

East Sussex County Council's responses to questions in Government's consultation on proposals for Local Government Organisation (LGR) in the area of East Sussex and Brighton & Hove

Representative Councils for a Devolved Sussex – A Five Unitary Proposal was submitted by Brighton and Hove City Council for five unitary councils across the whole of the area of East Sussex, West Sussex, and Brighton and Hove. This proposal includes a request to split existing district council areas between the proposed new councils. These would comprise the current areas of:

- Unitary A - Brighton and Hove plus 4 wards and 1 parish from Lewes
- Unitary B - Eastbourne, Hastings, Rother plus 5 wards from Lewes and 9 wards from Wealden
- Unitary C - Mid-Sussex plus 34 wards from Wealden and 10 wards from Lewes
- Unitary D - Chichester, Crawley, Horsham
- Unitary E - Adur, Arun, and Worthing

For each question, the following answers can be provided:

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Respondents will also be invited to explain their answers to questions 1 to 8 using a free text box as question 9.

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

Strongly disagree. Communities who are geographically close to Brighton expressed strong opposition to being combined with the City. The plan for five unitaries would involve hugely complex, confusing and costly boundary changes. It would also necessitate the complex disaggregation of public services, particularly social care, bringing both higher cost and risks to people using these services. It would not meet the guideline criteria clearly set out by the Government through the LGR process and would create authorities not of a scale or strength to be resilient. With regard to East Sussex, the proposal would create a coastal authority and an inland authority with very different demographic and economic profiles. This would have the effect of separating the area with the highest cost and demand for social care from an area with lower demand but a stronger tax base. This proposal would also damage or dissolve the strong and effective working partnerships which already exist in East Sussex, for example in health and care, emergency services, the voluntary sector and on economic growth.

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

Disagree. Dividing East Sussex between different unitary councils would involve breaking up working partnerships which could damage services people rely on and would certainly put a brake on future transformation.

For East Sussex, this proposal does not meet its stated aim to keep communities whole and match travel to work and study areas. For example, people in Wadhurst near the county's north east border with Kent would be moved into a unitary council extending as far west as Slaugham. There are no practical transport links between these places and no shared identity between those areas beyond a vaguely 'rural' character.

Similarly, a unitary council extending along the East Sussex coast is proposed partly on the basis that it groups areas of health inequality and low wages. Separating these parts of East Sussex from the rest of the county would create a unitary authority with very high social care costs and reduced resources and would severely hamper the collective desire to transform and improve services in East Sussex.

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

Strongly disagree. The proposed East Sussex coastal unitary ('unitary B') would have a population of 360,000. The inland 'unitary C', which merges large parts of the current Wealden and Lewes districts with parts of West Sussex would have a population of 323,000. Both these are well below the Government's 500,000 guidance and are little bigger than the slightly enlarged Brighton and Hove City council which would have a 301,000 population with the addition of some parts of Lewes district. The new proposed unitaries seem to offer the worst of both worlds: often joining together places with no shared identity while not being of a size that increases efficiency or sustainability. For example, by moving from three to five upper-tier authorities, Sussex taxpayers would have to support several new appointments at director level as well as the cost, confusion and complexity of dividing existing services into new shapes.

4) [where relevant] To what extent do you agree or disagree that this proposal will put local government in the area as a whole on a firmer footing, particularly given that some councils in the area are in Best Value intervention and in receipt of exceptional financial support?

Strongly disagree. A five unitary model will inevitably increase the financial pressure on local government in East Sussex. Modelling shows that creating two new unitary authorities in East Sussex would cost £404m by 2032/33. There is no evidence about the impact of the small increase in population on the City's efficiency and sustainability so it is not possible to assess whether it would be worth the costs of disaggregation.

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

Strongly disagree. Establishing five new unitary councils would pull apart existing services and systems. For example, whole new social care departments would need to be created with extra cost and increased risk to residents. In a world of huge financial pressure on local authorities, it is almost impossible to see how newly created services could be sustainable and quickly effective.

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

Strongly disagree. It is extremely disappointing that the proposal for five Sussex unitarities was drawn up without any engagement with those representing the residents and communities impacted by the proposal. There has therefore been no chance for local people or organisations to have a say on these proposals. As a result, there is no confidence this proposal reflects how people feel. For example, when people were surveyed about an earlier proposal to move their communities from the Lewes district of East Sussex into Brighton and Hove almost nine in 10 (86%), said they opposed the idea. No local authority in Sussex, apart from BHCC itself, has supported the plan for five unitaries.

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

Strongly disagree. Devolution in Sussex has proceeded effectively with three upper-tier authorities working together. One of the cornerstones of a successful Mayoral strategic authority is the health of its Constituent Authorities. The proposal put forward would fracture the current authorities, who have successfully worked in partnership to be on track to deliver devolution to the area. The proposals would result in the abolition of two of the authorities that represent 82% of the population for the area, replacing them with five authorities, all of which are below the population criteria laid down in the invitation, and some of who we do not consider would be viable and likely fail. This would create significant instability across the area of the Strategic Authority and for the Authority itself. It would inevitably become more complex, fragmented and costly. For instance, the combined authority would need to plan strategic transport and housing across five rather than three territories. Other public services, especially the emergency services, would likely need to undergo more significant re-shaping. For example, two existing fire and rescue authorities would need to significant reconfiguration.

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

Disagree. It would be an enormous challenge for authorities made from broken-up districts to engage newly fractured communities and give them a voice. We disagree that the proposal for five unitary councils is likely to achieve this.

Where a proposal includes a request that the Secretary of State modifies a proposal to split a district, respondents will be asked an additional question:

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

Strongly disagree. Explanation partially covered in answers to Q1 - Q3. In addition, given the level of disruption to existing boundaries that this proposal would entail – for East Sussex this would mean disaggregating East Sussex County Council, Lewes District Council and Wealden District Council – the justification does not appear to be commensurate, based primarily on an even spread of population across the five unitaries. This would not lead to resilient and sustainable local government for the area or increase value for money for council tax payers.

The complex and protracted process of disaggregating existing county services (across East and West Sussex County Councils) and reaggregating them on new unitary footprints is high risk in relation to service continuity and loss of economies of scale which could reduce efficiency and increase costs.