivery Challenges



Adult Social Care:
High service demand (5,329
requests per 100,000); carers
report strong access to
information (71.8%)



Health Needs:
20.3% of residents identify as
disabled plus elevated frailty
and mental health challenges
in parts of the county



Education & Children's
Services: Below national
average attainment at Key
Stages 2 and 4; rising
complexity in SEND provision

Opportunities



Enhance engagement:
A single unitary model
means engagement
county-wide with more
residents



Joined up prevention:
Creating holistic
pathways for residents to
improve preventative
work at scale



Whole system approach to
housing and social care:
Opportunity to create a
single aligned strategy to
support residents in most
need

Challenges



Increasing complexity
of demands amongst
both adult and children's
services requiring
multidisciplinary
responses



Recruitment difficulties:
growing difficulties in
recruiting and retaining
talent across adult social
care, children's services,
and education



Engaging residents can
reduce trust in decision-
making, and make it more
difficult to co-design
services or implement
reforms

Eastbourne Borough Council

Demography



Diverse population:
28% of primary
pupils from ethnic
minority
backgrounds



Aging population:
leading to an expected
6.8% decline in working
age residents by 2037



Seasonal population
shifts: Eastbourne can
expect a 30% seasonal
increase as a result of
tourism

Service Delivery Challenges



Housing challenges:
359 households in
temporary
accommodation



Mental health
condition score of
92.5% (below England
average of 100)



Frailty score of
112.5 – symptomatic of
an aging population

Opportunities



Leverage diversity
to enhance inclusive
service design



Invest in youth
employment and
vocational training



Strengthen
partnerships with
education and health
providers

Challenges



Housing affordability
and quality remain
persistent challenges



Seasonal economy
creates service
delivery
fluctuations



Need for culturally
competent services
and engagement

Lewes District Council



Demography



Balanced age profile with pockets of affluence and deprivation with a mix of urban and rural communities



Environmentally conscious population: with strong civic engagement and active voluntary and community sector



Highest rate of frailty in county (121.2)

Service Delivery Challenges



Financially solvent according to general fund reserves of 2023 unaudited accounts



Planning appeals: 36.6% major planning applications overturned on appeal



Strong performance in environmental health and air quality

Opportunities



Position as a leader in green infrastructure and sustainability



Improve planning consistency through clear policy standardisation



Build on civic engagement for co-designed services

Challenges



Addressing inequalities between urban and rural areas



Balancing growth with environmental protection



Tourism, culture and place-based services vulnerable under a larger authority

Wealden District Council

Demography



75% of Wealden residents are homeowners, with low ethnic diversity (3.4%)



High car dependency as primary mode of transport (>5% using public transport for commuting)



Strong community identity in market towns and village but lack of affinity with Wealden as a local identity

Service Delivery Challenges



Best performing district in waste recycling (48.2%)



Rural isolation impacts access to services



Growth in both children and working age populations

Opportunities



Scale best practices in waste and environmental services



Expand digital and mobile service delivery models and invest in aging infrastructure and transport



Opportunity to explore devolved decision making to ward councillors

Challenges



Rurality increases cost and complexity of service delivery



Risk of digital exclusion among older residents when compounded with rural isolation



Need for tailored health and social care models

Rother District Council

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Hastings District Council

Demography

Service Delivery Challenges

Opportunities

Challenges

2.2 Themes from CEX and Leader meetings

Summary of themes (1)

Common Themes:

Strong Local Identities: Each area has a distinct sense of place—Hastings with its cultural vibrancy and deprivation challenges, Wealden with its rural patchwork and community cohesion, and Eastbourne with its tourism economy.

- **Fear of Losing Local Character:** Councillors expressed concern that a larger unitary authority could dilute local distinctiveness and responsiveness.

Common Themes:

- **Temporary Accommodation Crisis:** Hastings, Eastbourne, and Rother are under severe pressure, with TA consuming large portions of budgets.
- **Council-Led Housebuilding:** Lewes and Wealden are actively building or acquiring homes and fear this momentum could be lost in a larger structure.

Opportunities:

- A unitary model could enable strategic housing planning and shared expertise across districts.

Common Themes:

- **Need for Neighbourhood-Level Delivery:** There is strong consensus that services must remain locally accessible, especially in rural and coastal areas.
- **Community Infrastructure:** Councils like Wealden and Hastings highlighted the importance of community centres, local forums, and embedded officers.

Risks:

- Loss of local contact points (e.g. wardens, contact centres)
- Reduced visibility and influence of smaller or rural communities

Common Themes:

- **Divergent Financial Health:** Wealden has strong reserves; Hastings and Eastbourne face potential insolvency within 2–3 years.
- **Concerns Over Resource Redistribution:** Wealthier or more stable councils fear their funds will be used to plug deficits elsewhere.

Risks:

- “County takeover” narrative, especially in Wealden and Hastings
- Loss of control over locally generated developer contributions (e.g. NIMC CRU)

Summary of themes (2)

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Opportunities:

- Planning: Shared planning services could address recruitment challenges and delays.
- Waste: Already shared in some areas (e.g. Wealden, Bother, Hastings), seen as scalable.
- Housing + Social Care Integration: Seen as a major opportunity for better outcomes.

Risks:

- Loss of Non-Statutory Services: Leisure, play, culture, and green spaces are at risk of being deprioritised.
- Staff Morale and Retention: Concerns about TUPE, job losses, and cultural clashes.

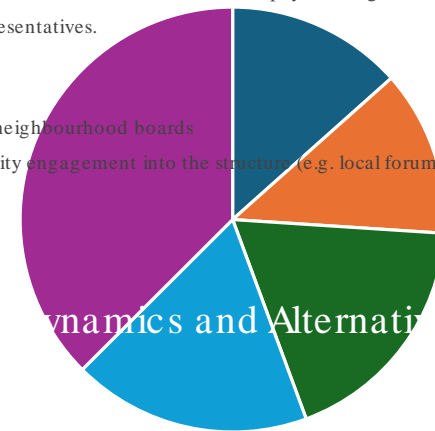
Common Themes:

- Low Public Awareness: Most residents don't understand LGR or its implications.
- Mistrust of County Council: Particularly strong in Hastings and Wealden, where "county takeover" fears are prominent.
- Need for Transparent, Inclusive Design: Councillors want to co-design the new authority, not be absorbed into it.

- Democratic Deficit: Fewer councillors could mean less access and weaker representation, especially in rural areas.
- Professionalisation of Councillors: Calls for better pay, training, and expectations to attract diverse, capable representatives.

Suggestions:

- Area committees or neighbourhood boards
- Embedding community engagement into the structure (e.g. local forums, participatory budgeting)



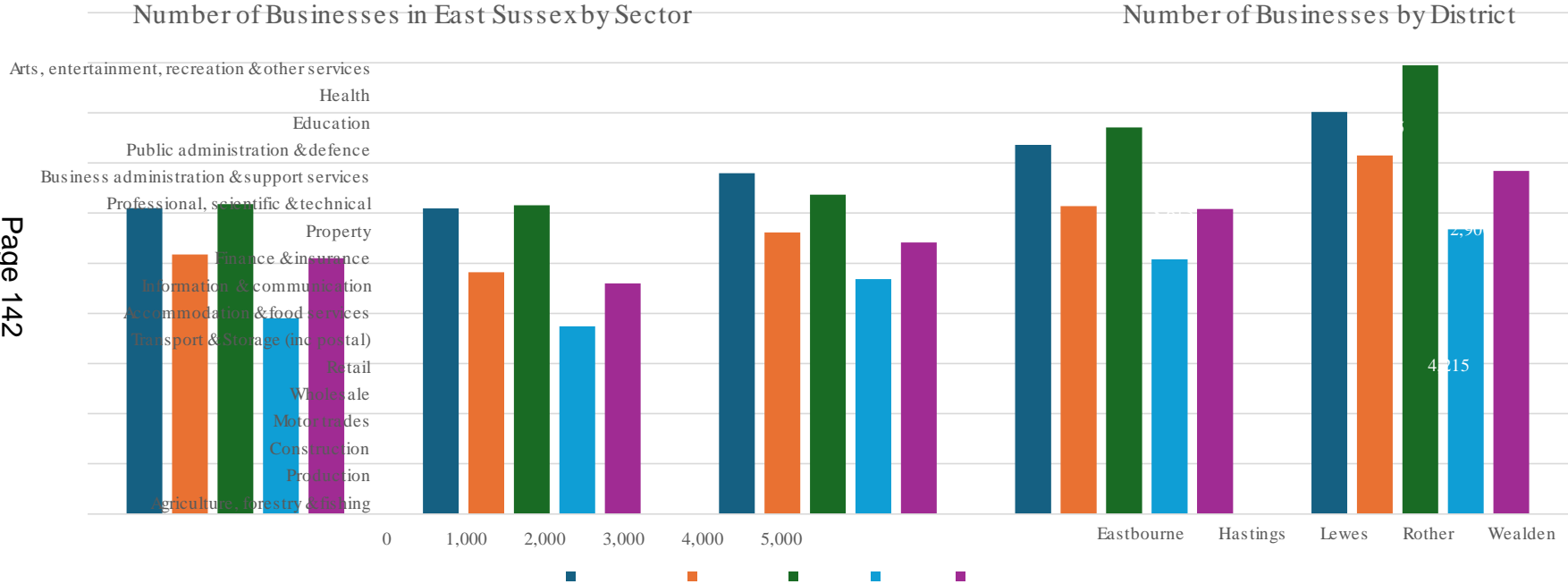
Common Themes:

- Tensions Around the East Sussex Model: Hastings and Wealden expressed interest in exploring alternatives (e.g. federated or coastal models).
- Perceived Predetermination: Some councillors felt the process was being driven by a pre-agreed agenda (e.g. "Lewis-County pact").

3 Appendices: Data Sources

The figures presented in this report are based on the most recent publicly available data, including mid-2023 population estimates and area measurements from the 2021 Census. While every effort has been made to ensure accuracy, these figures are subject to change as new data becomes available or as methodologies are updated by official statistical agencies.

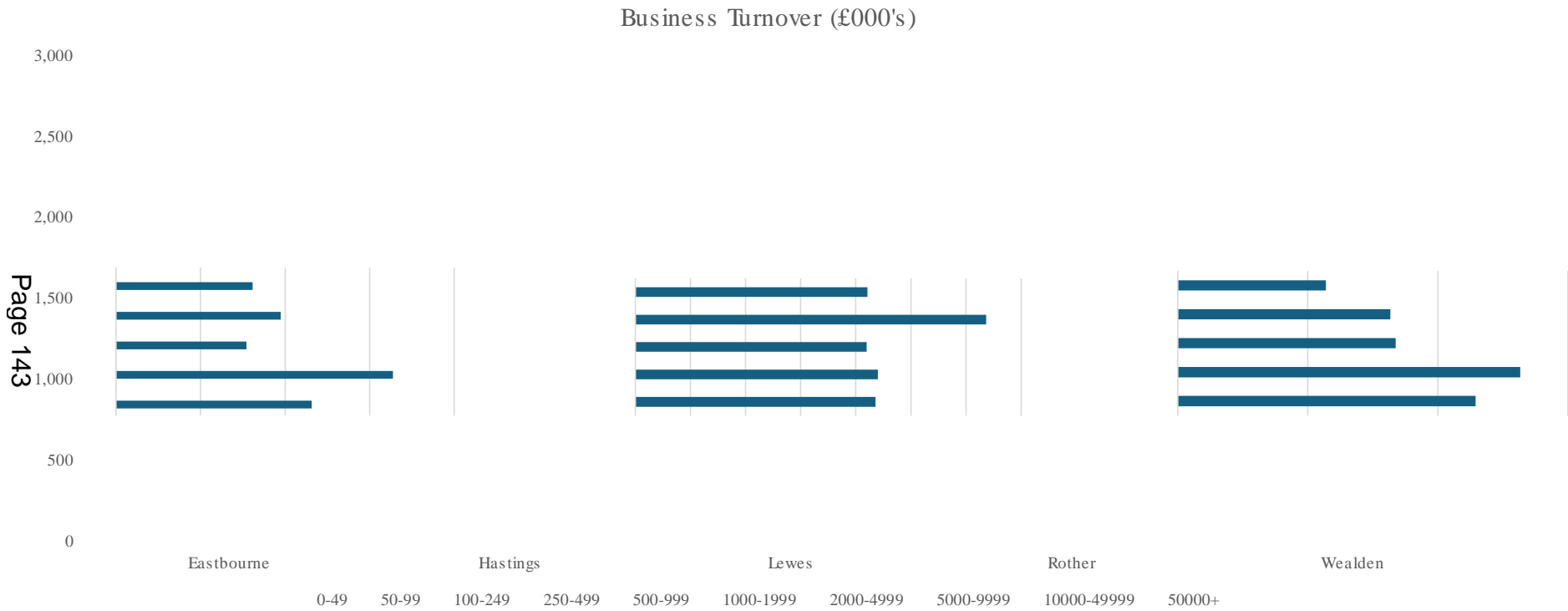
Businesses in East Sussex



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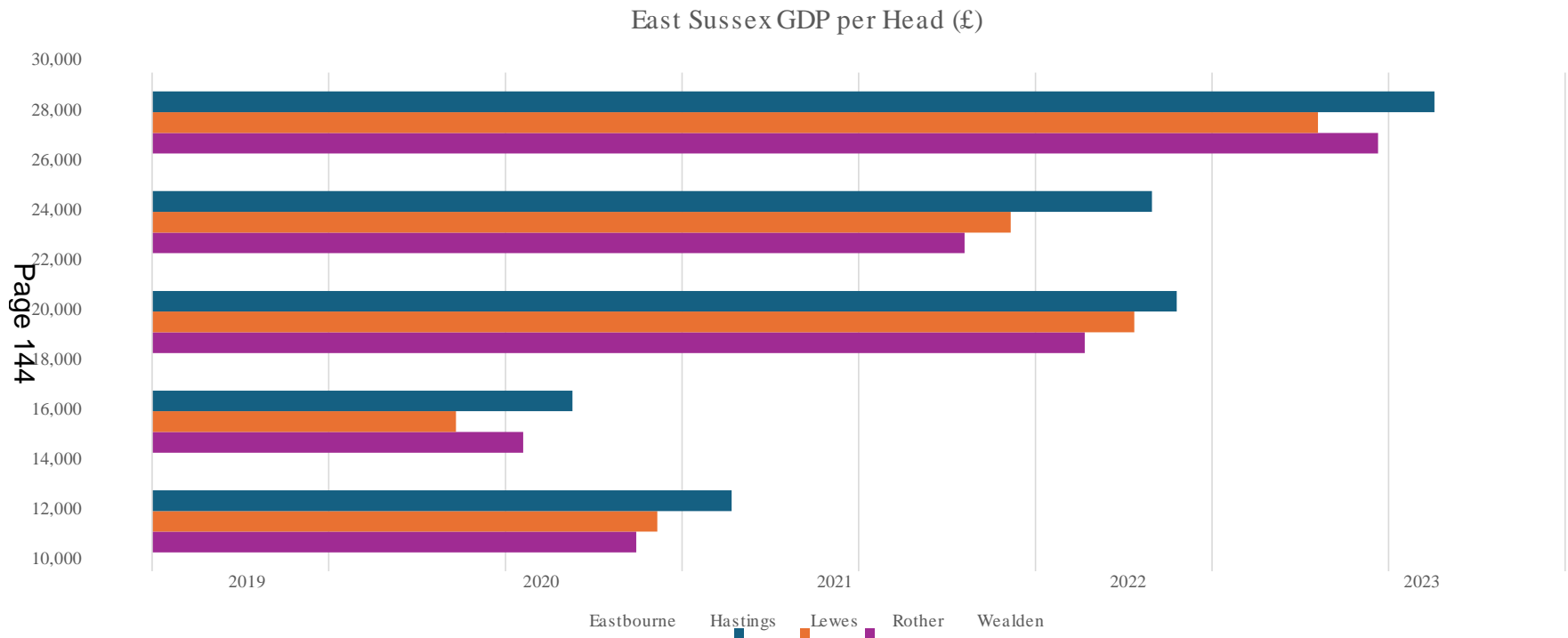
Source: [UKbusiness: activity, size and location - Office for National Statistics](#)

Businesses in East Sussex



Source: UKbusiness: activity, size and location - Office for National Statistics

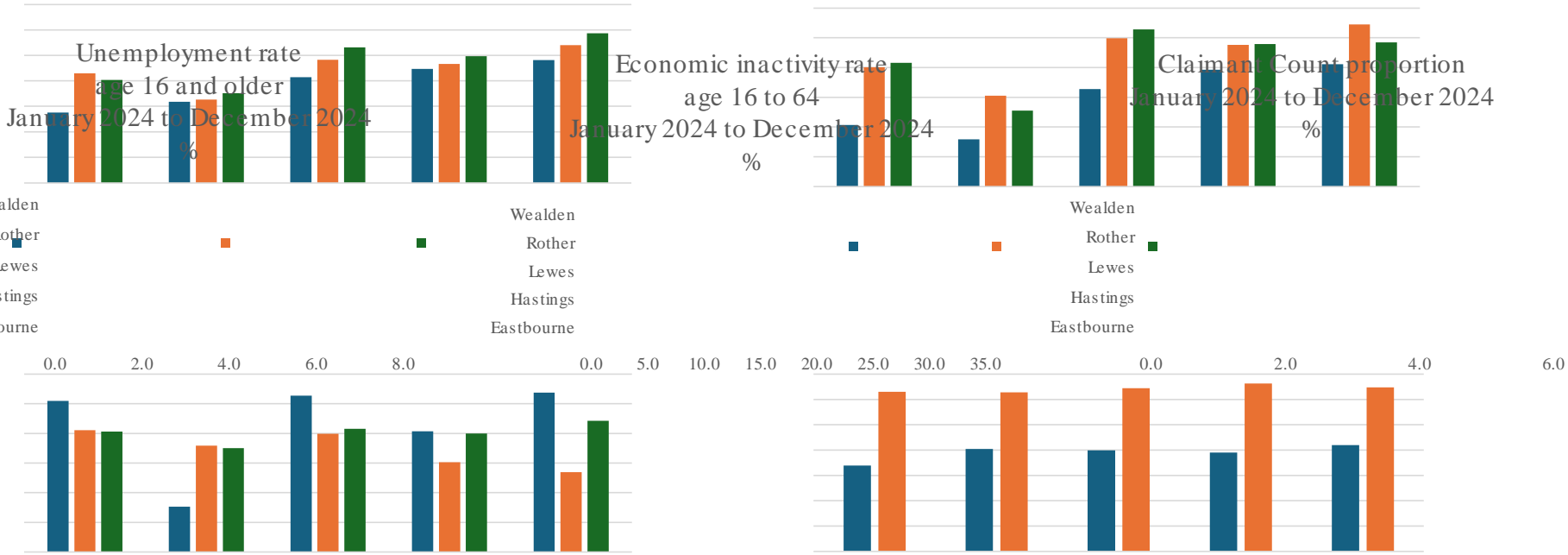
East Sussex GDP



Source: [Regional economic activity by gross domestic product, UK: 1998 to 2023](#)

Labour Market Indicators

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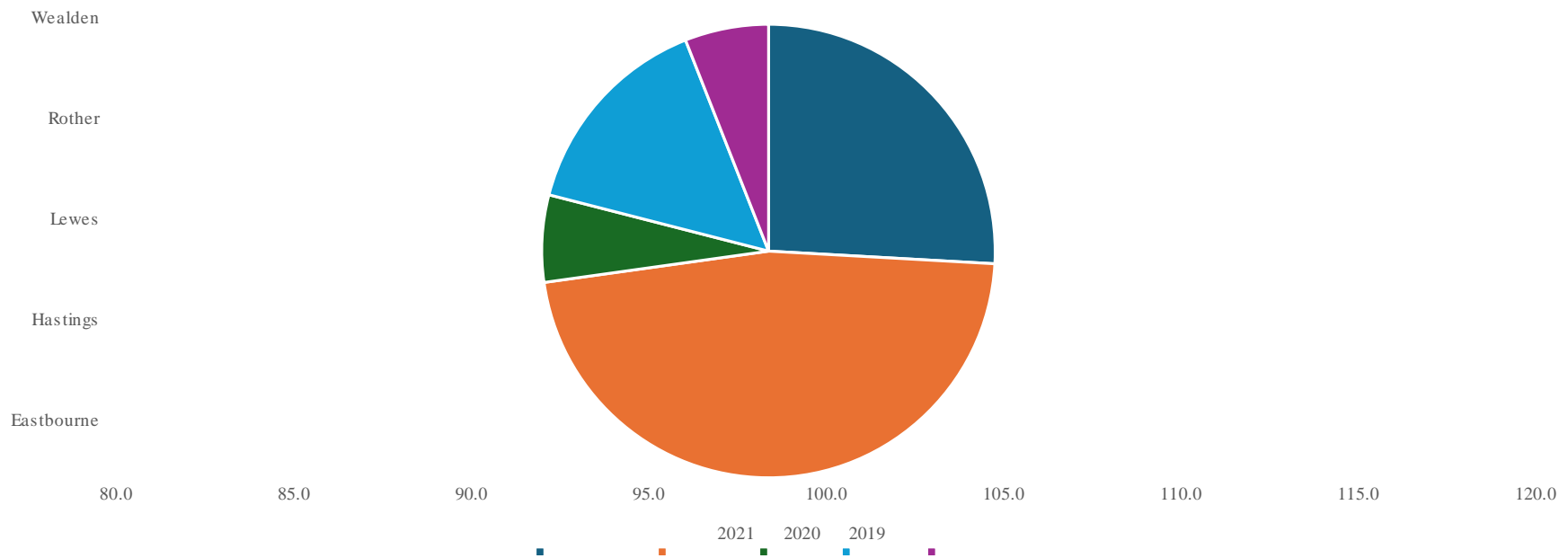


Source: [ONS, Employment and Labour Market](#)

