

PLACE OVERVIEW & SCRUTINY ADDENDUM

3.00PM, MONDAY, 22 SEPTEMBER 2025

HOVE TOWN HALL COUNCIL CHAMBER

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ADDENDUM

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Brighton & Hove City Council

Place Overview & Scrutiny Committee

Agenda Item 32

Subject: Local Government Reorganisation Update

Date of meeting: 22nd September 2025

Report of: Chair of Place Overview & Scrutiny

Contact Officer: Name: Natalie Sacks-Hammond

Email: Natalie.sacks-hammond@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: No

For general release

Note: Urgency

By reason of the special circumstances below, and in accordance with section 100B(4)(b) of the 1972 Act, the Chair of the meeting has been consulted and is of the opinion that this item should be considered at the meeting as a matter of urgency.

Note: Reasons for urgency

The special circumstances for non-compliance with Council Procedure Rule 3, Access to Information Procedure Rule 5 and Section 100B(4) of the Local Government Act 1972 (as amended), (items not considered unless the agenda is open to inspection at least five days in advance of the meeting) were that the proposals to central government were still under development.

1. Purpose of the report and policy context

- 1.1 This report provides an update to Place Overview & Scrutiny Committee on Local Government Reorganisation following the public engagement phase which was live from 25th July – 25th August 2025.

2. Recommendations

- 2.1 Place Overview & Scrutiny Committee to note and comment on the proposed submission on LGR to central government ahead of Cabinet approval.

3. Context and background information

- 3.1 The Government is planning a major reorganisation of how councils work. Under these plans, County and District Councils, such as neighbouring East

Sussex County Council and Lewes District Council, will be abolished and replaced by new unitary councils. These proposals are intended to strengthen local leadership, improve service integration, and ensure long-term financial resilience

- 3.2 On 3 June 2025, the Government formally invited councils in East Sussex and Brighton & Hove to submit final proposals for Local Government Reorganisation.
- 3.3 A public engagement exercise with residents of Brighton & Hove commenced on 25th July and remained open for a month. It presented four options for comment:
- Option A: Strengthening the Eastern Edge This proposes incorporating East Saltdean, Telscombe Cliffs, and Peacehaven. It reflects natural patterns of travel, service use, and community overlap with the city's eastern boundary.
 - Option B: Extending to the Eastern Downs Building on Option A, this includes the parish of Kingston, enabling greater continuity with rural downland communities and service networks.
 - Option C: Uniting the Coastal Corridor Extends Option B by incorporating Newhaven, creating a more coherent coastal geography with shared economic and transport links, particularly along the A259 corridor.
 - Option D: Coast and Downs Partnership Combines all of the above, presenting the broadest illustrative footprint 7 and the greatest potential for achieving scale, service integration, and financial resilience.
- 3.4 The Cabinet report presents the preferred options for Local Government Reorganisation in Sussex and the reasons behind this. You can access the Cabinet report at appendix A.
- 3.5 The proposal must be submitted to MHCLG by 26 September 2025, with Cabinet due to consider Brighton & Hove's proposal on 25 September 2025.

4. Analysis and consideration of alternative options

- 4.1 Place Overview & Scrutiny Committee can make specific comments to Cabinet if they wish, which will be shared with Cabinet members in advance of their meeting.

5. Community engagement and consultation

- 5.1 Not relevant for this report but there has been a lot of engagement in Local Government Reorganisation including being presented at Place Overview & Scrutiny Committee on 5th June 2025 and 31st July 2025. Please see Cabinet report for details on this.

6. Financial implications

- 6.1 Finance implications are addressed in the Cabinet report

Name of finance officer consulted: John Hooten
16/09/25

Date consulted:

7. Legal implications

7.1 The legal implications are addressed in the Cabinet report.

Name of lawyer consulted: Elizabeth Culbert Date consulted 100925:

8. Equalities implications

8.1 See Cabinet report

9. Sustainability implications

9.1 See Cabinet report

10. Health and Wellbeing Implications:

10.1 See Cabinet report

11. Conclusion

11.1 Place Overview & Scrutiny Committee notes the report and passes any comments on to Cabinet.

Supporting Documentation

1. Appendices

1. LGR Cabinet report
2. Appendix 1: Representative Councils for a Devolved Sussex_ a five unitary proposal
3. Appendix 2: LGR engagement document – July to August 2025

Brighton & Hove City Council

Cabinet

Agenda Item 37

Subject: Local Government Reorganisation

Date of meeting: 25 September 2025

(Special Full Council: 24 September 2025)
(Place Overview & Scrutiny: 22 September 2025)

Report of: Leader of the Council

Lead Officer: Name: Chief Executive

Contact Officer: Name: Elizabeth Culbert

Email: Elizabeth.Culbert@brighton-hove.gov.uk

Ward(s) affected: All Wards

Key Decision: Yes

Reason(s) Key: Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the Report

- 1.1 This report presents Brighton & Hove City Council's Local Government Reorganisation proposal for Sussex and seeks Member approval for submission to the Ministry of Housing, Communities and Local Government by 26 September 2025, in line with the nationally set timetable.
- 1.2 The report builds on earlier consideration of Local Government Reorganisation by the Council, including: Cabinet on 20 March 2025; and Overview and Scrutiny on 5 June 2025 Special Place Overview and Scrutiny on 31 July 2025
- 1.3 This report is being considered by Overview & Scrutiny on 22 September 2025 to allow Members to test the evidence, challenge assumptions and make recommendations. A Special Council will also consider this report on 24 September 2025.
- 1.4 The submission comprises two parts. The first is a statutory Base Proposal framed on whole principal authority boundaries in accordance with the Local Government and Public Involvement in Health Act 2007. The second is a request for ministerial modification to consult on a refined five-unitary model across Sussex, with each council serving approximately 300,000 to 400,000 residents. This approach ensures statutory compliance while also presenting what in the Council's judgement best meets the Government's six published criteria for local government reorganisation.

2. Recommendations

That Cabinet

- 2.1 Agrees the Final Proposal: 'Representative Councils for a Devolved Sussex: A Five Unitary Proposal' as set out at Appendix 1 and approves its submission to the Secretary of State for Housing, Communities and Local Government by 26 September 2025.
- 2.2 Delegates authority to the Chief Executive, in consultation with the Leader of the Council, to make any final adjustments to the Final Proposal before the deadline for submission.

3. Context and Background Information

- 3.1 In February 2025 the Secretary of State for Housing, Communities and Local Government invited principal authorities in East Sussex including Brighton and Hove and in West Sussex to bring forward proposals for Local Government Reorganisation. The invitation requires proposals to be submitted by 26 September 2025.
- 3.2 The invitation confirmed that proposals should be framed from whole district and borough boundaries wherever possible. It also stated that authorities may request refined boundaries where there is strong justification in terms of geography, services or identity.
- 3.3 The purpose of the invitation is to create a clear map of single-tier councils to replace the current county and district arrangements. Government has linked this to its wider policy on devolution and Mayoral Combined Authorities but the two processes are legally distinct. Local Government Reorganisation is about the structure of local councils. Devolution is about the transfer of additional powers to a directly elected Mayor and Combined Authority. A coherent unitary map may support devolution but the decisions are separate.
- 3.4 The Council submitted an interim response in March 2025 describing the unique character of Brighton and Hove, early engagement feedback and the options to be explored. East Sussex and West Sussex also submitted interim responses.
- 3.5 In June 2025 Government published feedback on the interim responses. This did not approve or reject options. It asked all areas to:
 - use common datasets and assumptions
 - present evidence clearly against the six criteria
 - format proposals so that residents and partners can compare options on a like-for-like basis
 - confirm that base proposals used whole districts as building blocks, with any refined boundaries presented as requests for ministerial modification
 - where proposals spanned both invitation areas, set out the implications for East and West Sussex together

- 3.6 The Final Proposal is entitled 'Representative Councils for a Devolved Sussex: A Five Unitary Proposal' and is set out at Appendix 1. The Proposal has two parts:
1. A statutory Base Proposal, framed on whole district boundaries as the initial basis in accordance with the 2007 Act. This fulfils the Council's legal duty to provide a compliant proposal.
 2. A request for ministerial modification, asking Government to consult on a refined five-unitary model for Sussex.
- 3.7 The Base Proposal ensures statutory compliance. The requested modification presents the option that in the Council's judgement better meets the Government's tests.
- 3.8 Government has set six criteria which it will use to assess all proposals. They are:
- A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government.
 - Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.
 - Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.
 - Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views.
 - New unitary structures must support devolution arrangements.
 - New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.
- 3.9 It is for Government to decide which proposals meet these criteria. Only those judged viable will be taken forward to statutory consultation later this year. If Ministers decide to proceed, change would be implemented through a Structural Changes Order. This would provide for vesting, transfer schemes for property, rights and liabilities, staffing and pensions, and interim electoral arrangements pending a full review by the Local Government Boundary Commission for England. Day-one continuity of services would be the guiding principle.

4. Analysis and Consideration of Alternative Options

- 4.1 This section sets out the options that have been considered, the statutory requirement to provide a Base Proposal, and the reasons why Cabinet is asked to agree a request for ministerial modification to a refined five-unitary model. It provides Cabinet with a transparent record of the appraisal process.
- 4.2 Under the Local Government and Public Involvement in Health Act 2007 the Council must submit a proposal framed on whole principal authority boundaries. This Base Proposal is a legal requirement. Without it the submission would be invalid. The Base Proposal is set out in Section 4,

Appendix 1 and creates five unitary councils based on existing district and borough boundaries. While compliant, it produces units of uneven size and does not always reflect how residents use services across boundaries.

- 4.3 The Council assessed alternatives using a Sussex-wide evidence base drawn from published datasets. The same assumptions were applied to all options. Options were reviewed against the six Government criteria and with reference to functional geographies, service footprints and population scale. Non-statutory engagement findings within Brighton and Hove's remit informed which alternatives were taken forward.
- 4.4 In developing the submission, three main structural configurations were assessed. Each has advantages and disadvantages when considered against the Government's criteria.
- 4.5 Three unitary councils: This option would be simpler to deliver in the short term and would reduce the number of organisations, creating opportunities for economies of scale. It would however create very large variations in population size. One or two councils would be very large and potentially remote from residents, while others would be relatively small and financially fragile. Councils of this scale would need compensatory governance arrangements to maintain a local connection, which runs against the intention to strengthen neighbourhood and resident led working. Overall, the pattern of resilience and collaboration across Sussex would be uneven.
- 4.6 Four unitary councils: A four council model would be easier to deliver than five and would allow stronger pooling of resources at the outset. It would still produce councils of uneven size, leaving larger units at risk of feeling distant and less recognisable to residents. Over time the structure would remain less balanced and the sense of local identity and accountability would be weaker than under other options.
- 4.7 Five unitary councils: A five council map, modified in accordance with the Final Proposal, would place all authorities within a broad population band of approximately 300,000 to 400,000 residents. This avoids extremes of size, reduces the risk of fragility or remoteness, and provides a fairer basis for collaboration. It aligns more closely to functional geographies, including the coastal corridor and the north to south travel routes, and preserves parishes and principal towns as intact building blocks. It would be more complex and costly to deliver in the short term and would require careful planning to separate and re combine services and systems.
- 4.8 All options have strengths and weaknesses. Three and four unitary councils offer relative ease of delivery at the start, yet leaves long term imbalances in size and accountability. The statutory Base Proposal satisfies the legal requirement yet does not fully reflect how residents use services. In the Council's judgement, the modified five unitary model provides the most balanced and sustainable structure over time and is therefore put forward as the Final Proposal for Government to test through statutory consultation.

- 4.9 Requested modification to the Base Proposal: The Council asks Ministers to modify the statutory Base Proposal in order to consult on a refined five unitary model. The modification proposes ward transfers and one parish transfer where the evidence shows stronger ties in schools, health services, workplaces and transport. The effect is to place each new council within the approximate 300,000 to 400,000 resident band and to align the map more closely to daily use of services and to economic corridors.

Table 1: summary of analysis of different options against the Government criteria

Government criteria	Three unitaries	Four unitaries	Five unitaries (modified proposal)
1. Single tier	Achieved	Achieved	Achieved
2. Right size & resilience	Very uneven size with one very large council and one relatively small council. Higher risk of remoteness at the top end and fragility at the bottom end.	Uneven size remains. Balance improves a little but larger councils still dominate.	All councils within about 300000 to 400000 residents. No council is very large or very small.
3. High quality sustainable services	Fewer organisations but more service hand offs because boundaries cut across how people use schools, care and transport.	Some early pooling of resources but service footprints still split.	Boundaries follow lived corridors. Fewer hand offs and a single discharge and reablement pathway per council footprint.
4. Local views & collaboration	Public concern that councils would feel too big and distant. Collaboration risks if one council dominates.	Some concern about recognition and accountability. Joint working still uneven.	Scepticism remains but design conditions are built in. Five councils collaborate as peers of similar size.
5. Supports devolution	One very large partner at the Mayoral table. Imbalance likely.	Two large, two smaller; imbalance persists	Five balanced partners; none too big or small
6. Community engagement & neighbourhood empowerment	Would need compensatory governance to	Larger councils risk diluting neighbourhood voice	Parishes preserved with neighbourhood

	keep decisions close to residents		standards to be considered
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5. Community Engagement and Consultation

- 5.1 Engagement was designed to inform residents and stakeholders within Brighton and Hove's current boundaries about Local Government Reorganisation, to gather views on principles and options for the Council's future footprint, and to surface the conditions people expect to see if change proceeds. The Council's remit is limited to engagement inside its own borders. It does not extend to consulting residents across Sussex. Only Government can undertake a statutory consultation that will allow residents and partners to compare all proposals on a like-for-like basis across the whole county.
- 5.2 Round 1 took place in April 2025. It sought open views on principles and priorities rather than testing specific options. More than six hundred people responded. Findings were used to shape the options brought forward for the formal consultation.
- 5.3 Round 2 ran from 25 July to 25 August 2025. It invited views on four eastward options for the Council's future footprint and asked what mattered most to people, including identity and continuity of services. In-person sessions were held along the eastern border including a public meeting in Saltdean. Online and paper routes ran in parallel. This round received 2,307 responses.
- 5.4 Participation was open and self-selecting and is therefore not statistically representative. Responses were analysed with support from Ignite Consulting using documented methods with disclosed limitations. The responses highlight themes and concerns but do not provide a statistically representative measure of overall opinion. They have therefore been used to inform the proposal as qualitative evidence rather than as a numerical mandate.
- 5.5 Of the 2,307 responses in Round 2, 31 per cent identified as Brighton and Hove residents, 58 per cent identified as non-residents, 6 per cent identified as staff, partners, businesses or voluntary and community groups, and 5 per cent identified as other or did not state. This pattern reflects interest from neighbouring areas but the Council's formal consultation activity was confined to its own boundaries.
- 5.6 Across both rounds respondents expressed scepticism about structural reform. This reflects national experience, where proposals for reorganisation are often viewed with caution. Within that, the following consistent concerns emerged.
1. Identity and representation: Many respondents feared losing the distinct identity of Brighton and Hove or of the towns and parishes to the east. They emphasised that councils need to remain recognisable in scale

and character. There was concern that larger authorities could feel remote, weakening the link between elected members and residents.

2. Trust and governance: Comments often referred to confidence in delivery. Some respondents expressed doubts about the Council's track record and wanted stronger assurances that a new authority would be well-governed, transparent and responsive. This mirrors national feedback in other reorganisations, where governance credibility is a central issue.
3. Services and infrastructure: Respondents highlighted the importance of continuity in frontline services such as waste, adult social care, special educational needs and school admissions. There was also anxiety about whether infrastructure such as roads, transport links and healthcare facilities could cope with further demand. A key theme was that reorganisation must not disrupt essential services.
4. Boundaries and alternatives: There was uncertainty and sometimes suspicion about why certain areas were included or excluded in the options. Some respondents questioned whether boundaries were being drawn for political convenience rather than functional logic. Others suggested alternatives, including westward integration or keeping existing arrangements. This demonstrates the importance of explaining the rationale for boundaries in terms of daily life, travel and service use.
5. Finance and council tax: Concerns were raised about how the costs of reorganisation would be met, how council tax levels would be harmonised, and whether debt would be fairly shared. Residents wanted transparency about financial impacts and guarantees that frontline services would not be reduced to fund change.
6. Safeguards for vulnerable groups: Respondents often asked what reorganisation would mean for children with special educational needs, families at risk of homelessness, and adults receiving care. There was a strong desire to ensure that the most vulnerable would not experience disruption or reduced access during transition.
7. Process and transparency: Finally, many respondents felt the process was rushed and wanted clearer information about what decisions could and could not be made locally. Some were unsure whether they would have the option to stay with their existing council. This aligns with experiences in other parts of the country where clarity about statutory process is crucial.

5.7 These concerns echo the themes raised in other areas of England undergoing reorganisation, where residents are cautious about change but focus on conditions such as identity, continuity, clear accountability, and protection of vulnerable groups.

5.8 This feedback has been used to inform the submission. In the Final Proposal at Appendix 1, Councils are kept within an indicative population band of 300,000 to 400,000 so they remain recognisable and do not feel remote. Parish and neighbourhood voice is protected through the retention of town and parish councils and the intention is set out to consider neighbourhood standards in each new authority. Day-one continuity is the guiding principle, with safeguarding and care pathways maintained under the Structural Changes Order. Financial candour is reflected in a single neutral method,

published assumptions and explicit guardrails on reserves, and a clear approach to council tax harmonisation to be set through the Order. Where respondents asked for clearer rationales for inclusions and exclusions, the requested modification uses evidence on daily travel, service use and anchors such as schools, hospitals and transport corridors.

- 5.9 Submission of the Final Proposal does not implement change. It is for Government to decide which proposals meet the published criteria. Only Government can run the statutory consultation that will cover all of Sussex. That consultation will present the proposal(s) Ministers judge viable, enabling residents and partners across the county to have their say before any decision is taken on implementation.

6. Financial Implications

- 6.1 Local government reorganisation has the potential to unlock significant annual savings. Financial modelling undertaken by Ignite suggests that, once fully implemented, net benefits could reach around £52 million to £60 million per year by year ten across Sussex. These figures are indicative and should not be relied upon in the Council's medium-term financial strategy without further validation and delivery planning.
- 6.2 Financial modelling included in these proposals has been undertaken by Ignite, drawing on publicly available financial data from across Sussex and Brighton, with assumptions for costs of change and potential benefits based on experience of LGR elsewhere in the country and research carried out in other county areas.
- 6.3 Modelling shows uneven pressures across the unitary areas. The largest in-year shortfall before transformation is around £75 million (9% of expenditure), with others showing smaller pressures and one showing a surplus. This illustrates that some councils would begin life under tighter financial strain than others, if no adjustments are made for this through the Fair Funding Review.
- 6.4 There are a number of factors that we believe are not adequately reflected in the proposed needs assessment formulas:
- Housing Costs: Brighton & Hove has some of the highest housing costs outside London, yet this is not factored into the cost of delivering services. We face over £25 million in pressures in temporary accommodation and social care placements in 2026/27 alone.
 - Urban and Coastal Pressures: As an urban coastal authority, we experience high levels of complexity in adult social care, particularly linked to mental health and substance misuse, contributing to significant additional service pressures.
 - Children and Young People's Services (CYPS): The formula does not reflect key drivers such as SEND and parental risk factors.
 - Tourism and International Visitors: Our economy is significantly shaped by international visitors, yet this is not captured in the proposed formulas.
 - Remoteness Factors: The removal of urban weightings in areas such as highways maintenance further disadvantages cities like ours.

- 6.5 The costs of reorganisation and transition are significant, ranging from and estimated £109m to £197m with the five authority model being the most expensive and complex to deliver.
- 6.6 It is unrealistic to assume that existing authorities across Sussex will be able to fund the costs of reorganisation and transition from existing reserves and budgets, these costs will need to be funded by central government. Councils across Sussex face significant financial challenges, particularly in respect of statutory, demand led services such as adults and children's social care, temporary accommodation and SEND. It is also important to understand that reorganising local government, whether the end result is a 3, 4 or 5 unitary model, will not deal with these underlying challenges. There is currently insufficient funding across the sector and the scale of savings from LGR is fairly marginal compared to the underlying and growing cost pressures faced by authorities in the region.
- 6.7 Cabinet is asked to note that the Council will request the following from Government as part of submission:
- capacity funding to support transition costs to ensure safe delivery of services over this period;
 - clear technical directions on debt, reserves, opening balances and council tax harmonisation;
 - recognition of particular coastal and other demographic pressures in the Fair Funding Review and in future multi-year settlements.

Finance Officer consulted: John Hooton

Date: 16/09/2025

7. Legal Implications

- 7.1 The relevant legislation is the Local Government and Public Involvement in Health Act 2007 (the Act). Under Section 2 of the Act the Secretary of State has issued an invitation to councils in East Sussex and to Brighton & Hove City Council to submit proposals for a single tier of local government. The invitation and subsequent feedback confirm that councils may also explore options across a wider geography within a strategic authority area.
- 7.2 The Act provides for different "Types" of proposal. The proposals in this report are a combination of Type B (a single tier covering one or more existing districts) and Type C (a single tier covering districts in a county together with one or more adjoining areas).
- 7.3 The Council is required to submit a Base Proposal framed on whole district boundaries to satisfy the statutory requirement to ensure the submission is valid. In addition, Cabinet is asked to approve a request for ministerial modification under Section 7 of the Act so that the Secretary of State may consider a refined five-unitary model.
- 7.4 Section 7 gives the Secretary of State power to implement proposals, with or without modification, but prevents any Order being made unless consultation

has been carried out with all affected authorities and others considered appropriate. This statutory consultation will be led by Government and is separate from the Council's own engagement activity.

- 7.5 If Government decides to proceed, the necessary legislation will be prepared in the form of a Structural Changes Order (SCO) for parliamentary approval. The SCO will establish the new single tier of local government and make provision for the abolition of predecessor councils. The Secretary of State may, where appropriate, designate an authority as a Continuing Authority with boundary changes rather than abolishing and creating a new authority. This is the request being made in relation to the proposed Unitary Authority 'A', including Brighton & Hove.
- 7.6 The SCO would place a duty on all affected councils to co-operate, to provide information as reasonably requested, and to prepare for the transfer of functions, property, rights and liabilities.
- 7.7 If implemented, there will be significant contractual, property and staffing implications requiring further legal advice, which will be addressed through the transition process.

Legal Officer consulted: Elizabeth Culbert
Date: 16/09/2025

8. Equalities Implications

- 8.1 An initial high-level Equality Impact Assessment (EIA) has been prepared to support this submission. The EIA has reviewed the potential impact of Local Government Reorganisation on residents across Brighton & Hove and the potential merger areas, using the nine protected characteristics and additional factors such as poverty, socio-economic disadvantage, migrant and refugee status, and homelessness.
- 8.2 The assessment identifies both potential positive and negative impacts. Potential positive impacts include improved coordination of services, the extension of Brighton & Hove's equalities expertise and infrastructure across a wider geography, and greater consistency in service standards. Potential risks include dilution of minority voices within a larger authority, reduced proportional representation for some groups, rural access challenges, the loss of specialist services if rationalised, and uncertainty during the transition period.
- 8.3 These risks are consistent with those identified in other areas undergoing reorganisation. The EIA concludes that the Council should "proceed with caution", with mitigation measures built into delivery. These include:
- maintaining parish and neighbourhood voice and representation, with consideration of neighbourhood standards in new councils
 - ensuring day-one continuity of services, especially safeguarding and support for vulnerable groups
 - retaining local access points for essential services, with accessible transport and non-digital routes for engagement

- embedding cultural competency training and inclusive service design in the new authorities
 - protecting minimum funding levels for specialist services
 - collecting and monitoring equalities data consistently across the new councils
- 8.4 The EIA notes that the forthcoming statutory consultation by Government will provide further opportunity for engagement with groups most affected, and that a full, boundary-specific EIA will be required once the Secretary of State has confirmed the final geography. The EIA will be updated at key milestones during transition if Government proceeds.
- 8.5 Cabinet is asked to note that equality considerations are live throughout the process, that risks have been identified transparently, and that further work will be brought forward alongside transition planning should Government decide to proceed.

9. Sustainability Implications

- 9.1 Local Government Reorganisation is not being driven by net zero or place-shaping objectives. However, a single-tier structure could provide opportunities for more coherent planning across wider functional geographies. In particular, integration of local transport, planning, housing and climate strategies may be easier where responsibility is consolidated in one authority.
- 9.2 Engagement referenced environmental and infrastructure issues, and respondents highlighted transport and sustainability as matters of concern. Should Government decide to proceed, there will be opportunities to align climate action, coastal management, and infrastructure investment at a more strategic level within each new council and in partnership with a Sussex Mayoral Combined Authority. These opportunities will be assessed in detail as part of transition planning. This includes opportunities to coordinate coastal management and flood risk programmes across coherent geographies.

10. Health and Wellbeing Implications

- 10.1 Local Government Reorganisation creates an opportunity to strengthen health and wellbeing by giving each area a single, accountable council for adult social care, children's services and public health. This can make local services easier to navigate, reduce hand-offs, and give clearer place leadership for prevention and early help.
- 10.2 NHS Sussex has noted concerns about disruption to coterminous boundaries. The health system itself is also restructuring and operating at larger scale. In this context, a five-unitary map would provide the NHS with a stable set of comparable local partners and create a stronger platform for neighbourhood models of care. While there are concerns about disruption, LGR offers the potential to create clearer local partners for the NHS and a stronger basis for neighbourhood working. With strong safeguards in place,

it provides an opportunity to protect what works well and make services more consistent and accessible for residents.

11. Conclusion

- 11.1 Cabinet is asked to agree that the balanced five unitary model set out at Appendix 1 be submitted to Government as the Council's Final Proposal. The statutory Base Proposal, required under the Local Government and Public Involvement in Health Act 2007, will accompany the submission to ensure validity.
- 11.2 Submission does not implement change. Government will assess proposals against the published criteria, decide which to take to statutory consultation, and only then determine whether to bring forward a Structural Changes Order.
- 11.3 In the Council's judgement the five unitary model proposed best meets the six criteria. Three and four unitary options are cheaper and simpler to deliver but leave uneven size and weaker resilience. Five carries higher one off costs but avoids extremes of scale, offers greater long term benefits, and provides five comparable partners for future devolution.
- 11.4 Cabinet is asked to note the financial risks set out in Section 6 and the need for strong safeguards if Government proceeds. If reorganisation is implemented, the Council will prioritise Day 1 continuity of services, protection of vulnerable residents, and close partnership with NHS and other agencies to ensure a safe and effective transition.

12. Supporting Documentation

Appendix 1 – 'Representative Councils for a Devolved Sussex: A Five Unitary Proposal submission for Local Government Reorganisation'.

Appendix 2 - LGR Engagement Document, July to August 2025

Representative Councils for a Devolved Sussex: A Five Unitary Proposal



Submission for
Local Government Reorganisation
September 2025



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Foreword

Sussex is at a once in a generation turning point. Government has invited us to bring forward proposals for simpler and stronger local government, alongside new devolved powers for our region. We welcome the opportunity and the challenge. This is our chance to design councils around how people actually live, to make everyday life easier, services better, and local democracy closer to home.

Change on this scale is unsettling. It is also necessary. Too often our current boundaries cut through communities, decisions feel distant, and responsibility is unclear. Our vision is for councils that are big enough to be resilient and small enough to stay connected, places where local pride and local voice shape what happens next.

This is not just about lines on a map. It is about the experience of residents. It means services that are easy to reach and joined up. It means decisions informed by lived experience and made with our communities, not for them. It means neighbourhood led partnerships with the NHS, schools, police and the voluntary sector so that support feels seamless when people need it most.

For the coast, we see one authority for a continuous coastal city that reflects the reality of a shared place and daily journeys. But this vision is wider than the coast alone. Across Sussex as a whole, we propose five councils, balanced in population size. Each would serve around three to four hundred thousand people, large enough to be financially resilient and small enough to remain rooted in local communities. Together they form a family of councils with clear responsibility and strong accountability, able to stand as equal

partners in a devolved Sussex. This is not about one place growing at the expense of another. It is about the whole of Sussex being set up to succeed, with every community recognised and every council built on a scale that works.

We have written this proposal so that people and partners across Sussex can compare approaches and judge them on their merits. Our commitment is to be constructive, open and ambitious, protecting local identity, simplifying daily life and giving Sussex the foundations to thrive for the next generation.



Councillor Bella Sankey
Leader of Brighton & Hove City Council

Executive Summary

Purpose and submission

Government is reshaping local government across England to make responsibilities clear, remove duplication and make services easier to use. At the same time, new powers over transport, skills, growth and net zero are being devolved to directly elected Mayors and their Strategic Authorities. In this context we are invited to bring forward a proposal for unitary local government covering East Sussex and Brighton and Hove, with the option to consider wider boundaries where this would improve sustainability and support devolution.

Our Base Proposal is presented with whole districts as the building blocks to comply with the Local Government and Public Involvement in Health Act 2007. The Base Proposal is submitted for legal compliance. We ask Ministers to consider modifications to the Base Proposal that, in our judgement, better meets the public service, financial sustainability and local identity tests. The

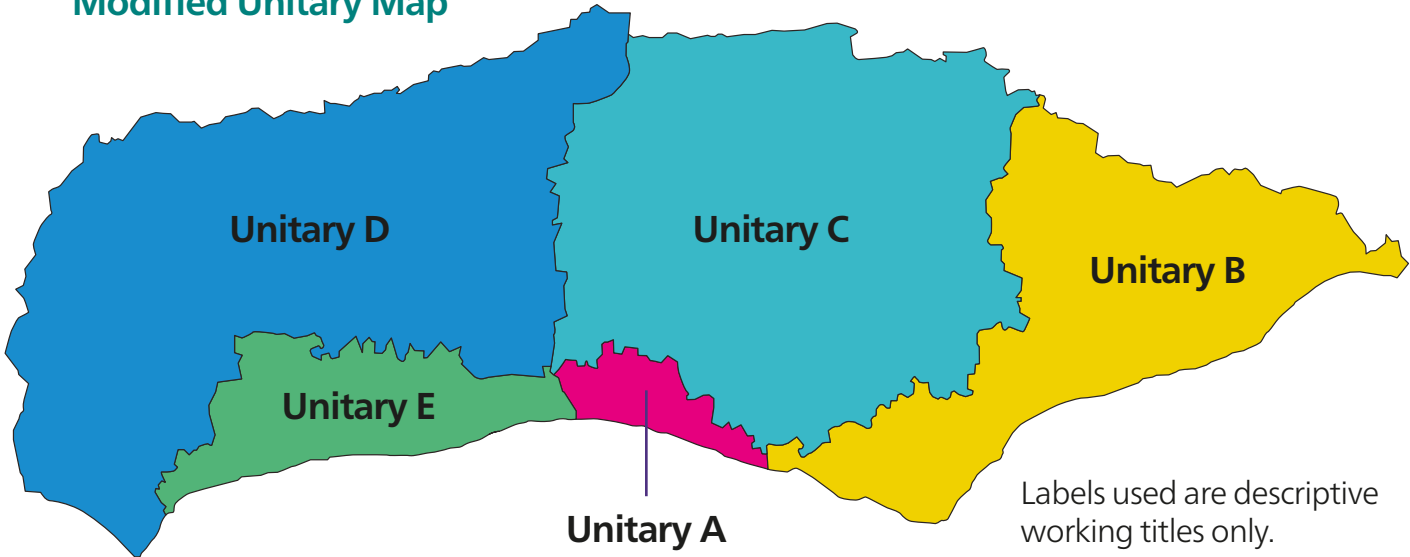
Modified Proposal is, in our view, the option that best meets the invitation criteria.

Our Modified Proposal is stronger than the Base Proposal as it aligns boundaries to daily travel-to-work and study routes, balances populations so no council is unusually large or small, and groups services in ways that support regeneration, health access and local accountability. This improves service coherence and financial sustainability while keeping communities whole.

A balanced Sussex-wide model

Our Modified Proposal creates five councils, each serving between approximately 300,000 and 400,000 residents. This balance avoids extremes of scale, gives every area councils that are large enough to deliver complex services, and keeps them small enough to stay rooted in their communities. Together they serve 1.72 million residents, providing a strong and resilient platform for devolution.

Modified Unitary Map



New Authority	Existing authorities/wards	Population
Unitary A	Brighton & Hove (all wards) The following wards from Lewes District Council: East Saltdean & Telscombe Cliffs, Peacehaven West, Peacehaven East, Peacehaven North, Falmer Parish (from Kingston ward)	301,130
Unitary B	Eastbourne (all wards) Rother (all wards) Hastings (all wards) The following wards from Lewes District Council: Seaford South, Newhaven North, Seaford West, Seaford North, Seaford Central. The following wards from Wealden District Council: Pevensey Bay, Lower Willingdon, South Downs, Herstmonceux & Pevensey Levels, Polegate South & Willingdon Watermill, Stone Cross, Upper Willingdon, Polegate North, Polegate Central.	359,868
Unitary C	Mid Sussex District Council (all wards) The following wards from Wealden District Council: Uckfield, Ridgewood & Little Horsted, Uckfield North, Arlington, Uckfield New Town, Withyham, Crowborough, South West Hailsham, Central Hailsham North Uckfield, East Framfield & Cross-in-Hand, Hadlow Down & Rotherfield, Hailsham North West Mayfield & Five Ashes, Chiddingfold, East Hoathly & Waldron, Crowborough, St Johns Frant & Wadhurst, Crowborough North, Forest Row, Buxted, Hailsham South, Hailsham West, Hartfield, Horam & Punnetts Town, Heathfield South Crowborough, Jarvis Brook, Crowborough Central, Maresfield, Crowborough South, East Danehill & Fletching, Heathfield, North Hailsham East Hellingly The following wards from Lewes District Council: Lewes Castle, Kingston (without Falmer Parish), Plumpton, Streat, East Chiltington & St John, Ouse Valley & Ringmer, Lewes Bridge, Lewes Priory, Ditchling & Westmeston, Newick, Chailey, Barcombe & Hamsey, Wivelsfield	322,617
Unitary D	Chichester (all wards), Horsham (all wards), Crawley (all wards)	394,308
Unitary E	Arun (all wards), Adur (all wards), Worthing (all wards)	343,098

Unitary A

Approximately 301,000 residents

Why this council works: Brings together Brighton, Hove, Saltdean, Peacehaven, Telscombe and Falmer Parish as one continuous urban coastal area, aligning services with the way people already live, study and travel.

People: The youngest and most diverse part of Sussex, with only 13.5 per cent of residents aged 65 or over compared to more than 23 per cent in West Sussex and 26 per cent in East Sussex. Strong student, commuter and family populations drive demand for housing, prevention and accessible services.

Place: Neighbourhoods along the seafront already function as a single city region. Falmer links through universities, the Amex Stadium and health services. This helps align the Brighton Kemptown constituency boundary which includes East Saltdean, Peacehaven and Telscombe.

Infrastructure and anchors: The A259 and Coastway rail bind the corridor. Universities, hospitals, cultural venues and the visitor economy provide major anchors.

Criteria check: Within expected population range, resilient, matches travel-to-work patterns, protects identity.

Unitary B

Approximately 360,000 residents

Why this council works: Unites the eastern Sussex coast so regeneration, health prevention and transport can be planned for one connected community.

People: Older age profiles and some of the starkest health inequalities in Sussex. In Hastings and Rother, over one in five adults

report a limiting long-term illness. Wages are below the South East average.

Place: Eastbourne, Hastings, Rother, Seaford and Newhaven with nearby Wealden communities such as Polegate and Willingdon that already rely on Eastbourne.

Infrastructure and anchors: The A259, East Coastway and Seaford rail lines connect the shoreline. Eastbourne District General and Conquest Hospitals provide health anchors. Newhaven Port is an international gateway.

Criteria check: Balanced population, aligns with service and travel patterns, supports regeneration, protects identity.

Unitary C

Approximately 323,000 residents

Why this council works: Creates one council for market towns, villages and rural communities that share daily commuting north to London and south to Brighton.

People: Employment is high (around 79 per cent), but the population is ageing quickly, with strong growth forecast in the over-65 and over-85 age groups. Families, commuters and older residents need reliable health and care services.

Place: Mid Sussex with towns such as Uckfield and Crowborough and Lewes hinterland villages that look north for work and education. Local character preserved through parish and town councils.

Infrastructure and anchors: The Brighton Main Line, Thameslink, Uckfield rail line and A23/A22 connect to London, Gatwick and Brighton. Market towns, education hubs and health services act as anchors.

Criteria check: Balanced population, supports growth and infrastructure, protects identity.

Unitary D

Approximately 394,000 residents

Why this council works: Links Crawley, Horsham and Chichester, combining an international gateway with historic towns and rural communities.

People: Crawley has a younger and more diverse population, with median monthly wages around £2,576 but a claimant unemployment rate above 4 per cent. Horsham and Chichester bring older age profiles and extensive rural settlements.

Place: The economy of Gatwick and Manor Royal connects with historic towns and the South Downs. Parish and town councils safeguard accountability.

Infrastructure and anchors: Gatwick Airport, Manor Royal, Goodwood, the University of Chichester and the South Downs National Park. The M23, A23 and A27 roads and the Arun Valley and Horsham rail lines provide connectivity.

Criteria check: Balanced population, links key economic anchors with communities, supports devolution, protects identity.

Unitary E

Approximately 343,000 residents

Why this council works: Brings together Arun, Adur and Worthing as one coastal strip, reflecting the shared identity and daily life of seaside towns.

People: Among the oldest age profiles in Sussex, with high demand for health and care services. The coastal economy mixes tourism, marine industries, horticulture and a growing creative sector.

Place: Worthing, Littlehampton, Shoreham and Bognor Regis share housing markets, labour patterns and seafront challenges. Parish and town councils continue.

Infrastructure and anchors: The A259 and West Coastway rail connect the coast. Worthing Hospital, Shoreham Port, Littlehampton Harbour and seafront economies act as anchors.

Criteria check: Balanced population, coherent for coastal renewal and flood planning, strengthens health and care resilience, protects identity.

How this proposal meets the Government’s criteria

Right size and scale

Each council serves between 301,000 and 394,000 residents. All fall within a tight band that gives resilience for adult and children’s services while staying close to communities. Collectively they form a county-wide population of 1.72 million, providing balance and strength for devolution.

High-quality and sustainable services

Single-tier councils remove duplication between counties and districts and place clear accountability in one unitary for each area. This makes services easier to use, decisions faster and integration with health, education, police and voluntary sectors more effective.

Financial sustainability

The model reduces duplication, streamlines management and aligns contracts and estates. Transition costs are real but will be paid back within a small number of years, after which recurring savings improve sustainability. For all councils, social care, SEN and Homelessness funding pressures remain, requiring national reform. This model acknowledges the financial pressures that already exist within the Sussex system and provides the opportunity for genuinely local transformation and engagement to address it in the years to come. It also provides a clearer framework of need to

engage central government, the wider public sector partners and the Mayoral Authority in rebalancing those pressures. Where individual councils face tighter financial margins, mitigations include shared platforms and procurement, phased policy convergence and reserve guardrails.

Local collaboration and consensus

This is a single coherent proposal for Sussex that allows clear comparison with East Sussex’s preferred option. It has been developed with input from partners and over 2,000 residents, whose feedback has shaped protections for parishes, clarified accountability and kept councils within a recognisable scale.

Support for devolution

The five balanced councils provide equal and stable partners for a Sussex Mayor. Together they create one transport voice, a visible investment pipeline and a skills framework that can move from plan to delivery.

Community engagement and neighbourhood empowerment

Councillor numbers and warding will follow LGBCE principles for fair representation and community identity. As an interim, election-ready scheme we propose using existing county electoral divisions as building blocks in four of the five councils, generally with two members per division, and a bespoke scheme where local circumstances require. This creates around 297 councillors across the five councils (typically 54–67 per council) and delivers elector-to-councillor ratios mainly in the 3,600–5,100 range, pending a full LGBCE review post-vesting day.

Parish and town councils remain with their existing powers and precepts, supported by neighbourhood charters and local access points to keep decisions close to communities.

Service delivery and lived experience

On day one there will be continuity: bins collected, care provided and front doors to services kept open. Over time services will become simpler and more responsive. Each council will have one website, one account and one main number. Policies will be harmonised fairly within each footprint and council tax aligned over a transparent glidepath. Decisions will be made with communities, not for them, so lived experience shapes priorities.

Financial case in outline

Change has costs and unlocks recurring savings. Estimated transition costs, savings and payback are set out in the financial case. Savings are driven by removing duplication, streamlining management and aligning contracts and estates. Overall, the model delivers prudent payback in a small number of years followed by sustained annual savings.

Top risks and mitigations

Reorganisation carries transition risks, particularly in ICT and finance, but these are recognised, openly managed and mitigated through phased delivery, dual running and independent assurance.

Transition disruption: managed through phased cutover, dual running and strong programme controls.

ICT and data migration: staged and supported by interoperable systems.

Funding reform and stranded liabilities: addressed through early dialogue with Government and prudent reserves.

Programme assumptions

Shadow arrangements from April 2027 and vesting from April 2028, subject to Government consultation and ministerial decision.



1. National and Legal Context

Why Change now

Government has set out a national programme to simplify two-tier areas where appropriate into single unitary councils and to devolve more powers for transport, skills, growth and net zero to directly elected Mayors and their Strategic Authorities. The English Devolution White Paper (December 2024) and the English Devolution and Community Empowerment Bill provide the policy and legislative framework for local government reorganisation and devolution in Sussex.

In February 2025, MHCLG invited principal authorities in East Sussex and in Brighton and Hove, and principal authorities in West Sussex, to bring forward proposals for unitary local government for the invitation area. The invitation allows exploration of wider boundaries where this would improve sustainability and support devolution, and asks councils to evidence how proposals meet the published criteria and enable easy comparison across Sussex.

The statutory route under the 2007 Act

Structural and boundary changes are made under the Local Government and Public Involvement in Health Act 2007:

- Invitation and proposal. The Secretary of State invites proposals. Principal authorities submit a single, coherent proposal for the invitation area, supported by evidence.
- Assessment and consultation. Government assesses proposals against its criteria and carries out statutory consultation before any decision is taken.

- Decision and implementation. If satisfied, the Secretary of State may implement change by making a Structural Changes Order. The Order provides for transfer of functions, property, rights and liabilities, staffing and pensions, and may establish a shadow period or designate a continuing authority. Government may also issue directions to protect financial stability during transition.
- Electoral arrangements. Interim electoral provisions are set out in the Order. The Local Government Boundary Commission for England then undertakes a review to settle longer-term electoral arrangements.
- Proposals are normally framed using existing district boundaries as building blocks. Where boundary change is sought, this must be presented as a request for ministerial modification, supported by clear public service and financial sustainability justifications. Our request for modifications is evidence-based, and designed to improve service coherence, financial resilience and community identity.

Interim plans submitted in Sussex

All Sussex partners provided interim plans in March 2025:

East Sussex councils set out a preference for a single unitary on the existing county boundary ("One East Sussex"), emphasising scale, continuity and collaboration.

- West Sussex councils described options and dependencies and sought clarity on population steers, timelines and the interface with the Mayoral Strategic Authority, without selecting a single preferred model at the interim stage.