Health Index Scores

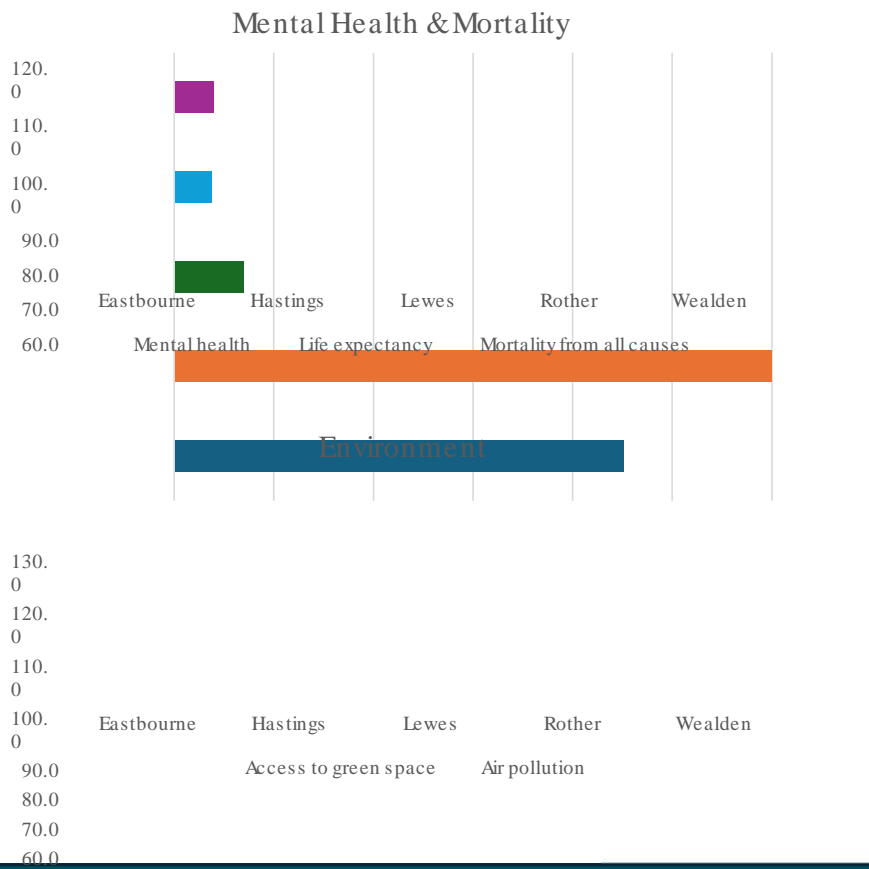
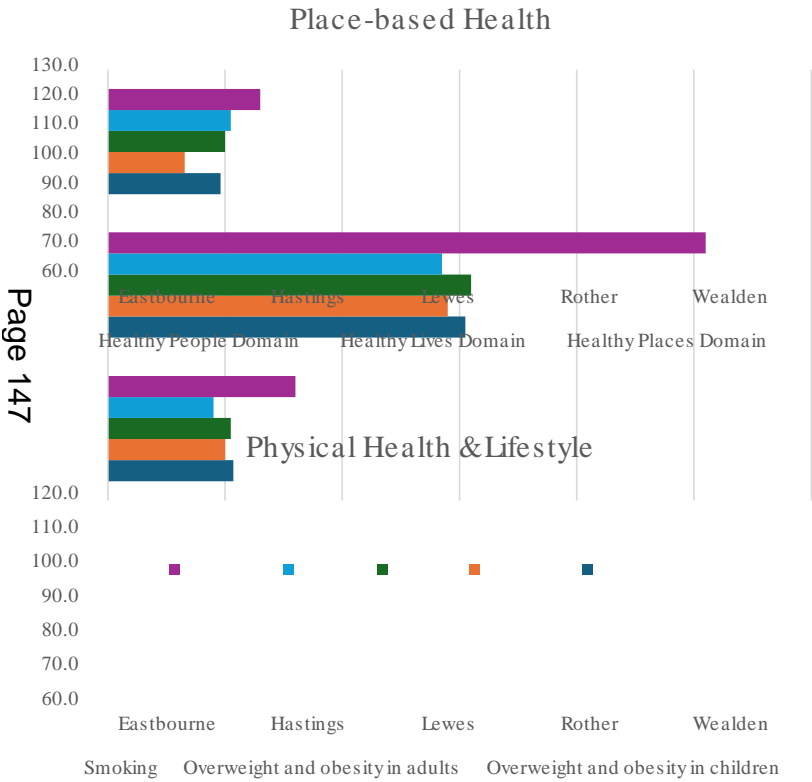
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Overall Health Index Scores



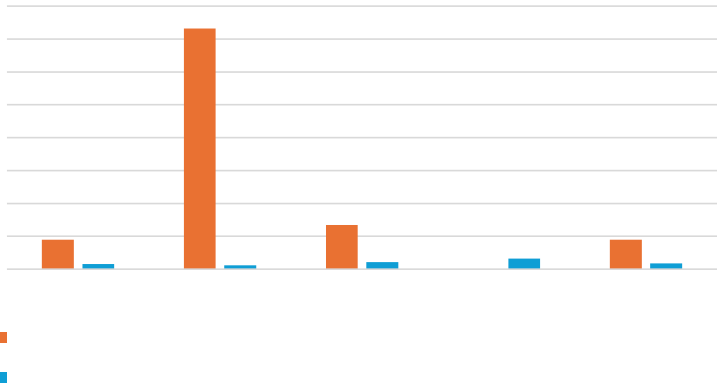
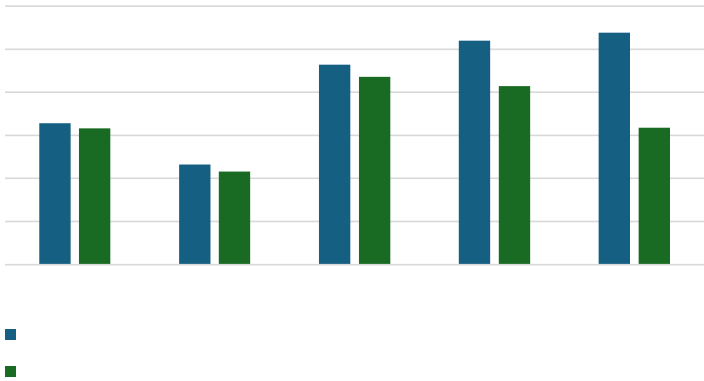
Source: [Health in England: 2015 to 2021](#)

Detailed Health Index Scores



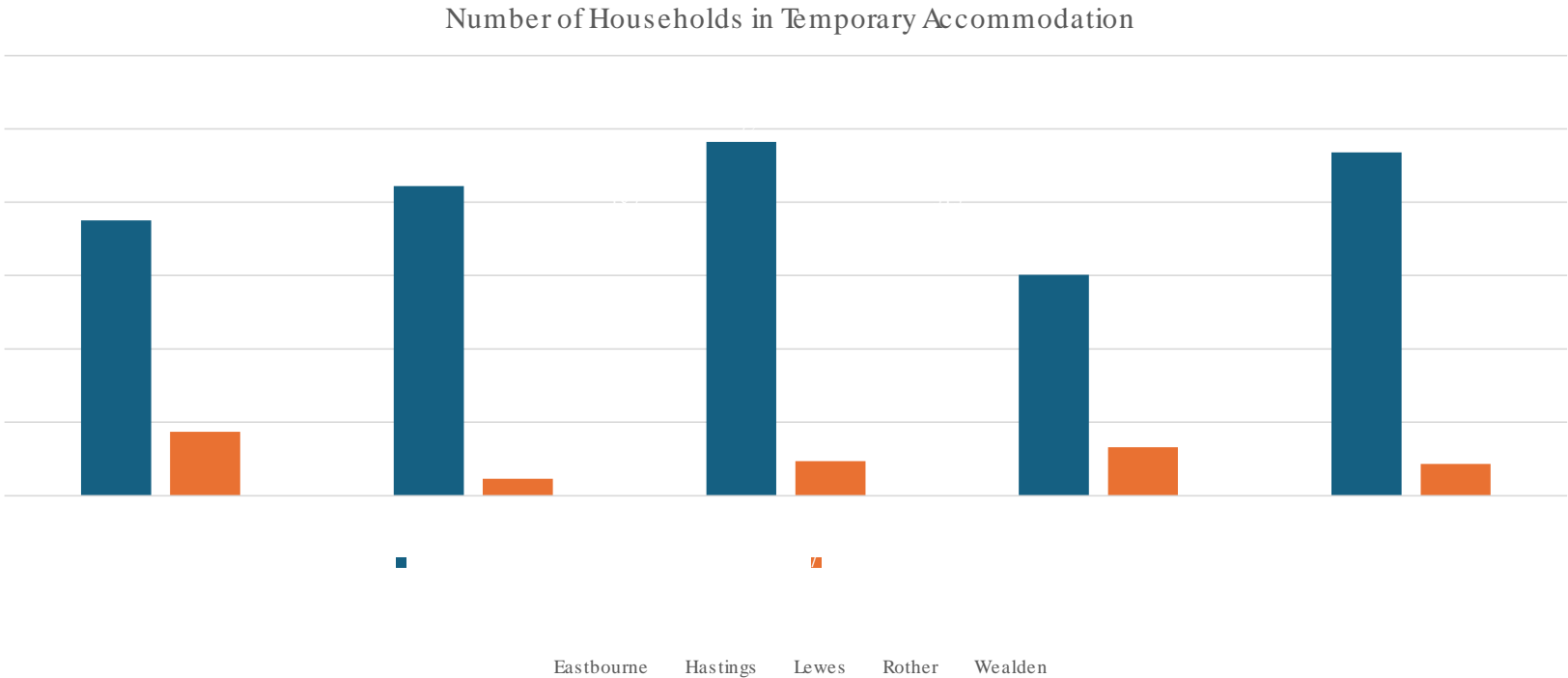
Source: [Health in England: 2015 to 2021](#)

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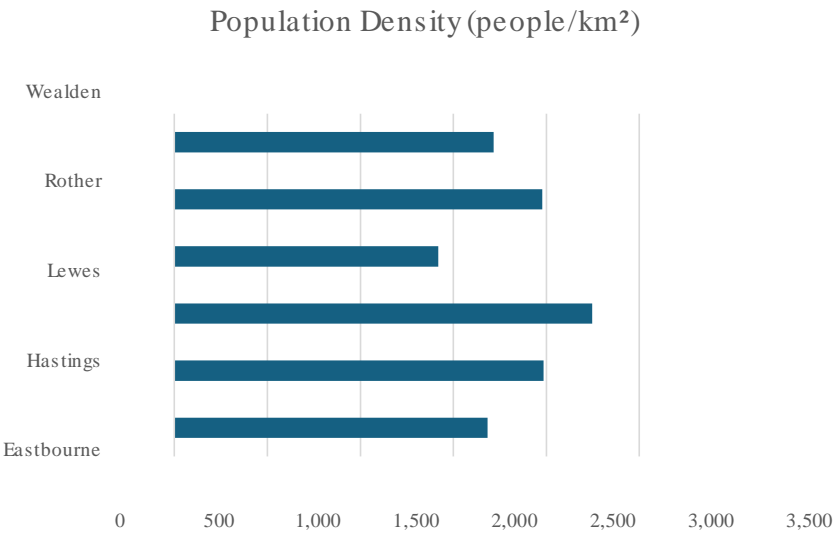
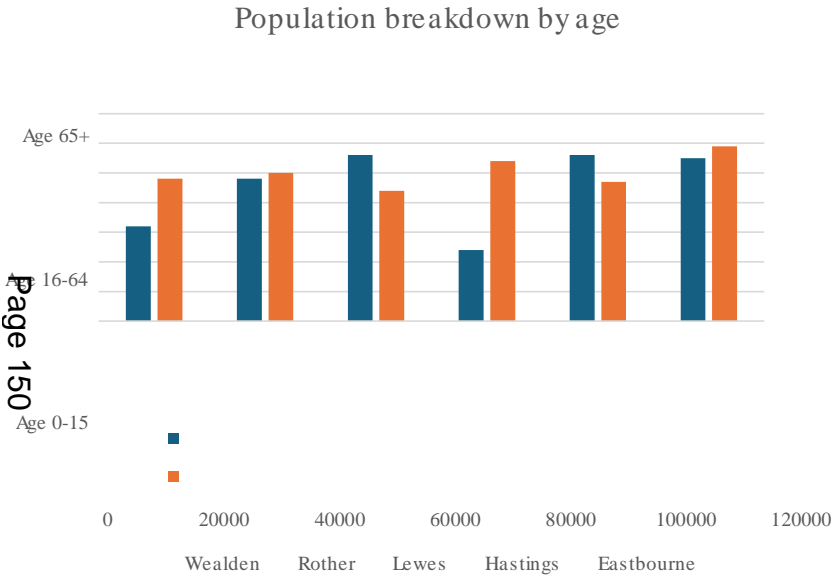
Temporary Accommodation

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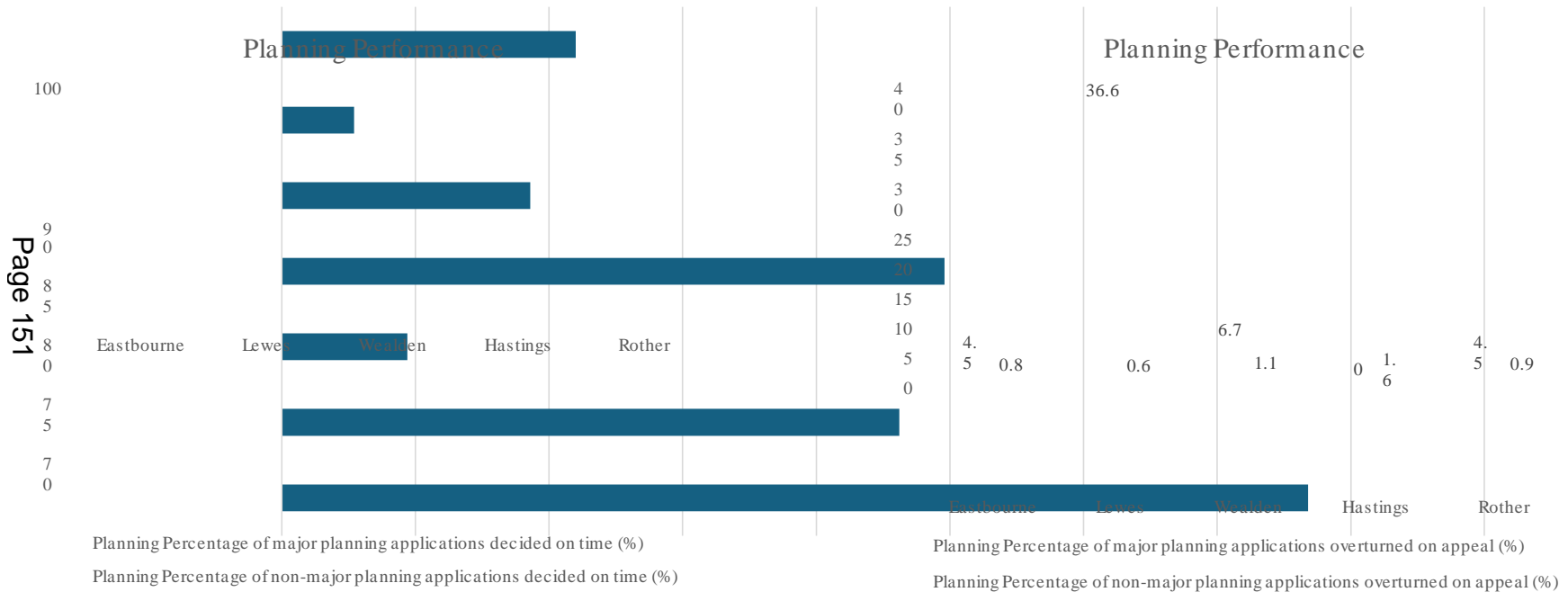
Source: Statutory homelessness in England: January to March 2025

Population Profile

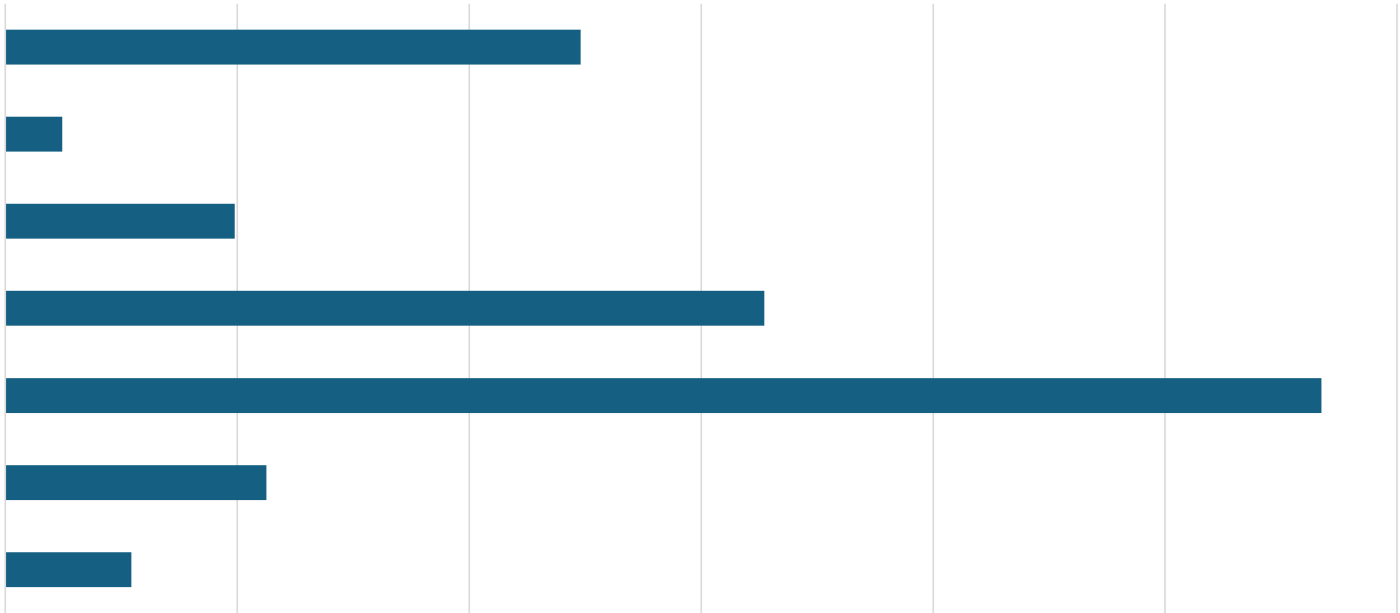


Source: Population profiles for local authorities in England

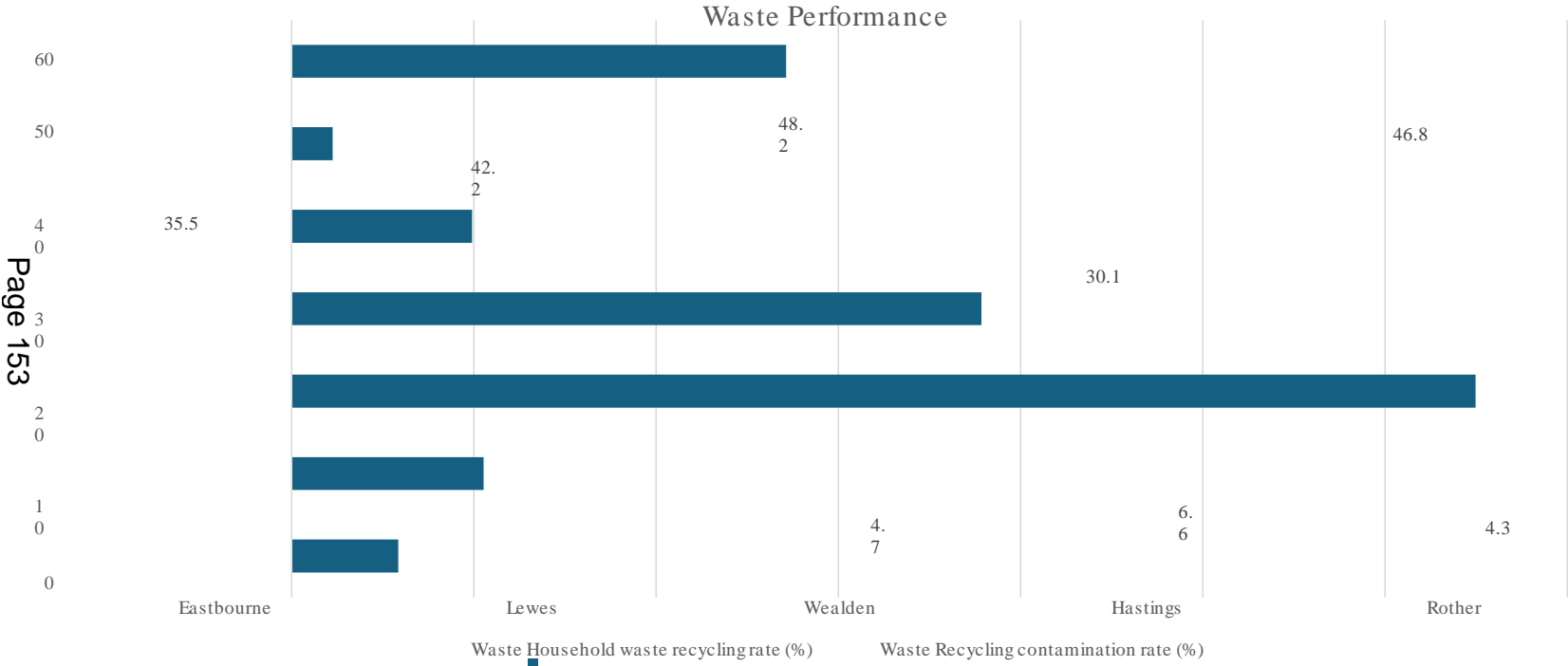
District Performance: Planning



Source: <https://oflog.data.gov.uk/>



District Performance: Waste



Source: <https://oflog.data.gov.uk/>

District Performance: Council Tax & NNDR



Source: <https://oflog.data.gov.uk/>

Your councils are changing

Share your views on Local Government Reorganisation proposals at:

eastsussexcouncils.org

Council tax revenue per dwelling 2023-24

District	Revenue (£)
England median (Districts)	£1,716.89
Rother	£1,978.20
Hastings	£1,418.95
Wealden	£1,245.30
Lewes	£1,295.57
Eastbourne	£1,644.68

Logos for Eastbourne Borough Council, East Sussex County Council, Hastings Borough Council, Lewes District Council, and Rother District Council.

Council Spending Power

Debt servicing as percentage of core spending power 2023-24



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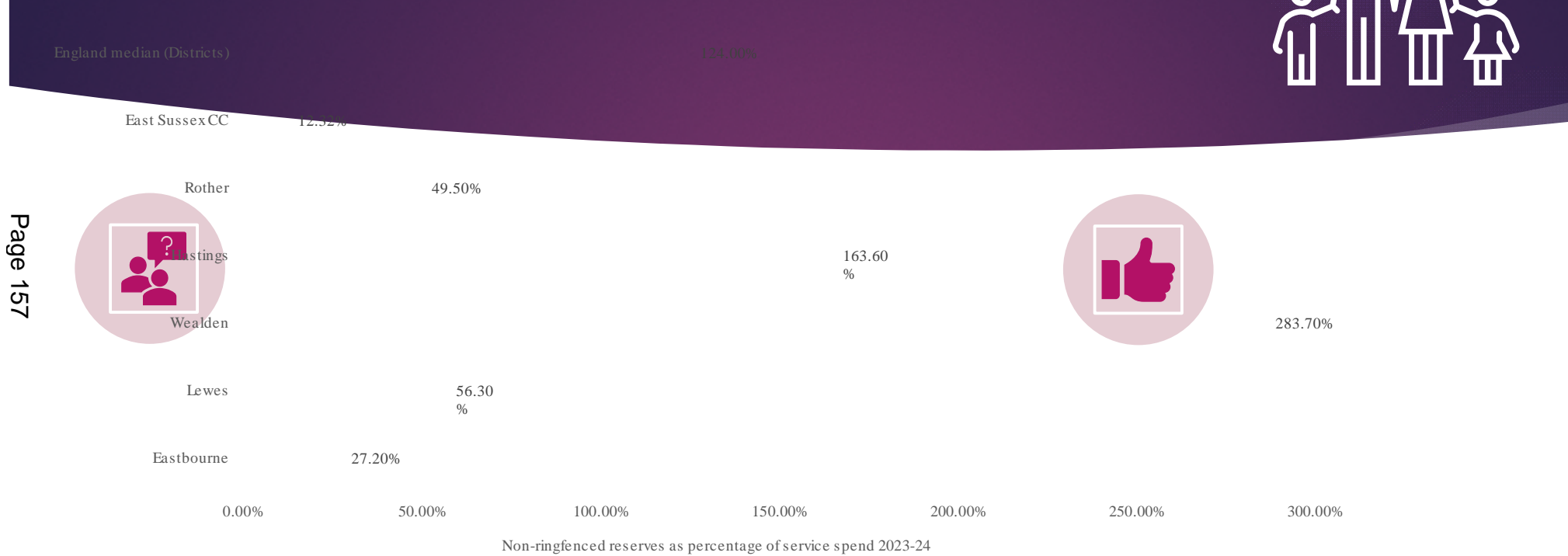


Source: <https://oflog.data.gov.uk/?>

Council Spending Power



Non-Ringfenced Reserves as Percentage of Service Spend



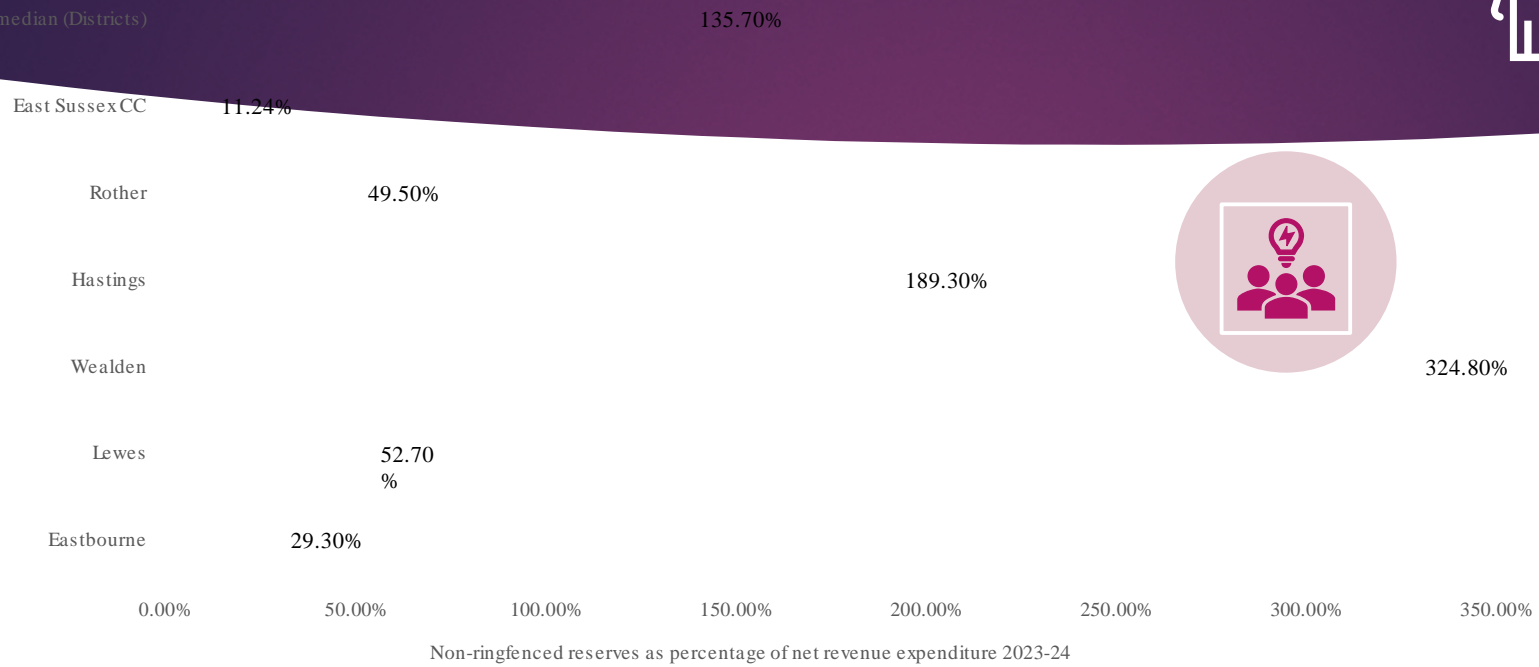
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Source: <https://oflog.data.gov.uk/?>

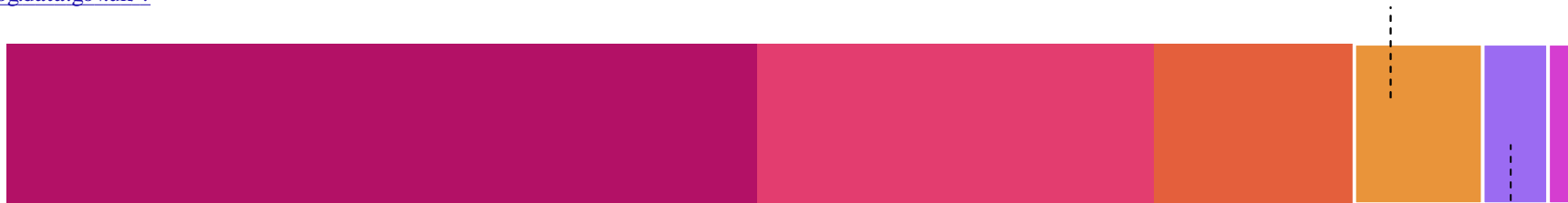


Council Spending Power

Non-Ringfenced Reserves as Percentage of Net Revenue Expenditure



Source: <https://oflog.data.gov.uk/?>





Local Government Reorganisation (LGR)

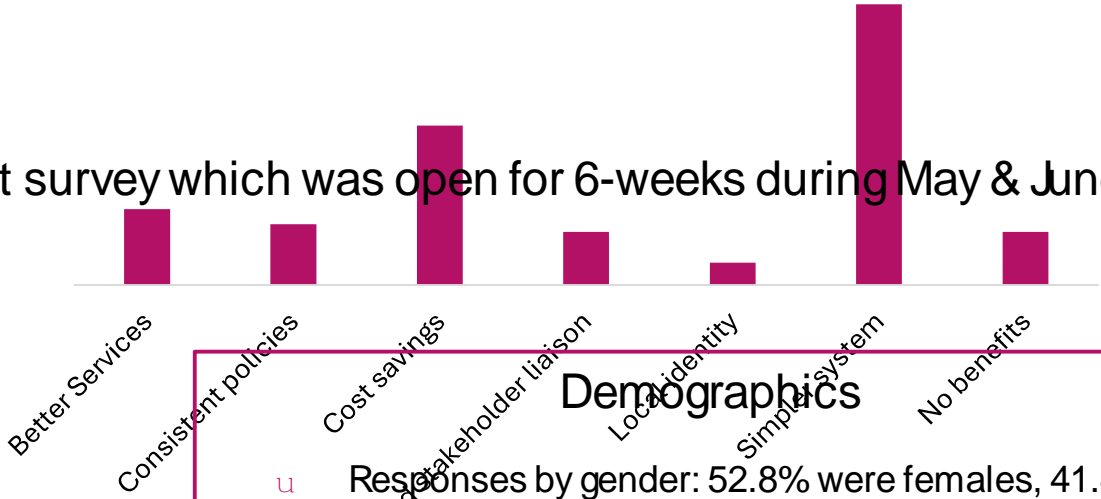


The Resident Survey

Residents were invited to complete the engagement survey which was open for 6-weeks during May & June 2025.

5,654 residents from across East Sussex responded This is about 1% of the East Sussex population (555,000).

Area	Responses received	Population of area (2023)	Proportion
Eastbourne	974	103,796	0.9%
Hastings	633	90,817	0.7%
Lewes	1,294	101,356	1.3%
Rother	1,055	94,862	1.1%
Wealden	1,585	164,653	1.0%
East Sussex	5,654	555,484	1.0%



Demographics

- u Responses by gender: 52.8% were females, 41.4% were male.
- u The majority of responses were from those aged 45-84 years old. We welcome the increase in responses from younger residents following dedicated promotion to younger audiences to improve proportionality.
- u 21.81% of respondents identified themselves as having an impairment or disability. The proportion of the East Sussex population that identify themselves as disabled is 20.3% (2021 Census).

The Resident Survey

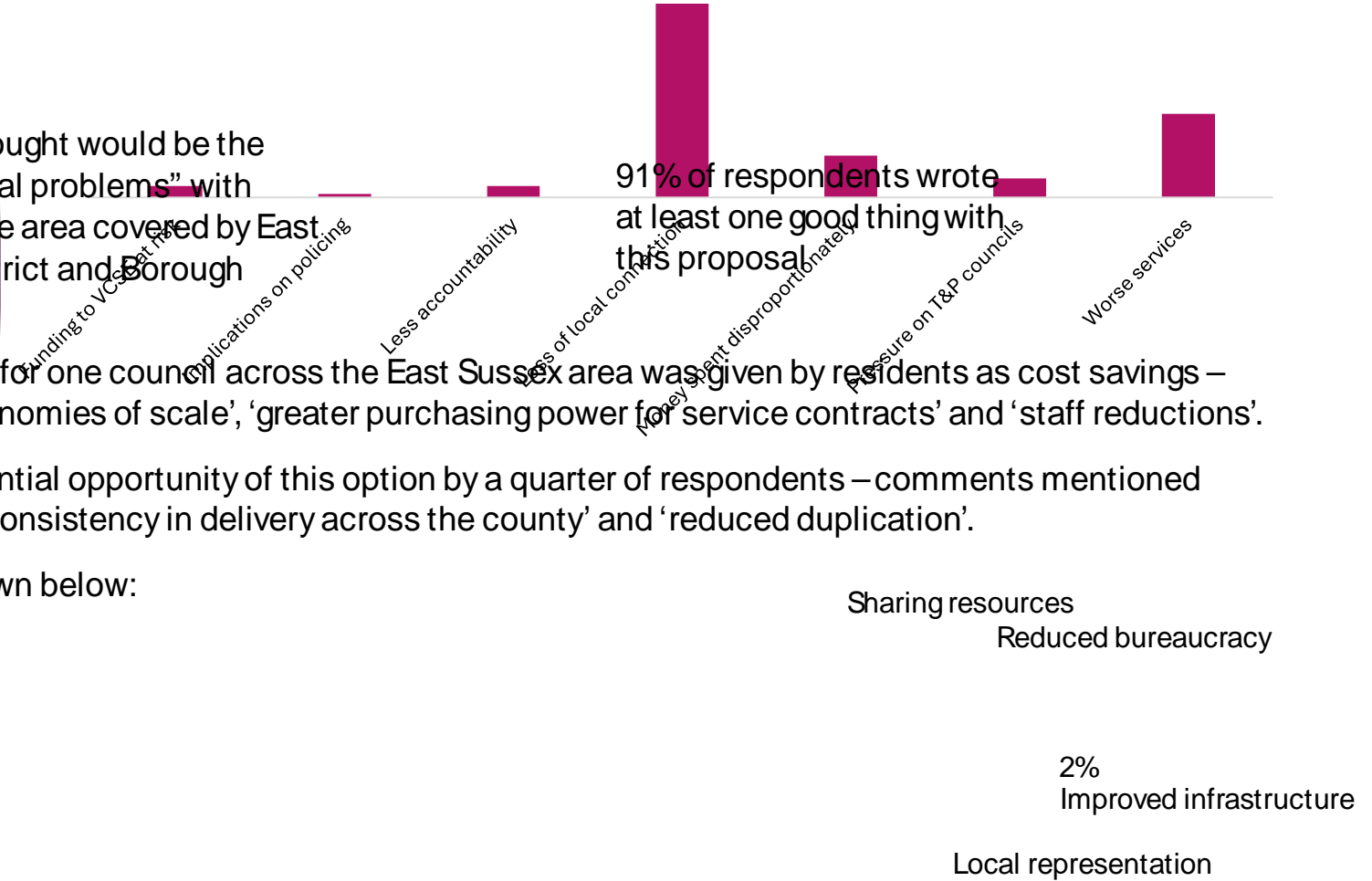


Respondents were asked what they thought would be the “good things” and some of the “potential problems” with having just one single council across the area covered by East Sussex County Council and all five District and Borough Councils

- u The most common opportunity with the proposal for one council across the East Sussex area was given by residents as cost savings – comments referred to savings made through ‘economies of scale’, ‘greater purchasing power for service contracts’ and ‘staff reductions’.
- u Access to services was also mentioned as a potential opportunity of this option by a quarter of respondents – comments mentioned ‘improved services’, ‘easier access to services’, ‘consistency in delivery across the county’ and ‘reduced duplication’.
- u A full summary of broad comment themes is shown below:

49% Cost savings

91% of respondents wrote at least one good thing with this proposal



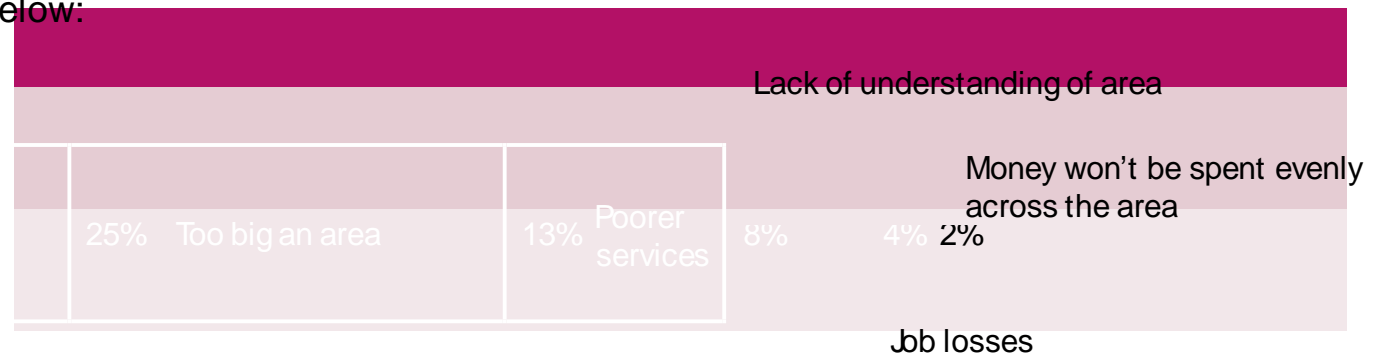
The Resident Survey



- There were 2,729 comments that thought the proposal for one council across the East Sussex area would result in reduced local representation – comments tended to focus on concern ‘our area would be forgotten’ by a single, county-wide council.
- These comments were similar to the 8% (468) of people who thought a new council wouldn’t ‘understand their area well enough’
- A quarter of responses (1,445) to this question were concerned with the fact they thought East Sussex was too big an area for a single unitary
- A full summary of broad comment themes is shown below:

48% Reduced local representation

97% of respondents listed a concern with the one East Sussex suggestion





The Resident Survey

- 988 (17.5%) people suggested an alternative geographic boundary from the proposal for one council across the East Sussex area.
- These have been categorised as shown in the chart:

The potential opportunities for these alternatives were given by residents as:

- The council would be closer to its residents (enhanced 'local voice')
- A council over a smaller area would be more responsive and accountable
- Services would improve if they were tailored to smaller geographies

There were concerns raised with these alternatives too:

- A council over a smaller area would have higher costs and funding shortages
- You would lose the economies of scale
- If the new authorities are too small, inefficiency can creep in to service delivery and community representation

	<i>Number of comments</i>
Split East Sussex into smaller councils	309
Seperate rural and urban	283
Inclusion or exclusion of specific areas	183
Combined Sussex Authority	118
Beyond Sussex boundaries	45

The Resident Survey



Page 165 There were some **key themes** emerging from the resident engagement.

- u **Loss of local representation:** Larger governance structures could lead to a loss of local representation and control, making it harder for residents to have their voices heard.
- u **Impact on services:** proposed changes could negatively impact local services.
- u **Desire for consultation:** Respondents express a desire for more consultation and involvement in the decision-making process to ensure that any changes reflect the needs and preferences of local communities.
- u **Protection of natural areas:** Respondents emphasised the need to protect natural areas such as national parks and areas of outstanding natural beauty, regardless of any boundary changes.
- u **Addressing deprivation:** There are specific socio-economic challenges that need to be addressed, and any changes should ensure that these areas receive adequate support.

7

Stakeholder engagement

- u We asked stakeholders what they thought would be the “benefits” of the proposal for one council across the East Sussex area, their comments have been categorised as follows:



21

37

7

3

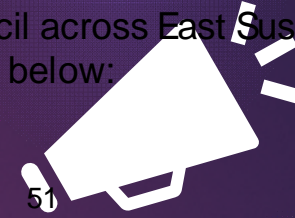
7

Category

- u Comments that mentioned a single unitary authority being ‘simpler or less confusing’ for residents and professional partners was the most popular - 37 out of 86 comments.
- u There were a notable amount (21) of comments that mentioned LGR would ‘result in cost savings’ for the new authority.

Stakeholder engagement

- u Similarly, stakeholders were asked to comment on “any problems” they could see with one unitary council across East Sussex. The comments have been categorised and presented below:



51

22

3

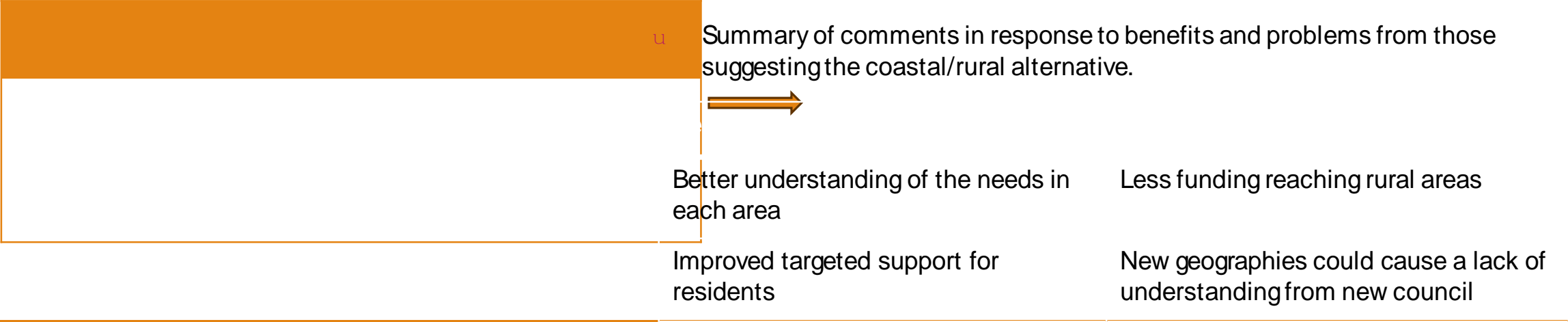
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5

Category	
u	Much like the concerns shared by residents, stakeholders are also worried about a ‘loss of local connection and understanding of their place’ from a new authority - 51 out of 83 comments related to loss of local connection/identity.
u	There were 22 comments that had concerns about council services worsening, particularly during the first few years as we transition from two-tier to unitary.

Stakeholder engagement

- u Received from stakeholders were 20 specific descriptions of an alternative geography to the proposal for one council across the East Sussex area, meaning less than a quarter of participating organisations opted to suggest something.
- u The suggestions we did receive were very mixed and only one – ‘a coastal/rural split’ – was in a notable quantity, with seven comments about this alternative. No other suggestions received more than two.



Stakeholder engagement

Notable contributions

- u Crime and disorder is significantly important to a vast number of people. Often, these problems are solved by joint action and partnership working at the district/borough level. It is imperative that partnership working, and joint funding arrangements continue and any local government services seek to enhance the well-established track record of joint problem-solving to continue to combat local issues proactively and preventatively.
- u LGR proposals should focus on how they contribute to bringing investment, will empower local leaders and communities, and positive community outcomes to our area.
- u Town and Parish councils being expected to take on additional services with no additional funding or manage assets that don't generate income
- u Health needs vary significantly across East Sussex. It will be essential to maintain strong local engagement mechanisms to ensure services remain responsive to the distinct needs of everyone

Resident Focus Groups

A resident focus group took place in each of the five district and borough areas across East Sussex, these were facilitated and documented by a consultant and the key themes that emerged from the conversations are summarised here.

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There were many conversations about the opportunities these changes may bring about,

- u Most participants were open-minded to the idea of a unitary council model in East Sussex, one of the benefits was seen as reducing confusion about which council is responsible for which services.
- u There was hope that the creation of a unitary council(s) would result in cost savings as a result of functions that exist across all councils combining e.g. finance, human resources.
- u Residents thought this change created an opportunity for services to become more joined-up, for example: adult social care and housing.
- u Thinking about local democracy, residents felt optimistic that more people might be attracted to the role of being a local councillor as they would have more power in a unitary authority.

Resident Focus Groups

There were of course, concerns too about this change to local government,

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Residents felt unsure about how any new unitary council could work with the Mayoral Strategic Authority, more detail is needed to help understand how the two will compliment each other

From a financial point of view, while many recognised LGR could bring about cost savings, others thought the cost of the change itself would be high and prevent future cost savings. Concerns were also raised that even more money will go to the statutory services meaning some of the 'nice to dos' miss out.

- u People were worried that a larger organisation would be less responsive and accessible, there were worries they might not be able to walk into the council offices anymore.
- u Concern about local representation was raised by some who felt that their current district and borough councillors are local people who have connections to their area, if this change results in councillors representing larger areas it might make them more remote and less accessible to residents.
- u Similarly, people were worried about being joined with larger areas. Those in the more rural areas/villages want their voices heard and not lost to the larger towns.

Resident Focus Groups

Suitable geographies for the reorganisation was also discussed, just like it was asked as part of both the resident survey and stakeholder engagement. All the options mentioned here were discussed in at least one of the five focus groups.

Current East Sussex County Council boundary	Less disruptive than other options	Current setup doesn't work for some people and keeping the current boundary will lead to more of the same
Rural/Costal split of East Sussex	Smaller areas with shared identities and challenges	Concern residents wouldn't get a say in other area. People living on coast valued rural areas and vice versa.
Split East and West Sussex in three i.e. East, Central and West.	It was felt not many people identify with "mid-Sussex" so it gives a chance to improve local identity	It feels like a random boundary suggestion, lacks justification.

Lewes district boundary consultation

During July & August, Lewes District Council (LDC) and East Sussex County Council (ESCC) carried out a public consultation over Brighton & Hove City Council's proposals to expand the city boundaries into areas of Lewes district.

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7,472 residents have responded to the Lewes consultation survey

86% of those did not want to make a change to the Lewes district boundary

Lewes resident	6,568	88%
Resident of elsewhere	527	7%
A business or organisation	43	0.5%
Councillor or MP	34	0.5%

Where in Lewes?