- Brighton & Hove submitted an interim plan that described the unique character of the area, our early engagement feedback and the options that would be explored. We indicated that, if feasible, a five-unitary Sussex-wide model would provide the most balanced and sustainable structure.

Government feedback on interim plans

In June 2025 MHCLG published national feedback on interim plans. It did not approve or reject options. It asked areas to use common assumptions and datasets, to present evidence clearly against the six criteria, and to format proposals so that residents and partners can compare proposals side by side. Officials invited further dialogue to refine cases ahead of final submissions.

The interim plan feedback requested that where a proposal contained a preferred option for a single tier of local government across the whole of the proposed Sussex and Brighton MSA area, such as an option for five unitary councils across Sussex, it is recommended that the impacts for both invitation areas are set out. The interim plan feedback also clarified that existing district areas should be considered the building blocks for proposals, but that where there is a strong justification more complex boundary changes will be considered.

How this proposal meets the Government’s six criteria

This document is deliberately structured against the six criteria set out in the invitation, to enable clear and auditable assessment. A summary of this is included in the Executive Summary.

Indicative timelines and dependencies

The invitation set an indicative pathway from proposal development to consultation and, if Ministers decide to proceed, to the making of a Structural Changes Order. The sequence and timing are for Government to determine and may change. Our delivery plans therefore identify the decisions only Government can make, set out the steps we will take once those decisions are confirmed, and build in safeguards from recent reorganisations, including phased implementation, external assurance and clear financial directions.

How this document responds

- We present a five-unitary council base case with whole district councils as the building blocks and request a ministerial modification to adopt refined boundaries where this better meets the criteria.
- We have aligned headings and assumptions so assessors, residents and peers can compare like-for-like with East Sussex and West Sussex interim work.
- We have consistently indicated that, subject to feasibility, a five-unitary Sussex model could provide the most balanced and sustainable structure if it could be made to work. This final proposal shows how that can now be delivered.
- We set out the Government’s six criteria next, followed by our options and shortlisting, our modified five-unitary authority model, and the base case it is built from.

Key documents and references

English Devolution White Paper (Dec 2024)

Sets the national direction: simplify two-tier areas into unitary councils and devolve powers to Mayors and Strategic Authorities.
[Read the White Paper](#)

English Devolution and Community Empowerment Bill (2024–25)

Provides the legislative framework for unitarisation and neighbourhood governance.
[Read the Bill](#)

MHCLG invitation letter (Feb 2025)

Invited East Sussex, Brighton & Hove, and West Sussex councils to bring forward proposals, with scope to explore wider boundaries.
[Read the invitation](#)

East Sussex interim plan (Mar 2025)

Preferred option: “One East Sussex” — a single county-wide unitary, emphasising scale, continuity and collaboration.
[Read East Sussex’s interim plan](#)

West Sussex interim submission (Mar 2025)

Explored one or two unitaries, flagged dependencies on Brighton’s footprint and Crawley’s alignment, no preferred option.
[Read West Sussex’s interim submission](#)

Brighton & Hove interim plan (Mar 2025)

Tested a coastal unitary footprint and signalled that a five-unitary Sussex model could be the most balanced option.
[Read Brighton & Hove’s interim plan](#)

MHCLG national feedback on interim plans (Jun 2025)

Did not approve or reject options. Called for common datasets, clear evidence against six criteria, and like-for-like comparability.
[Read national feedback](#)

Sussex feedback pack (Jun 2025)

Collated MHCLG feedback on East Sussex, West Sussex and Brighton & Hove interim plans.
[Read Sussex feedback pack](#)

2. The Case for a New Beginning

This section explains why change is needed across Sussex, the outcomes we want for residents and partners, and the principles that shape a stronger map for local government and devolution.

Why change is needed now

People in Sussex deal every day with a system that is too complicated, too slow and increasingly fragile. Residents are passed between tiers and families are sometimes unsure whether to call the district or the county. Boundaries cut across daily life. Prevention and early help often stop at the council line, even though health, education and care pathways cross them every day.

Services are under strain. Adult social care, children’s SEND and homelessness are rising faster than budgets. Without reform, councils will struggle to cope.

Duplication drives cost. Partners can find themselves repeating conversations across several councils before decisions are taken, delaying investment and reducing efficiency.

Doing nothing risks costing more and delivering less. Standing still risks weaker resilience in services and leaves residents with a system that is harder to use.

What people told us

Over 2,300 people took part in our second round of engagement. Responses were self-selecting and not statistically representative, but they gave clear insight. As in other parts of the country, many were sceptical about structural reform. Within that, residents and partners consistently set out

the safeguards they would want if change proceeds. Concerns included identity and representation, trust and governance, services and infrastructure, finance, vulnerable groups, boundaries and process.

We have treated these as design conditions. Our proposal reflects them through indicative right-sized councils of around 300,000 to 400,000 residents (subject to statutory consultation), neighbourhood charters to support parish and town voice, a Day-1 continuity principle for services, safeguards in principle on finance, and clearer accountability about who does what.

Full details of engagement are set out in section 9.

Functional Sussex: councils designed around how people live

People in Sussex routinely cross council lines to use schools, hospitals, workplaces, libraries and leisure facilities. Organising local delivery and accountability around lived geographies could support:

- **Devolution readiness.** The Mayor working with a small number of stable, expert councils anchored in functional geographies.
- **Design once, deliver locally.** Prevention standards and service pathways set once per corridor, so people do not face different rules town by town.
- **Clearer accountability.** Residents having a defined local lead for the services they use most; partners having fewer, more consistent relationships.

This approach is expected to give people fairer access, clearer rules and faster action; to make services simpler and more consistent across the places they actually use; and to enable Sussex to present a clearer national voice while keeping councils recognisable and close to communities.

Illustrative corridors already cut across current boundaries:

South coast corridor

The A259 and the Coastway rail lines link communities from Hastings and Eastbourne through Seaford, Newhaven, Peacehaven, Saltdean and Brighton & Hove, continuing west towards Worthing and Chichester. Aligning local delivery here could bring consistency to services such as admissions, travel concessions and social care, support joined-up regeneration, and provide the Mayor with clear partners on coastal priorities.

North–south spines

The Brighton Main Line and Thameslink services connect Mid Sussex and Crawley directly to Gatwick and London. Horsham links in via the Arun Valley line. Treating these routes as functional geographies could support planning around stations, integrate prevention with NHS providers and colleges, and give the Mayor clear partners for rail, skills and investment.

Gateways: ports and the airport

Gatwick Airport, together with Newhaven and Shoreham ports, are gateways of regional and national significance. Littlehampton harbour plays a more local role. Aligning councils to these gateways could ensure local impacts are managed

coherently while enabling the Mayor to lead on trade corridors, freight strategy, decarbonisation and national investment.

Rural Sussex: east and west

In the east, market towns such as Uckfield and Crowborough anchor the High Weald. In the west, Chichester and the South Downs sustain farming, visitor economies and green industries. Recognising these rural systems could bring services into a single local approach tailored to dispersed settlements, ensure parish and town voices are designed-in, and give the Mayor rural counterparts on connectivity, investment and climate resilience.

What good looks like for Sussex

The case for reform is not about structure for its own sake. It is about councils that are simpler to navigate, safer for services and closer to communities. The Government’s six tests are the guardrails that ensure any proposal delivers those outcomes. Our interpretation for Sussex is to create councils that are local where it matters and scaled where it helps.

- Local means councils people recognise, a single accountable route for services, neighbourhood voice designed in, and visible local access.
- Scale means councils large enough to deliver high-risk services safely, withstand financial shocks, sustain professional depth and act as credible partners to the NHS, education, police, Government, investors and the Mayor.

Meeting the six tests

1. Establishing a single tier of local government.

For residents this means one accountable council for local services in each area, so people are clear who to turn to. The aim is to simplify responsibility and reduce duplication. The exact configuration will be tested further in the statutory process.

2. Councils of the right size.

Councils must be large enough to run complex services and resilient enough to absorb shocks, while still being recognisable. We believe that councils in the 300,000–400,000 range may best balance local identity with resilience, subject to statutory consultation and ministerial decision.

3. High-quality and sustainable services.

The priority is safe continuity. On day one residents should continue to use services in the same way. In the longer term aligning councils to lived geographies can make prevention more consistent and allow focus on local pressures such as coastal deprivation, growth around Gatwick or rural access.

4. Collaboration and local views.

Engagement was sceptical about reform but surfaced clear conditions for support: recognisable councils, clear accountability and neighbourhood voice. These conditions are embedded in the design. Only the statutory consultation can test all options across Sussex.

5. Support for devolution.

Sussex is preparing for a Mayoral Strategic Authority. Right-sized councils aligned to lived geographies could provide the Mayor with a small number of expert, democratically accountable partners, improving pace and clarity of decisions on transport, skills, housing growth and net zero.

6. Stronger community engagement and neighbourhood empowerment.

Parish and town councils will remain with their existing powers and precepts. It is anticipated that new authorities will consider mechanisms such as neighbourhood charters and locality arrangements. Local access could be maintained through existing hubs. Specific mechanisms would be determined locally through democratic processes.

3. Options Considered & Methodology

This section explains how options were appraised and how we reached our proposal. The Government’s invitation made clear that whole principal authorities are the normal building blocks, but it also allowed for refined boundaries where there is a strong justification.

We therefore assessed both:

- a statutory base case using whole principal authorities (Districts and Boroughs) to meet the requirement under the 2007 Act, and
- alternative maps using wards (and one parish) where this better reflects communities and lived experiences

Considering the whole of Sussex

Although the invitation formally covered East Sussex and Brighton & Hove, the Government’s letter (February 2025) also made clear that proposals could explore wider boundaries where there was justification. All of Sussex is moving towards a single Mayoral Strategic Authority (MSA) and the interim plan feedback invited further detail on how the proposed new structures would support arrangements for the proposed Sussex & Brighton MSA. MHCLG feedback stated that ‘in this regard it would be helpful for proposals to have regard to the model of government that is proposed across the whole Sussex & Brighton area’.

For that reason, and because Brighton & Hove sits between East and West Sussex, we assessed options across the whole of Sussex.

This approach ensures:

- **Coherence for devolution.** The Mayor will need a stable set of constituent councils covering the whole county. Considering Sussex as a whole means the final structure is balanced and credible at Mayoral level.
- **Continuity for residents.** Daily travel and service use cross the East–West line: Coastway, Gatwick and the Downs–Weald corridors all cut across boundaries.

Our starting point

All councils in Sussex face financial pressures from adult social care, special educational needs and homelessness. Reorganisation does not remove those national pressures. Our gateway test was therefore resilience: no new council should be too small to survive or so large that it becomes remote.

We also assessed deliverability and cost of change. More complex options require services to be split and recombined, which increases programme cost and risk in the short term. This cannot be ignored. But we are clear: this is a once-in-a-generation opportunity to reshape local government for the next 30–40 years. That means short-term costs and complexity must be weighed against long-term benefits for residents and communities.

Feedback from engagement reinforced these principles. Residents consistently stressed the importance of councils they recognise, parish and neighbourhood voice, and clearer accountability for services. These conditions were built into our considerations.

Method and evidence

We built a Sussex-wide evidence base from published sources. The same assumptions were applied to every option. Options were assessed against the six Government criteria:

- 1. A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government.
- 2. Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.
- 3. Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.
- 4. Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views.
- 5. New unitary structures must support devolution arrangements.
- 6. New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.

Options considered

Three unitaries

- Uneven sizes; some large and remote, others small and fragile.
- Harder collaboration due to imbalance; weaker pooling of risk.
- Fewer partners for the Mayor but with imbalance in size and weight.

Four unitaries

- Stronger short-term pooling; easier to deliver.
- Still unbalanced in size, with larger councils at risk of feeling remote.
- Better match to ICB footprints in the short term, but identity and local connection weaker.

Five unitaries

- More costly transition in the short term.
- Creates balanced councils within a 300,000–400,000 band.
- Better long-term match to how people live; avoids leaving outlier communities underserved.

Whole-district maps either produced councils that were too large and remote, or required costly and disruptive service separation.

Options compares against the Government’s tests

Government test	Three unitaries	Four unitaries	Five unitaries
1. Single tier of local government	Removes the two-tier system, but uneven sizes make consistency harder across Sussex.	Also delivers a single tier, with simpler delivery than five but at the expense of balance.	Single tier across Sussex. Transition more complex, but creates a consistent long-term model for the county.
2. Right size and financial resilience	Councils would be very different in size. Some very large and potentially remote, others relatively small and fragile. Risk pooling is uneven.	Sizes remain unbalanced. Larger councils pool risk in the short term, but are more likely to feel remote from communities.	All councils fall within an indicative 300,000–400,000 band. None too big, none too small. Higher upfront cost, but stronger long-term balance and resilience.
3. High-quality and sustainable services	A single tier reduces duplication, but uneven sizes make collaboration harder and current boundaries do not always match how people use services.	Better aligned than three, but uneven sizes remain.	Stronger long-term fit with how people live. Short-term disruption, but avoids leaving outlier communities underserved and supports prevention at a scale councils can know well.
4. Local collaboration and consensus	Uneven sizes can make joint working slower and require more negotiation.	Risk that one or two larger councils dominate, unless formal mechanisms are added.	Five councils of comparable size collaborate as peers, with less risk of dominance and clearer space for local voice.
5. Support for devolution	Fewer partners for the Mayor, but with uneven size and weight that can distort the county-wide table.	Still fewer partners than five, but uneven size and weight remain.	Five balanced partners for the Mayor, none dominant. A fair and stable set of counterparts for strategy, investment and performance.
6. Community engagement and neighbourhood empowerment	Larger councils increase the risk that places feel distant from decision-making.	Same risk: large councils could blunt local voice without compensating governance.	Councils at the right size to stay connected to communities. Greater scope to design prevention and locality models, with parishes and towns kept intact and supported by charters.

Shortlist

On the combined balance of the six Government criteria, the five-unitary map with modifications is proposed.

- Resilience: all five councils fall within a stable 300,000–400,000 band.
- Deliverability: transition is more complex than three or four, but manageable with a phased approach and worth it to secure the right long-term structure.
- Identity: parishes and towns remain intact, so councils remain recognisable.
- Devolution: five balanced partners for the Mayor, with no single authority dominant.

A four-unitary map pools resources more easily in the short term and is easier to deliver. But over decades it risks councils that are too large and remote, and requires disruptive separation now. Finance is one test among six. On the combined balance, analysis indicates that five unitaries, though harder to deliver, offer the most sustainable long-term balance for Sussex.

Sensitivities and dependencies

National decisions on adult social care, SEND and homelessness funding remain decisive for every option. These pressures account for the majority of future deficits across all Sussex councils and cannot be resolved through reorganisation alone.

The forthcoming Fair Funding Review is particularly important. Its timing creates both risk and opportunity:

- If the Review shifts resources away from areas with older populations or higher social care demand, all Sussex councils will face greater structural pressure.

- Equally, the Review provides an opportunity to address current funding discrepancies across East and West Sussex, where costs of care, transport and housing are high but not always fully recognised in the national formula, and risk not being adequately understood and represented on the national stage by the current large upper tier councils.

Our financial modelling is therefore cautious. It assumes that current funding arrangements continue and that any positive changes from Fair Funding or wider reform (for example multi-year settlements or simplification of grants) will be treated as upside.

Other dependencies include:

- Implementation timetable: sequencing of Orders and elections will affect costs, complexity and deliverability, especially where shadow arrangements are needed.
- ICT and contract transition: scale and cost of data migration and contract transition varies with the number of councils created. More councils means more harmonisation, but also greater resilience once established.
- Neighbourhood governance requirements: expected secondary legislation on neighbourhood charters and representation ratios will shape how local voice is built into each new council.

We have tested sensitivities around population forecasts and inflation assumptions. In all cases the relative balance between options remained the same: four performs best on short-term financial pooling, while five performs best on long-term balance, identity and prevention.

4. The Base Proposal using whole districts as building Blocks

This is a requirement under the 2007 Act. It is not the final proposal we are advancing.

Our substantive Modified Proposal, which requests ministerial modification, is set out in Section 5.

In Section 5 we request a ministerial modification to refine this base case into a balanced five-unitary model for Sussex.

Compliance statement

This section constitutes our Base Proposal on whole district boundaries, prepared in accordance with Part 1 of the Local Government and Public Involvement in Health Act 2007 and the February 2025 invitation. It is a statutory base proposal and is not the final proposal we are advancing. Our substantive proposal, which requests ministerial modification, is set out in Section 5.

Base case configuration

The base case groups existing principal authorities into five unitary councils, without any changes to existing District council boundaries:

- Unitary A:** Brighton & Hove City Council (all wards); Lewes District Council (all wards) - Type C proposal
- Unitary B:** Eastbourne Borough Council (all wards); Hastings Borough Council (all wards); Rother District Council (all wards); Wealden District Council (all wards) - Type B proposal
- Unitary C:** Mid Sussex District Council (all wards) - Type B proposal
- Unitary D:** Crawley Borough Council (all wards); Horsham District Council (all wards); Chichester District Council (all wards) - Type B proposal
- Unitary E:** Arun District Council (all wards); Adur District Council (all wards); Worthing Borough Council (all wards) - Type B proposal

Assessment against the Government’s tests

Government test	Baseline assessment (whole districts, no modifications)
1. Single tier of local government	Creates five unitary authorities using existing principal authorities as building blocks. Meets the invitation’s requirement to set out a base case on whole districts and removes two-tier arrangements within each area.
2. Right size and financial resilience	Produces units of uneven population size (for example, a single-district unit is smaller than a unit comprising several districts). The range in size may have implications for resilience and perceived local connection. The extent of risk pooling would depend on the size of each unit and on the delivery model adopted.
3. High-quality and sustainable services	Establishes single tiers per area, which removes duplication of tiers. The degree of service integration and consistency would depend on local access, locality arrangements and phasing. Uneven population sizes may make collaboration and standardisation more variable across the county.
4. Local collaboration and responsiveness to views	Provides a legally coherent configuration based on administrative boundaries. It does not incorporate ward-level refinements or other adjustments arising from engagement. Transition would require formal collaboration mechanisms between the new councils.
5. Support for devolution	Creates a complete set of constituent councils across Sussex for a Mayoral Strategic Authority. Variation in unit size could affect perceived balance at the Mayoral table and may require compensating partnership arrangements.
6. Community engagement and neighbourhood empowerment	Interim electoral and governance arrangements would ordinarily be set in the Structural Changes Order. A full electoral review by the Local Government Boundary Commission would typically follow vesting to secure appropriate representation and neighbourhood governance in each new unitary.

Dependencies

All decisions on consultation, Orders, electoral arrangements and financial directions rest with Government.

No changes take effect unless and until Government makes a Structural Changes Order following statutory consultation.

5. Our proposal for five balanced Councils for Sussex

This section sets out the proposal we are asking government to consult on and consider. The proposal is a modification of our base case which is based on whole districts in accordance with s2 of the Act, and laid out in section 4

We show the precise areas involved, the rationale for change, and how each option performs against the government’s published tests.

Sussex-wide rationale for five balanced councils

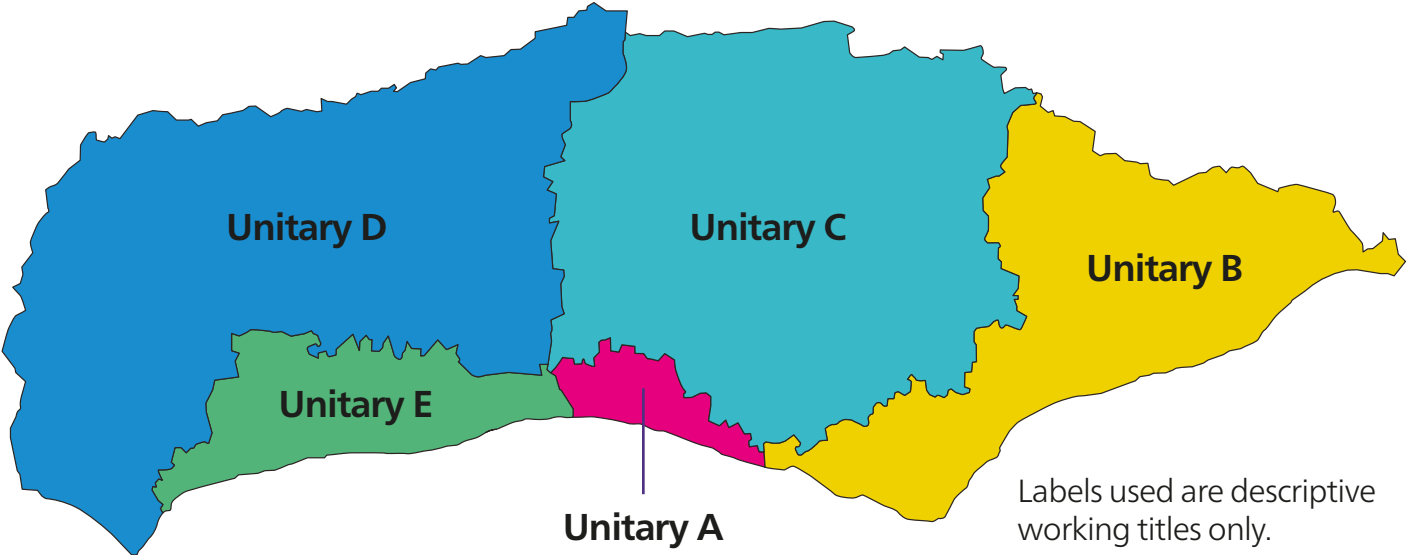
Our proposal creates five new unitary councils that together cover the whole of Sussex. They are designed as a single, coherent family of authorities: each rooted in its local communities, yet collectively strong enough to partner effectively with a Sussex Mayor. Every council falls within a balanced population band of 300,000 to 400,000 residents, avoiding extremes of scale that risk

either fragility or remoteness. Each footprint reflects daily travel-to-work patterns and economic corridors, ensuring that services, growth and infrastructure can be planned once and delivered more effectively.