- The most common area for responses to come from was Newhaven with 1,512 (23% of total).
- Peacehaven, Seaford and Lewes town were the other most represented areas

Lewes district boundary consultation

Preferred boundary options beyond 2028

- u “No change to the current Lewes district boundary” was the most common preference from residents – 86% of all respondents opted for no change
- u The second most popular option was for “Brighton & Hove to include East Saltdean, Telscombe Cliffs and Peacehaven” however, this was only the preference for 8% of respondents. All other options received less than 3% of the vote.

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Reasons for preference, each respondent was asked to write why they had chosen the option they did, the most common themes within these comments is summarised below

- u Respondents saying they “wanted to keep the current Lewes district boundary” was the most common with over 3,000 comments saying this.
 - u Again, over 3,000 comments were made that referred to “not wanting to be part of Brighton & Hove”.
 - u There were 2,243 comments from respondents who felt their area “is better within Lewes district”.
 - u Other comments referred to things such as “I’m worried my area will be negatively impacted by joining Brighton”, “Brighton has financial issues”, and “our small town/village isn’t suitable to join a large urban area like Brighton”.
-

Lewes district boundary consultation

Specific responses were received from many of the town or parish councils within the areas affected by the consultation. The key points within their submissions are summarised here:

- u There was concern the distinct identity of these places, and the connections they have with the surrounding geography, will be lost e.g. connection to the Ouse Valley and the South Downs creating an eastward orientation.
- u Infrastructure and service concerns were raised, particularly in some of the areas vulnerable flood risk it was felt these places are best served by the current East Sussex structures and expertise as this is lacking in Brighton & Hove. Accessibility of services (tailored to rural needs) was also a concern as the BHCC offices would mean residents having to travel 5 times the distance the council office.
- u Also, despite some socio-economic challenges in these areas, there was feeling that recent regeneration attempts are beginning to show results and a change in council boundaries may disrupt this.
- u There is opposition from the communities involved as they feel they would be overlooked in favour of urban priorities if their areas were to be brought within any reorganised Brighton & Hove authority boundary.

TELSCOMBE TOWN COUNCIL

TOWN CLERK & RFO: MRS STELLA NEWMAN, PSLCC

TELEPHONE: (01273) 589777

TELSCOMBE CIVIC CENTRE
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TELSCOMBE CLIFFS
EAST SUSSEX
BN10 7ES



Mr J McMahon, OBE, MP
Minister of State for Local Government & English Devolution
Parliamentary Office
House of Commons
LONDON
SW1A 0AA

Dear Mr McMahon

Re: Proposed Local Government Reorganisation – Opposition to the Inclusion of Telscombe & East Saltdean within Brighton and Hove City Council

I am writing on behalf of Telscombe Town Council and the residents of Telscombe and East Saltdean to formally object to the proposal that Telscombe Town Council's administrative area be incorporated into Brighton and Hove City Council as part of the ongoing Local Government Reorganisation (LGR) discussions.

We believe that the inclusion of Telscombe Cliffs and East Saltdean in these proposals fails to meet the Government's core criteria for Local Government Reorganisation, as outlined by the Department for Levelling Up, Housing and Communities (DLUHC). Below, we outline our concerns and the reasoning behind our position.

Telscombe Cliffs is a semi-rural coastal town with a distinct identity, culture, and geography. It does not share the urban characteristics or planning needs of Brighton and Hove. Its inclusion in a city-based authority does not represent a coherent, functional geography and would ignore the clear differences in character, land use, and governance needs between Telscombe Cliffs, East Saltdean and the Brighton and Hove urban area.

Telscombe Cliffs includes a rural historical village and Telscombe Tye, a 211 acre area of registered common land with specific management and protection needs. The area does not naturally align with the urban travel-to-work patterns or economic focus of Brighton and Hove. It would be more appropriate and effective to remain aligned with other rural and semi-rural communities in East Sussex under a Unitary Authority.

The proposal clearly fails the criteria requiring a good deal of local support as Telscombe Town Council opposes the inclusion in Brighton and Hove and residents have expressed their clear desire to remain under East Sussex governance through existing channels. The current governance model reflects the will of the local community and any attempt to forcibly shift governance would erode democratic legitimacy.

Telscombe Cliffs and East Saltdean, along with Peacehaven and Newhaven, already benefits from a strong, locally effective governance model that is aligned with East Sussex's rural governance structure. This includes a Joint Neighbourhood Plan between Telscombe and Peacehaven Town Councils, developed to reflect local priorities and planning needs.

There is also a 3-Towns Community Bus, a shared and locally managed transport service that connects Telscombe Cliffs, East Saltdean, Peacehaven, and Newhaven, enabling mobility and access to essential services for many residents.

These services and planning frameworks would face disruption or even dissolution if Telscombe Cliffs and East Saltdean were moved into an urban council structure that does not share the same priorities or funding mechanisms. Such a change would reduce service quality, increase administrative confusion, and distance decision-making from those it directly affects.

Telscombe Tye is a unique and protected area of registered common land within the South Downs National Park that plays a vital role in the character, environment, and recreational life of the local area. It is rich in archaeological importance, highlighting prehistoric and historic human activity. The Tye has Bronze Age Barrows, a Cross Dyke and an old funeral track which is now a registered restricted byway which was historically used by funeral processions heading to St Laurence Church. The track also has associations with highwaymen and smugglers and links Telscombe Village across the Tye and down to the sea. Its continued stewardship requires an authority with experience managing rural and environmental assets, and a governance structure that recognises commoners' rights, heritage protections, and community involvement.

Based on the Government's own criteria, it is clear that Telscombe Cliffs and East Saltdean does not represent a credible geography for inclusion in a city-based authority, there is a lack of local support for the proposal, and the change would undermine effective governance and disrupt vital community infrastructure.

We therefore respectfully urge the Department and any other relevant authorities to remove Telscombe Cliffs and East Saltdean from any proposal to include it within Brighton and Hove City Council, and we steadfastly affirm our continued position within the East Sussex Unitary Authority structure.

Yours faithfully

Stella Newman
Town Clerk & RFO
On behalf of Telscombe Town Council
stella.newman@telscombetowncouncil.gov.uk



KINGSTON PARISH COUNCIL

www.kingston-pc.gov.uk

Julie O'Donnell
Clerk to Kingston Parish Council
Kingston Community Pavilion
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19th August 2025

Jim McMahon OBE MP
Minister of State for Local Government
House of Commons
London
SW1A 0AA

Dear Mr McMahon

Kingston Parish Council Response to Proposed Unitary Authority Expansion

This response is on behalf of Kingston Parish Council (KPC) but the points made apply to the vast majority of the Kingston Ward, which is included in two of the expansion proposals being put forward by Brighton and Hove City Council (B&H CC) to create an enlarged Unitary Authority (UA). It is apparent that the proposal to annexe areas outside the natural limits of the City are for the expedience of the City Council, and not for the benefit of the residents of those areas.

Kingston is largely a rural ward which feels very remote from Brighton, both geographically and culturally. Because of the South Downs, we literally look eastwards; i.e. to East Sussex. There is a large section of uninhabited downland between the eastern boundary of Brighton and the settlements of the Ouse Valley of at least two miles, but which feels like a lot more due to the topography and its emptiness. While the ancient parish boundaries abut the boundary of the city UA, the communities are a world apart.

Our District Council services have been working well under the management of a very efficient council. East Sussex would have been greatly improved if the 2025 County Council elections had been held and the anticipated removal of the incumbent administration had not been prevented by the LGR agenda. A case has not been made that services would be improved if Kingston were incorporated into Brighton. Indeed, services are likely to be degraded by such a move as the distance between provider and service user will be extended. Lewes town centre is 2 miles from the village centre. Lewes, as the historic County Town of all Sussex, hosts the East Sussex County Council headquarters as well as Lewes District Council offices. B&H CC offices are based at Hove Town Hall, which is 11 miles away, and involves driving through congested streets or two changes of bus or train; it is very possible to walk or cycle into Lewes and many residents of the Ouse valley do so regularly.

One of the rationales put forward by Bella Sankey, with whom KPC have met, is that the current population size of B&H is smaller than being stipulated by your department for consideration as a UA. The case for a new UA being formed with the current Brighton and Hove UA as a starting point would be better made by extending the boundary westward. The City Council area already covers the neighbouring town of Portslade, which is part of a large conurbation which extends for 20 miles to Littlehampton, at the mouth of the river Arun. The coastal conurbation is only interrupted by the River Adur between Shoreham and Lancing and many residents of this coastal strip are unlikely to realise where the boundaries between existing authorities or communities lie and for many the distinction will be limited to which logo is on the refuse bins. If population size is a consideration, then neither West Sussex nor B&H form the ideal size. The population of West Sussex is 882 000, and for Brighton its 277 000, (East Sussex as proposed is 546 000, near the ideal). Therefore, it would be logical and practical to incorporate areas of West Sussex into the enlarged B&H CC area, if it is considered to be too small. Extending the boundary to the Adur would transfer nearly 36 000, and if the Arun is the western limits of the newly created UA, a further c180 000. In other words, the population of the Sussex Coast Unitary Authority would be near the ideal at 505 500, and West Sussex would be reduced in population size to c 650 000. The population of Kingston Ward is c 1900, so will add little to the population size of an enlarged Brighton UA. Even by adding the Coastal strip to the East of Brighton, particularly East Saltdean, Telscombe Cliffs and Peacehaven only adds an additional 22 000, people. Expanding Eastwards does not address the criteria your department considers to be an imperative when considering UA size.

Kingston's natural administrative alignment with ESCC/LDC reflects its position embedded in East Sussex; the effect of annexation by BHCC would be to sever administrative ties with these bodies. Were the proposal to succeed, it would run counter to Kingston's community identity and disrupt existing governance arrangements. Kingston's remoteness from Brighton means inefficiencies are likely to result from our inclusion, and not efficiencies. Bella Sankey has often used the term "efficiencies of scale" without realising it has a bedfellow, "the law of diminishing returns"

When asked why BHCC was not considering expanding West to satisfy its (and West Sussex's' target population) Bella Sankey said it was "financially unviable" for Brighton and Hove UA to extend westwards. No explanation has been provided as to why this might be the case. The urban areas of BHCC and West Sussex share a boundary of over 2 miles, through which cuts three main arterial road connections, the A27, the A270 and the A259, numerous residential streets as well as a rail connection with regular services between the communities along the coastal strip and further to London and Portsmouth. Whereas the West-East road connection between Brighton and East Sussex are heavily congested. In Newhaven the A259 is one of the most heavily congested roads in the South of England. Likewise, during peak hours, the A27 becomes grid locked. There are no alternative routes East-West. This road network is so heavily congested that 10 000¹ vehicles a day use the north-south connecting road on the Western bank of The River Ouse, the C7, to access the A27 and other routes away from the south coast. This 10 000 figure does not include the vehicles that use the other North-South route, the A26, on the Eastern bank of the River Ouse, which will include much of the traffic, including freight, using the Newhaven to Dieppe ferry crossing. The communities that live along the C7 are seeking to improve travel conditions and options by introducing schemes to reduce volumes and speeds along what should be a quiet country road. This would increase pressure on the other roads connecting these annexed areas, particularly if B&H UA seek to build more homes on this coastal strip to meet housing targets.

One potential reason for B&H CC hoping to incorporate Kingston ward into an enlarged UA is the value of the houses here, and therefore the Council Tax revenue. This may well benefit a poorly run council to balance its books but ignores the fact that East Sussex too has the kind of demands on its services that B&H CC has. Eastbourne, Bexhill and Seaford are towns well known for their incoming

¹ Sources. Safer C7 Project: Draft Project Report 06.06.24



retirement community. As well as a degree of relative comfort in many parts of East Sussex, there are high levels of deprivation. Large tracts of East Sussex are in the 25% of most deprived areas in the country.² Hastings is the 20th most deprived local Authority Area out of 370 LA's. East Sussex's financial viability should not be sacrificed to alleviate the profligacy of another's. B&H CC has a debt of £1350 per resident as opposed to £470 pp for Lewes and £396 pp for East Sussex. Therefore, the combined debt for the UA area is £866 per person, i.e. two thirds that of Brighton.

Kingston is a semi-rural community which feels remote from Brighton. All our services are based nearby, the Household Waste Recycling site is two miles distant, as is the library and the District Council leisure facilities. Our health services are provided locally, and we have an Urgent Treatment Centre based at the community Hospital in Lewes. There are cultural and artistic events held in Lewes, and the outlying villages and we are an established, functioning community. While many residents do utilise the facilities offered by a large city like Brighton, we don't need to be residents of their council area to do so, which is the same for many other communities further away in East Sussex, to the north of the Downs and indeed the residents of the coastal conurbation to the west. We feel differently to residents of Brighton about the South Downs and their importance to our sense of place. We live mindful of the Downland Landscape on our doorstep and try to reflect the diversity and richness of the natural environment in our gardens and villages.

There is enormous public resistance to the areas currently in the County Council area of East Sussex being run from a large city. The notion that all areas will become part of one enlarged unitary authority is fallacious. The needs and priorities of the large urban conurbation will undoubtedly and inevitably, take precedence over those of the rural hinterland. Residents of East Sussex affected by these proposals believe we would forever be an afterthought.

We fully support the submission made by East Sussex Council to form a Unitary Authority on existing County Council boundaries.

Yours sincerely,

Kingston Parish Council

² Source [Indices of Deprivation 2015 and 2019](#). Accessed 6th August 2025 20:40 hrs

RODMELL PARISH COUNCIL

Conifers,
Green Road,
Wivelsfield Green,
RH17 7QL
22nd August 2025

Jim McMahon OBE MP
Minister of State for Local Government
House of Commons
London
SW1A 0AA

Dear Mr McMahon

Rodmell Parish Council Response to Proposed Unitary Authority Expansion

Executive Summary

Rodmell Parish Council (RPC) strongly opposes Brighton & Hove City Council's proposed annexation of Kingston Ward, arguing it is driven by financial expedience rather than community benefit. The Council stresses that Rodmell's services, identity, and geography are firmly rooted in East Sussex, and that governance from Brighton would reduce efficiency, neglect rural needs, and burden residents with Brighton's higher debt. RPC supports East Sussex Council's proposal for a unitary authority based on existing county boundaries.

Precis

- **Context:** Rodmell Parish Council (RPC) responds to Brighton & Hove City Council (B&H CC) proposals to expand into East Sussex and annex Rodmell Ward.
- **Main Objection:** Expansion is for B&H CC's expedience, not residents' benefit; Rodmell is geographically and culturally distinct from Brighton.

- **Geography:** South Downs form a natural barrier; Rodmell looks eastward to Lewes and East Sussex, only 2 miles away, versus 11 miles to Hove Town Hall.
- **Services:** Current services from East Sussex County Council (ESCC) and Lewes District Council (LDC) work well and are accessible; incorporation into Brighton would degrade access and efficiency.
- **Population Argument:** Expansion eastwards adds little to population size (~500 in Rodmell); better case would be to expand westward into West Sussex to meet UA size criteria.
- **Transport Issues:** East–West road links between Brighton and East Sussex are heavily congested; links westward are stronger and more practical.
- **Financial Motives:** RPC suspects B&H CC is targeting Rodmell for its higher-value housing and council tax revenue; highlights Brighton’s higher debt (£1,350 per resident vs £470 Lewes, £396 East Sussex).
- **Community Identity:** Rodmell is rural, with services, culture, and health provision rooted in Lewes and East Sussex. Residents value the South Downs landscape as part of their identity.
- **Public Resistance:** Strong opposition across East Sussex communities to governance from a large city; fear rural needs would be overlooked in favour of urban priorities.
- **Preferred Solution:** RPC supports East Sussex Council’s proposal for a unitary authority based on existing county boundaries.

Yours Sincerely

Rodmell Parish Council

George Dyson
Town Clerk

(01273) 585493
TownClerk@peacehaventowncouncil.gov.uk

Community House,
Meridian Way,
Peacehaven,
East Sussex,
BN10 8BB.

To Whom it may concern,

Peacehaven Town Council opposes any plans to change the current boundary of Lewes District as part of Local Government Reorganisation.

When the Minister of State for Local Government and English Devolution wrote to Council leaders on 5th February 2025, the Minister laid out criteria for unitary local government in a schedule. We believe that Peacehaven's needs will be overwhelmingly better met by being in the East Sussex Unitary rather than any variant of Brighton & Hove City Council. We believe the following points should be considered as per the Minister's letter.

Peacehaven is currently in sensible economic area with an appropriate tax base which does not create an undue advantage or disadvantage for one part of the area. Peacehaven's businesses are currently Ouse Valley and Seaford/Lewes Town oriented, often with branches in several of the local towns, there is a risk that we could lose business to Brighton.

Geography and topography is better as we are in the East Sussex area. The watershed is at Telscombe Tye and our South Downs dry valley in the North of town flows and sometimes floods into the Ouse. There is no evidence to show that extra housing supply would not go to meet local needs if we were to become part of Brighton Unitary.

There is no evidence or analysis to suggest that there are any benefits for Peacehaven to being part of a Brighton Unitary Authority. Local engagement suggests a strong local opposition to this change.

Single tier arrangements in an East Sussex Unitary Authority are clear within the East Sussex proposal about improvements for Peacehaven: Peacehaven would remain in the Lewes district administrative area, with no transition costs. There would be substantial administrative upheaval if district were to be divided and all Peacehaven's service provision moved to Brighton & Hove. The only way in and out of Brighton is the A259, and the long stretch of the A259 to Brighton is already jammed in rush hours: employment, social, and educational needs for Peacehaven residents should be concentrated locally, or on the short Eastbound route to Lewes Town, not Westward.

The optimal numbers as set are met in the East Sussex Unitary Authority proposal.

There is a concern that consumer spending, employment, and businesses could be shifted Westward for the benefit of Brighton residents and to the detriment of Peacehaven.

If Lewes District is divided and East Sussex loses services to the Brighton Unitary Authority, including Social Services, Education, transition costs will likely be higher than any potential savings for any of the parties involved. There would also be significant impacts on the NGOs and charities such as Lewes District Citizens Advice, Sussex Community Development Association, SEN services in Schools, and Alcohol & Drugs related advice services.

Peacehaven residents could suffer financially as they become liable for Brighton & Hove City Council Debts.

There will be severe fragmentation of Social Services such as Social Care and Children's Services.

Peacehaven will likely lose its leadership role with Family Hub & youth services, currently shared with other towns in Lewes District, all social services would be disrupted for many years if Peacehaven services were shifted into the Brighton & Hove Unitary Authority.

Brighton & Hove City Council chose not to work co-operative with Lewes District, especially in their late decision to propose that areas to the East should be incorporated into the Brighton & Hove Unitary area.

Additionally, the Government guidance on boundary changes specifies that the existing District areas should be considered the building blocks for proposals unless there is a strong justification for more complex boundary changes. No such justification exists in this instance.

Yours sincerely, and on behalf of Peacehaven Town Council,

George Dyson
Town Clerk

Mr. J. McMahon, OBE MP,
Minister of State for Local
Government & English Devolution,
Parliamentary Office.
House of Commons,
London.
SW1A 0AA.

12th August 2025

Dear Mr. McMahon,

Brighton and Hove City Council's Interim Plan for Local Government Reorganisation – Option C (uniting the coastal corridor) and D (coast and downs partnership).

The Town Council has instructed me to write and set out its views regarding the above matter.

Following detailed analysis of the above proposals and a meeting with Cllr Sankey (Leader of Brighton & Hove City Council) on 30th July 2025, Newhaven Town Council are in broad agreement that any plans for eastward expansion to include Newhaven should be rejected.

As the Town Council, we align with Lewes District Council, which has consistently opposed these proposals, and whose position reflects a strong understanding of local needs and widespread support for Newhaven to remain under the existing East Sussex governance structure.

Newhaven has a distinct identity, deeply rooted in the geography, history, and culture of East Sussex. Its position along the River Ouse ties it naturally to the Ouse Valley, a defining geographical feature that lies predominantly within East Sussex. It also shares significant cultural, social, and economic ties with neighbouring Seaford (together often referred to as 'Seahaven'), with whom it shares a bay. The additional separation of Newhaven from nearby South Heighton under the proposed boundaries would also disrupt shared heritage and longstanding community networks.

Newhaven's governance needs are best served within the established structures and service models of East Sussex. The Towns' vulnerability to riverine flooding for example, is already well-managed through existing local expertise and infrastructure, which Brighton & Hove City Council (BHCC) lacks.

Additionally, the severing of Newhaven from existing District boundaries and East Sussex County Council electoral divisions (Newhaven and Bishopstone and Ouse Valley West) cannot be justified. Cllr Sankey acknowledged that the merger would likely prompt a boundary review, further delaying the implementation of Local Government Reform (LGR), and impeding electoral processes. Newhaven is part of the Lewes parliamentary constituency, and disrupting this alignment between our authority and parliamentary representative would similarly confuse residents and reduce effective representation.

Although Newhaven has faced socio-economic challenges, recent regeneration initiatives — funded through national 'levelling up' schemes managed by Lewes District Council — are beginning to show results. A sudden administrative shift risks undermining this progress, and there are also concerns that BHCC's significant debt burden could divert much-needed investment away from Newhaven.

Whilst we support addressing the ongoing housing crisis, we believe Newhaven (which sits predominantly outside the South Downs National Park) would be disproportionately impacted under a Brighton-led authority, which lacks the broader land base of East Sussex. Increased development pressure on an already stretched transport infrastructure — concerns echoed by the MP for Lewes and acknowledged by Roads Minister Lilian Greenwood — would also be unsustainable.

Whilst we recognise BHCC's need to expand its population to form a viable unitary authority, the preference for eastward over westward growth is unclear—especially given BHCC's strategic ties to Shoreham Port. Cllr Sankey has also cited an 'engagement exercise' with just 597 respondents as part of their justification for this direction of expansion, yet the exercise findings revealed that *'...a significant number of respondents are opposed to combining with areas east of the city'*. Cllr Sankey and BHCC have similarly yet to provide any compelling financial or strategic justification for including Newhaven.

Given that BHCC appears set on expanding East, it is interesting to note that all of its models include East Saltdean, Telscombe Cliffs and Peacehaven, areas it is more geographically aligned with due to its urban sprawl. However, the natural boundary created by the significant hill between Newhaven and Peacehaven makes Options C & D even more unclear and further reinforces the case for excluding Newhaven.

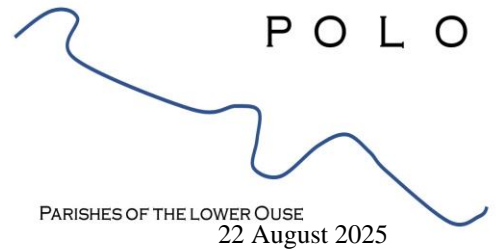
For these reasons, we believe BHCC's proposal fails to meet the government's LGR criteria, and we therefore urge that Options C and D be withdrawn from any considerations.

Yours faithfully,

Ken Dry,
Town Clerk.