By keeping parishes and towns intact, the model preserves local identity and accountability, while shared platforms across the five councils reduce cost and risk. This arrangement balances what matters most: resilient councils that can run complex services, neighbourhoods that retain a clear voice, and a county-wide structure that provides a credible foundation for devolution.

Other models were tested, including three or four unitaries. These offered some short-term simplicity but created uneven scales, left some areas feeling remote from decision making, and risked concentrating too much power in one or two very large authorities.

5.1 Our proposed five unitaries



Labels used are descriptive working titles only.

Five councils strike the right balance:

- **Resilient but connected.** Each council has 300,000–400,000 residents, large enough for adult and children’s services, small enough to remain rooted.
- **Functional fit.** Boundaries align to daily travel patterns and economic corridors.
- **Fair partnership.** Five councils of similar size avoid dominance by any one authority and give the Mayor a stable set of partners.
- **Deliverable.** The model allows phased transition and shared platforms to manage complexity.
- **Recognisable.** Each footprint reflects places that residents already identify with and keeps parishes intact.

The five proposed unitaries at a glance

Council (working title)	Areas covered (summary)	Population (approx.)	Indicative councillors*
Unitary A	Brighton, Hove, Peacehaven, Telscombe, East Saltdean, Falmer	301,000	~59
Unitary B	Eastbourne, Hastings, Rother, Seaford, Newhaven, south Wealden communities	360,000	~67
Unitary C	Mid Sussex, Lewes hinterland, Uckfield, Crowborough, northern Wealden towns	323,000	~55
Unitary D	Crawley, Horsham, Chichester	394,000	~62
Unitary E	Worthing, Adur, Arun	343,000	~54

*Indicative councillor numbers are based on county divisions, scaled to 2–3 members each. Final arrangements would be subject to LGBCE review post-vesting.

5.2 Government criteria at a glance: five balanced councils

Our proposal creates five balanced councils across Sussex. Each falls within an indicative population band of 300,000 to 400,000 residents, avoiding extremes of scale that risk fragility or remoteness. The configuration reflects daily travel and service corridors, keeps principal towns and parishes intact, and ensures councils are similar in size so that none dominates. This creates a fair and stable set of partners for a Sussex Mayor, while ensuring services remain recognisable and local voice is protected. The table below sets out how each proposed council performs against the Government’s six published tests.



Government test	Unitary A (Brighton, Hove, Peacehaven, Telscombe, Falmer)	Unitary B (Eastbourne, Hastings, Rother, Seaford, Newhaven, south Wealden)	Unitary C (Mid Sussex, Lewes hinterland, northern Wealden towns)	Unitary D (Crawley, Horsham, Chichester)	Unitary E (Arun, Adur, Worthing)
1. Right size and scale	Approx. 301k residents. Within the 300–400k indicative band. Continuous coastal and urban corridor avoids extremes of size.	Approx. 360k residents. Within the band. Brings eastern shoreline into one authority without creating an over-large unit.	Approx. 323k residents. Within the band. Keeps market towns and rural areas together at a sustainable scale.	Approx. 394k residents. Upper end of the band but still within range. Combines airport communities, towns and South Downs without dominance.	Approx. 343k residents. Within the band. A coherent west-coast strip at a sustainable size.
2. High-quality and sustainable services	One authority for school admissions, SEND travel and care pathways along the A259/Coastway, reducing hand-offs. Unites eastern coast and Newhaven Port so prevention, health and regeneration can be planned once	Unites eastern coast and Newhaven Port so prevention, health and regeneration can be planned once.	Aligns commuter flows to Gatwick and London; single local approach to rural prevention and family support.	Links Gatwick Airport, Crawley, Horsham and Chichester with surrounding South Downs, allowing coherent planning of services and infrastructure.	Supports coastal renewal, flood management and consistent community health and care along the West Coastway.
3. Financial resilience	Balanced tax base. Shared corporate platforms across five councils anticipated to reduce overheads. Savings to be tracked and verified through implementation and audit.	Larger coastal footprint supports consistent commissioning and shared systems, improving resilience over time.	Mix of growing towns and rural areas. Shared procurement and platform alignment intended to support efficiencies.	Diverse economy around Gatwick and historic towns. Shared back-office systems intended to provide savings once steady state is reached.	Shared coastal challenges addressed jointly. Procurement alignment and platform sharing expected to support recurring efficiencies. Provides a west-coast partner for seafront renewal, flood schemes and skills for coastal sectors.
4. Local collaboration and responsiveness to views	Comparable in size to peers, avoiding dominance. Responds to engagement feedback about recognisable councils and clear accountability. Well placed to collaborate with NHS trusts, universities and the voluntary sector across the city region.	Balances three coastal districts with inland communities. Keeps Seaford and Newhaven with Eastbourne, reflecting feedback. Supports joint work with East Sussex Healthcare NHS Trust, Newhaven Port, FE/HE and regeneration partnerships.	A peer of comparable size to others. Keeps Lewes town and rural hinterland together, responding to engagement. Strong basis for joint work with health, FE/HE and rural networks.	Larger but still within the band, acting as a peer among five. Combines Gatwick with market towns and South Downs, supporting collaboration with airport bodies, employers, FE/HE and rural partnerships.	Provides a west-coast peer of comparable size. Keeps coastal towns together, reflecting identity. Supports joint approaches on flooding, coastal renewal and skills with local partners.
5. Support for devolution	Provides a clear coastal urban partner for the Mayor on transport, skills, growth and net zero.	Provides a single eastern shoreline partner for regeneration, port and transport programmes.	Provides a coherent inland partner aligned to rail spines and rural networks.	Provides a balanced partner linking Gatwick with historic towns and rural areas to the west.	Provides a west-coast partner for seafront renewal, flood schemes and skills for coastal sectors.
6. Community engagement and neighbourhood empowerment	Ward councillors continue under interim arrangements; full LGBCE review post-vesting. Parishes remain in Peacehaven, Telscombe and Falmer. A neighbourhood charter anticipated to set standards across urban neighbourhoods and eastern parishes. Local access maintained through hubs such as libraries and family centres, with further tools to be considered by the new authority.	Ward councillors continue; full LGBCE review post-vesting. Parishes remain across the eastern coast, including Seaford and Newhaven. A neighbourhood charter anticipated to set standards for coastal and inland engagement. Local hubs provide visible access; outreach for vulnerable groups.	Ward councillors continue; full LGBCE review post-vesting. Parishes and market towns remain intact. A rural-focused neighbourhood charter anticipated, with parish partnerships, digital outreach and locality budgets considered by the new authority.	Ward councillors continue; full LGBCE review post-vesting. Parishes remain in Horsham and Chichester; unparished Crawley covered by tailored arrangements. A charter anticipated to formalise standards across towns and villages, with mechanisms such as resident panels considered for issues linked to the airport, skills and transport.	Ward councillors continue; full LGBCE review post-vesting. Parishes remain in Arun; unparished Worthing and parts of Adur covered by tailored neighbourhood arrangements. A coastal charter anticipated to set standards for engagement on seafront renewal, flood schemes and local environment.

5.3 Request for ministerial modification to the Base Proposal

We request that the Secretary of State modifies the statutory baseline described in Section 4, to adopt the boundary refinements set out below. These refinements better satisfy the Government criteria by improving public service coherence, financial sustainability, local identity, and the balance of partners for devolution.

What change is sought

1. Unitary A – Coastal urban council centred on Brighton & Hove

- Transfer from Lewes District: East Saltdean & Telscombe Cliffs ward; Peacehaven West, East and North wards; Falmer parish (from Kingston ward)

2. Unitary B – Eastern coastal council (Eastbourne, Hastings, Rother, part-Wealden, part Lewes)

- Transfer from Lewes District: Seaford South, West, North, Central and East wards; Newhaven North and South wards
- Transfer from Wealden District: Polegate North and Central wards; Polegate South & Willingdon Watermill ward; Upper and Lower Willingdon wards; Stone Cross ward; Pevensey Bay ward; Herstmonceux & Pevensey Levels ward; South Downs ward

3. Unitary C – Rural and market towns council (Mid Sussex, northern Wealden, Lewes hinterland)

- Transfer from Lewes District: Lewes Castle, Bridge and Priory wards; Kingston ward (minus Falmer parish); Newick ward; Chailey, Barcombe & Hamsey ward; Plumpton, Streat, East Chiltington & St John ward; Ouse Valley & Ringmer ward; Ditchling & Westmeston ward; Wivelsfield ward
- Transfer from Wealden District: Uckfield Ridgewood & Little Horsted, North, East and New Town wards; Arlington ward; Buxted ward; Maresfield ward; Hartfield ward; Forest Row ward; Danehill & Fletching ward; Horam & Punnetts Town ward; Heathfield North and South wards; Hellingly ward; Withyham ward; Hadlow Down & Rotherfield ward; Mayfield & Five Ashes ward; Chiddingly, East Hoathly & Waldron ward; Crowborough Central, North, South East, South West, St Johns, Jarvis Brook wards; Frant & Wadhurst ward; Hailsham Central, North, North West, South, West, East wards

4. Unitary D – North Sussex council (Crawley, Horsham, Chichester) - No change.

5. Unitary E – West Sussex coast council (Arun, Adur, Worthing) - No change.

Why this modification better satisfies the tests than the statutory baseline

Public services. The modification removes artificial splits created by whole-district boundaries. Seaford and Newhaven are placed with Eastbourne, where residents already travel for schools, hospitals and jobs. Lewes hinterland wards and northern

Wealden towns join Mid Sussex, matching commuting and education flows north and south. This alignment means councils can plan once for the services people actually use, instead of handing off across boundaries.

Financial sustainability. The refined map is more complex to deliver in the short term and will bring higher transition costs than whole-district mergers. However, it avoids leaving councils at extremes of size that would be financially fragile or too remote from residents. By creating five authorities in a tighter band of around 300 to 400k residents, the model provides a stronger long-term balance. National pressures in social care, SEND and

homelessness remain, but this structure ensures no council is set up to fail.

Identity and accountability. The modification produces councils that people recognise. Parishes and towns are kept whole, with no principal settlement split. Seaford is not separated from its coastal neighbours, Lewes town remains with its rural hinterland, and Peacehaven and Telscombe join the city corridor where they already look. Town and parish councils remain, supported by neighbourhood charters. This ensures local voice is visible and protected, while councils are big enough to carry complex services sustainably.



Comparison of the statutory Base Proposal (whole districts, no ward changes) and the requested Modified Proposal (refined boundaries).

Government test	Base Proposal (whole districts, no modifications)	Modified Proposal (refined boundaries as set out in 5.25.3)
1. Single tier of local government	Creates five unitary authorities using existing principal authorities as building blocks. Meets the invitation’s requirement to set out a base case on whole districts and removes two-tier arrangements within each area.	Also creates five unitary authorities and removes two-tier arrangements. Uses ward and parish refinements to adjust footprints where justified so that the single-tier pattern better follows how people use services.
2. Right size and financial resilience	Produces units of uneven population size (for example, a single-district unit is smaller than a unit comprising several districts). The range in size may have implications for resilience and perceived local connection. The extent of risk pooling would depend on the size of each unit and on the delivery model adopted.	Places all five councils within an indicative band of about 300,000 to 400,000 residents. This is intended to avoid extremes of scale and to provide a more balanced platform for long-term resilience. Financial performance would still depend on delivery choices, but the starting sizes are more even.
3. High-quality and sustainable services	Establishes single tiers per area, which removes duplication of tiers. The degree of service integration and consistency would depend on local access, locality arrangements and phasing. Uneven population sizes may make collaboration and standardisation more variable across the county.	Aligns footprints more closely with travel-to-work and service corridors, so fewer hand-offs should be needed and prevention can be designed once and delivered locally. Any service changes would follow assessment, engagement and due process.

Government test	Base Proposal (whole districts, no modifications)	Modified Proposal (refined boundaries as set out in 5.25.3)
4. Local collaboration and responsiveness to views	Provides a legally coherent configuration based on administrative boundaries. It does not incorporate ward-level refinements or other adjustments arising from engagement. Transition would require formal collaboration mechanisms between the new councils.	Reflects engagement themes about recognisable councils, clearer accountability and neighbourhood voice by keeping principal settlements and parishes intact where possible. Councils of similar size are intended to collaborate as peers, with less risk of dominance.
5. Support for devolution	Creates a complete set of constituent councils across Sussex for a Mayoral Strategic Authority. Variation in unit size could affect perceived balance at the Mayoral table and may require compensating partnership arrangements.	Provides five partners of comparable size for the Mayor. This is intended to create a fair and stable platform for strategy, investment and performance without a single authority dominant.
6. Community engagement and neighbourhood empowerment	Interim electoral and governance arrangements would ordinarily be set in the Structural Changes Order. A full electoral review by the Local Government Boundary Commission would typically follow vesting to secure appropriate representation and neighbourhood governance in each new unitary.	Parishes and towns remain intact where possible. Neighbourhood charters and proportionate locality arrangements are anticipated so that local voice is visible, with initial warding settled through the Order and a full LGBCE review post-vesting.

Representative Councils for a Devolved Sussex: A Five Unitary Proposal

6. Proposed council profiles



Unitary A

Population: ~304,000

Boundary and geography

This authority would bring together the existing Brighton & Hove City Council with East Saltdean & Telscombe Cliffs, Peacehaven (East, West, North) and Falmer Parish. These areas already share schools, universities, hospitals and cultural anchors, with thousands of daily journeys along the A259, Coastway rail and Brighton Main Line. Including Falmer resolves an administrative anomaly: it is functionally part of the city’s service and transport system but currently sits outside the boundary.

Governance and representation

- Indicative councillors: c.59, based on county divisions scaled to 2–3 members each, subject to full LGBCE review after vesting.
- Leader and Cabinet governance model.
- Peacehaven Town, Telscombe Town and Falmer Parish Councils retained with their existing powers and precepts.
- Ward councillors continue, supported by a Neighbourhood Charter to guarantee consultation standards, response times and escalation routes.
- Legal neutrality: all proposals are subject to ministerial decision and statutory process.

Council tax and finance

- Band D harmonisation phased fairly; parish precepts remain local. The period and method for harmonisation are set in the Structural Changes Order. Recent

reorganisations have used multi-year glidepaths. We do not fix a number here; it would be confirmed in the Order.

- Resilience strengthened by pooling resources and cutting duplication across the coastal corridor.
- Potential to explore corporate platforms across all five councils (finance, HR/payroll, customer, cyber/data) support steady-state savings.
- Like all councils, this footprint will still face national pressures in adult social care, SEND and homelessness. The coherent footprint improves the ability to manage these pressures; it does not remove them.

Services (council-led)

- Children’s services rated Outstanding (Ofsted, 2024), with standards extended across the new footprint.
- Adult services stable but under rising demand; wider urban base improves resilience.

Education, housing, public health/prevention and local regeneration could be planned once across the corridor, reducing costly hand-offs (council-led).

Why this council works

Brighton, Hove, Peacehaven, Telscombe, East Saltdean and Falmer already operate as one urban coastal system. Residents share the same schools and colleges, universities,

hospitals, leisure and cultural facilities. Aligning local government with this lived reality delivers:

- Simpler services (council-led): one accountable authority instead of hand-offs across boundaries.
- Clearer local accountability: one website, one account and one main number.
- Identity protected: parish and town councils retained; neighbourhood plans for places that want them.
- Better strategic fit with the Mayor: a single coherent coastal council that can work with the Sussex Mayor on county-wide strategy for transport corridors, skills and investment. Local housing and regeneration remain council functions, aligned to Mayoral strategy where relevant.

At ~304,000 residents, the footprint sits within the 300–400k which we believe is large enough for professional depth

and financial resilience, yet small enough to remain connected to communities. Collectively, the five new councils provide Sussex-wide scale without creating a single remote authority.

What this means for residents

- Clarity: one council responsible for local services across the corridor, fewer points of confusion.
- Continuity: bins collected, care packages maintained, schools open, safeguarding in place.
- Identity protected: Peacehaven, Telscombe and Falmer remain distinct places, with parish and town councils unchanged.
- Fair council tax: harmonisation phased gradually and explained clearly.
- No change to addresses: residents still live in Peacehaven, Telscombe, Saltdean, Falmer, Brighton or Hove.

Government tests at a glance

Criterion	Assessment	Evidence
1. Single tier of local government	Meets	Creates a single unitary authority, removing two tiers along the corridor.
2. Right size and financial resilience	Meets	Approx. 304k residents within the 300–400k indicative band; balanced with the other four councils.
3. High-quality, sustainable services	Meets	A single council reduces hand-offs and duplication. Strong existing children’s services (Ofsted, 2024: Outstanding) and wider prevention can be planned once.
4. Local collaboration and responsiveness to views	Meets	Responds to engagement feedback on recognisable councils and accountability. Balanced peer alongside four others; able to collaborate with NHS trusts, universities and voluntary sector.
5. Support for devolution	Meets	Provides a coherent coastal partner for the Sussex Mayor on transport, skills and investment.
6. Community engagement and neighbourhood empowerment	Meets	Indicative councillor numbers 59 subject to LGBCE; Peacehaven, Telscombe and Falmer councils remain; neighbourhood charter anticipated to guarantee standards and visibility of local voice.

Unitary B

Population: ~360,000

Boundary and geography

This council would unite Eastbourne, Hastings and Rother with Seaford and Newhaven, plus nearby Wealden communities that functionally tie into Eastbourne (for example Polegate, Willingdon, Pevensey, Stone Cross). These places share daily travel and service use along the A259 and East Coastway rail corridor, with the Marshlink line extending east from Hastings to Ashford International.

Governance and representation

- Indicative councillors: c.67, based on county divisions scaled to 2–3 members each, subject to SCO and full LGBC review.
- Governance model: arrangements for the shadow period would be set in the Structural Changes Order. The enduring model (executive or committee) would be determined by the new council under the Local Government Act 2000 (as amended) after vesting.
- Town and parish councils (e.g., Seaford, Newhaven, Rye, Bexhill, Polegate, and rural parishes) would continue with their existing powers and precepts.
- Ward councillors would continue. Tools to strengthen neighbourhood voice (for example, local standards or charters) could be considered by the new council.
- Legal neutrality: all changes are subject to ministerial decision and statutory process.



Council tax and finance

- Council tax would be phased to a single schedule in line with the method and period set in the Structural Changes Order (SCO); parish precepts would remain local.
- Financial resilience is intended to improved by pooling resources and reducing duplication across one coastal authority.
- Shared corporate platforms used across all five councils (finance, HR/payroll, customer, cyber/data) would support steady-state efficiencies, subject to each council's decisions.
- National pressures in adult social care, SEND and homelessness will continue. A coherent coastal footprint improves the ability to manage these pressures, it does not remove them.

Services

- Health services are anchored by Eastbourne District General Hospital and Conquest Hospital (Hastings), which together can provide complementary acute and planned care for the corridor.
- Newhaven Port is a strategic maritime asset with the ferry link to Dieppe and growing clean-energy activity.
- Education, housing, public health/prevention and local regeneration could be planned once for the shoreline, reducing hand-offs between authorities and aligning delivery to lived geographies.

Why this council works

The eastern shoreline already functions as a shared system:

- Eastbourne ↔ Polegate/Willingdon: daily commuting and service use.
- Hastings ↔ Rother: integrated labour and housing markets with linked regeneration priorities.
- Seaford & Newhaven: strong east–west ties along the A259 and rail, and a working harbour at Newhaven.

Common challenges: older-than-average age profiles, well-documented health inequalities (particularly in Hastings), constrained housing supply and A259 transport bottlenecks. These are easier to address when planned once across the shoreline and delivered locally.

This council would:

- Simplify local services: one accountable authority instead of multiple hand-offs.
- Clarify accountability: a single local decision-maker for the eastern coast; access routes could be simplified over time.
- Protect identity: towns and parishes remain; any further neighbourhood-voice arrangements would be for the new council to decide.
- Work better with the Mayor: provide a coherent coastal partner that can work with the Sussex Mayor on county-wide strategy for transport corridors and skills. Local housing, public health and regeneration would remain council responsibilities, aligned to Mayoral strategy where relevant.

People and place

The area combines diverse coastal towns (Eastbourne, Hastings, Bexhill, Seaford, Newhaven), historic settlements (Rye, Battle) and growing commuter hubs (Polegate,

Willingdon). It includes both affluent rural communities and some of the South East's more deprived coastal wards. The coastline supports strong visitor economies but is also exposed to flood and climate risks. Nearby assets such as the South Downs and Seven Sisters draw visitors and require coordinated stewardship.

Infrastructure and anchors

- Health: Eastbourne District General and Conquest Hospitals provide complementary acute and planned care for the corridor.
- Transport: The A259 and East Coastway rail connect Seaford, Newhaven, Eastbourne, Bexhill and Hastings; Polegate provides onward rail to London.
- Economy and culture: Newhaven Port; Eastbourne's conference and cultural offer (e.g., Towner Eastbourne); Hastings' heritage and creative economy; Bexhill's De La Warr Pavilion.
- Natural environment: South Downs National Park, Seven Sisters cliffs and Rye Harbour nature reserve underpin tourism and resilience planning.

What this means for residents

- Clarity: one council responsible for local services across Eastbourne, Hastings, Rother, Seaford and Newhaven.
- Continuity: hospitals, schools and frontline services are intended to continue; safeguarding and local access points remain.
- Identity protected: Seaford, Newhaven, Bexhill, Rye and parishes remain with their names and civic institutions unchanged.
- Fair council tax: harmonisation phased in line with the SCO and explained clearly.
- Joined-up improvement: a single shoreline view for coastal renewal, flood planning, housing growth and public realm, delivered locally.

Government tests at a glance

Criterion	Assessment	Evidence
1. Single tier of local government	Meets	Creates one unitary across Eastbourne, Hastings, Rother, Seaford, Newhaven and part-Wealden; removes two tiers along the corridor.
2. Right size and financial resilience	Meets	~360k residents within the 300–400k band; balanced with the other four councils; avoids extremes of scale.
3. High-quality, sustainable services	Meets	One authority for the shared coastal system anchored by Eastbourne DGH and Conquest Hospital; reduces hand-offs and aligns services with lived geographies.
4. Local collaboration and responsiveness to views	Meets	Balanced peer alongside four others. Keeps Seaford and Newhaven with Eastbourne, reflecting engagement feedback. Well placed to collaborate with East Sussex Healthcare NHS Trust, Newhaven Port, FE/ HE and regeneration partnerships.
5. Support for devolution	Meets	Provides a coherent eastern coastal partner that can work with the Sussex Mayor on strategic transport, skills and investment.
6. Community engagement and neighbourhood empowerment	Meets	Indicative ~67 councillors, subject to LGBCE review post-vesting. Town and parish councils (e.g. Seaford, Newhaven, Rye, Bexhill, Polegate, rural parishes) remain. Neighbourhood charters or other tools anticipated to guarantee standards of engagement.

Unitary C

Population: ~323,000

Boundary and geography

This authority would bring together Mid Sussex (Burgess Hill, Haywards Heath, East Grinstead and surrounding villages), the Lewes town and hinterland (for example Lewes, Ringmer, Chailey, Newick, Ditchling, Wivelsfield, Plumpton) and northern and central Wealden towns and parishes (for example Uckfield, Crowborough, Forest Row, Maresfield, Buxted, Danehill & Fletching, Heathfield, Hailsham). These places already align along north–south rail and road corridors serving London, Gatwick and Brighton.

Governance and representation

- Indicative councillors: c.55, based on county divisions scaled to 2–3 members each, subject to SCO and full LGBCE review after vesting.
- Governance model: arrangements for the shadow period would be set in the Structural Change Order. The enduring model (executive or committee) would be determined by the new council under the Local Government Act 2000 (as amended) after vesting.
- Town and parish councils remain with their existing powers and precepts.
- Ward councillors would continue; additional neighbourhood-voice tools (for example, local standards or charters) could be considered by the new council.
- Legal neutrality: all changes are subject to ministerial decision and statutory process.



Council tax and finance

- Council tax would be phased to a single schedule in line with the method and period set in the Structural Changes Order; parish precepts remain local.
- Financial resilience is intended to be improved by pooling resources and reducing duplication within one inland authority.
- Shared corporate platforms across all five councils (finance, HR/payroll, customer, cyber/data) would support efficiencies, subject to each council's decisions.
- National pressures in adult social care, SEND and homelessness will continue. A coherent north–south footprint improves the ability to manage these pressures, it does not remove them.

Services (council-led)

- Health: anchored by the Princess Royal Hospital (Haywards Heath) and the specialist Queen Victoria Hospital (East Grinstead), alongside strong primary/ community networks.
- Education & skills: secondary and FE provision across Mid Sussex and the Lewes area; Plumpton College supports land-based and green skills.

- Local delivery: education, housing, prevention and regeneration could be planned once across the footprint, reducing hand-offs and aligning to lived geographies.

Why this council works

Daily life in Unitary C is structured along north–south corridors:

- Places: Lewes is the cultural centre for its hinterland; Uckfield, Crowborough, Hailsham and Heathfield look both north and south for work and learning; Burgess Hill and Haywards Heath are strategic growth and service hubs.
- Rail: the Brighton Main Line/Thameslink through Burgess Hill and Haywards Heath connects to London and Gatwick; the East Grinstead and Uckfield lines serve commuters north, with interchange links to Brighton and the wider Sussex network.
- Road: the A23/M23, A22 and A272 carry flows between towns, villages and employment hubs.

The footprint combines growing commuter towns with rural parishes and nationally significant landscapes (South Downs, High Weald, Ashdown Forest). Shared challenges like housing affordability, rural access, transport capacity and environmental stewardship are better addressed when planned once across the footprint and delivered locally.

This council would:

- Simplify local services (council-led): one accountable authority instead of multiple hand-offs.
- Clarify accountability: a single local decision-maker for the area; access routes could be simplified over time.
- Protect identity: towns and parishes remain distinct; further neighbourhood-

voice arrangements would be for the new council to decide.

- Work better with the Mayor: provide a coherent inland partner that can work with the Sussex Mayor on county-wide strategy for transport corridors and skills. Local housing, public health and regeneration would remain council responsibilities, aligned with Mayoral strategy where relevant.

People and place

- Communities: commuter families in Mid Sussex towns; older residents in villages and rural areas. Need is often dispersed and less visible, making prevention and rural access central to planning.
- Access: residents rely on town-anchored hubs (Lewes, Uckfield, Crowborough, East Grinstead, Haywards Heath, Burgess Hill) for schools, GPs, shopping and leisure; priorities include reliable bus services, station access and digital connectivity.
- Economy: Burgess Hill and Haywards Heath support knowledge-intensive clusters; Plumpton College anchors land-based and green skills; town-centre renewal opportunities across Lewes, Uckfield, Burgess Hill, East Grinstead and Crowborough.
- Environment: the South Downs, High Weald and Ashdown Forest shape growth and transport decisions. Stewardship of these landscapes is part of the council’s place identity.

Infrastructure and anchors

- Health: Princess Royal Hospital (Haywards Heath); Queen Victoria Hospital (East Grinstead); strong community health networks.
- Transport: Brighton Main Line/Thameslink; East Grinstead and Uckfield lines to London; A23/M23; A22; A272.

- Education & skills: Plumpton College; FE and secondary networks across Mid Sussex, Lewes and northern Wealden.
- Economy: Burgess Hill Northern Arc and Science Park; Haywards Heath health/ knowledge clusters; East Grinstead clinical specialism; Lewes town renewal.
- Continuity: bins, schools, GP services and safeguarding continue.
- Identity protected: towns and parishes keep their names and civic bodies.
- Fair council tax: harmonisation set by the SCO, phased and explained clearly.
- Joined-up improvement: one view of north–south transport, rural access, housing and skills planned once and delivered locally.

What this means for residents

- Clarity: one council responsible for local services across Mid Sussex, Lewes town and villages, Uckfield, Crowborough, Hailsham and surrounding parishes.

Government tests at a glance

Criterion	Assessment	Evidence
1. Single tier of local government	Meets	Creates one unitary across Mid Sussex, Lewes town and hinterland, and northern/central Wealden; removes two tiers.
2. Right size and financial resilience	Meets	~323k residents within the 300–400k band; balanced with the other four councils; avoids extremes of size.
3. High-quality, sustainable services	Meets	One inland unitary aligned to commuter flows and rural patterns; anchored by Princess Royal and Queen Victoria hospitals; intended to reduce hand-offs and align prevention with lived geographies.
4. Local collaboration and responsiveness to views	Meets	A peer of comparable size to others; keeps Lewes town with its rural hinterland, reflecting engagement feedback. Supports collaboration with NHS trusts, Plumpton College, FE/HE, and rural networks along north–south spines.
5. Support for devolution	Meets	Provides a coherent inland partner for the Sussex Mayor on north–south transport corridors, skills and rural sustainability.
6. Community engagement and neighbourhood empowerment	Meets	Indicative ~55 councillors, subject to LGBCE review post-vesting. Town and parish councils remain. A rural-focused neighbourhood charter anticipated to formalise engagement standards; new authority could also consider tools such as locality budgets or resident panels.

Unitary D

Population: ~394,000

Boundary and geography

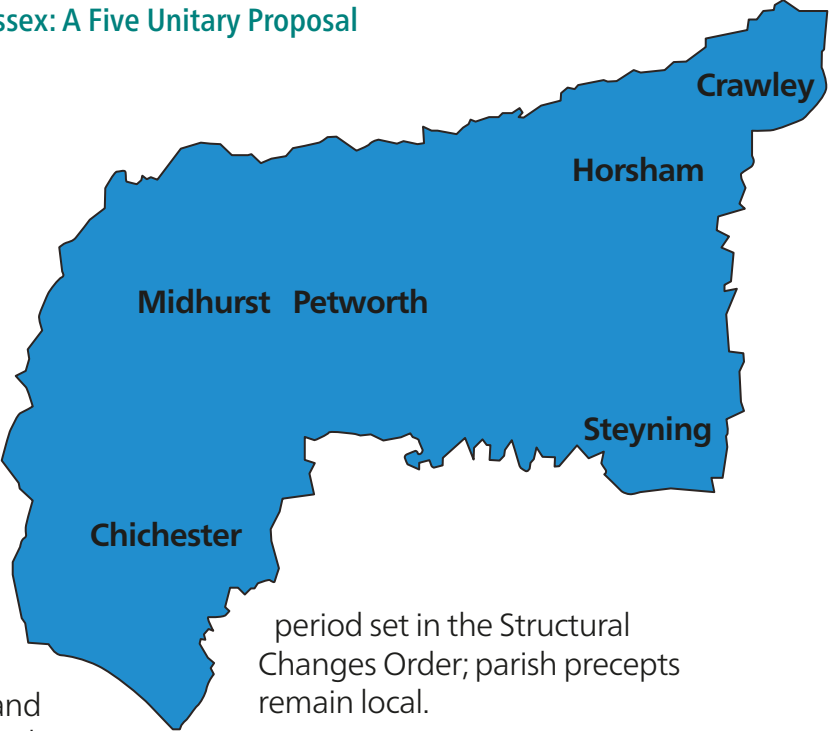
This authority would bring together Crawley, Horsham and Chichester districts. The area runs from the international gateway around Gatwick and Three Bridges in Crawley, through the market town of Horsham, to the cathedral city of Chichester and its South Downs and coastal plain. Daily life and services are tied together by the A23/M23 and A24 corridors, the A27 across Chichester, and rail links via Gatwick/Three Bridges, Horsham and Barnham.

Governance and representation

- Indicative councillors: c.62, based on county divisions scaled to 2–3 members each, subject to the SCO and full LGBCE review after vesting.
- Governance model: arrangements for the shadow period would be set in the Structural Changes Order. The enduring model (executive or committee) would be determined by the new council under the Local Government Act 2000 (as amended) after vesting.
- Town and parish councils remain with their existing powers and precepts.
- Ward councillors continue and additional neighbourhood-voice tools may be considered by the new council.
- All changes are subject to ministerial decision and statutory process.

Council tax and finance

- Council tax would be phased to a single schedule in line with the method and



period set in the Structural Changes Order; parish precepts remain local.

- Financial resilience is intended to be improved by pooling resources and reducing duplication across Crawley, Horsham and Chichester.
- Shared corporate platforms across all five Sussex councils (finance, HR/payroll, customer, cyber/data) would support efficiencies, subject to each council's decisions.
- National pressures in adult social care, SEND and homelessness will continue. A coherent North Sussex footprint improves the ability to manage these pressures, it does not remove them.

Services

- Health: acute services anchored by St Richard's Hospital (Chichester); Crawley Hospital and Horsham Hospital provide urgent treatment and community care, with established referral routes to neighbouring acute providers.
- Education & skills: strong secondary/FE provision across Crawley, Horsham and Chichester; the University of Chichester anchors higher education and training.
- Local delivery: education, housing, prevention and regeneration could be planned once across the area, reducing hand-offs and aligning to lived geographies.

Why this council works

Authority D combines:

- Gateway strength: Gatwick Airport and Manor Royal in Crawley anchor jobs and national connectivity.
- Market town vitality: Horsham provides services and identity for a wide rural hinterland.
- City heritage: Chichester blends cathedral, culture and a thriving visitor economy.
- Shared assets and challenges (from the A23/M23 Gatwick corridor, to growth pressure in Horsham, to managing the South Downs and Chichester Harbour AONB) benefit from one council planning once.

This council would:

- Simplify local services (council-led): one accountable authority instead of multiple hand-offs.
- Clarify accountability: one decision-maker for the area; access routes could be simplified over time.
- Protect identity: Crawley, Horsham and Chichester retain their councils and names; parishes remain intact.
- Work better with the Mayor: provide a coherent inland-gateway partner that can work with the Sussex Mayor on county-wide strategy for the Gatwick economy and A23/A27 corridors. Local housing, health prevention and regeneration would remain council responsibilities, aligned with Mayoral strategy where relevant.

People and place

- Communities: a young and diverse workforce in Crawley; older populations in Horsham and Chichester towns and villages.
- Access: residents use town hubs for schools, GPs, retail and services; key

interchanges include Gatwick, Three Bridges, Horsham and Chichester stations.

- Economy: aviation/logistics and advanced engineering (Crawley/Manor Royal); services and professional sectors (Horsham); cultural, education and visitor economy (Chichester, Goodwood, Chichester Festival Theatre).
- Environment: the South Downs National Park and Chichester Harbour AONB frame growth, housing and transport decisions; stewardship of these landscapes is part of place identity.

Infrastructure and anchors

- Health: St Richard's Hospital (Chichester); Crawley and Horsham hospitals for urgent/community care.
- Transport: A23/M23, A24, A27; rail via Gatwick/Three Bridges to London; Arun Valley line through Horsham to Barnham for Chichester access.
- Education & skills: University of Chichester; FE/secondary networks across Crawley, Horsham and Chichester.
- Economy: Gatwick Airport; Manor Royal business district; Goodwood; Chichester Festival Theatre; horticulture and viticulture on the coastal plain.

What this means for residents

- Clarity: one council responsible for local services across Crawley, Horsham and Chichester.
- Continuity: bins, schools, GP/community health and safeguarding continue.
- Identity protected: towns, city and parishes retain their names and civic bodies.
- Fair council tax: harmonisation set by the SCO, phased and explained clearly.
- Joined-up improvement: one view for Gatwick/Manor Royal, the A23/A24/A27 corridors, housing and place-making. Planned once, delivered locally.

Government tests at a glance

Criterion	Assessment	Evidence
1. Single tier of local government	Meets	Creates one authority covering Crawley, Horsham and Chichester; removes two tiers in those areas.
2. Right size and financial resilience	Meets	~394k residents, at the upper end of the 300–400k indicative band, balanced against the other four councils.
3. High-quality, sustainable services	Meets	One council linking gateway, towns and rural areas; anchored by St Richard’s, Crawley and Horsham hospitals; intended to reduce hand-offs and align services to lived geographies.
4. Local collaboration and responsiveness to views	Meets	Balanced peer alongside four others. Responds to engagement on recognisable councils. Well placed to collaborate with Gatwick Airport, NHS providers, University of Chichester, employers, and environmental partnerships (South Downs NP, Harbour AONB).
5. Support for devolution	Meets	Provides a coherent inland-gateway partner for the Sussex Mayor on Gatwick, skills and transport corridors.
6. Community engagement and neighbourhood empowerment	Meets	Indicative ~62 councillors, subject to LGBCE review post-vesting. Parishes and towns remain. Neighbourhood charters could formalise standards, with tailored engagement for unparished areas such as Crawley.

Unitary E

Population: ~343,000

Boundary and geography

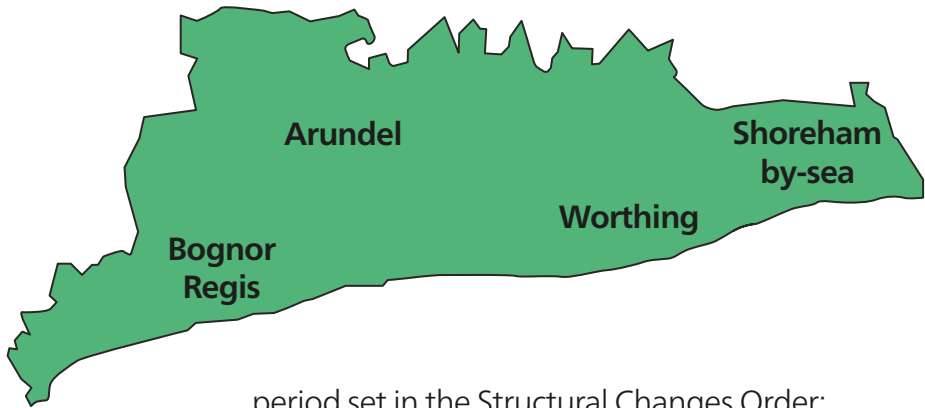
This authority would bring together the three coastal authorities of Arun, Adur and Worthing. It runs from Bognor Regis and Littlehampton in Arun, through Worthing, to Shoreham-by-Sea, Lancing and Southwick in Adur. The coastline is connected by the A259 and West Coastway rail, with the A27 providing the main east–west trunk route and interchanges north via the A24/A283.

Governance and representation

- Indicative councillors: c.54, based on county divisions scaled to 2–3 members each, subject to the SCO and full LGBCE review after vesting.
- Governance model: arrangements for the shadow period would be set in the Structural Change Order. The enduring model (executive or committee) would be determined by the new council under the Local Government Act 2000 (as amended) after vesting.
- Town and parish councils remain with their existing powers and precepts.
- Ward councillors continue; additional neighbourhood-voice tools could be considered by the new council.
- All changes are subject to ministerial decision and statutory process.

Council tax and finance

- Council tax would be phased to a single schedule in line with the method and



period set in the Structural Changes Order; parish precepts remain local.

- Financial resilience is intended to be improved by pooling resources and reducing duplication across one shoreline authority.
- Shared corporate platforms across all five councils (finance, HR/payroll, customer, cyber/data) would support efficiencies, subject to each council’s decisions.
- National pressures in adult social care, SEND and homelessness will continue. A coherent coastal footprint improves the ability to manage these pressures, it does not remove them.

Services

- Health: acute care anchored by Worthing Hospital (University Hospitals Sussex). Community and planned care delivered through Bognor Regis War Memorial Hospital and local primary/community hubs.
- Economy & regeneration: Shoreham Port (trust port) and Littlehampton Harbour are strategic maritime assets; Bognor Regis is a major visitor destination; Worthing and Shoreham town centres anchor retail, culture and services.
- Local delivery: education, housing, prevention and regeneration could be planned once for the coastal strip, reducing hand-offs between councils.

Why this council works

This footprint reflects how the West Sussex shoreline already functions:

- A single seafront system: towns share shoreline infrastructure, sea defences and flood risk management needs.
- Connected places: the A259 and West Coastway rail link Bognor Regis–Littlehampton–Worthing–Lancing–Shoreham; the A27 provides the trunk route east–west.
- Shared economies: coastal tourism (Bognor Regis, Littlehampton, Worthing), marine and port activity (Shoreham Port, Littlehampton Harbour), horticulture on the coastal plain, and growing creative and digital sectors in Worthing and Shoreham.

One shoreline council means:

- Simpler local services (council-led): one accountable authority instead of multiple hand-offs.
- Clearer accountability: one local decision-maker; access routes could be simplified over time.
- Identity protected: towns and parishes remain distinct; additional neighbourhood-voice tools would be for the new council to decide.
- Better strategic fit with the Mayor: a coherent shoreline partner that can work with the Sussex Mayor on county-wide strategy for the A27/A259 corridors, skills and coastal resilience. Local housing, prevention and regeneration remain council responsibilities, aligned with Mayoral strategy where relevant.

People and place

- Communities: a mix of older-than-average populations in many neighbourhoods and younger families in growing coastal communities. Needs can be concentrated (town centres, seafront) or dispersed (village hinterlands).

- Access: residents rely on town hubs for schools, GPs, retail and leisure; priorities include reliable rail services, safer local roads and good station access (e.g. Shoreham-by-Sea, Lancing, Worthing, Littlehampton, Bognor Regis).
- Economy: tourism and hospitality (Bognor Regis resort, Littlehampton seafront), creative and digital businesses (Worthing/Adur), marine and port industries (Shoreham Port, Littlehampton Harbour), and horticulture/food on the coastal plain.
- Environment: the coastline faces tidal flood and climate risks; the South Downs National Park meets the urban fringe at places such as Findon, Angmering and Arundel; stewardship and access management are central to balancing growth, homes and green space.

Infrastructure and anchors

- Health: Worthing Hospital (acute); Bognor Regis War Memorial Hospital (community/urgent care).
- Transport: A27 and A259; West Coastway rail; Shoreham (Brighton City) Airport for general aviation.
- Economy & culture: Shoreham Port; Littlehampton Harbour; Butlin’s Bognor Regis; Arundel Castle (heritage); Worthing Museum & Theatres; Shoreham’s Creative Mile and seafront cultural assets.
- Environment: coastal-flood schemes (e.g., Adur tidal walls), shoreline management plans, and links to the South Downs National Park.

What this means for residents

- Clarity: one council responsible for local services across Arun, Adur and Worthing.
- Continuity: on day one bins, schools, GP/ community health and safeguarding continue.
- Identity protected: towns and parishes keep their names and civic bodies.

- Fair council tax: harmonisation set by the SCO, phased and explained clearly.
- Joined-up improvement: one view for seafront renewal, flood management, housing growth and public realm (planned once, delivered locally.)