Ken.Dry@newhaventowncouncil.gov.uk

IFORD PARISH MEETING
c/o FISHERS
SWANBOROUGH
LEWES
BN73PF
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+447875-111738



Mr Jim McMahon OBE, M.P.
Minister of State for Local Government and English Devolution
House of Commons
London
SW1A 0AA
Jim.mcmahon.mp@parliament.uk

Also sent by post

and

Councillor Bella Sankey
Leader of Brighton and Hove City Council
Hove Town Hall
Norton Road
Hove
BN3 3QB
Bella.Sankey@brighton-hove.gov.uk

Also sent by post

Dear Minister and Councillor Sankey,

Re: Brighton and Hove City Council (BHCC) – consultation on proposed eastward expansion

Last month BHCC launched its consultation on its four options for its eastward expansion of its boundaries, (the B&HCC proposals), one of which to include Kingston Ward, part of Lewes District Council (LDC). Iford is a parish of the Ouse valley and forms part Kingston Ward.

LDC is one of the second-tier authorities, which with East Sussex County Council submitted their interim plan to you on 21 March 2025 to become a unitary authority. That plan proposes the creation of a coherent new unitary authority, reflecting the integrity of the geography.

On Wednesday, 13 August 2025, Iford held an extra-ordinary Parish Meeting to decide:

Which, if any, of the four options proposed by Brighton & Hove City Council for eastwards expansion does the meeting support or oppose?

and

In either case does the meeting support or oppose the sending of a letter to the Minister of State for Local Government, Jim McMahon OBE MP to express its support or as the case may be, opposition to any of the four options?

The meeting strongly opposed all four of BHCC's proposals and unanimously supported the sending of a letter to you to express its opposition. This is that letter.

The meeting unanimously expressed the desire that the areas concerned be governed by the new unitary authority for East Sussex. It does so on the triangle of:

1. **Geography:** our parish is tied to Lewes, it and the parishes along the Ouse valley are separated from BHCC by the Downs.

2. **History:** our parish's history and that of the others along the Ouse valley is with Lewes, with East Sussex and to the coast at Newhaven; and A Havas Company

3. **Identity:** Culturally our parish's identity is tied to the historic town of Lewes, the Ouse Valley and the rural and smaller borough and town geography of Lewes District and East Sussex. B&HCC's unique identity is described in its interim plan as:

"...a cosmopolitan, dynamic city by the sea, located on the edge of the South Downs National Park. This inspiring place to live, work and visit is home to over 280,000 people and attracts 10 million visits each year. The city's success is a result of continually adapting innovating and growing while maintaining its independent spirit and distinct identity."

To subsume small Ouse valley villages in B&HCC's unitary authority would result in a loss of their proud identity and be a mis-match. B&HCC's particular identity as a city was reflected in the grant to it of city status on 31 January 2001: an identity that has not changed in the intervening period.

Additionally:

- East Sussex County Council and its second-tier authorities' interim plan is well prepared; that of B&HCC is not, in particular it does not have regard to the Secretary of State's guidance on proposals for unitary local government as set out in the Schedule to your letter to East Sussex and Brighton dated 6 February 2025;
- Neither the B&HCC interim plan, nor the B&HCC proposals have taken account of the matters identified in your letter of 6 February 2025 under the heading **Developing proposals for unitary government**;
- B&HCC has not, despite requests in public meetings and in writing from Kingston's Ward councilor, provided the data upon which B&HCC says it is relying to reject expansion westwards. Moreover, written enquiry of B&HCC's Programme Director as to the source of the requirement to increase the existing unitary authority's population to between 300,000 and 400,000 has received no reply. This stated requirement contradicts the English Devolution White Paper's statement that "*decisions will be made on a case by case basis.*";
- With the exception of one lone voice at the public meeting in East Saltdean on Friday, 1 August that supported the joining of East and West Saltdean, all that was said there was very hostile towards B&HCC's proposals, despite B&HCC's Councillors Sankey and Hewitt seeking to answers residents' questions and allay their concerns;
- With the exception of one lone hand at the meeting in Peacehaven on Tuesday, 12 August all that was said there was also very hostile towards B&HCC's proposals, despite B&HCC's Councillor Hewitt seeking to answers residents' questions and allay their concerns;
At each meeting of these two meetings there were between 200 and 250 people, including at the latter, a representative of the local M.P., who is the Prime Minister's PPS, who will have witnessed first-hand the strength of feeling.
A meeting of parishioners in Kingston parish attracted 100 of its parishioners, at which they expressed their strong opposition to B&HCC proposals; and
- It has been noticed that B&HCC's proposals would enlarge, for local government purposes, Labour's control, whereas westward expansion would give it no such advantage, a cynical approach, which diminishes trust in politics, in particular because B&HCC has been unable to articulate any benefits for the areas subject to B&HCC's proposals.

It is for all the foregoing reasons that Iford Parish Meeting considers the B&HCC proposals to be flawed with no evidence of benefit and that therefore they should be abandoned.

Yours faithfully,

Christopher Baker
Chairman
Iford Parish Meeting

To:

Cllr. Keith Glazier OBE – Leader, East Sussex County Council

Cllr. Zoe Nicholson – Leader, Lewes District Council

CC: Cllr Sarah Osborne – ESCC, Cllr Stella Spiteri – LDC Kingston Ward

24 August 2025

**RESPONSE BY THE KINGSTON WARD PARISHES OF THE LOWER OUSE TO PROPOSED
UNITARY AUTHORITY EXPANSION BY BRIGHTON AND HOVE CITY COUNCIL**

We are writing on behalf of POLO (the Parishes of the Lower Ouse) to express the unanimous rejection by these 5 parishes of the proposal by Brighton and Hove City Council (BHCC) to remove the ward of Kingston from East Sussex and to absorb it into an expanded Brighton and Hove Unitary Authority.

No convincing rationale for the proposals has been provided, whether in terms of benefits to a B&H unitary authority, to an East Sussex Unitary Authority, or to the residents of the Lewes District Council ward of Kingston.

Contextual Information

The Lewes District Council ward of Kingston lies to the east of Brighton. Kingston ward comprises the parish of St. Anne (Without), and part of Falmer located in the west of the ward, and five small parishes in the east of the ward. These five parishes are ranged along the Lewes-Newhaven Road, which follows the path of the River Ouse between Lewes and Newhaven, a distance of 6.5 miles, running north-south.

The five Lower Ouse parishes are: Kingston Parish Council (pop 830), Iford Parish Meeting (pop 209), Rodmell Parish Council, including Northease (pop 527), Southease Parish Meeting (50) and Piddinghoe Parish Council. (234).

Kingston ward is a sparsely populated rural area. The parishes and settlements are set amidst agricultural land, within an area of outstanding natural beauty. All the Lower Ouse Parishes lie within the boundary of the South Downs National Park. All the villages have conservation areas. Responsibility for planning lies with the SDNPA.

Representatives of the 5 parishes meet three times per year as POLO (the Parishes of the Lower Ouse). The purposes of POLO include: encouraging parish collaboration on issues of common interest and co-ordinating and lobbying on matters of common concern.

The five Lower Ouse parishes are united in their rejection of the proposals for the following reasons:

- Brighton and Hove City Council – its services and systems – have been designed for an urban, densely populated and relatively compact, well connected environment. In contrast, the parishes of Kingston, Iford, Rodmell, Southease and Piddinghoe are separated by agricultural land and bounded by steep ridges of the South Downs National Park, and by a river and railway, with no public road bridges to allow east-west travel. Most residents are without access to piped gas, and many households rely on septic tanks for sewerage. The villages are served by a single bus service between Lewes and Newhaven with a very limited daily service and no service in the evenings.

If the ward of Kingston was taken over by Brighton and Hove it is unlikely that the needs of these small settlements on the periphery of the authority would be given much consideration in terms of the design and provision of services, or fair consideration in decision making and prioritisation. It is highly likely that the efficiency and appropriateness of services for these rural villages and businesses such as farms, would deteriorate, and that there would be limited accountability by the authority to local users.

- The Lower Ouse parishes are very close – geographically, culturally and historically – to Lewes, and a long way from Brighton and Hove. The POLO parishes lie along the 6.5 mile C7, a road which runs north-south between Lewes and Newhaven. As the name suggests, the road leads directly to Lewes or to Newhaven. There are no east west routes for residents or businesses in these parishes, because of their physical location between the Downs, the river and the railway line. To get to Brighton by public transport, it is necessary to first travel to Lewes to catch a train or bus to travel the 8 – 11 miles distance depending on the route taken. To drive to Brighton, it is necessary to first drive towards Lewes to join the A27 east-west route, or to Newhaven to join the A259 coast road, which already suffers from chronic congestion and which can only get worse if more homes are built along the route. Parking in Brighton is notoriously expensive.

- Because of their close proximity and direct access to Lewes, most residents travel to Lewes (or Newhaven) for public services, GP, dentist, urgent treatment centre, schools, waste and recycling centre, shops, libraries, leisure and other amenities. To have to travel to Brighton and Hove for such services would be a cause of major inconvenience, increased cost, travel time, road congestion etc. It would particularly disadvantage elderly residents, and children/ adults with 'special needs' who may be more reliant on public transport, less mobile, and have greater need of the services.

Providing local services such as household waste and recycling collection for remote rural areas would be an additional cost for Brighton and Hove and it is likely that efficiency would decrease.

As the historic County town of East Sussex, the headquarters of East Sussex County Council, district council offices, the police HQ and County Court are all located nearby in Lewes. The corresponding offices and services in B&H at Hove Town Hall are 11 miles distant. Services by

Lewes District Council are generally thought to be good, (recognising budget constraints), and local accountability to residents is also good.

- Culturally and historically, the villages and settlements in the Lower Ouse Valley ward have been linked to the ancient market town of Lewes since Saxon times, when Lewes was established as a crossing point over the River Ouse. All the villages appear in the Domesday Book. Then, as now, these were rural agricultural settlements close to the River Ouse, and they share their history with the market town of Lewes.
- Children in the ward of Kingston can currently attend primary school relatively close to home, but could be disadvantaged at the age of 11 in terms of transition to secondary education, if the local secondary schools are part of a different authority. The nearest secondary schools are located in Lewes and Newhaven. Many residents would be unhappy about their children having to travel to and from Brighton every day and having few school friends living nearby. Brighton and Hove would need to meet the cost of additional travel to school.
- The population size of Kingston ward is very low relative to the extent of the land it covers. Government guidance for proposals for new Unitary Authorities recommends a population of around 500,000. The population of West Sussex is around 880,000. An East Sussex Unitary Authority, as proposed by East Sussex (ie. retaining its existing boundaries, including Newhaven, Telscombe, Peacehaven and Kingston ward), would have 546,000, close to the recommended figure. Brighton and Hove, in contrast, have a current population of only around 277,000. The population of the Ward of Kingston is 1904 (2021 Census). Incorporating the ward of Kingston into a Brighton and Hove Unitary Authority is not therefore going to assist in boosting its population towards the 500,000 target.
- It would be more logical and effective to incorporate areas of West Sussex into an enlarged B&H than seeking to extend east wards. Extending the boundary westwards to the River Adur (Shoreham) would transfer a population of nearly 36,000, or to the River Arun (Littlehampton) a further 180,000. This would give an enlarged B&H UA a population of 505,500 and reduce West Sussex to around 650,000, thereby bringing both authorities closer to the target. Moreover, there are strong east-west road (A27) and rail links between B&H and the urban communities along the coast to the west of Hove, such as Shoreham and Worthing. These form a more homogenous and continuous urban settlement than eastwards towards Newhaven.
- B&H have indicated that by extending eastwards to include the coastal strip to Newhaven, they will gain the land they need to build more homes. This fails to take account of some significant geographical obstacles. At the back of the coastal strip, the South Downs form a physical barrier to building, and land within or bordering the national park would probably be protected from extensive development.

Secondly, the only A road along the coast is the A259, a very slow, congested urban road, which would not be able to function if there were a significant increase in road users as a result of extensive housing development. The faster east-west road route (the A27) is inland, just south of Lewes. There is no direct road access to the A27 from towns along the A259 coast road, due to the barrier formed by the South Downs

There is no rail route along the coast between Newhaven and Brighton, due presumably to the cliffs. The only rail route is via Lewes.

For these reasons, the Parishes of the Lower Ouse reject the proposal that they should become part of a Brighton and Hove Unitary Authority and fully support the submission by East Sussex Council, formulated with the participation of the component district and town councils, to form a Unitary Authority using existing County Council boundaries.

Yours sincerely

The Parishes of The Lower Ouse (POLO)

Chair: Alex Pett – ouse.valley.polo@gmail.com

Convener: Sue Carroll – ouse.valley.polo@gmail.com

East Sussex Local Government Reform

Public Focus Groups Write-Up

Summary

Most participants were open to the idea of a Unitary Authority, recognising possible benefits such as clearer accountability, better services, and cost savings. However, there were strong concerns about losing local identity, having less say in decisions, and reduced access to services under a more centralised system. These concerns often related to the size of the new authority, rather than a debate about whether or not a Unitary was appropriate.

There were varied views on any potential new boundaries. The only overarching consensus was that the people did not want to be joined with Brighton and Hove. Otherwise, the rural/coastal split and current East Sussex footprint (either as a normal Council or a Federated model) were most popular.

Hopes and Fears

Participants expressed hopes and fears about reforming local government in East Sussex. Below is a summary of key themes, showing where people saw potential benefits and where they raised concerns.

Clarity and Transparency

Many people hoped the reforms would reduce confusion about which council is responsible for what. Currently, residents feel "passed between" different levels of government without clear answers. A single unitary authority could make responsibilities easier to understand and improve transparency.

"No overlapping of roles and responsibilities"

However, we also heard concern about how the new Unitary would work with the Mayoral Strategic Authority (MSA), with a request for more clarity on how they would work together to ensure transparency.

People also talked about the role of Town and Parish Councils in the new model. Some felt they could be given more responsibilities and powers (they close the gap between Unitary and local). We heard from other people who questioned what their current role was.

Financial Impact

There was hope that the creation of a single Unitary Authority would result in cost savings.

"Cost saving through less duplication – e.g. shared HR, admin, finance functions."

"Good value – if duplication is removed and resources reassigned."

People expressed concerns about the ability to realise this cost savings, both in terms of the potentially significant cost of the transition itself and the ability to make savings over the longer-term.

'That the re-org will cost a fortune and fail'.

People also talked about how it would impact where money was spent and how any savings would be made. For example, people expressed concern around the sale of local assets and the redirection of discretionary spend to statutory services.

"Budgets being pooled leads to social care taking all the money"

Overall, there was a feeling that this change will not resolve the financial challenges in local government.

Services and Outcomes

People wanted the change to have a positive impact on the things that they care about. From holistic person-centred services, economic growth, being able to walk round safely, better funding for schools, hospitals, roads, through to environmental protection.

The increased ability to join-up services and create a long-term strategic view were particularly highlighted.

"Better partnership between adult social care, housing and environmental health to improve outcomes"

While many could see the opportunity, there were significant questions about how this change would actually make a difference to the things that mattered to them.

"I fear that local services will be further cut back in this exercise e.g. pest control"

"Our landscapes are needing help. Will a bigger authority be more cohesive in their conservation policy"

People expressed a desire for change and improvement. Some expressed a view that this is *"Just arranging the deckchairs"* rather than dealing with fundamental issues. With some suggesting this as an opportunity to *"reimagine the services of the future"*.

People also questioned what would happen to local assets and services where there had been a difference in views between the County Council and D&B in the past. For example, they talked about a swimming pool being closed by County and reopened by the local council.

People were worried that a large organisation would be less responsive and accessible. They talked about not being able to walk into the local government offices to get issues resolved and difficulty in communicating, with potentially slower response times.

This was also raised when thinking about partnership working. For example, we heard about a charity with strong links and joint working with the local authority because they were 'next door', but other charities doing similar roles in other areas of the district not having these close links. People requested that 'there needs to be a strong focus on localities'.

Local Democracy and Decision Making

Some participants expressed optimism that councillors could have more power, attracting more people to the role and making the position more meaningful and effective.

'Better quality councillors because they have more power'

There was also hope that a Unitary model would enable more to be done, as there would be less political division between D&B and County Council.

'At the moment local & county council are hampered by political ideology resulting in often no action. I am hopeful that a change in structure will benefit all'

People also welcomed the devolution of some powers from central government.

'Should produce and deliver more effective projects, infrastructure in the area, due to less hurdles to jump through for Mayoral Authority'.

However, many expressed concerns that these changes would result in an erosion of local democracy.

People felt Councillors now are local people, with knowledge and connections in the local area, and are accessible to them. There was a concern that in the future Councillors would have to represent a larger number of people, making them more remote and less accessible. One focus groups specifically asked that Councillors should still cover the same number of people as the current D&B Councillors.

Some also expressed concerns that it would lead to a reduction in independent Councillors and a reduction in "political spread".

There were different opinions on what the future of decision making should look like. Some hoped more "Decisions based on metrics" while others worried about "spreadsheet decisions not people decisions" and decision being taken top-down, without local knowledge e.g. "Force fed planning decision".	
Influence and Identity	
People were worried about being joined with larger areas. For example, how to ensure small populations in rural areas have their voices heard compared to larger towns, or towns raising concerns about being grouped with even larger towns or cities such as Brighton.	
"Getting lost when competing with bigger towns in the county"	
This was also reflected in specific issues.	
"Eastbourne, Bexhill, Hastings - tourist economy lost in East Sussex".	
People expressed concern that this could increase competition and inequality between areas.	
People were worried about the erosion of identity and their areas uniqueness. They typically identified with smaller geographical areas. It was the clubs, churches, neighbours, community groups and local landmarks, that were the most important to people. They expressed concern about how this would change. For example, people talked about "The loss of Rother's identity" and "Not sure if I want to be in one melting pot".	

Transition

There were a range of concerns raised about the transition:

- Legitimacy – people were not informed of these potential changes before voting in the general election.
- Who was consulted - People felt that this was a significant change and that many more people needed to be involved in the consultation, with a wider range of people being reached. Some suggested that people should have a vote on the changes.
- Speed - There was a feeling that this is being 'rushed through'. That the pace of change should be slowed down and that East Sussex should defer and come off the priority programme.
- Sustainability - Questions were raised on whether central government will change its mind.
- Loss of local knowledge – Staff and Councillors with extensive local knowledge leaving during the transition.
- The change will fail – People gave examples of local changes to integrate which they perceived to have failed.

Geographies and Boundaries

Some people felt there was not sufficient information about the purpose of the new unitary to be able to make an informed decision i.e. form should follow function. Others felt there just wasn't enough information or time to consider in full. However, the points below related to those who did share an opinion.

There was a clear and widely held view among participants that they did not want to be joined with Brighton and Hove.

"How can a restructure with Brighton and Hove not become Brighton centric".

The only consideration was how to benefit from and align with Brighton and Hove economic growth.

The discussion on boundaries varied between focus groups, with some groups developing potential ideas; some reviewing existing proposals (e.g. Hastings); and some having a broader discussion which related more to the hope and fears.

The options below were covered in one or more of the focus groups.

Option	Perceived benefits	Perceived drawbacks
Rural/Coastal or North/South split of East Sussex	Smaller area, shared identity and challenges. "Authority footprint over area with needs and ambitions in common"	People questioned if this would mean they wouldn't have a say on what happens in the other area. To note: when talking about identity, people on the coast valued the rural areas and vice versa.
Current East Sussex Footprint	Less disruptive than other models. Some felt it should be the presumed model unless the business case was able to make a strong case for an alternative approach.	Others felt the current County Council did not work well for them and saw this as more of the same, while losing their local voice.
Split into three across West and East Sussex (i.e. West, Central/Mid and East).	Limited number of people identified with 'Central' or 'Mid-Sussex.	Others felt it was an arbitrary split.
Federated Model (Hastings only)	Achieve efficiencies while keeping identity and voice of local areas.	
Whole Sussex model		Discounted as too large an area
Split East and West Sussex into four (North West, North East, South West and South East)	Not sufficiently discussed to draw out key benefits and drawbacks.	

There were also some comments about going back to how things were split up before, but this was not elaborated on.

As highlighted above, not everyone expressed a clear preference. However, the feeling of those that did clearly express a view were as follows:

Area	View
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Wealden	Rural/Coastal followed by current East Sussex footprint. Some interest in three-way split and even the four way split.
Rother	Less clear boundary suggestions discussed, but some expressed support for rural/coastal option.
Eastbourne	Less clear boundary suggestions discussed, but some support for rural/coastal split.
Lewes	East Sussex footprint most supported
Hastings	Federated Model, followed by Rural/Coastal split.

Methodology and Limitations

- The focus groups were not representative, and findings cannot be extrapolated into the views of everyone in these areas.
- Only 60 minutes in Eastbourne and Lewes.
- Push back against the identity exercise as people didn't see its relevance. Given time constraints and this push back, the identity exercise was not carried out for all of the focus groups.

East Sussex Local Government Reform

User Voice Groups – Supplementary engagement

Summary

As part of the ongoing engagement process, council officers attended four distinct service user voice groups held in July 2025. These sessions were designed to gather insights and feedback from diverse communities across East Sussex.

Each group provided valuable perspectives on how the proposed changes may impact their communities. The feedback was thematically analysed and cross-referenced to identify common concerns and priorities.

Thematic analysis of the feedback from the four service user groups

Youth Cabinet (6 July 2025)

Key Themes:

- **Identity & Representation:**
 - Young people do not strongly identify with "East Sussex" as a place.
 - Concern that local identities (e.g., Bexhill, Seaford) may be diluted in a larger authority.
- **Youth Voice & Participation:**
 - Strong concern about lack of youth involvement in the restructure.
 - Recommendations for structured youth representation (e.g., local youth groups feeding into a central youth council).
- **Equity & Rural Inclusion:**
 - Fear that rural areas will be overlooked in funding and service provision.
 - Emphasis on tailoring services to diverse local needs.
- **Funding & Services:**
 - Concerns about insufficient funding for youth services, especially in rural areas.
 - Desire for increased investment in youth engagement and services.
- **Communication & Accountability:**
 - Need for two-way communication between young people and decision-makers.
 - Suggestions for feedback loops and ongoing engagement.

The findings highlight a disconnect between young people and the broader East Sussex identity, alongside strong concerns about being excluded from decision-making processes.

There is a clear call for more inclusive, locally tailored services, especially in rural areas, and for structured youth representation to ensure meaningful engagement and accountability.

East Sussex Seniors' Association (ESSA) Health and Community Care Group (11 July 2025)

Key Themes:

- **Access & Local Contact:**
 - Worry about losing local points of contact and representation.
 - Importance of physical hubs for older people who may not be digitally connected.
- **Equity in Service Distribution:**
 - Concerns about fair distribution of resources, especially in rural areas.
 - Fear that centralisation could exacerbate existing inequalities.
- **Health & Integration:**
 - Questions about how the new structure will align with NHS services.
 - Desire for services to be based on proximity and need, not just administrative boundaries.

Citizens' Panel (11 July 2025)

Key Themes:

- **Digital Exclusion:**
 - Strong concerns about increased reliance on digital services.
 - Many residents lack access or skills to engage online.
- **Loss of Local Voice:**
 - Fear that local improvements and representation will be lost.
 - Emphasis on preserving local access and visibility of services.
- **Efficiency vs. Equity:**
 - Hope that restructuring could bring efficiency and cost savings.
 - But only if it draws on best practices and ensures alignment across systems.
- **Learning from Others:**
 - Recommendation to study other councils' experiences with unitary transitions.
 - Importance of maintaining or improving service quality.