Government tests at a glance

Criterion	Assessment	Evidence
1. Single tier of local government	Meets	Creates one shoreline authority covering Arun, Adur and Worthing; removes two tiers in those areas.
2. Right size and financial resilience	Meets	~343k residents within the 300–400k indicative band; balanced with the other four councils.
3. High-quality, sustainable services	Meets	One shoreline authority for health, housing and coastal resilience; anchored by Worthing Hospital and Bognor Regis War Memorial Hospital; intended to reduce hand-offs and align services.
4. Local collaboration and responsiveness to views	Meets	A peer of comparable size to the other four councils. Reflects engagement by keeping coastal towns together. Supports collaboration with University Hospitals Sussex, Shoreham Port, South Downs NP, visitor economy networks and FE/HE providers.
5. Support for devolution	Meets	Provides a coherent shoreline partner for the Sussex Mayor on A27/A259 corridors, skills, housing growth and coastal resilience.
6. Community engagement and neighbourhood empowerment	Meets	Indicative ~54 councillors, subject to LGBCE review post-vesting. Town and parish councils remain where they exist across Arun. Unparished areas like Worthing and parts of Adur could be covered by tailored arrangements. A coastal neighbourhood charter anticipated to set standards for engagement, subject to decisions of the new authority.

7. Comparison with other proposals for Sussex

The Government asked each invitation area to put forward an evidence-led proposal that meets the six statutory tests. Refined boundaries may be included where justified. Ministers will then test proposals they assess as meeting the criteria side by side through statutory consultation before any decision.

East and West Sussex developed their cases to the same timetable as us. They could not fully appraise our refined five-council proposal at that stage. This section places the approaches next to each other, using the Government’s six tests. The purpose is to show how different interpretations of the tests have been brought forward for Ministers and residents to compare.

All three approaches, a single East Sussex authority, the single and two unitary models for West Sussex, and our proposal for five balanced councils, are valid interpretations of the Government’s six statutory tests. Each has strengths and trade offs. The statutory Sussex wide consultation is the proper stage for Ministers, residents and partners to weigh those options side by side.

Why the footprints differ

East and West Sussex were asked to work within their invitation areas. Their cases therefore tested county-wide and two-unitary models but did not cross county lines. Our proposal takes a whole-Sussex view, as MHCLG’s invitation allowed. Our ask to Government is that these options are now consulted on side by side across the whole Sussex region, subject to the Secretary of State’s decision.

Transition and deliverability

We recognise that a five council model involves greater transition complexity than a single county unitary. West Sussex in particular has emphasised the simplicity of a continuing authority model. Our view is that this is a once in a generation reform that is expected to shape local government for 30 to 40 years. The short term costs and programme risks of transition are recognised and have been modelled in our financial case. They can, in principle, be funded safely through reserves, capital receipts and, subject to Government decision, time limited capacity support. Over the long term, we judge that the benefits of balanced structures where no council is fragile, no council is excessively large, and none dominates the Mayoral table outweigh the short term disruption of transition.

Residents’ safeguards made real

Engagement across our footprint was sceptical about structural reform but clear on the safeguards people would want if change proceeds. Residents asked for councils they can recognise, for parish and neighbourhood voice to be protected, and for clarity about who does what. These conditions are embedded in our proposal. Every council is designed to sit within the 300,000 to 400,000 range so that it feels recognisable. Parishes would remain with their existing powers and precepts. New authorities would be expected to consider neighbourhood charters, subject to local decision, to formalise engagement standards. Each council would provide a single accountable route for local services, removing confusion between district and county responsibilities, while day to day services and safeguarding continue under the Structural Changes Order on vesting.

Short term and long term trade offs

In the short term, East and West Sussex single county models offer simplicity, stronger headline pooling and quicker payback, with lower transition risk. In the long term, five balanced councils avoid extremes of size, keep councils recognisable, enable peer to peer collaboration and create a Mayoral table where no single authority is dominant.

How the approaches interpret the six Government tests

MHCLG test / Feature	East Sussex: “One East Sussex” (single county unitary ~555,000)	West Sussex: Option A – single county unitary (~891,000)	West Sussex: Options B1/B2 – two unitaries (~400–500,000 each)	Sussex: Five balanced councils (~300–400,000 each)
Geography and constituent areas	One unitary covering the current East Sussex county area: Eastbourne, Hastings, Rother, Wealden and Lewes. Brighton & Hove remains a separate unitary.	One unitary covering the current West Sussex county area: Adur, Arun, Chichester, Crawley, Horsham, Mid Sussex and Worthing.	B1: Arun, Chichester and Worthing in one council; Adur, Crawley, Horsham and Mid Sussex in another. B2: Adur, Arun, Chichester and Worthing in one council; Crawley, Horsham and Mid Sussex in another.	A: Brighton & Hove with Peacehaven, Telscombe, East Saltdean and Falmer. B: Eastbourne, Hastings and Rother with Seaford, Newhaven, and south Wealden communities (Polegate, Willingdon, Pevensey). C: Mid Sussex with Lewes town and hinterland and northern/central Wealden towns (Uckfield, Crowborough, Hailsham, Heathfield). D: Crawley, Horsham and Chichester. E: Arun, Adur and Worthing.
1. Single tier of local government	Creates one county-wide unitary, removing the two-tier system. Minimal disaggregation inside East Sussex means simpler transition.	Creates one county-wide unitary, removing the two-tier system. County services transfer intact with no disaggregation required.	Creates two authorities of about 400–500,000 residents. Delivery would involve disaggregation of county services and new interfaces between the two.	Creates five unitaries across Sussex, each replacing two-tier structures in their area. Boundaries refined to follow lived geographies, with transition phased to manage disaggregation safely.
2. Right size and financial resilience	Resilience through scale at about 555,000 residents. Their case argues a single large authority reduces fragility and pools risk.	Maximum pooling at about 891,000 residents. Their business case identifies the strongest savings and quickest payback, with a modelled net benefit of £48.8m per year and 2.3-year payback. Figures are based on West Sussex’s own methodology.	Two councils of about 400–500,000 residents. Their case shows lower savings, with a modelled net benefit of £18.8m per year and 6.4-year payback, but sizes are closer to Government’s right-size guidance. Figures are based on West Sussex’s own methodology.	Five councils all within the 300,000 to 400,000 band, avoiding extremes of fragility or remoteness. Our modelling, using only publicly available RA data and Pixel forecasts, shows structural shortfalls comparable to three- and four-unitary comparators and therefore viable. Net recurring benefits rise to about £52m per year at steady state. These take longer to release than in larger models but are sustainable with guardrails on reserves and capital receipts. One-off costs are higher but affordable with phasing and, subject to Government decision, time-limited capacity support. Full methodology is set out in Section 9 (Finance and Resilience).
3. High-quality and sustainable services	Simplifies service delivery within county lines, reducing hand-offs. Their case notes reorganisation alone will not resolve national pressures in adult social care, SEND and homelessness.	Simplest to deliver, as existing county services move intact. Fewest transition risks in the short term.	Service delivery would involve creating two new authorities. More interfaces initially, with greater transition complexity to manage.	Services planned once along lived corridors such as the Coastway, north–south rail spines and rural systems. This reduces cross-boundary hand-offs over time. Day-one continuity is the guiding principle: bins, schools and safeguarding continue on vesting. Collaboration with NHS partners is supported, though footprints may evolve.
4. Local collaboration and responsiveness to views	County-wide engagement and collaboration by the six councils is cited. Their case argues that identity can still be protected within a single large unit.	Presented jointly by West Sussex councils. Engagement undertaken, though preferences were divided between single and two-unitary options.	Public and stakeholder survey of 9,332 responses. 62 per cent preferred a two-unitary model. Of these, 62 per cent favoured B2 (southwest/northeast split) and 28 per cent B1 (west/east split).	Responds directly to engagement in our footprint, where residents asked for recognisable councils, clear accountability and neighbourhood voice. Five councils of similar size support equal collaboration as peers. We invite statutory consultation so residents across Sussex can compare options on a like-for-like basis.
5. Support for devolution	Provides one clear county partner for the Sussex Mayor, simplifying relationships.	Provides one partner representing about 52 per cent of the Strategic Authority population. This offers clarity but risks imbalance at the Mayoral table.	Provides two partners at about 25 per cent each, giving a more balanced representation than a single 52 per cent authority.	Provides five partners in the 300,000 to 400,000 range. No council is dominant, creating a fair and stable Mayoral table across Sussex. .
6. Community engagement and neighbourhood empowerment	Proposes locality and neighbourhood mechanisms within a single large authority to address remoteness.	Intends formalised locality arrangements to preserve neighbourhood voice. Detail to be developed during transition.	As above, with locality working designed across two authorities.	Local voice designed in by scale, with each council recognisable to residents. Parishes and towns remain where they exist. New authorities would be expected to consider neighbourhood charters, subject to local decision, to formalise engagement standards. Visible access would be maintained through existing hubs such as libraries, leisure and family centres, complemented by digital routes. Electoral arrangements would be confirmed through the Structural Changes Order and reviewed by the Local Government Boundary Commission post-vesting.

8. Engagement: what we heard and how it shaped this footprint

We ran two rounds of non-statutory engagement to understand what matters most to people and partners and to build safeguards into any change.

Scope and method

Our engagement focused on Brighton & Hove’s potential future footprint. One council cannot legitimately consult the whole of Sussex on all options; that is the Secretary of State’s statutory role. If Ministers proceed with this proposal, MHCLG will run a Sussex-wide consultation so all options are tested side-by-side across the whole affected area.

Round 1 (April 2025): open views on principles and priorities. Over 600 people responded.

Round 2 (July–Aug 2025): tested four eastward options; included a public meeting and border drop-ins for in-person questions. 2,307 people responded.

Our approach was: open, self-selecting online survey with optional questions; equalities monitoring included. We also held a public meeting and drop in events.

Open participation means responses are self-selected and not statistically representative. Results provide directional insight rather than a mandate.

Data assurance. 2,307 survey responses (2,283 online and 24 paper) were analysed independently by Ignite Consulting using documented quantitative and qualitative methods. All responses were included; optional questions retained; free-text coded line by line with cross-checks. Known

limitations: open participation, optional items, and partial coding of one free-text question are disclosed. This makes the dataset directional rather than statistically representative.

Who responded

Total responses: 2,307.

Relationship to BHCC: 31% BHCC residents; 58% non-residents; 6% staff/partners/business/VCSE; 5% other/blank.

Coverage: significant participation from communities east of the city; many comments addressed wider Sussex impacts.

Headline message

Respondents were sceptical of structural reform and many preferred no change. Within that, seven consistent concerns emerged. We treat these as conditions to be met if reorganisation proceeds.

What people told us – the seven concerns

1. Identity and representation: fear of being subsumed by a larger urban authority; strong parish and village attachment; concerns about dilution of heritage and local political identity.

2. Trust and governance: doubts about BHCC’s record; calls for competent local delivery; perception that engagement felt rushed or biased; demand for transparency and meaningful involvement.

3. Services and infrastructure: worries about continuity in waste, SEND, and adult care; concern about congestion on the A259 corridor; scepticism that a larger authority could remain close and effective.

4. Boundaries and alternatives: suspicion of arbitrary or political maps; calls for clearer rationale; suggestions for coastal, pan-Sussex, or westward alternatives.

5. Finance: anxiety about debt inheritance, council tax harmonisation, and fair distribution of resources; desire for financial transparency.

6. Vulnerable groups: concern that children with SEND, families, and adults needing care could be disrupted during transition.

7. Process and transparency: confusion about whether people could remain with existing councils; calls for clearer information about what reorganisation can and cannot achieve.
- These concerns align with what other areas have found: widespread scepticism of structural reform, combined with clear conditions residents expect to see if change happens.

How we responded

You said	We did
Keep councils at a scale people recognise and minimise disruption	Proposed the smallest coherent footprint for Unitary A, and proposed 5 unitaries of a size of 300-400k residents, to reflect lived geographies.
Protect parish and neighbourhood voice	Parishes retain their powers and precepts. As new authorities, they would be expected to review and strengthen their relationships with Town and Parishes. Parish and town councils would continue as separate legal bodies and set their own precepts. Subject to member decisions and statutory processes, the new unitaries could bring forward a draft Parish & Communities Charter for consultation. They may also explore options for devolving defined local assets and services where there is local appetite, capacity and a sound business case.
Safeguard vulnerable groups and keep services local	A Day1 Service Continuity Plan is intended to maintain existing SEND, education and adult care pathways; all current access points will remain open; and no changes to eligibility thresholds would be proposed without an impact assessment and engagement.
Make it easier to know who does what	New unitaries would deliver all local services. The Sussex Mayor and Strategic Authority would cover only county-wide strategy.
Be transparent about debt and council tax	We propose working with MHCLG to explore ring-fencing of legacy debts through the Structural Changes Order; phased council tax harmonisation with damping; and independent assurance of the Medium-Term Financial Strategy.
Address A259 congestion	Align transition with a coastal corridor transport programme, subject to funding and devolved powers.
Justify which areas are included or excluded	Falmer included due to clear city ties; Kingston and the wider Downland excluded as rural in service profile with limited benefit.

What happens next

We are transparent about the limits of our remit. Our role has been to surface local concerns and embed safeguards. We now invite MHCLG to test all Sussex proposals side by side through the statutory consultation, so residents and partners across the whole area can compare options on a like-for-like basis.

9. Finance and resilience

This section explains the financial case for change. Its purpose is to show that the five proposed authorities would each be viable and sustainable, that the programme of reorganisation is affordable to deliver, and that the new structure would be resilient in the face of national pressures such as rising demand for adult social care, SEND, and temporary accommodation. It also sets out how we have applied a single neutral method across all options so that results can be compared fairly, and how one-off costs are intended to be funded safely through guardrails on reserves, capital receipts, and, subject to Government decision, time-limited capacity support.

Purpose and principles

The first test for reorganisation is whether each new unitary is financially sustainable, the programme is affordable to deliver, and the structure is resilient in the face of the national pressures every council faces.

Financial returns for 2025/26 show that authorities across Sussex are planning to make £48m appropriations from reserves (excluding school reserves) in the current financial year. This signals structural pressure before any reorganisation. Every council in Sussex is working to close further structural gaps in medium-term financial plans.

Finance at a glance

- On day one, services are intended to continue without disruption, with safeguarding and care pathways protected under the SCO.
- Council tax would be harmonised to a single schedule, subject to the SCO, typically phased over a multi-year glidepath. Parish precepts remain local.
- Reserves would be protected. The funding plan has guardrails which mean minimum balances will be maintained and statutory services will not be cut to fund change.
- Eligible capital receipts could be used for qualifying transformation costs. We will also request time-limited Government capacity support to shorten dual running and accelerate savings.
- Recurring savings are modelled to build steadily to a sustainable steady state. Three or four unitaries model higher early returns; five delivers more balanced scale and identity with sustainable long-term resilience.

Our baseline therefore models pressures first, then applies transformation effects, and does not assume any benefit from the Fair Funding Review. Any positive outcome from funding reform would be treated as upside and not assumed in the base case.

Reorganisation cannot remove national pressures in adult social care, SEND and homelessness. What it can do is create a stronger structure to manage them, with fewer hand-offs, reduced duplication, clearer accountability, and more consistent prevention and early help.

Method and scope

A single neutral assumption set has been applied across all options, whether three, four or five unitaries. The approach has three steps.

Financial modelling has been undertaken for the whole of Sussex, for the proposed option and comparator options.

Three stages of financial modelling have been adopted to transparently delineate between separate elements of costs and benefits. The aim of this approach is to focus not just on the aggregate savings for all authorities in scope for any

given option, but also acknowledge the sustainability of each component unitary, and therefore the region as a whole. Numerical figures throughout the section should be interpreted as relative indicators of resilience rather than precise forecasts.

While these steps do not seek to pre-empt The Fair Funding Review 2.0, we believe it is complementary to constructively inform this review.

The steps opposite have been combined into an MTFP model summarising the core structural position (from step 1), transformation and reorganisation benefits (from step 2) and implementation costs (from step 3).

Through an assumption that gaps between this structural position and phased costs/ benefits are met from usable reserves, modelling also indicates that any option is likely to see at least one unitary that will meet significant challenges in funding transformation delivery from reserves alone.

A full description of financial modelling methodology is in Appendix A, which sets out further detail and source data.

Step	Explanation	What it tells us
Step 1: financial sustainability baseline	<p>Disaggregating £3.56 billion FY25/26 revenue expenditure and related spending power (funding) across BHCC and the two tier areas of East Sussex and West Sussex, and reaggregating against proposed unitary geographies. It is based on publicly available RA data, which is highly comparable. However, it does attempt to include existing or medium-term cost pressures since the budget was set at the start of the financial year due to varying management accounting conventions in how these pressures are represented.</p> <p>Council tax harmonisation, base growth, population increases and inflation are also factored into future forecasts by financial year, for both service expenditure and relevant spending power elements. However, Pixel Financial Management data has been used to forecast key spending power changes into future financial years. Debt and reserves positions have also been analysed and disaggregated using consistent techniques.</p>	<p>A medium-term assessment of the structural revenue pressure on the individual proposed authorities, before transformation benefits and implementation costs are considered.</p> <p>This step is considered critical; demonstrating the financial pressure Sussex as a whole is likely to experience in the medium-term, with a high level assessment as to how equitably spread this financial pressure is likely to be across the region.</p>
Step 2: transformation and reorganisation benefits	<p>Forecast how the core financial benefits of LGR could be unlocked, and an indication of their scale/ profile. This includes removing duplication, creation of agile unitaries with lower unit costs, regional joint working and recurring disaggregation disbenefits.</p>	<p>Recurring benefits and disbenefits, for each proposed unitary for each financial year in the medium-term.</p> <p>This benefit profile can be assessed in addition to the financial sustainability baseline in step 1 above.</p>
Step 3: implementation costs	<p>Estimate the one-off costs of reorganisation and their likely profile.</p>	<p>This cost profile can be assessed in addition to the financial sustainability baseline in step 1 above, to give a sense of ROI.</p>

Financial sustainability baseline

The following table summarises the maximum forecast difference between revenue expenditure requirement and spending power at each of the proposed authorities in a single financial year up to end FY29/30.

Council tax harmonisation is included in these forecasts, but these figures are otherwise a reflection of how existing pressures are distributed (noting as per methodology section above, that any further pressures, and savings plan, specific to the existing authority are not included).

Note that maximum structural shortfalls could be occurring in different financial years for different proposed authorities.

Table 1: financial sustainability baseline summary for proposed five unitary option and comparators; deficits denoted in brackets, surpluses denoted by positive figures

Proposed unitary	Five unitary option		Three unitary comparator		Four unitary comparator	
	Maximum structural shortfall	As % of revenue expenditure	Maximum structural shortfall	As % of revenue expenditure	Maximum structural shortfall	As % of revenue expenditure
Unitary A	(£24.3m)	-3.3%	(£26.2m)	-3.7%	(£26.2m)	-3.7%
Unitary B	(£75.1m)	-9.1%	(£36.1m)	-3.0%	(£36.1m)	-3.0%
Unitary C	£79.4m	14.0%	N/A	N/A	N/A	N/A
Unitary D	(£19.0m)	-2.4%	N/A	N/A	£32.1m	4.0%
Unitary E	(£57.2m)	-7.4%	(£24.4m)	-1.2%	(£62.5m)	-5.9%

Four areas of transformation benefits were assessed and disaggregated, to apply these benefits to the financial sustainability baseline of each proposed unitary/ geography. These costs represent recurring/ structural benefits and disbenefits to the base budget.

Our modelling forecasts total annual net benefits (but excluding one-off costs) rising to £52.4M per annum in the proposed five unitary option. However, this full benefits realisation is modelled over a period of circa 10 years. For example, circa £14M per annum of this benefit is forecast to be released by FY29/30.

Table 2: breakdown of annualised net benefits increasing to £52.4M per annum across Sussex

Savings group	Savings sub-group	Total annual net benefits
Constitution and governance	Consolidated Members - basic allowance	£0.916m
Constitution and governance	Consolidated Members - SRAs	£0.934m
Constitution and governance	Elections	£0.299m
Transformation	Senior management	£4,788m
Transformation	Service duplication (staffing and running expenses)	£20,239m
Transformation	Agile unitaries	£26,002m
Joint working	Economies in services run collaboratively at scale	£9,014m
Disaggregation disbenefits	Recurring increase to base budget	(£9,787m)
		£52,406m

Comparative three unitary and four unitary models forecast total annual net benefits rising to £59.7M and £58.2M per annum respectively.

Building on Table 1, the sustainability of proposed authorities after transformation can be summarised as follows. Note that this post-transformation improvement also represents improving council tax revenues following harmonisation, which is reflected below:

Table 3: maximum structural challenge in a financial year, for each unitary in each option over a 10 year forecast period; deficits denoted in brackets, surpluses denoted by positive figures

Proposed unitary	Five unitary option		Three unitary comparator		Four unitary comparator	
	Maximum structural shortfall	As % of revenue expenditure	Maximum structural shortfall	As % of revenue expenditure	Maximum structural shortfall	As % of revenue expenditure
Unitary A	(£18.1m)	-2.4%	(£21.8m)	-3.0%	(£21.8m)	-3.0%
Unitary B	(£55.0m)	-6.5%	(£2.7m)	-0.2%	(£0.7m)	-0.1%
Unitary C	£104.0m	16.4%	N/A	N/A	N/A	N/A
Unitary D	£0.9m	0.1%	N/A	N/A	£61.8m	6.7%
Unitary E	(£41.6m)	-5.2%	£22.6m	1.1%	(£40.2m)	-3.7%

Implementation costs

Estimated one-off implementation costs are as follows. Figures are indicative ranges only, included for comparison between options.

Mitigations for more pressured units

Modelling indicates that some units, particularly B and E, could face tighter margins in early years. To mitigate this risk, the proposal includes:

- Guardrails on reserves, with no drawdown below risk-assessed minima.

- Shared corporate platforms across all five councils to reduce duplication of effort and deliver savings faster.
- Sequencing of transformation so higher-risk councils adopt changes later, once platforms are proven.
- Independent assurance of each authority’s Medium-Term Financial Strategy.

These targeted mitigations are designed to ensure that all five councils remain viable during transition and build resilience in steady state.