Migration Partnership Board (10 July 2025)

Key Themes:

- **Continuity of Engagement:**
 - Concern about the future of the Partnership Board under the new structure.

- Desire to ensure ongoing engagement with migrant communities.
- **Inclusion of Marginalised Voices:**
 - Emphasis on ensuring lesser-heard voices are included in LGR discussions.
 - Follow-up from partners requesting continued involvement.

Cross-Cutting Themes Across All Groups:

Theme	Summary
Local Identity & Representation	All groups expressed concern about losing local identity and representation in a larger authority.
Equity & Inclusion	Rural areas, older people, youth, and migrants were all highlighted as at risk of being overlooked.
Access to Services	Physical access (hubs), digital exclusion, and tailored services were recurring concerns.
Voice & Participation	Strong calls for meaningful engagement and structured feedback mechanisms.
Funding & Resources	Concerns about fair distribution and adequate funding, especially for vulnerable groups.
Learning & Best Practice	Desire to learn from other councils and build on existing strengths.

DRAFT Equality statement for LGR proposal

All of the East Sussex councils have responsibilities under the Equality Act 2010 to ensure that, in the exercise of their functions, they have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act.
- (b) advance equality of opportunity between persons who share a relevant protected characteristic (as defined by the Act) and persons who do not share it.
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The protected characteristics set out in the Act are age, disability, gender reassignment, pregnancy/ maternity, race, religion or belief, sex and sexual orientation. Marriage and civil partnership are also protected characteristics for the purposes of the duty to eliminate discrimination. When making decisions councils may also consider other matters such as the impact of rurality, deprivation, care experience, and being a carer, where relevant.

Any change in how public services are delivered will have the biggest impact on those most reliant on them, who are often among the most vulnerable people in society and include people sharing one or more of the legally protected characteristics.

If the proposal for the establishment of a single unitary council is accepted by Government, detailed implementation plans will be created. Equality impact assessments of these will set out both how the new council will continue to ensure it fulfils its legal requirements in relation to equality, diversity and inclusion, and will also include assessments of how each of the detailed plans are likely to impact people sharing different protected characteristics.

There are potential equality and inclusion benefits and challenges in relation to this proposal, but at this stage with so much uncertainty over funding, structures, process and practical implications, it is not possible to assess specific impacts with confidence, nor to define appropriate mitigating actions.

However, the councils are aware of the need to consider a range of issues, including (but not limited to) the following:

- Ensuring no disruption or delay in service delivery, especially for the most vulnerable, including during transition arrangements.

- Effective communication of transitions and any changes in services to people currently using services, especially where there are cognitive, sensory, language, digital or other barriers to understanding.
- Anticipating and addressing barriers and opportunities arising from changes to the ways services are delivered.
- Using assessment of equality impact throughout the transition and implementation processes.
- Identifying opportunities to tackle inequalities, including potential to shifting investment towards prevention and early intervention and connecting services currently delivered by different councils.
- Addressing practical challenges for service delivery across urban and rural areas, specifically considering physical and digital isolation.
- Working with the skills, experience and community links held by VCSE organisations across the county to support transition.
- Using equality data to inform planning, implementation and monitoring throughout the transition process and in the new authority.
- Ongoing consideration of patterns of deprivation across the county and ensuring appropriate interventions.
- Maintaining a focus on community cohesion across the county.
- Identifying impacts and opportunities inherent in any changes to political representation and how local people are engaged in decision-making.
- Ensuring ongoing compliance with equality legal duties through the transition and in the new authority.
- Monitoring staffing implications, including any changes to staffing structures, working policies and locations; providing ongoing communication about changes and impacts; and ensuring change processes are followed.

Summary of Draft SI: The Sussex & Brighton Combined County Authority Regulations 2026

1.	The SI will establish the Sussex & Brighton Combined County Authority (CCA) and confirm the statutory tests are met, the Constituent Authorities (CAs) have consented, and the process of approval has been completed.
2.	Commencement date – all Regulations will come into force the day after they are made except Mayoral Functions which come into force on 11 May 2026 (post Mayoral election on 7 th May).
3.	<p>Establishes CCA</p> <ul style="list-style-type: none"> Establishes the Combined County Authority and names it as the Sussex and Brighton Combined County Authority. The Authority will have the functions set out in SI although further functions may be conferred in the future through further regulations. Confirms how the Local Audit and Accountability Act 2014 provisions (statement of accounts) will be met during the first and subsequent years. References that the Constitution is included as a Schedule (see below). <p>Confirms first financial reporting required from the date Regulations in force to 31st March 2027.</p>
4.	<p>Election of Mayor</p> <p>Sets out how mayors will be elected every fourth year as well as how terms will begin (the first on 7.5.26) and end.</p> <p>Sets out that the mayor will be able to employ a single political advisor, who will be an employee of the Combined Authority. The employment of an advisor is tied to the mayor who recruits them, meaning that they cannot be employed after the end of a term or after a mayor resigns. The position will be a politically restricted post. The advisor will not be responsible for other employees of the Combined Authority.</p>

	Incorporates LGHA 1989 provisions relating to political advisors, including restrictions on pay.
5.	<p>Transport</p> <p>Transfers the functions set out in Ss108, 109 and 112 of Transport Act 2000 to the CCA from the Constituent Authorities.</p> <p>There will be a transition period which will end 31 March 2027 during which the powers will be held concurrently.</p> <p>S108 TA 2000 – is the requirement to develop policies for the promotion and encouragement of safe, integrated, efficient and economic transport to, from and within their area and requirement to produce a Local Transport Plan setting out the Policies and how they will be implemented.</p> <p>S109 TA 2000 – sets out the details of who to consult and how to publish the Local Transport Plan</p> <p>S112 TA 2000 – sets out the requirement to have regard to Guidance from Secretary of State and to the needs of disabled people when producing Local Transport Plans.</p> <p>Power to pay a grant</p> <p>A CCA may pay a grant to CA towards expenditure incurred or to be incurred by a constituent council This power is exercisable only by the mayor. In determining the amount to be paid to a constituent council in relation to that council's highway functions, the CCA must have regard to the desirability of ensuring that the council has sufficient funds to exercise its highways function and decisions must take into account other sources of funding.</p>
6.	<p>The following functions can only be exercised by the Mayor:-</p> <p>Ss108,109 and 112 Transport Act 2000 (Local Transport Plans)</p> <p>S31 LGA 2003 – power to pay grants (under Reg 8 above)</p>

	<p>The Mayor can also do anything that a Combined Authority can do under section 49 of the Levelling Up and Regeneration Act (general power of the CCA).</p> <p>However the Mayor may enter into joint committee arrangements pursuant to S101(5) of the LGA 1972 (with the CCA, the CAs and other LAs) for the discharge of the above functions.</p>
7.	<p>How the CCA will be Funded</p> <p>Constituent Authorities to ensure costs of CCA and Mayor are met (to the extent Mayor has decided not to use other funds) reasonably attributed to the exercise of function.</p> <p>The constituent councils must meet the costs of expenditure associated with regulation 10 (Part 5 - mayoral functions above). However, the mayor must agree with the CCA the total expenditure in advance of incurring the expenditure. Any precept issued in relation to this expenditure under section 40 of the Local Government Finance Act 1992 is to be disregarded from the cost of expenditure.</p> <p>The constituent councils must be apportioned either through a mechanism of their own agreement or if no agreement is in place, based on the number of their residents as a proportion of the total population of the CCA area.</p> <p>CCA can raise its own funds through a precept.</p>
8.	<p>CCA duty to share information in relation to Crime & Disorder (plus other additional functions)</p> <p>The functions of the constituent councils set out in section 17A of the Crime and Disorder Act 1998 (sharing of information), exercisable concurrently with the constituent councils. The Combined Authority also becomes the relevant authority for the purposes of Section 115 of the Act (disclosure of information).</p>

	The Localism Act functions of the CAs exercisable for the purpose of economic development (<u>not</u> economic *assessments*) may also be exercised by the MCCA.
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Constitution

	Detail	Comment/Questions
Membership	<p>The Constitution sets out that each constituent authority must appoint two members to join the CCA.</p> <p>The Constitution outlines that a member of the CCA would cease to be a member if they were no longer a member of the appointing constituent authority, or the appointing constituent authority ended the appointment. Process for termination of appointment (by CA - not CCA) or resignation by written notice to the appointing CA (in latter case takes effect on date of receipt).</p> <p>Where above has happened, a process whereby the CA 1) gives written notice to the CCA & 2) appoints another member 'as soon as practicable'</p> <p>Any new appointment starts/ terminated appointment ends between one week (min) from notice or later specified period of up to 4 weeks.</p>	<p>Membership provisions reflect the provisions proposed within Government's Sussex and Brighton Devolution Consultation.</p> <p>Both East Sussex CC and West Sussex CC have queried this proposal when set out in the consultation, advocating the need for membership to be reflective of population ratios between the three constituent authorities. BHCC is supportive of the proposed membership.</p>

Substitution	One substitute to be appointed per member – i.e. two for each CA (either of whom may sub for either member)	
Chair	<p>Chair and Vice Chair</p> <p>Mayor to act as Chair once elected.</p> <p>Process for appointing a Chair and Vice Chair from the CCA members for the period before the mayoral election.</p> <p>Ahead of the mayor being elected, the CCA will appoint a Chair and Vice Chair. The Chair appointed by the CCA will cease to be Chair following the election of the mayor and the Office of Vice Chair will be abolished. The Chair will also cease holding the position if they are no longer a member of the CCA.</p> <p>Vice Chair to act where Chair unable to/ office vacant.</p> <p>A vacancy in the chair or vice-chair must be filled at the next meeting of the CCA unless this date is within 14 days, then the vacancy is to be filled at the following meeting.</p> <p>No meetings of the CCA can happen if for any reason <u>both</u> the Chair & Vice Chair are unable to act or both their offices are vacant.</p>	
Non-constituent & associate members	<p>Non-Constituent and Associate Members</p> <p>CCA may have a maximum of six non-constituent (NC) members & associate members (AMs) <u>in total</u>.</p> <p>Requirement that each of the above also nominate a sub.</p> <p>See the LURA 2023 for voting & appointment:</p>	<p>The Draft SI does not prevent Non-Constituent Members from voting but requires CCA members to consent. This reflects the position within the 2023 Act (non-</p>

	<ul style="list-style-type: none"> • AMs may not vote • The NCs are designated by a 'nominating body' only if the CCA approves this and that body agrees. These NCs do not have voting rights <u>unless</u> the CCA resolves to give them voting rights. 	<u>constituent members of a CCA).</u> The limit on NC and Associate Members was queried in the consultation, and it was requested that local discretion be allowed.
Voting	<p>Any decision of the CCA ahead of a mayor being elected is by a simple majority, subject to the exceptions listed below. Once a mayor is elected, any decision of the CCA is by simple majority but must include the mayor (or deputy mayor acting in their place).</p> <p>Ahead of a mayor being elected, no business can be transacted without the chair (or vice chair) and three constituent members being present. Once a mayor has been elected, no business can be conducted without the mayor (or deputy) and four constituent members being present.]</p> <p>Decisions regarding the Local Transport Plan (section 108 of the 2000 Act) will be decided by a simple majority.</p> <p>Each member has one vote and there is no casting vote. In the event of a tie in relation to the power of the Local Transport Plan only, the Mayor (or Deputy, acting as Chair) shall have a casting vote.</p> <p>Business conducted by the CCA will not be deemed void as a result of a membership vacancy, or a clerical error in the appointment of a member or substitute.</p> <p><u>Exceptions</u> to normal rule:</p>	Means a majority vote which the Chair does not vote for would not succeed.

	<ul style="list-style-type: none"> • a two thirds majority vote needed to veto the Mayor's budget(• in a tied vote on a local transport plan, the Mayor has a casting vote <p>Each member (i.e. voting member) to have one vote and the status quo prevails if vote is tied.</p> <p>No member to have a casting vote – with exception of Mayor on local transport plan.</p>	
Quorum	<p><u>Before the first Mayor's term</u> starts: requirement that the Chair/ Deputy be present and also three of the members appointed by each constituent council'.</p> <p><u>After Mayor is elected</u>, the following must be present 1) the Mayor and/or Deputy Mayor acting as Chair and also 2) any four CA members</p> <p>NB If Deputy is chairing, they do <u>not</u> count also as a CA member</p>	
Minutes & records of meetings; Standing Orders & Constitution	<p>Minutes and records required (5); Standing Orders to regulate proceedings (6) and a Constitution (8) permitted.</p> <p>Sets out that the CCA can make provisions about its constitution and Standing Orders.</p>	
Remuneration of members	<p>Ordinary members not remunerated (other than travel & expenses).</p> <p>Remuneration only allowed to following appointees:</p> <ul style="list-style-type: none"> • Mayor, the Deputy (provided not leader or elected mayor of a CA & receiving an SRA for that) 	

	<ul style="list-style-type: none"> • Members appointed to the O&S of the CCA and any Sub Committee under it OR to the Audit Committee <p><u>provided that</u> the CCA has established an IRP, considered a report recommending it, and sets a level which does not exceed its recommended allowances</p>	
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The framework below sets out the statutory functions of **Mayoral Strategic Authorities (MSAs)** as set out in the English Devolution and Community Empowerment Bill and other legislation.

As set out in the Devolution Framework in the English Devolution White Paper, different categories of Strategic Authorities are also guaranteed access to other non-statutory offers, including partnership and funding arrangements.

General Mayoral Powers – not included in the Devolution Framework but included in the English Devolution and Community Empowerment Bill:

The Mayoral Powers of Competence are suite of powers which will be conferred on Mayoral Strategic Authorities. The powers provide new legal force to Mayors’ existing “soft powers” and convening role, and will help drive growth, collaboration and improvement across geographies. **The MPC is made up of:**

Statutory Function	Governance – where “Standard” means: <ul style="list-style-type: none"> Voting is a simple majority inc. the Mayor Exercised solely by the SA 	Related Clauses	Tier of Functions devolved from Central Government
The General Power of Competence This is an existing broad general power which will enable Mayoral Strategic Authorities, and their Mayors, to do anything an	To be used at the discretion of the Strategic Authority and its Mayor independently of each other.	Clause 20 of the English Devolution and Community Empowerment Bill &	MSAs – new power provided for in the EDCE Bill.

individual can do in relation to their areas of competence		Schedule 4 in the English Devolution and Community Empowerment Bill	
A Power to Convene and a Duty to Respond This will enable Mayors to convene local partners to address local challenges. It will also place a duty on local partners to respond to a Mayor's request when they make use of the power to convene. The specific local partners covered will be set out in subsequent secondary legislation.	To be used at the discretion of the Mayor of a Strategic Authority.	Clause 21 of the English Devolution and Community Empowerment Bill	MSAs – new power provided for in the EDCE Bill
A Duty to Collaborate This will ensure that Mayors of neighbouring Strategic Authorities have a formal process by which they can enter into collaboration with one another.	To be used at the discretion of the Mayor of a Strategic Authority.	Clause 22 of the English Devolution and Community Empowerment Bill	MSAs – new power provided for in the EDCE Bil

Area of Competence – Transport and Infrastructure

Statutory Function	Governance	Related Clauses	Tier of Functions devolved from Central Government
<p>Local Transport Authority functions</p> <p>Strategic Authorities are the Local Transport Authority for their area, with responsibility for preparing and publishing a local transport plan and powers to secure the provision of passenger transport services where not otherwise provided. Strategic Authorities also have powers and duties to prepare a bus strategy for carrying out their bus functions, enter into partnerships with bus operators, enter into franchising schemes, and manage travel concessions.</p>	<p>Standard, with the exception that functions relating to Local Transport Plans and the decision on whether to make a proposed franchising scheme are exercisable only by the Mayor.</p> <p>However, final approval of a Local Transport Plan is subject to a simple majority vote of constituent members where the Mayor must be in the majority. If the vote is tied, the Mayor has an additional casting vote.</p>	<p>Clause 29 and Schedule 9 of the English Devolution and Community Empowerment Bill</p> <p>Host legislation:</p> <p>Transport Act 2000 – Part 2</p> <p>Transport Act 1985 – Parts 4 and 5</p>	<p>MSA - powers consolidated over a strategic geography (but with transitional concurrency)</p>

<p>Transport Levy</p> <p>Strategic Authorities can issue levies to their constituent authorities to meet the cost of exercising their transport functions, where otherwise not met.</p>	<p>Standard.</p> <p>Apportionment between constituent councils is subject to the Transport Levying Bodies Regulations 1992.</p>	<p>Clause 13 of the English Devolution and Community Empowerment Bill</p> <p>Host legislation:</p> <p>Local Government Finance Act 1988 – s.74</p>	<p>MSAs – new power provided for in the EDCE Bill</p>
<p>Agreements between authorities and strategic highways companies</p> <p>This allows Strategic Authorities to enter into agreements with local highway authorities (upper-tier local authorities) and/or National Highways to delegate or share the maintenance and improvement of roads.</p>	<p>Standard, with the exception that:</p> <ul style="list-style-type: none"> • The function is exercised concurrently with local authorities. • Use of these functions requires the consent of the relevant constituent authority where the function would be exercised. 	<p>Clause 24 and Schedule 6 of the English Devolution and Community Empowerment Bill</p> <p>Host legislation:</p> <p>Highways Act 1980 – s.6 and 8</p>	<p>Held concurrently between MSA and constituent LAs</p>
<p>Civil enforcement of road traffic contraventions</p> <p>These powers enable Strategic Authorities to enforce parking, bus lane, and moving traffic contraventions through penalty</p>	<p>Standard, with the exception that:</p> <ul style="list-style-type: none"> • The function is exercised concurrently with local authorities. • Use of these functions requires the consent of the relevant constituent authority 	<p>Clause 25 and Schedule 7 of the English Devolution and Community Empowerment Bill</p> <p>Host legislation:</p> <p>Part 6 and Schedule 8 of the Traffic Management Act 2004</p>	<p>Held concurrently between MSA and constituent LAs</p>

charge notices. This is only possible if the relevant constituent council already has those functions and consents to the SA using them. The SA must follow existing statutory guidelines for charge levels for Fixed Penalty Notices and provide information on appeals processes.	where the function would be exercised.		
<p>Key Route Network</p> <p>Mayoral Strategic Authorities will have a duty to set up and coordinate a Key Route Network. This will allow the most important local roads to be strategically managed.</p> <p>Mayors will also hold a Power of Direction over constituent highway authority exercise of their traffic, permit, street and local highways authority powers on Key Route Network roads to support delivery of the Mayor's agreed Local Transport Plan. This means Mayors can direct councils with responsibilities for roads in their area to use their</p>	<p>This function is exercisable only by the Mayor, on behalf of the Strategic Authority.</p> <p>However, final agreement of which roads are included in the Key Route Network will be subject to a simple majority vote where the Mayor must be in the majority.</p>	<p>Clause 27 and Part 1 of Schedule 8 of the English Devolution and Community Empowerment Bill</p> <p>Host legislation:</p> <p>Local Democracy, Economic Development and Construction Act 2009 – s.107ZA</p> <p>Levelling Up and Regeneration Act 2023 – s.22-24</p>	MSAs – new power provided for in the EDCE Bill

powers in a certain way; for example, to create a bus gate.			
Transfer of duty of principal councils to make reports on Key Route Network roads Mayoral Strategic Authorities will be required to prepare reports assessing local road traffic levels and forecasting their growth on their Key Route Network. These reports may include targets and proposals for achieving these targets.	Standard	Clause 27 and Part 2 of Schedule 8 of the English Devolution and Community Empowerment Bill Host legislation: The 1997 Road Traffic Reduction Act - s2	MSAs are taking over this duty for key route network roads. Constituent LAs retain this duty for other local roads.
Road User Charging These powers enable a Strategic Authority to make a joint road user charging scheme (e.g. congestion charging) with relevant constituent councils.	Standard, with the exception that this function can only be exercised jointly with the relevant constituent local traffic authority (the upper-tier local authority) where the scheme would take place.	Chapter I of Part III of the Transport Act 2000	Can only be exercised by MSA jointly with relevant constituent LA(s). Constituent LAs continue to be able to exercise independently.
On-Street Micromobility Schemes These powers enable Strategic Authorities, in their role as the Local	Standard	Clause 23 and Schedule 5 of the English Devolution and Community Empowerment Bill	MSAs – new power provided for in the EDCE Bill. (Although this power

Transport Authority, to license micromobility schemes operating on public roads and pavements. This allows them to have greater control of bike and e-bike rental schemes run by private companies. Other types of shared micromobility impacting on public space could also be included in the framework in the future.			would be available to constituent LA's if MSA didn't exist).
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Area of Competence: Skills and Employment Support

Statutory Function	Governance	Related Clauses	Tier of Functions devolved from Central Government
<p>Adult Education Functions</p> <p>Subject to a transition period for new Strategic Authorities, some powers of the Secretary of State relating to education and training of adults will be devolved to Strategic Authorities. These powers support the delivery of devolved adult skills funding.</p> <p>Powers relating to apprenticeships and people subject to adult detention are not devolved.</p>	<p>Standard, except that the relevant functions in section 90 and 100 of the Apprenticeships, Skills, Children and Learning Act 2009 are exercised concurrently with the Secretary of State.</p>	<p>Clause 30 and Schedule 10 of the English Devolution and Community Empowerment Bill</p> <p>Host legislation:</p> <p>Apprenticeship, Skills, Children and Learning Act 2009 - s.86, s.87, s.88, s.90, s.100(1), s.100(1B)</p>	<p>MSAs – new power provided for in the EDCE Bill.</p>

Area of Competence: Housing and Strategic Planning

Statutory Function	Governance	Related Clauses	Tier of Functions devolved from Central Government
<p>Spatial Development Strategy</p> <p>All Strategic Authorities will have a duty to produce a Spatial Development Strategy. These documents enable them to strategically plan for development across their whole area.</p> <p><i>(Note: This duty will also be mirrored for all principal local authorities in areas without Strategic Authorities, where authorities will be required to collaborate via Strategic Planning Boards where necessary.)</i></p>	<p>This function is exercised by the Mayor on behalf of the Strategic Authority.</p> <p>However, approval of the strategy requires a simple majority vote of the Mayor and constituent members. The Mayor must be included in the majority for a vote to be carried. If the vote is tied, the Mayor gets an additional casting vote.</p>	<p>To be introduced through clause 52 of the Planning and Infrastructure Bill: Part 1A of the Planning and Compulsory Purchase Act 2004</p>	<p>MSAs – new power provided for in the EDCE Bill (although new duty would sit with constituent LA if MSA didn't exist)</p>
<p>Housing and Land Powers, concurrent with Homes England</p> <p>These additional powers allow Mayoral Strategic Authorities to acquire housing and land for specific purposes (set out in the</p>	<p>These functions are exercised concurrently with Homes England.</p> <p>Mayors exercise the compulsory purchase function on behalf of the Strategic Authority. Before</p>	<p>Clause 34 and Part 1 of Schedule 15 (Acquisition and development of land) in the English Devolution and Community Empowerment Bill</p> <p>Host legislation:</p>	<p>MSAs – new power provided for in the EDCE Bill</p>

<p>governance arrangements column). This includes powers to acquire land using the compulsory purchase powers previously solely held by Homes England.</p> <p>They also include the ability to provide financial assistance to any person (again in line with the objectives set out in the governance arrangements column).</p>	<p>exercising their compulsory purchase powers, Mayors must consult the local planning authority where the power is to be exercised.</p> <p>All other functions are exercised by the Strategic Authority and subject to the standard governance.</p> <p>All of these functions must be exercised for the purposes of, or for purposes incidental to the objectives of:</p> <ul style="list-style-type: none"> • Improving the supply and quality of housing in the area; • Securing the regeneration or development of land or infrastructure in the area; • Supporting in other ways the creation, regeneration or development of communities in the area or their continued well-being; 	<p>Housing and Regeneration Act 2008 – s.5-10; s.19; p.19 & 20 of Sch.3; p.1-4, 6, 10, 20 of Sch.4</p>	
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	<ul style="list-style-type: none"> Contributing to the achievement of sustainable development and good design in the area. 		
<p>Housing and Land Powers, concurrent with Local Authorities</p> <p>These powers enable Strategic Authorities to acquire and develop housing and land as well as provide services in relation to housing.</p> <p>The powers of local authorities conferred on Strategic Authorities differ from the powers of Homes England by placing a duty on Strategic Authorities to review housing needs in their area and enabling them to provide additional facilities in relation to housing they provide. The land acquisition powers can also be used for the purpose of providing housing, develop the land, or for planning purposes.</p>	<p>These functions are exercised concurrently with local authorities.</p> <p>Compulsory purchase powers under the Housing Act 1985 are only exercisable by the Mayor. Whereas all other powers, including compulsory purchase powers under the Town and Country Planning Act 1990, are exercised by the Strategic Authority.</p> <p>Before exercising their compulsory purchase powers, Mayors and Mayoral Strategic Authorities (depending on who is exercising the function) must consult the local planning authority where the power is to be exercised.</p>	<p>Clause 34 (Acquisition and development of land); Clause 35 (Housing accommodation); Part 2 of Schedule 15; and Schedule 16 of the English Devolution and Community Empowerment Bill</p> <p>Host legislation:</p> <p>Housing Act 1985 - s.17-18</p> <p>Town and Country Planning Act 1990 - s.226, 227, 229, 230(1)(a), 232, 233, 235, 236, 238, 239, 241</p>	<p>All powers held concurrently between MSA and constituent LAs</p>

These powers are held by lower-tier local authorities ordinarily.	Apart from functions exercised by the Mayor, the standard voting arrangement applies.		
Mayoral Development Corporations These powers enable Mayors of Strategic Authorities to designate a Mayoral Development Area and subsequently establish a Mayoral Development Corporation (MDC) for that area. MDCs are statutory corporate bodies which can take broad planning and land assembly powers, have the ability to attract inward investment, and are well placed to harness private sector expertise to drive forward development.	These functions are exercisable only by the Mayor on behalf of the Strategic Authority. This means that the Mayor is responsible for establishing and overseeing a Mayoral Development Corporation. However, the designation of a Mayoral Development Area will be subject to a simple majority of voting members of the Strategic Authority where the Mayor must be in the majority.	Clause 36 and Schedule 17 of the English Devolution and Community Empowerment Bill. Host legislation: Localism Act 2011 – Chapter 2 of Part 8; and Schedule 21	MSAs – new power provided for in the EDCE Bill
Strategic Development Management Powers These powers enable Mayors of Strategic Authorities to intervene in	These functions are exercisable only by the Mayor on behalf of the Strategic Authority.	Clause 31 and Schedule 11 of the English Devolution and Community Empowerment Bill Host legislation:	MSAs – new power provided for in the EDCE Bill

planning applications of potential strategic importance (e.g. especially large or prominent developments) and the ability to call in these applications.		Town and Country Planning Act 1990 – Part 1, s2A (call-in); and Part 3, s74(1B) (direct refusal)	
Mayoral Development Orders These powers give Mayors of Strategic Authorities the ability to prepare Mayoral Development Orders (MDOs). MDOs allow them to grant pre-emptive planning permission for a particular development instead of relying on an application to be submitted.	These functions are exercisable only by the Mayor on behalf of the Strategic Authority. Mayors must consult and gain approval of the local planning authority where the order would have effect. Where the local planning authority does not approve the order, the Mayor can request the Secretary of State approve the order instead.	Clause 32 and Schedule 12 of the English Devolution and Community Empowerment Bill. Host legislation: Town and Country Planning Act 1990 – Part 3, s.61DA-61DE.	MSAs – new power provided for in the EDCE Bill
Mayoral Community Infrastructure Levy These powers enable Mayors of Strategic Authorities to charge developers a Mayoral Community Infrastructure Levy. This is a charge	These functions are exercisable only by the Mayor on behalf of the Strategic Authority. This means that the Mayor is responsible for developing and applying the Mayoral Community Infrastructure Levy.	Clause 33 and Schedule 14 of the English Devolution and Community Empowerment Bill. Host legislation:	MSAs – new power provided for in the EDCE Bill. Constituent LPAs retain CIL powers.

which can be imposed on new development in their area. It can be used to raise funds to deliver infrastructure needed to support development in their area.	However, the approval of a charging schedule for the levy is subject to a simple majority vote of the voting members of the Strategic Authority.	Planning Act 2008 – Part 11	
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Area of Competence: Economic Development and Regeneration

Statutory Function	Governance	Related Clauses	Tier of Functions devolved from Central Government
Mayoral Council Tax Precept The changes to this power will allow Mayors to issue a precept to generate revenue across all Mayoral and CA/CCA functions. Previously, a Mayor could precept only for Mayoral functions, and not CA/CCA functions.	Voting and governance arrangements will vary, depending on whether the precept is on Mayoral functions, or wider C(C)A functions: <ul style="list-style-type: none"> • Mayors will continue to be subject to voting rules set out in previous legislation on precepts raised against Mayoral functions, which is 	Clause 11 of the English Devolution and Community Empowerment Bill	MSA's – new power provided for in the EDCE bill.

	<p>commonly 2/3 of constituent authorities can vote against or to amend a precept.</p> <ul style="list-style-type: none"> • A Mayor wanting to raise a precept on wider C(C)A functions would be subject to the standard voting arrangements of a simple majority including the Mayor. 		
<p>Power to borrow up to an agreed cap</p> <p>This power will remove the requirement to lay bespoke SIs for Mayoral Strategic Authorities (MSAs) by automatically conferring on them the power to borrow upon establishment for purposes relevant to their functions. However, an MSA must obtain consent from the Secretary of State before the first exercise of the power to borrow money for a purpose relevant to a</p>	<p>Standard, except that this function is exercised concurrent with local authorities.</p> <p>Exercise of the power to borrow will be automatically conferred for functions relevant to transport, police and crime commissioner and fire and rescue functions when an MSA takes on those functions. This power may be exercised by an MSA immediately for these functions only, before a Mayor has been elected. Otherwise, Secretary of</p>	<p>Clause 12 of the English Devolution and Community Empowerment Bill</p>	<p>MSA's – new power provided for in the bill. Constituent LA's retain their own borrowing powers.</p>

function other than its transport, police or fire and rescue functions.	State consent will be needed before the power is used.		
Local Growth Plans Mayoral Strategic Authorities will have a duty to produce a local growth plan.	Standard	Clause 38 and Schedule 19 of the English Devolution and Community Empowerment Bill	MSA's – new power provided for in the EDCE bill.
Duty to prepare an assessment of economic conditions Strategic Authorities must prepare and maintain an assessment of the economic conditions of their area. This is a separate duty from the duty to produce a Local Growth Plan but both duties could be satisfied simultaneously.	Standard, except that exercise of function is concurrent with local authorities.	Clause 37 and Schedule 18 of the English Devolution and Community Empowerment Bill Host legislation: S.69 of Local Democracy, Economic Development and Construction Act 2009	Power is held concurrently between MSA and constituent LAs
Power to pay grant to a constituent authority	This function is exercisable only by the Mayor on behalf of the Strategic Authority.	Clause 39 of the English Devolution and Community Empowerment Bill Host legislation:	MSA's – new power provided for in the EDCE bill.

<p>This power enables Mayors to pay grants to their constituent councils. This is most commonly used to pass funding for maintaining local roads to councils.</p>	<p>When paying grants for councils' road functions, Strategic Authorities must make sure payments are sufficient for them to exercise their functions.</p>	<p>s.32A of the Local Government Act 2003</p>	
<p>Powers to encourage visitors and provide entertainment.</p> <p>These powers enable Strategic Authorities to encourage people to visit their area and provide, support, and/or contribute to the provision of entertainments, such as concerts, plays, or exhibitions, and incur expenditure for these purposes. This includes powers to provide premises, facilities, or publicity for cultural and recreational events.</p>	<p>Standard, except that exercise of function is concurrent with local authorities.</p>	<p>Clause 40 of the English Devolution and Community Empowerment Bill</p> <p>Host legislation:</p> <p>s.144 and s.145 of the Local Government Act 1972.</p>	<p>Power is held concurrently between MSA's and constituent LAs</p>
<p>Power to arrange for publication of information relating to the functions of the Strategic Authority</p>	<p>Standard, except that exercise of function is concurrent with local authorities.</p>	<p>Clause 42 and Paragraph 2 of Schedule 20 of the English Devolution and Community Empowerment Bill</p>	<p>Power is held concurrently between MSA's and constituent LAs</p>

<p>These powers enable Strategic Authorities to arrange for the publication of information related to their functions as well as services available in the area. This means that they can collect, compile, and disseminate such information.</p>		<p>Host legislation:</p> <p>Local Government Act 1972 – s.142(2)</p>	
<p>Power to place staff at the disposal of other authorities</p> <p>These powers enable Strategic Authorities to enter agreements with other Strategic Authorities, local authorities, and other organisations like the NHS, to share staff services for their functions.</p>	<p>Standard, except that the function can be exercised concurrently with other Strategic Authorities, local authorities or other bodies such as NHS England.</p>	<p>Clause 42 and Paragraph 1 of Schedule 20 of the English Devolution and Community Empowerment Bill</p> <p>Host legislation:</p> <p>s.113 of the Local Government Act 1972</p>	<p>Power is held concurrently between MSA and constituent LAs</p>
<p>Power to prosecute and defend legal proceedings</p> <p>These powers allow Strategic Authorities to initiate or defend legal proceedings where they consider it</p>	<p>Standard, except that exercise of function is concurrent with local authorities.</p>	<p>Clause 42 and Paragraph 3 of Schedule 20 of the English Devolution and Community Empowerment Bill</p>	<p>Power is held concurrently between MSA and constituent LAs</p>

expedient for promoting or protecting the interests of the residents of their area. This includes the ability to prosecute, defend, or appear in any legal action and to institute proceedings in their own name to address local concerns.		Host legislation: s. 222 of the Local Government Act 1972.	
Research and collection of information These powers enable Strategic Authorities to conduct research and collect information on matters concerning their area to support their functions and share their findings.	Standard, except that exercise of the function is concurrent with local authorities.	Clause 42 and Paragraph 4 of Schedule 20 of the English Devolution and Community Empowerment Bill Host legislation: s.88(1)(a) and (1)(b) of the Local Government Act 1985	Power is held concurrently between MSA and constituent LAs

Area of Competence: Environment and Net Zero

Statutory Function	Governance	Related Clauses	Tier of Functions devolved from Central Government
Heat Network Zoning coordination role This means that Strategic Authorities will be well placed to take forward heat network zones and create zone coordinators.	Standard	s228(5) of the Energy Act 2023	MSA's – new power provided for in the 2023 Energy Act.

Area of Competence: Health, Wellbeing and Public Service Reform

Statutory Function	Governance	Related Clauses	Tier of Functions devolved from Central Government
A bespoke statutory health improvement and health inequalities duty When considering whether or how to use any of its powers and functions a Mayor or a Strategic Authority will have a duty to have regard to the need to improve the health of	Standard	Clause 43 of the English Devolution and Community Empowerment Bill	MSA's - new power provided for in the EDCE Bill.

people in the Strategic Authority area and the need to reduce health inequalities in the local area.			
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Area of Competence: Public Safety

Statutory Function	Governance	Related Clauses	Tier of Functions devolved from Central Government
Sharing of information in relation to crime and disorder These powers both enable and place a duty on Strategic Authorities to disclose information relating to the reduction of crime and disorder, including anti-social behaviour, to other relevant authorities (such as local authorities, social landlords and the police).	Standard, except that exercise of the function is concurrent with local authorities.	Clause 48 of the English Devolution and Community Empowerment Bill Host legislation: s.17A and s.115 of the Crime and Disorder Act 1998	Power is held concurrently between MSA and constituent LAs
Police and Crime Commissioner Functions	This function is exercisable only by the Mayor.	Clause 44, 45 and 47 of the English Devolution and Community Empowerment Bill	MSA's – new power is provided for in the EDCE Bill.

<p>Mayors will be, by default, accountable for the exercise of Police and Crime Commissioner (PCC) functions where mayoral boundaries align with police force boundaries, or with two police force boundaries when taken together. Transfers will be subject to secondary legislation.</p> <p>The Secretary of State may by order transfer PCC functions to the elected mayor of a CA or CCA where there are coterminous borders. The Secretary of State, at the same time, may alter the boundary of the police area (or areas) to which the transfer relates to achieve coterminosity.</p>	<p>Mayors will have to delegate PCC responsibilities to a Deputy Mayor (for Policing, Fire and Crime for each police force area for which they have PCC functions).</p>	<p>Host Legislation:</p> <p>Existing power, in statute in Police Reform and Social Responsibility Act 2011 sections 5, 7(7), 16, 18, 21, 28, 29, 20, 31(3), 62-63, 64(3) to (4A), 65, 70 and Schedule 1, and the modification of several related pieces of legislation</p>	
<p>Fire and Rescue Authority Functions</p> <p>Mayors will be, by default, accountable for the exercise of Fire and Rescue Authority (FRA)</p>	<p>Mayors will have the option to delegate FRA responsibilities to a Deputy Mayor for Policing, Fire and Crime, or a Public Safety Commissioner.</p>	<p>Clause 46 and 47 of the English Devolution and Community Empowerment Bill</p> <p>Host Legislation:</p>	<p>MSA's - where constituent LAs are the FRA, it will be passed to the SA.</p>

<p>functions where FRA and mayoral boundaries align, subject to secondary legislation</p> <p>The Secretary of State may by order transfer FRA functions to a CA or CCA where there are coterminous borders. The Secretary of State, at the same time may alter the boundary of the FRA area (or areas) to which the transfer relates to achieve coterminosity.</p>		<p>Existing power, in statute in – Fire and Rescue Services Act, 2004 p2 sections 6-10</p> <p>Transfer functions to a Mayor – Local Democracy, Economic Development and Construction Act 2009, Section 107D</p>	
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Functions which are solely exercisable by the Mayor of a Mayoral Strategic Authority

Function	Clauses in the English Devolution and Community Empowerment Bill
<p>A Power to Convene and a Duty to Respond</p> <p>This will enable Mayors to convene local partners to address local challenges. It will also place a duty on local partners to respond to a Mayor's request when they make use of the power to convene. The specific local partners covered will be set out in subsequent secondary legislation.</p>	<p>Clause 21 of the English Devolution and Community Empowerment Bill</p>
<p>A Duty to Collaborate</p> <p>This will ensure that Mayors of neighbouring Strategic Authorities have a formal process by which they can enter into collaboration with one another.</p>	<p>Clause 22 of the English Devolution and Community Empowerment Bill</p>
<p>Certain Local Transport Authority functions</p> <p>Functions relating to Local Transport Plans and the decision on whether to make a proposed franchising scheme are exercisable only by the Mayor.</p> <p>However, final approval of a Local Transport Plan is subject to a simple majority vote of constituent members where the Mayor must be in the majority. If the vote is tied, the Mayor has an additional casting vote.</p>	<p>Clause 29 and Schedule 9 of the English Devolution and Community Empowerment Bill</p>
<p>Key Route Network Power of Direction</p> <p>Mayoral Strategic Authorities will have a duty to set up and coordinate a Key Route Network. This will allow the most important local roads to be strategically managed.</p> <p>Mayors will also hold a Power of Direction over constituent highway authority exercise of their traffic, permit, street and local highways authority powers on Key Route Network roads to support delivery of the Mayor's agreed Local Transport Plan. This means Mayors can direct councils with responsibilities for roads in their area to use their powers in a certain way; for example, to create a bus gate.</p>	<p>Clause 27 and Part 1 of Schedule 8 of the English Devolution and Community Empowerment Bill</p>

<p>This function is exercisable only by the Mayor, on behalf of the Strategic Authority. However, final agreement of which roads are included in the Key Route Network will be subject to a simple majority vote where the Mayor must be in the majority.</p>	
<p>Spatial Development Strategy</p> <p>All Strategic Authorities will have a duty to produce a Spatial Development Strategy. These documents enable them to strategically plan for development across their whole area.</p> <p>(Note: This duty will also be mirrored for all principal local authorities in areas without Strategic Authorities, where authorities will be required to collaborate via Strategic Planning Boards where necessary.)</p> <p>This function is exercised by the Mayor on behalf of the Strategic Authority. However, approval of the strategy requires a simple majority vote of the Mayor and constituent members. The Mayor must be included in the majority for a vote to be carried. If the vote is tied, the Mayor gets an additional casting vote.</p>	<p>To be introduced through clause 52 of the Planning and Infrastructure Bill: Part 1A of the Planning and Compulsory Purchase Act 2004</p>
<p>Powers to acquire land using the compulsory purchase powers previously solely held by Homes England.</p> <p>Mayors exercise the compulsory purchase function on behalf of the Strategic Authority. Before exercising their compulsory purchase powers, Mayors must consult the local planning authority where the power is to be exercised. These functions are exercised concurrently with Homes England.</p>	<p>Clause 34 and Part 1 of Schedule 15 (Acquisition and development of land) in the English Devolution and Community Empowerment Bill</p>
<p>Housing and Land Powers, concurrent with Local Authorities</p> <p>Compulsory purchase powers under the Housing Act 1985 are only exercisable by the Mayor. Whereas all other powers, including compulsory purchase powers under the Town and Country Planning Act 1990, are exercised by the Strategic Authority.</p> <p>Before exercising their compulsory purchase powers, Mayors and Mayoral Strategic Authorities (depending on who is exercising the function) must consult the local planning authority where the power is to be exercised.</p>	<p>Clause 34 (Acquisition and development of land); Clause 35 (Housing accommodation); Part 2 of Schedule 15; and Schedule 16 of the English Devolution and Community Empowerment Bill</p>

These functions are exercised concurrently with local authorities.	
<p>Mayoral Development Corporations</p> <p>These powers enable Mayors of Strategic Authorities to designate a Mayoral Development Area and subsequently establish a Mayoral Development Corporation (MDC) for that area. MDCs are statutory corporate bodies which can take broad planning and land assembly powers, have the ability to attract inward investment, and are well placed to harness private sector expertise to drive forward development.</p> <p>These functions are exercisable only by the Mayor on behalf of the Strategic Authority. This means that the Mayor is responsible for establishing and overseeing a Mayoral Development Corporation. The overview and scrutiny committee of the Strategic Authority will in turn scrutinise the Mayor's decisions regarding the MDC. However, the designation of a Mayoral Development Area will be subject to a simple majority of voting members of the Strategic Authority where the Mayor must be in the majority.</p>	Clause 36 and Schedule 17 of the English Devolution and Community Empowerment Bill.
<p>Strategic Development Management Powers</p> <p>These powers enable Mayors of Strategic Authorities to intervene in planning applications of potential strategic importance (e.g. especially large or prominent developments). These include the ability to 'call in' these applications (and determine them instead of local planning authorities), or direct the local planning authority to refuse the application.</p> <p>These functions are exercisable only by the Mayor on behalf of the Strategic Authority.</p>	Clause 31 and Schedule 11 of the English Devolution and Community Empowerment Bill
<p>Mayoral Development Orders</p> <p>These powers give Mayors of Strategic Authorities the ability to prepare Mayoral Development Orders (MDOs). MDOs allow them to grant planning permission for a particular development instead of relying on an application to be submitted.</p> <p>These functions are exercisable only by the Mayor on behalf of the Strategic Authority. Mayors must consult and gain approval of the local planning authority where the order would have effect. Where the local planning authority does not approve the order, the Mayor can request the Secretary of State approve the order instead.</p>	Clause 32 and Schedule 12 of the English Devolution and Community Empowerment Bill.

<p>Mayoral Community Infrastructure Levy</p> <p>These powers enable Mayors of Strategic Authorities to charge developers a Mayoral Community Infrastructure Levy. This is a charge which can be imposed on new development in their area. It can be used to raise funds to deliver infrastructure needed to support development in their area.</p> <p>These functions are exercisable only by the Mayor on behalf of the Strategic Authority. This means that the Mayor is responsible for developing and applying the Mayoral Community Infrastructure Levy. However, the approval of a charging schedule for the levy is subject to a simple majority vote of the voting members of the Strategic Authority.</p>	<p>Clause 33 and Schedule 14 of the English Devolution and Community Empowerment Bill.</p>
<p>Mayoral Council Tax Precept</p> <p>The changes to this provision will allow Mayors to issue a precept to generate revenue across all Mayoral and CA/CCA functions. Previously, a Mayor could precept only for Mayoral functions, and not CA/CCA functions.</p> <p>Voting and governance arrangements will vary, depending on whether the precept is on Mayoral functions, or wider C(C)A functions:</p> <ul style="list-style-type: none"> • Mayors will continue to be subject to voting rules set out in previous legislation on precepts raised against Mayoral functions, which is commonly 2/3 of constituent authorities can vote against or to amend a precept. • A Mayor wanting to raise a precept on wider C(C)A functions would be subject to the standard voting arrangements of a simple majority including the Mayor. 	<p>Clause 11 of the English Devolution and Community Empowerment Bill</p>
<p>Power to pay grant to a constituent authority</p> <p>This power enables Mayors to pay grants to their constituent councils. This is most commonly used to pass funding for maintaining local roads to councils. This function is exercisable only by the Mayor on behalf of the Strategic Authority.</p>	<p>Clause 39 of the English Devolution and Community Empowerment Bill</p>
<p>Police and Crime Commissioner Functions</p> <p>Mayors will be, by default, accountable for the exercise of Police and Crime Commissioner (PCC) functions where mayoral boundaries align with police force boundaries, or with two police force boundaries when taken together. Transfers will be subject to secondary legislation. The Secretary</p>	<p>Clause 44, 45 and 47 of the English Devolution and Community Empowerment Bill</p>

<p>of State may by order transfer PCC functions to the elected mayor of a CA or CCA where there are coterminous boundaries. The Secretary of State, at the same time, may alter the boundary of the police area (or areas) to which the transfer relates to achieve coterminosity.</p> <p>This function is exercisable only by the Mayor. Mayors will have to delegate PCC responsibilities to a Deputy Mayor (for Policing, Fire and Crime for each police force area for which they have PCC functions).</p>	
<p>Fire and Rescue Authority Functions</p> <p>Mayors will be, by default, accountable for the exercise of Fire and Rescue Authority (FRA) functions where FRA and mayoral boundaries align, subject to secondary legislation. The Secretary of State may by order transfer FRA functions to a CA or CCA where there are coterminous boundaries. The Secretary of State, at the same time may alter the boundary of the FRA area (or areas) to which the transfer relates to achieve coterminosity.</p> <p>Mayors will have the option to delegate FRA responsibilities to a Deputy Mayor for Policing, Fire and Crime, or a Public Safety Commissioner.</p>	<p>Clause 46 and 47 of the English Devolution and Community Empowerment Bill</p>

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SUSSEX & BRIGHTON MAYORAL STRATEGIC AUTHORITY

East Sussex, West Sussex and Brighton & Hove Devolution Partnership Board

Terms of Reference

Summary of Purpose

The Board shall serve as the strategic leadership body guiding the establishment and development of the Mayoral Strategic Authority (MSA) for Sussex & Brighton.