Table 4: total implementation costs; costs denoted in brackets

Cost group	Cost sub-group	Three unitary comparator		Four unitary comparator		Five unitary comparator	
		Lower range (£M)	Upper range (£M)	Lower range (£M)	Upper range (£M)	Lower range (£M)	Upper range (£M)
Transition	Shadow authorities	2.7	3.2	2.9	3.4	3.1	3.6
Transition	Election to shadow authorities	2.9	3.4	3.0	3.5	3.1	3.6
Transition	Programme delivery	13.7	16.1	18.6	21.9	25.3	29.7
Transition	Redundancy and pension strain	8.5	10.0	6.4	7.5	4.8	5.7
Transition	ICT consolidation	26.4	31.0	28.2	33.1	30.1	35.4
Transition	Branding, communications and engagement	1.6	1.9	2.4	2.8	3.4	4.1
Transition	Creation of new councils	3.6	4.3	4.4	5.2	5.3	6.3
Transition	Closedown of existing/ shadow councils	1.6	1.9	1.6	1.9	1.6	1.9
Transformation	Programme delivery	15.4	18.1	16.0	18.8	16.5	19.4
Transformation	Redundancy and pension strain	11.7	13.8	9.2	10.8	7.2	8.5
Transformation	ICT consolidation	15.4	18.1	30.2	35.5	59.2	69.6
All	Contingency	5.2	6.1	6.1	7.2	8.0	9.4
Total one-off implementation costs		108.7	127.9	128.9	151.6	167.7	197.2

Upper range estimates are included in the full financial model.

Note that when these total one-off costs are phased by financial year in which they are likely to be incurred, and combined with the summary in Table 2, it demonstrates that funding transformation from usable revenue reserves of circa £500M across Sussex would be a significant challenge. This represents circa 40% of usable reserves (excluding schools) would be required to fund transformation. Disaggregation of debt and reserves, currently assumed on a population basis relative to existing geographies, also suggests funding transformation will be even more challenging in coastal authorities.

10. Services and delivery

This section explains the intended service model for the modified five Unitary Proposal. It focuses on how local services would be organised if reorganisation proceeds, recognising that final decisions would be subject to the Structural Changes Order and local democratic choice.

Local where it matters, scale where it helps

Each unitary would be responsible for the full range of local services: education and children’s care, adult social care, housing, planning, waste, public health and community safety. Bringing these together within one organisation is intended to reduce duplication and make it clearer to residents who is responsible.

At the same time, the principle is to keep service delivery rooted in communities. Front-line services work best when they stay close to the people who use them. Functions such as social work, early help, homelessness casework, SEND transport, and public health outreach are expected to remain locally based, with councils continuing to work directly with schools, GPs and community partners.

Other functions are better organised at scale, either across each council or, in some cases, jointly across more than one council. Commissioning, market management, specialist hubs, ICT and data platforms, workforce development and analytics could be delivered on shared platforms where this improves resilience and value. Any such arrangements would follow options appraisal and local decision.

Continuity as the guiding principle

On vesting day, continuity is the guiding principle. Services are intended to continue under the SCO, with safeguarding and care pathways protected. Eligibility thresholds would not change without an impact assessment and engagement.

Social care partnerships

- **Strategic with the NHS.** The five councils will work with NHS Sussex. Strategic issues such as discharge, reablement, urgent community response and winter planning could be coordinated through a Sussex forum with the Mayor and the ICB. Current discharge and safeguarding protocols will continue on vesting day.
- **Place-based integrated delivery.** Each council would aim to operate a single discharge and reablement pathway, agreed jointly with NHS providers. Integrated Community Teams would remain aligned to primary care networks and neighbourhoods. Where current team footprints follow districts, these would be respected during transition.
- **Market shaping and workforce.** The councils could prepare joint market position statements for sectors where the market is Sussex-wide, such as high-cost placements. They may consider common approaches to provider sustainability, fair cost of care evidence and provider failure protocols. Workforce plans would include shared recruitment pipelines and training for reablement, dementia and strength-based practice.

- **Safeguarding and assurance.** Adults’ and children’s safeguarding arrangements would remain legally constituted throughout transition, with statutory leadership and membership continuous. Inspection readiness would be maintained for CQC assurance of Care Act duties, Ofsted ILACS, and local area SEND inspections.

Children’s services and education

- Strong practice already exists across Sussex. The new councils would draw on this and extend proven approaches across each footprint, while maintaining continuity for families and schools.
- Early help and social care. Neighbourhood-based teams would keep family support and child protection close to communities. Pathways would be harmonised gradually, subject to appraisal and consultation.
- Education and inclusion. Admissions, school place planning and attendance support would be coordinated at council level, with locality teams working with schools, trusts and special schools.
- SEND and transport. Policies and panels would be harmonised over time with schools and parents. Current travel arrangements are expected to continue for each academic year until any agreed changes are made.

Adults’ services and independence

- Reablement and urgent community response. Councils would work with NHS

partners to reduce hand-offs and improve outcomes. Any new pathways would be jointly developed; existing arrangements continue on vesting day.

- Care markets and self-funders. Advice and brokerage would be strengthened so people can access support more easily. Market management would focus on stabilising home care capacity and supporting quality.

- Carers. Carers’ assessment and support would be available locally and joined up with voluntary and community services.

Housing and homelessness

- Housing options. Each council would run an assessment pathway and severe-weather protocol, while local housing teams continue day-to-day work.
- Temporary accommodation. Placements would be coordinated to manage cost and improve standards, with an emphasis on prevention and rapid rehousing.
- Supported housing. Commissioning would be aligned with social care and public health to meet demand for extra care, supported living and move-on accommodation.

Waste and environmental services

- Continuity. Collections, recycling centres and disposal contracts are intended to continue on vesting day.
- Harmonisation. In the first year, councils may review collection policies and consider

- adopting the strongest affordable model, following engagement and decision. The intention is to lift standards up, not average them down.
- Cross-border flows. Agreements for treatment facilities would remain in place; there would be no export of risk to neighbouring councils.

Public health

- Mandated services. Sexual health, substance misuse, NHS Health Checks and health protection would continue without interruption.
- Improvement and outreach. Each council would produce a Joint Strategic Needs Assessment and report outcomes by place so progress is visible locally. Outreach programmes would remain community-led and evidence-based.

Community safety and resilience

- Police and resilience partners. The new councils would act as Category 1 responders, aligned to Sussex Police and the Local Resilience Forum. Plans would be simplified but partner structures unchanged.
- Community safety. Violence reduction, anti-social behaviour and safeguarding priorities would be coordinated at council level and delivered locally with partners and voluntary organisations.

Libraries, culture and leisure

- Libraries, museums, arts and leisure services are central to community identity and wellbeing. Cultural programmes would reflect local identity in each council while benefiting from shared commissioning where that adds value.

Growth, planning and transport

- Local plans, spatial planning and transport strategies would be set at council level and aligned to the functional corridors described earlier. Residents would see one set of rules per council for planning applications, parking and permits, with neighbourhood input through parishes and community forums. Strategic transport and growth issues would be led by the Mayor, with delivery by councils that know their places.

Multi-council delivery candidates

Some activities offer better value and resilience when delivered once for more than one council. Candidates include:

- specialist fostering and adoption recruitment,
- complex adaptations,
- ICT and technology operations,
- shared data and analytics,
- joint procurement,
- market shaping, and
- workforce development.

These would proceed only where options appraisal shows benefit, with clear service agreements, performance standards and local accountability preserved.

11. Democracy & Local Voice

Change must not mean losing the places people call home. The new councils in our modified five Unitary Proposal would be designed to simplify services and strengthen resilience while keeping identity and accountability close to communities.

Continuity and identity

Residents would continue to elect ward councillors. Parish and town councils would remain in place with their existing powers and precepts. Local casework would still be handled by people who know the area.

Experience already shows that bringing councils together does not erase identity. Nearly three decades after Brighton and Hove became a single authority, Hove remains Hove with its own centre, seafront and civic organisations intact, and Rottingdean remains Rottingdean. In 2024, residents around Hove Station and Rottingdean voted decisively for neighbourhood plans that now form part of the statutory development plan. These votes are proof that local identity can be actively protected within larger councils.

Postal addresses and post towns would also remain unchanged. Residents would still live in their neighbourhoods, and those names would continue to appear on bills, GP records and deliveries.

Day-one arrangements

From vesting day, residents are intended to see continuity in the services they rely on. Waste would still be collected, care packages delivered, and local access points to services kept open. Ward representation would continue. Services that work best close to

communities, such as social work, early help, school relationships, homelessness casework and public health outreach, would remain rooted in place.

Councillor numbers and warding

For the first elections only, interim arrangements are required because the Local Government Boundary Commission for England (LGBCE) can conduct a full electoral review only after the new councils legally exist. The interim approach is designed to meet electoral equality, reflect community identity where practicable, and support effective and convenient local government at the first polls, while being deliverable for returning officers.

- **Building blocks.** For Unitaries B, C, D and E, existing county electoral divisions would be used as the starting point and, where this improves equality and practicality, uplifted to two-member wards. Single-member wards may still be used where necessary to minimise variance or reflect identity.
- **Bespoke exception.** For Unitary A, a bespoke interim scheme is recommended where returning-officer readiness and local evidence support a coherent pattern with better interim equality.
- **Illustrative totals.** On this basis the interim model provides about 297 councillors across the five councils, with elector-to-member ratios typically in the 3,600 to 5,100 range. These figures are illustrative. Final numbers, ward boundaries and ratios will be set by the Secretary of State in the Structural Changes Order and then

- reviewed in detail by the LGBCE after vesting.
- This approach follows best practice from recent reorganisations. It ensures the first elections are deliverable and reasonably fair, while leaving the LGBCE free to carry out a full review post-vesting.

Unitary A (Brighton, Hove, Peacehaven, Telscombe, Falmer): 59 councillors

Unitary B (Eastbourne, Hastings, Rother, Seaford, Newhaven, southern Wealden): 67 councillors

Unitary C (Mid Sussex, northern Wealden, Lewes hinterland): 55 councillors

Unitary D (Crawley, Horsham, Chichester): 62 councillors

Unitary E (Arun, Adur, Worthing): 54 councillors

These figures are indicative only. Final numbers and warding would be determined by the Secretary of State in the SCO and then reviewed in detail by the Local Government Boundary Commission for England after vesting.

Neighbourhood voice

Parish and town councils would continue unchanged, but with the opportunity for a reset and stronger relationship with the new unitary councils. Subject to budget and statutory process, the new authorities would be expected to consider a Parish, Town and Community Charter. Such a Charter could set out standards for responsiveness, early

engagement and escalation routes when issues arise. It would be owned by the new councils, reviewed periodically and tailored to local need.

In unparished areas, no new parish councils would be imposed. Residents would remain represented by their ward councillors and retain the right to petition for a Community Governance Review. New councils may also choose to pilot tools such as neighbourhood forums or participatory budgeting to strengthen local voice without creating new bureaucracy.

Devolution to communities

Where both sides request it, and where capacity and value for money are demonstrated, defined functions could be delegated to parish and town councils under existing legislation. This would only happen by mutual agreement and subject to council decisions. Nothing would be imposed.

Fairness in council tax

Neighbourhood empowerment also requires financial candour. Council tax would be harmonised fairly over a clear glidepath, subject to the Structural Changes Order, and explained in advance. Parish precepts will continue to be set locally.

Assurance and accountability

From day one each new council will maintain overview and scrutiny arrangements and a standards regime, so that residents can hold decision-makers to account.

12. Our plan for delivery

This section sets out how reorganisation is intended to be delivered in Sussex if Ministers decide to proceed. It is a practical plan designed to demonstrate deliverability, continuity and assurance. The principles are clear: keep services steady on day one, join up the things residents do not see during the first year, and deliver visible improvements in years two and three.

The framework applies to all five proposed councils, but each new unitary would remain responsible for its own detailed implementation. For the council we would deliver, we would adopt the framework in full.

Programme governance

Implementation would be led by a Senior Responsible Officer and a Programme Board including the Section 151 Officer, Monitoring Officer and senior service leads. The Programme Board would report to each council’s Audit & Risk Committee for implementation assurance, in addition to external gateway reviews. Independent assurance would be commissioned at key milestones, consistent with recent reorganisations. Governance will be proportionate to avoid duplication across the five councils.

Legal route and governance during transition

- Ministers will decide the legal route. The programme is designed to be deliverable through creation of:
- a new authority with a shadow period (for Unitaries B-E), and

- a continuing-authority route with an implementation executive for Unitary A.
- The request is for the Unitary A to be treated as a Continuing Authority and for Brighton & Hove to retain its City Status. Unitary A could be treated as a Continuing Authority of Brighton & Hove with a modest increase in population by including Falmer Parish, East Saltdean & Telscombe Cliffs and Peacehaven wards from Lewes District Council. Existing contractual arrangements within the extended areas would be novated to the City Council, thus minimising disruption and cost. Continuity of service provision in the areas of SEND, children’s social care, adult social care, planning, waste, homelessness would be achieved by including the relatively small number of additional clients in the extended area within the City Council’s existing operational delivery arrangements. There would be no need for complex property transfer or TUPE arrangements to be put in place and this would allow for faster and more efficient mobilisation. This is the preferred route for Unitary A due to the de minimus change in population size and the significant minimisation of disruption that would be achieved.

The Local Government Boundary Commission for England (LGBCE) would carry out a full electoral review post-vesting.

Timeline

The plan follows the Sussex Devolution Pathfinder Programme (DPP):

Q4 2025–Q1 2026: Government consultation on proposals.

Spring 2026: Ministerial decision; Structural Changes Order drafted.

2027/28: Shadow authority year, with shadow members elected in May 2027.

April 2028: Vesting Day: new councils become operational.

Before vesting: legal, financial and ICT foundations would be put in place, staff seconded where helpful, and transfer schemes agreed with neighbours. Vesting day is intended to be about continuity, with frontline services kept running and residents contacting the council in the usual ways. These milestones are indicative and dependent on Government decision.

Disaggregation and reaggregation

Unlike whole-district models, this proposal requires some disaggregation and reaggregation of services. That means separating county functions in some areas and recombining them into new footprints.

To manage this safely:

- A Sussex Implementation Framework would set common rules for allocation of staff, budgets, contracts and casework.
- Standard identifiers (such as UPRNs) would be used to match records, with reconciliation and dual running where safest.
- Protocols with neighbours would cover waste flows, SEND transport, depots and joint services to avoid disruption.
- Memoranda of Understanding would set out handover and escalation routes where footprints do not initially align.

This approach brings higher programme

complexity in the short term, but avoids the longer-term inefficiencies. Complexity will be front-loaded, but lessons from other reorganisations will be applied to reduce risk.

Service continuity

Statutory eligibility and entitlements are intended to remain unchanged in law. Care packages and placements will transfer safely, with managed exceptions only where agreed with families and providers. Front doors for advice, safeguarding and urgent help would remain open in the same places and with the same contact details.

Specific safeguards include:

- Safeguarding Partnerships
- NHS Sussex Transition Protocol for discharge to assess, reablement, equipment services and SEND transport, with named single points of contact and escalation routes.
- Continuity agreements for shared services and temporary hosted arrangements where footprints change.
- Neighbourhood access: civic offices and local points would remain open in Year 1; parish precepts would continue to be set locally.

People and culture

Colleagues would transfer under TUPE with full protections. Terms and conditions would not change on day one. A joint consultative forum would operate for the life of the programme. Induction would focus on safe practice, escalation routes and risk reporting. Wellbeing and engagement of staff will be a central part of the programme.

Pension responsibilities would be split on actuarial advice and administered under admitted-body agreements.

Digital and data

The principle is platform-first, not big bang. Existing corporate platforms would be used as the receiving environment to reduce risk.

- Devices and accounts would be set up ahead of vesting with secure connectivity and single sign-on.
- Data would be migrated in controlled steps with reconciliation and dual running where safest.
- Data protection impact assessments would be completed, with Caldicott Guardian oversight for clinical and safeguarding transfers.
- Cyber security posture would be externally assessed with priority fixes completed before vesting.
- Residents will continue to use familiar websites and phone numbers, with redirects in place.

Finance and council tax

Financial standing would be secured with:

- IFRS opening balance sheets, signed off by external audit;
- clear treatment of reserves and debt, with ringfencing in the SCO;
- agreed collection-fund adjustments;
- bank accounts, payroll and creditor systems live from day one.

Council tax would be harmonised fairly over a transparent glidepath, subject to the Structural Changes Order, with damping/ equalisation applied where required to protect residents during transition. Parish precepts would remain separate.

Contracts and suppliers

Contracts would transfer under the SCO or by novation. Existing end dates would be respected and no contract would be re-let for the sake of it.

A 90-day supplier readiness plan would be published during the shadow year, setting default routes for critical contracts: novate unless a re-let is demonstrably safer. Supplier engagement would begin early to avoid disruption.

Estates and local access

Civic buildings and access points would remain in public use. A light-touch approach would be taken to estates in the first year so staff and residents can carry on as normal. Branding would only change at end of life or where safety requires it.

Benefits realisation and assurance

The first and most important benefit is stability on vesting day: bins collected, care provided, local offices open.

From there, duplication would be removed behind the scenes, reducing overheads and releasing capacity for frontline services. Practical improvements residents would see include:

- fewer hand-offs,
- faster decisions,
- clearer lines of responsibility.

Benefits would be tracked in a published ledger. Verified benefits and delivery risks would be reported to Members and published annually post-vesting, with an in-year update if material changes occur.

Risks and mitigations

Risks would be managed through a single register with clear owners, mitigations and contingencies for high-risk items such as ICT cutover, payroll, contract transition and public confidence. Proportionate Equality Impact Assessments would be carried out for key decisions.

A fuller explanation on risks and dependencies is set out in the next section.

Transitional funding

Delivering structural reform at Sussex scale requires significant one-off investment. Our modelling shows estimated transition and transformation costs ranging from £168m to £197m for the five-unitary option. This reflects the number of ICT consolidations, branding and communications exercises, and programme delivery requirements.

Government has been clear that transition funding is expected to be met from local capital receipts rather than new grant. While that route is available, it carries opportunity costs: disposing of assets or drawing down reserves reduces councils’ ability to invest in housing, regeneration and climate priorities during the same period. Across Sussex, usable reserves are finite, and in some authorities already under strain.

Funding a transition of this scale wholly from receipts would require using a proportion of available reserves, diverting resources from other pressing local needs.

We can manage this safely by moving in waves, running critical systems in parallel until they are proven, and using shared platforms to avoid duplicating effort five times. Capital receipts are part of the funding mix, but they come with trade-offs. We would protect frontline services, keep a minimum reserve, and track every saving in a published benefits ledger. Transitional

support from Government would reduce risk and bring benefits forward sooner, but the plan remains deliverable within the guardrails above.

To mitigate risk, we propose:

- **Capital receipts strategy:** a published pipeline of qualifying disposals, with timings and valuations, supported by a Flexible Use of Capital Receipts strategy that demonstrates future savings. If receipts underperform, fallback options would include prudential borrowing for capitalisable ICT/estates, supplier-staged payments, or reprofiling low-impact capital programmes, subject to decisions of the new councils.
- **Financial guardrails:** no drawdown below risk-assessed minimum reserves; no cuts to statutory services to fund transition; no unfunded redundancy programmes; and benefits only counted when independently verified.
- **Phased implementation:** ICT and data migrations delivered in waves with freeze windows where needed. Where safer, dual running would continue until systems are reconciled.
- **Shared platforms:** finance, HR/payroll, customer contact, cyber and data systems procured once and used across the five councils, cutting cost while preserving local control.
- **Transparent assurance:** progress and benefits tracked in a published benefits ledger, with independent external assurance providing go/no-go checks on readiness.

This balanced approach allows the transition to be funded within existing national policy, while safeguarding essential services and protecting councils from undue financial strain.

13. Risks and Dependencies

Every reorganisation of this scale carries risks. The purpose of this section is to show that we recognise them, that mitigations are planned, and that residual risks are transparent. A full register with owners and ratings will be developed at programme mobilisation.

Our approach is open-eyed. Reorganisation is not without risk, but the risks are identifiable, manageable and proportionate. The mitigations are practical and consistent with best practice from recent reorganisations. Independent assurance and published reporting will give Ministers, residents and partners confidence that the transition is safe and deliverable.

Programme risks

Transition complexity

Creating five new unitaries involves both disaggregation and reaggregation. Without safeguards, complexity could delay delivery or increase costs. We will manage this through a Sussex-wide implementation framework, phased waves, dual running where necessary, and clear governance gateways.

ICT and data cutover

Merging and separating systems creates risk of service disruption or data loss. Mitigation includes adopting a platform-first approach (using existing systems as receiving environments), agreed freeze windows, dual running where safest, use of UPRNs and NHS identifiers to create reconciled golden records, and mandatory Data Protection Impact Assessments with external cyber assurance.

Workforce, TUPE and pensions

Staff need clarity, protection and confidence.

The programme will apply full TUPE protections, maintain admitted-body pension agreements, run parallel payroll in the first cycle, and establish a joint consultative forum with unions.

Service continuity

Residents must see no break in statutory services. Continuity protocols will include safeguarding pathways, SEND provision, and NHS discharge arrangements. The intention is to keep all current access points open on day one under the SCO, subject to operational safety. A list of continuity guarantees could be published in advance, with clear caveats, and scenarios tested in advance.

Opening balances and council tax harmonisation

Councils will begin with different reserves, debt and tax levels. The mitigation is a transparent, government-approved glidepath for harmonisation, signed off through audit, with damping where needed to avoid sharp shocks.

Contracts and suppliers

Service risk arises if novations or terminations slip. We will implement a 90-day supplier readiness calendar, novate contracts by default, and apply temporary hosted or shared service agreements where necessary.