Its core purpose is to:

1. Shape the vision and mission - define the goals and early vision for the MSA, ensuring it reflects the unique needs and aspirations of communities across the MSA geography.
2. Foster regional cooperation to create a inform the establishment of the MSA.
3. Develop strategic priorities - identify key areas for regional development and priorities for the MSA.
5. Guide and oversee the legal, financial, and administrative processes required to establish the MSA.

Membership

The Partnership Board will comprise:

- Two Executive Members appointed from East Sussex County Council,
- Two Executive Members appointed from West Sussex County Council and
- Two Executive Members appointed from Brighton and Hove City Council.
- The Sussex Police and Crime Commissioner
- A representative of the Sussex Integrated Care Board
- A representative of the District and Borough Councils across East Sussex
- A representative of the Districts and Borough Councils across West Sussex
- A representative of the business community of Sussex
- A representative of the Higher Education sector for Sussex
- A representative of the Further Education sector for Sussex
- A representative of South Downs National Park Authority
- A representative of East Sussex Fire and Rescue Authority
- A Transport representative

The Partnership Board may invite other persons to attend and contribute to the meetings of the Partnership Board.

Appointment of Co-Chairs

The Partnership Board Co-Chairs shall be the Leaders of the three constituent councils. The Chairing is to be determined by where the meeting is held, with the

meetings rotating between WSCC, ESCC and Brighton & Hove. In the absence of the scheduled Co-Chair, one of the remaining Co-Chairs will be appointed as chair at the meeting.

Frequency of Meetings

The Partnership Board shall meet as and when required or at the request of any of the Leaders of the Constituent Councils and/or at the request of any of the Chief Executives of the Constituent Councils.

Stakeholder Engagement

The Partnership Board shall establish further arrangements for engaging and consulting organisations with a significant interest in the development and shaping of the MSA and will invite representatives of those organisations to join a Stakeholder Board to discuss and advise on the business of the Partnership Board and to make representations to the Partnership Board.

Members to be invited to join the Stakeholder Board will include:

1. Upper Tiers (1 Exec Member each)
2. The District and Borough Councils of East Sussex (1 rep from each D&B Council)
3. The District and Borough Councils of West Sussex (1 rep from each D&B Council)
4. The representative bodies of small and medium businesses across Sussex
5. A representative from Transport for South East
6. Representatives of the further education providers across Sussex
7. Representatives of the higher education providers across Sussex
8. Representatives from East Sussex Fire and Rescue Service/Authority
9. Representatives from West Sussex Fire and Rescue Service/Authority
10. Representatives from Sussex Police/PCC
11. Sussex Association of Local Councils - representatives from SALC (1 representative from Easy Sussex and one representative from West Sussex)
12. Voluntary, Community and Social Enterprise (a representative from each of Brighton and Hove, East Sussex and West Sussex) East Sussex Jennifer Twist, Chair of the VCSE East Sussex Alliance; Brighton & Hove Jess Sumner, Chief Officer, Community Works; West Sussex TBC
13. A representative of the Sussex Integrated Care Board - Chair of SICB

14. A representative of South Downs National Park Authority

15. Chair of Sussex LVEP

16. Representative from Youth Councils

Administration of the Partnership Board

East Sussex County Council will take responsibility for the administration and support for the convening the meetings of the Partnership Board. Minuting the meetings will be delivered by the Council hosting the meeting.

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Director of Communities, Economy and Transport

1. To authorise, pursuant to the powers contained in the Highways Act 1980 (as amended):
 - (a) the erection and siting of buildings or structures (including but not limited to seats, signs, notice boards and bollards) or the carrying out of works (including but not limited to maintenance):
 - (i) within, over or under the highway and public rights of way;
 - (ii) in front of the prescribed building line;
 - (iii) of a private nature over or under the public highway, subject to securing appropriate bonding arrangements and commuted maintenance payments.
 - (b) interference with or obstruction to highways;
 - (c) the grant of permissions and licences;
 - (d) the grant of permissions and licences including but not limited to skips; trees/shrubs; scaffolding; builders' materials and hoardings.
2. After consultation with the Deputy Chief Executive to serve any notices and to exercise the powers of the County Council to authorise direct action or institute legal proceedings relating to:
 - (a) interference with or obstruction to or nuisance on any highway or land adjoining a highway; and
 - (b) a failure to comply with any prohibition or requirement of the Highways Act 1980, Part 3 of the New Roads and Street Works Act 1991, the Traffic Management Act 2004, National Parks and Access to the Countryside Act 1949, Wildlife and Countryside Act 1981, Dangerous Dogs Act 1989 or Builders' Skips (Markings) Regulations 1984.
3. (a) After consultation with the Deputy Chief Executive, appropriate District Council and local member (save in the case of temporary traffic restrictions), to make, give consent or object to the making of, apply or confirm any order under the provisions of:

the Highways Act 1980 (as amended);
the Wildlife and Countryside Act 1981;
the Road Traffic Regulation Act 1984 (as amended);
the Town and Country Planning Act 1990;
the Parking Act 1989;
the Rights of Way Act 1990;
the Traffic Management Act 2004;

the New Roads and Street Works Act 1991;
the Countryside and Rights of Way Act 2000; and
The Cycle Tracks Act 1984.

- (b) To make provision for the regulation of traffic, pursuant to the County Council's statutory powers, where formal orders are not required.
 - (c) To authorise the Deputy Chief Executive to make temporary traffic orders without recourse to the consultation procedure.
- 4. To approve, from time to time, a schedule of prospectively maintainable highways under the New Roads and Street Works Act 1991.
- 5. To authorise the entering into of agreements with developers under Sections 38 and 228 of the Highways Act 1980 and to exercise the powers of the County Council with respect to the formal adoption of private streets generally.
- 6. To authorise the entering into of any agreements under the Highways Act 1980 including (but not limited to) agreements under Sections 6 and 278 of that Act.
- 7. To authorise entry onto any land, including for the purpose of survey and to place or leave on or in that land any apparatus for use in connection with that survey.
- 8. To exercise the discretionary powers of the County Council under the Land Compensation Act 1973 (as amended) and the Noise Insulation Regulations.
- 9. After consultation with the Deputy Chief Executive to serve notices of exemption from the Advance Payments Code (Private Street Works) in appropriate cases where this would not prejudice the County Council.
- 10. To object, when appropriate on highway grounds, to applications to local licensing authorities for licences for goods vehicle operating centres.
- 11. To undertake the powers and duties of the County Council as Enforcement Authority under the Reservoirs Act 1975, including the service of formal notices and the authorisation of legal proceedings.
- 12.
 - (a) In consultation with the Deputy Chief Executive, to grant permits under Section 115(E) of the Highways Act 1980 for the carrying out of trading and similar activities on footways and pedestrianised areas, in cases of unopposed applications.
 - (b) To deal with consultations by district councils exercising their own powers under Section 115(E) of the Highways Act 1980 and to give consent to the exercise of such powers.
 - (c) To authorise payment terms and associated conditions where permits are issued under Section 115(E) of the Highways Act 1980 for trading

and similar activities on footways and pedestrianised areas, in cases where the Highways Authority is the owner of the land.

13. After consultation with the Chief Operating Officer, to amend the fee for the service provided by the County Council in answering highway enquiries on the CON29 Enquiries of Local Authority Form, based upon current costs.
14. To determine the need for on-street parking bays for blue badge holders close to their residences, in terms of traffic problems.
15. To sign controlled waste transfer notes under the Environmental Protection Act 1990 and the Environmental Protection (Duty of Care) Regulations 1991 in respect of waste transferring between the County Council and another party.
16. After consultation with the Deputy Chief Executive, to determine claimed public rights of way pursuant to Section 53(5) of the Wildlife and Countryside Act 1981.
17. After public consultation, and consultation with the Deputy Chief Executive, and where no objections have been received, to authorise the withdrawal of Town and Village Green applications made under Section 15 of the Commons Act 2006.
18. After public consultation, and consultation with the Deputy Chief Executive, to join applications for the de-registration and replacement of Common Land made under Section 16 of the Commons Act 2006.
19. After consultation with the Deputy Chief Executive to exercise the powers of the County Council contained in the Countryside & Rights of Way Act 2000, including to authorise enforcement action and the removal of obstructions
20. Pursuant to powers contained in the Countryside & Rights of Way Act 2000, to exercise powers of entry, the appointment of wardens and agreements in relation to access.
21. To authorise, pursuant to the powers contained in the Marine & Coastal Access Act 2009, the establishment and maintenance of the England Coast Path, the erection and maintenance and removal of notices and signs and powers of entry.
22. Following recommendations from the Lane Rental Surplus Group and in accordance with The Street Works (Charges for Occupation of the Highway) (England) Regulations 2012, to approve East Sussex Lane Rental Scheme projects with a value below £500,000.

Public Transport

232. (i) To arrange such consultations as appear to him to be appropriate following the notification by an operator of an intention to change a local bus service.

- (ii) To take steps to provide for the provision at short notice of temporary gap filling journeys where an operator withdraws from a route.
- (iii) To award contracts, within established guidelines and policy, to the lowest tenderer.
- (iv) On behalf of the County Council, to enter into a 'de minimis' arrangement with an operator, subject to being satisfied that the particular arrangement is both appropriate and the most cost effective means of securing the provision of a journey.
- (v) To approve requests for fares increases on supported services which are broadly in line with the general level of inflation.

Development Control

- 243.** To determine all applications for planning permission which fall to be determined by the County Council where the proposal is considered to be in accordance with the development plan and current planning policies except where two or more objections on planning grounds have been received within the consultation period.
- 254.**
 - (a) To determine applications for planning permission amounting to minor variations to applications already granted.
 - (b) To determine applications for non-material amendments to planning permissions made under the Town and Country Planning Act 1990.
 - (c) To determine particulars submitted pursuant to conditions attached to planning permissions.
- 265.** To determine any matter arising under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and associated legislation and any legislation which amends or replaces it.
- 276.**
 - (a) To determine whether an application for prior approval is required under Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015.
 - (b) To determine, where there are less than two objections relating to matters that can be considered by the County Planning Authority under Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015, applications for prior approval under the aforementioned legislation.
- 287.** To determine applications for a periodic Review of Old Mineral Permissions made under Paragraph 4 of Schedule 14 of the Environment Act 1995.
- 298.** To determine applications for certificates of appropriate alternative development under Section 232(3) of the Localism Act 2011, in respect of decisions which fall to be made by the County Planning Authority.
- 3029.** To determine applications for Certificates of Lawfulness of Existing or Proposed Use or Development under Sections 191 and 192 respectively of the Town and Country Planning Act 1990 (as amended).

- | 310. To determine applications for Listed Building consent for alterations, extension or demolition of a Listed Building under the Planning (Listed Buildings and Conservation Areas) Act 1990, where the proposal is considered to be in accordance with the development plan and current planning policies, except where two or more objections have been received within the consultation period.

- | 324. To assess whether a proposal which is a departure from the Development Plan requires referral to the Secretary of State and, when deemed necessary, make the referral.

- | 332. To respond to consultations by District / Borough Planning Authorities on applications for development in areas which have been notified to them as mineral consultation areas or waste consultation areas.

- | 343. To respond to the to any consultation undertaken by the Marine Management Organisation (MMO), including in respect of Marine Plans or any Marine Licence, unless the proposal raises issues of strategic importance.

- | 354. To submit observations on behalf of the County Planning Authority and the Highway Authority in respect of proposals for development by District Councils.

- | 365. To respond to the relevant District Planning Authority on behalf of the Highway Authority in respect of any statutory or other consultations in relation to proposals for development.

- | 376. To submit observations on proposals for development by local authorities and government departments not involving formal consultation.

- | 387. To give observations, if appropriate, on behalf of the County Council on applications to the Secretary of State for deemed planning permission under Section 90(1) of the Town and Country Planning Act 1990 for the erection of poles, pole mounted equipment and overhead electricity lines below 33kv.

- | 398. To give observations, if appropriate, on behalf of the County Council on proposals for minor diversions or temporary routes on power lines up to 400kv where no objection is being raised.

- | 4039. After consultation with the Deputy Chief Executive, to decide whether to take and/or to discontinue formal enforcement action or initiate any other legal proceedings in any case where they consider it appropriate to do so; any action taken to be reported to a subsequent meeting of the Planning Committee.

- | 410. In consultation with appropriate Directors to authorise the County Council to participate in planning obligations under Section 106 Town and Country Planning Act 1990.

- | 424. To consider requests for variations to agreements made under S106 of the Town and Country Planning Act 1990, in consultation with relevant Directors,

the local Members and the Chair of Planning Committee where this materially affects the obligations of, or to the County Council, and to enter into such variation agreements as appropriate.

- 4~~32~~. To exercise the powers delegated to the Council by another Planning Authority to provide the planning service for matters detailed in Paragraphs 18 – 24 and 33 – 35 above for sites and proposals that are in accordance with arrangements agreed with the other Planning Authority.

Development Plans and Consultation

- 4~~43~~. To respond to consultations by other Planning Authorities on Draft Local Plans and any other Development Plan.
- 4~~54~~. To consider, agree and sign Statements of Common Ground that are prepared in support of Development Plans by both the County Council and other planning authorities.
- 4~~65~~. To respond to consultations by Town and Parish Councils and other Qualifying Bodies on Neighbourhood Development Plans, Neighbourhood Development Orders and Community Right to Build Orders.
- 4~~76~~. To respond on behalf of the Council as County Planning Authority, Highway Authority and/or Lead Local Flood Authority to consultations from government departments and other statutory and non-statutory organisations.
- 4~~87~~. To make representations on Development Consent Orders at the Pre-application, Acceptance and Pre-Examination stages, and to further these representations and represent the County Council at the Examination stage.
- 4~~98~~. To agree briefs for joint County and District Local Plan studies.
- 50~~49~~. To agree to publish the Waste and Minerals Monitoring Reports and Local Aggregate Assessments.
- 51~~0~~. To publish amendments to the Council's Local Development Scheme.

Other Matters

- 5~~24~~. To make new Tree Preservation Orders and modify existing Orders.
- 5~~32~~. To determine applications for consent to fell, top or lop trees included in a Tree Preservation Order (where this is the responsibility of the County Planning Authority).
- 5~~43~~. To submit observations when consulted on applications for felling licences.
- 5~~54~~. To authorise the planting of trees, subject to funds being available within the agreed budget.

- 565. To authorise the service of Notices under Section 207 of the Town and Country Planning Act 1990, requiring the replacement of trees.
- 576. To exercise the County Council's powers and duties under orders and regulations made under the Plant Health Act 1967 (includes Dutch Elm Disease).
- 587. After undertaking appropriate consultations, to decline the offer of an access agreement between the County Council and the landowner in respect of woods which clearly have insignificant recreational value.
- 598. To make arrangements for the transport of pupils and students to school or college where there is a statutory duty or it is the policy of the County Council to provide such transport.
- 6059. To discharge any function relating to the control of pollution or the management of air quality.
- 610.
 - (a) To discharge the powers, duties and responsibilities of the County Council under the legislation in respect of trading standards and animal welfare, which shall include but not be limited to the legislation listed in 55 below ('the Trading Standards and Animal Welfare Legislation').
 - (b) To appoint and designate officers in Trading Standards as authorised officers in respect of the Trading Standards and Animal Welfare Legislation. The Team Manager –Trading Standards is designated the Chief Inspector of Weights and Measures.
 - (c) To grant, amend, refuse, suspend and transfer licenses or certificates, and to register persons or premises, pursuant to the Trading Standards and Animal Welfare Legislation.
 - (d) To authorise the institution of proceedings brought under the Trading Standards and Animal Welfare Legislation.
- 624. The legislation set out below includes also any enabling enactment, statutory instrument, order in council, byelaw or other order, and any enactment repealing, amending or extending the provisions thereof.

Accommodation Agencies Act 1953
Administration of Justice Act 1970 – Section 40
Administration of Justice Act 1985

Agriculture Act 1970
Animal Welfare Act 2006
Anti-Social Behaviour Act 2003
Cancer Act 1939
Children & Young Persons (Protection from Tobacco)
Act 1991
Children & Young Persons Act 1933
Clean Air Act 1993
Companies Acts 1985/2006
Consumer Credit Act 1974

Consumer Protection Act 1987
Copyright, Designs and Patents Act 1988
Courts and Legal Services Act 1990
Criminal Damage Act 1971
Criminal Justice Act 1988
Customs & Excise Management Act 1979
Education Reform Act 1988
Energy Act 1976
Enterprise Act 2002
Environmental Protection Act 1990
Estate Agents Act 1979
Explosives Act 1875
Fair Trading Act 1973
Fireworks Act 2003
Food and Environment Protection Act 1985
Food Safety Act 1990
Forgery & Counterfeiting Act 1981
Fraud Act 2006
Hallmarking Act 1973
Health & Safety at Work etc Act 1974
Housing Act 2004
Knives Act 1997
Legal Services Act 2007 (S198)
Licensing Act 2003
Local Government (Miscellaneous Provisions) Act 1976
(S16)
Malicious Communications Act 1988
Medicines Act 1968
Merchant Shipping Act 1995
Motor Cycle Noise Act 1987
Motor Vehicles (Safety Equipment for Children) Act
1991
Olympic Symbol etc (Protection) Act 1995
Performing Animals (Regulation) Act 1925
Poisons Act 1972
Prices Act 1974
Protection of Animals Act 1911
Psychoactive Substances Act 2016
Public Health Act 1961
Road Traffic (Foreign Vehicles) Act 1972
Road Traffic Act 1988 and 1991
Road Traffic Regulation Act 1984
Telecommunications Act 1984
Theft Acts 1968 and 1978
Tobacco Advertising and Promotion Act 2002
Trade Descriptions Act 1968
Trade Marks Act 1994
Unsolicited Goods & Services Act 1971 (as amended)
Video Recordings Act 1984
Weights & Measures Act 1985

- 632. To authorise officers of the East Sussex Fire and Rescue Service or another Local Authority to act as licensing officer and petroleum inspectors, under sections 18 and 19 of the Health and Safety At Work (etc) Act 1974 and the Petroleum (Consolidation) Regulations 2014, on behalf of the County Council.
- 643. In liaison with Action in Rural Sussex and the Chief Operating Officer to agree arrangements for the consideration of applications for assistance to Village Halls and to determine applications, subject to keeping the Lead Cabinet Member, opposition Group Spokespersons and the local member informed.
- 654. To determine applications for ordinary watercourse consent, under the Land Drainage Act 1991 as amended.
- 665. After consultation with the Deputy Chief Executive, to decide whether to take formal enforcement action or initiate legal action under the Land Drainage Act 1991 or the Flood and Water Management Act 2010 in any cases it is deemed appropriate to do so.
- 676. To respond to the relevant planning authorities on behalf of the County Council as Lead Local Flood Authority in respect of any statutory or other consultation in relation to the drainage and local flood risk aspects of proposals in applications for planning permission (including Notifications for Prior Approvals) and Development Plans.
- 687. To designate features which affect flood risk and to determine applications to alter or remove designated features under the Flood and Water Management Act 2010.
- 698. Under the Safety of Sports Grounds Act 1975 (as amended):
 - (a) after consultation with the East Sussex Fire Authority, to carry out inspections and issue Safety Certificates subject to any matters of particular relevance being reported to the Regulatory Committee.
 - (b) to issue, serve and enforce prohibition notices.
- 7069. Under the Fire Safety and Safety of Places of Sport Act 1987:
 - (a) after consultation with the East Sussex Fire Authority, to undertake the County Council's powers and duties: (i) in respect of inspections, determinations and the issue, amendment and cancellation of certificates under Part III of the Fire Safety and Safety of Places of Sport Act 1987; and (ii) to enforce and institute proceedings under this legislation.
 - (b) to charge applicants for certificates up to the statutory maximum.
- 710. In relation to libraries:
 - (a) to fix the opening and closing hours; and
 - (b) to set the fees and charges made by the Business Information Services.

- 721. To take the lead role in Arts related work, including determining applications for grant aid for support for the Arts where the sum applied for is £2,000 or less.
- 732. To amend the Commons Register following an application under Section 15(8) of the Commons Act 2006.
- 743. To undertake and be responsible for the day to day management and operation of the Lewes Public Library and Museum Charitable Trust.
- 754. To set charges for transport conditional permits within guidelines set by the Cabinet.
- 765. (a) To publish a consultation draft of a Local Nature Recovery Strategy and undertake all tasks under Regulations 4 to 12 (inclusive) of the Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023 in preparing and publishing a draft LNRS.

(b) To make representations on Local Nature Recovery Strategies prepared by neighbouring authorities.

Registration Matters

- 776. (a) To exercise the powers of the County Council under the Marriage Act 1994 and the Marriages & Civil Partnerships (Approved Premises) Regulations 2005, save where a review has been sought which falls to be determined by the Approved Marriage Premises Review Panel.

(b) To convene a Panel of three Members, drawn from the membership of the Regulatory Committee, to review decisions made by the Proper Officer for Registration under the Marriage and Civil Partnerships (Approved Premises) Regulations 2005.

Economy

- 787. To act as the Accountable Body representative on all matters in respect of which the Council has agreed to act or has been appointed as Accountable Body in respect of Local Enterprise Partnership functions.
- 798. Where the Council is acting as the Local Enterprise Partnership Accountable Body:
 - (a) To agree the issuing of any new funding calls;
 - (b) In consultation with the s.151 officer, to assess bids in response to a funding call and to agree the prioritisation / allocation of loans or grants to bidding organisations;
 - (c) To collect monitoring and evaluation information from the recipients of loans or grants, in accordance with the terms of the relevant funding agreement;

- (d) Subject to government approval where required, to agree the following variations to the terms and conditions of funding agreements:
 - (i) the completion date of the project;
 - (ii) in consultation with the s.151 officer, amendments to the length and/or conditions of a funding agreement.
- (e) To approve the submission to Government of Project Change Requests relating to grants and/or loans.

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