External dependencies

Government criteria clarity

We have built this proposal against the six published tests. If Ministers adjust the interpretation, we will need clear guidance to apply consistently across Sussex.

Parliamentary slot

The Structural Changes Order requires parliamentary time. Any slippage could compress delivery. Mitigation is early drafting, external legal check, and an indicative schedule agreed with Government.

Fair Funding Review and national reform

Social care, SEND and homelessness pressures cannot be solved by reorganisation alone. Our modelling is prudent and does not assume relief from the Fair Funding Review. Any positive outcome would be treated as upside.

Transition funding

Government policy is that transition costs should be met from local capital receipts. That route is available but carries opportunity costs: disposing of assets or using reserves reduces councils’ ability to invest in housing, regeneration and climate priorities. To mitigate this we will:

- protect a minimum reserve in every new authority
- sequence receipts disposal to avoid cliff edges
- track delivery through a published benefits ledger
- request time-limited transitional capacity funding from Government, with milestone-linked drawdowns and independent verification.

Partner dependencies

Delivery relies on alignment with NHS Sussex, Sussex Police, Fire & Rescue and other agencies. Continuity will also require engagement with regulators such as CQC, Ofsted and HMICFRS. This will be secured through co-signed NHS Transition Protocols, data-sharing agreements and DPIAs (with Caldicott oversight where applicable), and cross-boundary service protocols.

Residual risk

Even with mitigations, residual risks remain. The programme is ambitious and requires sustained focus. Independent assurance and readiness gateways will provide Ministers, residents and partners with transparent go/no-go decisions at critical stages.

Risk summary

Risk	Why it matters	Mitigation	Residual risk
Transition complexity	Disaggregation/ reaggregation increases cost and delivery risk	Sussex framework, phased waves, dual running, gateways	Medium (Manageable with mitigation)
ICT/data cutover	Risk of outage or data loss	Platform-first, freeze windows, UPRNs/ NHS IDs, DPIAs, cyber assurance	Medium (manageable with mitigation)
Workforce/TUPE/ pensions	Morale, retention, legal continuity	TUPE protections, admitted-body agreements, dual payroll, union forum	Medium-low (residual risk proportionate)
Service continuity	Safeguarding, SEND, NHS discharge must not break	NHS Transition Protocol, SPOCs, scenario tests, access points open	Medium-low (mitigations reduce risk to proportionate level)
Opening balances & council tax	Day-one financial standing, predictable bills	IFRS opening balances, audit sign-off, glidepath with damping	Medium-low (guard rails in place)
Contracts & suppliers	Risk of gaps if novations slip	90-day supplier plan, default novation, temporary hosted services	Medium (manageable with mitigations)
Parliamentary slot	SCO timing risk could compress delivery	Early drafting, external legal check, published schedule	Medium (Manageable with mitigations)
Funding reform/ receipts	National pressures remain; receipts carry opportunity costs	Guardrails, receipts sequencing, transitional ask with verification	Medium (mitigated but remains external dependency)

14. Our asks of government

We recognise that final decisions rest with Ministers. Our asks are designed to give clarity, protect services and make sure change is delivered safely. They are consistent with approaches used in recent reorganisations in Dorset, Northamptonshire and Somerset.

We ask that the statutory consultation is run on a Sussex-wide basis so residents can see, in one place, the whole map of options across both invitation areas. Many people live, work and travel across the East–West boundary every day. A single consultation, or at minimum a fully aligned pair of consultations with shared evidence and a single comparative pack, would help residents compare like-for-like and give Ministers a fair read on the whole Sussex picture.

We ask that Government considers capacity funding to underwrite safe delivery of the programme. This follows the precedent seen elsewhere, where Government has funded programme teams, legal drafting, ICT migration, audit and assurance so that day-to-day services remain protected. If available, time-limited capacity support with milestone-linked drawdown and independent verification would reduce risk and shorten dual running.

We ask that Government confirms a fair and predictable glidepath for council tax harmonisation. Recent reorganisations have used up to five years. We would welcome the same flexibility here, subject to the Structural Changes Order, with parish precepts continuing to be set locally.

We ask that technical finance directions provide for a neutral and orderly transfer. This includes adjustments to settlements and

business rates baselines, treatment of reserves and debt, and clear guidance on collection funds so surpluses and deficits are shared fairly at vesting. We also ask for transitional protection, if required, should the Fair Funding Review or a rates reset fall during the programme, recognising that all councils are currently managing financial pressure.

We ask that the Structural Changes Order contains the standard provisions used in other reorganisations. These include precise ward and parish schedules, clean maps, transfer of property, rights, liabilities and staff, confirmation of the vesting date, and any necessary provisions on Section 24 controls and electoral arrangements.

We ask that the proposed Unitary A is considered as a Continuing Authority in recognition of the significant benefits this will achieve in speed and cost of implementation and balanced against the de minimus boundary change involved for this new Unitary Council. It will be important to also include legal protection for the City Status of Brighton & Hove.

Finally, we ask for the standard flexibilities that allow councils to deliver change at pace and with care. These include permission to use capital receipts for transformation, confirmed pension arrangements on the advice of fund actuaries, and the ability to operate temporary hosted or shared arrangements across borders where this protects residents during transition.

With these provisions, Government can give residents clarity, safeguard essential services and allow the new councils to focus on making services simpler and better across Sussex.

15. Where to find the detail

Annex A: Financial modelling and sensitivities

Estimated one-off transition costs, recurring efficiencies and breakeven periods. Sets out assumptions on harmonisation and national funding reforms, with high/low sensitivities.

Annex B: Equalities screening

Proportionate equality screening at proposal stage, with a commitment to full Equality Impact Assessments at implementation.

Annex C: Engagement summary

Sets out the non-statutory engagement undertaken so far, explains its scope and limitations, and notes that statutory consultation will test the Sussex-wide option in full.

Appendix A: financial model methodology

Three stages of financial modelling have been adopted to transparently delineate between separate elements of costs and benefits:

Financial sustainability baseline: the ongoing financial sustainability of each proposed authority across the MSA region, focusing on indicative structural challenges for each proposed authority and creating equitable distribution of likely net expenditure requirements and core spending power at each authority. This serves as a baseline from which to apply transformation benefits and delivery costs and has been the prevalent focus of financial modelling

Transformation and reorganisation benefits: ongoing/revenue structural revenue benefits and disbenefits associated with LGR, enabled through consolidation and elimination of duplication. The annualised benefits delivered are expected to increase of the medium-term as transformation is implemented

Implementation costs: one-off delivery costs of delivering transformation, including disaggregation and reaggregation of services, also expected to be incurred over a medium-term period

1. Financial sustainability baseline	<ul style="list-style-type: none">• Estimated structural position of revenue expenditure requirement vs. spending power• Medium-term view of likely change to demand and spending power (including council tax harmonisation)• Debt summary• Reserves summary and forecast• Applicable to the region as a whole and then each proposed authority individually
2. Transformation and reorganisation benefits	<ul style="list-style-type: none">• Ongoing benefits associated with reorganisation to the new option (e.g. consolidation of services and elimination of duplication)• Applicable to the region as a whole and then each proposed authority individually
3. Implementation costs	<ul style="list-style-type: none">• Disaggregation / reaggregation• Enterprise transformation / implementation costs• Applicable to the region as a whole and then each proposed authority individually

While transformation is the mechanism for realisation of genuine public sector benefits (both financial and non-financial), it is acknowledged that estimates at this stage will require significant testing and validation with data not available to Brighton & Hove City Council during this phase of the LGR process. However, analysis demonstrates that the following are most likely to determine viability of all options:

- Financial sustainability baseline (service demand and core spending power)
- Outcome of the Fair Funding Review 2.0ⁱ
- Funding of one-off change (i.e. distribution and availability of existing reserves to proposed authorities). It is of particular note that reliance solely on reserves to fund transformation will be incredibly challenging in Sussex and central government funding and/or flexible capital receipts (e.g. from asset rationalisation) will almost certainly be required

Financial sustainability baseline

Structural revenue projections

Brighton & Hove City Council’s approach to financial sustainability modelling across the Sussex MSA can be summarised as follows:

- Summarise revenue expenditure of existing authorities
- Summarise spending power of existing authorities
- Allocate drivers, and values of those drivers, as a basis to disaggregate revenue expenditure and spending power of existing authorities
- Create District and ward geographies that can be constructed into proposed authorities for all options (these are district geographies or collections of ward geographies where options propose changes)
- Map District and ward geographies to proposed unitary authorities for each option
- Disaggregate revenue expenditure and spending power for District and ward geographies
- Restate revenue expenditure and spending power for proposed authorities
- Forecast critical changes to core spending power in future years
- Model council tax harmonisation schedule
- Forecast revenue expenditure and spending power for a five year period and identify structural revenue challenge (i.e. the value of maximum projected difference between revenue expenditure and spending power, and the year in which it occurs)

The following sections break down these steps in more detail and indicate the source data.

Summarise revenue expenditure of existing authorities

Restating FY25/26 revenue expenditure returns (RA returns)ⁱⁱ into a structured summary of net income and expenditure in a standardised format similar to a statement of accounts.

Summarise spending power of existing authorities

Restating FY25/26 revenue financing returns (SG returns)ⁱⁱⁱ into a structured summary

of grants outside Aggregated Expenditure Finance (AEF), grants inside AEF and revenue expenditure financing.

Allocate drivers, and values of those drivers

Allocate every RA/SG code with a driver to disaggregate spend. For example, Adult Social Care (RA code 360) is disaggregated using a population-IMD composite. Internal data across East Sussex and West Sussex was not available. List of drivers used (some of which have been calculated into composites):

- Population by ward (by age and sex)^{iv}
- Forecast population (2032)^v
- Homeless cases accepted (FY23/24)^{vi}
- Tax base (2024)^{vii}
- Tax base (2021)^{viii}
- IMD^{ix}
- Collection rates^x

Create ‘building block’ geographies

Create ‘building block’ geographies from existing wards. This mostly uses district footprints but the following areas are comprised of ward level groupings:

- Three sub-groups for the Lewes footprint:
 - Lewes – merged wards: part of unitary A in the five unitary proposal
 - Lewes – coastal: part of unitary C in the five unitary proposal
 - Lewes – inland: part of unitary C in the five unitary proposal
- Two sub-groups for the Wealden footprint:
 - Wealden – north: part of unitary C in the five unitary proposal
 - Wealden – south: part of unitary B in the five unitary proposal

The following table provides a full description of the wards in each ‘building block’ area.

Building block’ geography	Wards included
Brighton & Hove	All
Eastbourne	All
Lewes - merged wards	East Saltdean & Telscombe Cliffs Kingston Peacehaven East Peacehaven North Peacehaven West
Lewes - inland	Chailey, Barcombe & Hamsey Ditchling & Westmeston Lewes Bridge Lewes Castle Lewes Priory Newick Ouse Valley & Ringmer Plumpton, Streat, East Chiltington & St John Wivelsfield
Lewes - coastal	Newhaven North Newhaven South Seaford Central Seaford East Seaford North Seaford South Seaford West
Hastings	All
Rother	All
Wealden - north	Arlington Buxted Chiddingly, East Hoathly & Waldron Crowborough Central Crowborough Jarvis Brook Crowborough North Crowborough South East Crowborough South West Crowborough St Johns Danehill & Fletching Forest Row Framfield & Cross-in-Hand Frant & Wadhurst Hadlow Down & Rotherfield Hailsham Central Hailsham East Hailsham North Hailsham North West

Wealden - north	Hailsham South Hailsham West Hartfield Heathfield North Heathfield South Hellingly Horam & Punnetts Town Maresfield Mayfield & Five Ashes Uckfield East Uckfield New Town Uckfield North Uckfield Ridgewood & Little Horsted Withyham
Wealden - south	Herstmonceux & Pevensey Levels Lower Willingdon Pevensey Bay Polegate Central Polegate North Polegate South & Willingdon Watermill South Downs Stone Cross Upper Willingdon
Adur	All
Arun	All
Chichester	All
Crawley	All
Horsham	All
Mid Sussex	All
Worthing	All

Map ‘building block’ geographies to proposed unitary authorities for each option
Mapping of ward and population data for ‘building block geographies’ (from step 3 above) to new proposed unitary authorities for each option.

Disaggregate revenue expenditure and spending power for ‘building block’ geographies
Disaggregate East Sussex County Council and West Sussex County Council revenue expenditure and spending power across corresponding districts, using allocated drivers and associated values of those drivers (from step 3 above).

Further disaggregate resulting Lewes District Council and Wealden District Council figures into ‘building block’ areas (from step 4 above). Note that population figures are available by wards and tax base has been calculated by:

- Using published council meeting notes from Lewes for town and parish council Band D

equivalents, in combination with national council taxbase data, to deduce tax base by ward^{xi}

- Weighted by population where detailed taxbase data was not available for Wealden District Council

Restate revenue expenditure and spending power for proposed authorities
Sum the related component financial data for each area to restate existing FY25/26 position for proposed authorities in each option (using the mapping from step 5 above).

Forecast critical changes to core spending power in future years
Forecast key spending power components from FY26/27 onwards^{xii}, disaggregating into ‘building block’ areas and proposed unitary authorities for each option as above (i.e. using the same methodology/drivers/driver values).

Model council tax harmonisation
Model council tax harmonisation using combined precepts (i.e. sum of upper and lower tier precept, excluding parish councils and any other precepting authority)^{xiii} of existing authorities for each ‘building block’ geography, in combination with council tax base (by ward) and collection rates (existing local authority CTR1 returns)^{xiv}.

Council tax decisions will ultimately be decided by Members of the new authorities. However, the following assumptions demonstrate that harmonisation in all options can be achieved within two council tax setting cycles and demonstrate minimum council tax foregone in each option:

- No council tax precepts are reduced
- Maximum 4.99% increases applied to the lowest combined precept in each proposed authority
- Precepts in the remaining part of each authority are frozen, or applied with a reduced increment in the year it is exceeded by the lowest precept in the proposed authority, until all precepts are equalised

Forecast revenue expenditure and spending power for a five year period
Calculate the difference between projected revenue expenditure and spending power by financial year by:
a) Creating a view of FY25/26 using current tax base and adjusting contributions from reserves (which are a starting pressure currently being met from reserves)
b) Forecast FY25/26 onwards by:
i) Multiplying the FY25/26 revenue expenditure requirement, which has been adjusted for likely service demand, by annual OBR inflation estimates xiv and annualised forecast percentage population increase
ii) Forecasting spending power by:
• Introducing Pixel estimates of major funding components (e.g. Retained business rates and RSG) where they are known; or
• Incrementing by CPI inflation forecasts for core grants not covered by Pixel data
iii) Introducing maximum council tax attainable from the harmonisation schedule, applying a further increase to the taxbase based on average annual growth of Band D equivalent in the area of the proposed unitary over the last three years

Analyse largest structural gap by year, as total/percentage/deficit per capita.

Debt and reserves modelling

Summarise debt and investments

Summarise total debt and investments at each existing authority across (data does not distinguish between General Fund and HRA).^{xv}

Summarise debt servicing

Summarise annual principal, leasing and interest payments as per FY25/26 RA returns at each existing authority.

Summarise usable revenue reserves

Analyse current budget statements to estimate general and earmarked reserves. These include capital and ringfenced balances but exclude schools.^{xvi}

Disaggregation and reaggregation

Use of similar disaggregation and reaggregation principles and calculations as set out in elsewhere in this appendix to summarise debt/investments, annual debt servicing and usable revenue reserves in the context of the financial sustainability baseline.

Transformation and reorganisation benefits

Four areas of transformation benefits were assessed and disaggregated, to apply these benefits to the financial sustainability baseline of each proposed authority/geography:

1. Transformation benefits
- a. Service duplication

b. Agile unitaries

c. Joint working
2. Disaggregation disbenefits
3. Member consolidation
- a. Basic allowances

b. Special responsibility allowances
4. Elections
5. Senior leadership consolidation

Transformation benefits

In each of the following areas, an estimate of controllable annual expenditure has been made by removing grants and funding (both inside and outside AEF) which are arguable directly attributable service areas to estimate controllable net expenditure in the base revenue for each of the proposed geographies. For example:

- Education service expenditure is adjusted to remove DSG, Pupil Premium Grant and Universal Infant School Meals funding
- Children’s service expenditure is adjusted to remove Children’s Social Care Prevention Grant funding

Note that no benefits have been applied to Education or Public Health in any scenario to take a conservative view in areas where there is less consensus and/or evidence in the right operating model.

The following table details application of benefits in each scenario:

Three unitary scenarios

Area	Benefit applied to estimated controllable net expenditure (%) Benefit (+)/ Disbenefit (-)	Explanation
Service duplication	+8.0%	Economies of scale in services being aggregated at district level: <ul style="list-style-type: none">• Housing Services (GFRA only)• Cultural and Related Services• Environmental and Regulatory Services• Planning and Development Services• Central Services
Agile unitaries	0.0%	Right-sizing the scale of unitaries in social care (PeopleToo research) ^{xvii} applicable to: <ul style="list-style-type: none">• Children’s Social Care• Adult Social Care
Joint working	+2.0%	Shared working and collaboration from services more transactional in nature and/or could benefit from a regional approach and/or which are most likely to benefit from economies of scale: <ul style="list-style-type: none">• Highways and Transport• Environmental and Regulatory Services• Central Services
Disaggregation disbenefits	0.0%	Lost economies of scale, loss of larger pools of flexible resources, increasing overhead burden (e.g. ICT infrastructure, support/democratic services of sovereign authorities) arising in services already delivered on a larger county scale: <ul style="list-style-type: none">• Education• Highways and Transport• Children’s Social Care• Adult Social Care• Public Health• Central Services

Four unitary scenarios

Area	Benefit applied to estimated controllable net expenditure (%) Benefit (+)/ Disbenefit (-)	Explanation
Service duplication	+6.4%	Economies of scale in services being aggregated at district level: <ul style="list-style-type: none">• Housing Services (GFRA only)• Cultural and Related Services• Environmental and Regulatory Services• Planning and Development Services• Central Services
Agile unitaries	+2.0%	Right-sizing the scale of unitaries in social care (PeopleToo research)xviii applicable to: <ul style="list-style-type: none">• Children’s Social Care• Adult Social Care
Joint working	+2.0%	Shared working and collaboration from services more transactional in nature and/or could benefit from a regional approach and/or which are most likely to benefit from economies of scale: <ul style="list-style-type: none">• Highways and Transport• Environmental and Regulatory Services• Central Services
Disaggregation disbenefits	-0.7%	Lost economies of scale, loss of larger pools of flexible resources, increasing overhead burden (e.g. ICT infrastructure, support/democratic services of sovereign authorities) arising in services already delivered on a larger county scale: <ul style="list-style-type: none">• Education• Highways and Transport• Children’s Social Care• Adult Social Care• Public Health• Central Services

Five unitary scenarios

Area	Benefit applied to estimated controllable net expenditure (%) Benefit (+)/ Disbenefit (-)	Explanation
Service duplication	+4.8%	Economies of scale in services being aggregated at district level: <ul style="list-style-type: none">• Housing Services (GFRA only)• Cultural and Related Services• Environmental and Regulatory Services• Planning and Development Services• Central Services
Agile unitaries	+3.0%	Right-sizing the scale of unitaries in social care (PeopleToo research)xix applicable to: <ul style="list-style-type: none">• Children’s Social Care• Adult Social Care
Joint working	+2.0%	Shared working and collaboration from services more transactional in nature and/or could benefit from a regional approach and/or which are most likely to benefit from economies of scale: <ul style="list-style-type: none">• Highways and Transport• Environmental and Regulatory Services• Central Services
Disaggregation disbenefits	-0.8%	Lost economies of scale, loss of larger pools of flexible resources, increasing overhead burden (e.g. ICT infrastructure, support/democratic services of sovereign authorities) arising in services already delivered on a larger county scale: <ul style="list-style-type: none">• Education• Highways and Transport• Children’s Social Care• Adult Social Care• Public Health• Central Services

Member consolidation

A separate appendix on Member numbers and warding scheme details the proposals made for each new area, while this section covers the financial workings. Data from FY24/25, including basic and special responsibility allowances, is collected from each authority^{xx} (excluding outturns of travel and expenses which are assumed to remain constant).

Proposed basic allowances are assumed using the costs of BHCC, ESCC and WSCC councillors for each geography as relevant. This leads to:

- A total of 294 Members in a three unitary model
- A total of 294 Members in a four unitary model
- A total of 297 Members in a five unitary model

A structure for special responsibility allowances for a ‘typical’ unitary is assumed using data from South East Employers for unitary authorities in the South East. This element is duplicated for each proposed authority (at a cost of £222K per unitary authority).

Elections

Electoral costs are assumed constant in each option and based on Maximum Recoverable Amounts from recent elections xxi. Without more detailed proposals, it is assumed that LGR will present an opportunity for all-out elections and create a modest but constant savings in all options.

More detailed work to understand cost drivers is needed but it is currently assumed that this is likely to be staff and polling stations, which are conservatively assumed to remain relatively unchanged in each option.

There could be further opportunity to align town/parish, local, remaining PCC and CA elections for wider public sector savings.

Senior leadership consolidation

Data from FY24/25 accounts is collected from each authority regarding senior leadership roles^{xxii}.

Current senior leadership of two tier areas, is disaggregated against across the proposed geographies.

Similarly to the Members approach, an assumed senior leadership structure of a typical unitary authority is assumed for each unitary authority (adjusted for FTEs where shared leadership already exists), duplicated for each proposed authority and deducted from the current disaggregated costs.

Implementation costs

Benchmarked values of costs (and benefits) xxiii adjusted relating to number of existing authorities with multipliers applied for number of existing, number of proposed and complexity of disaggregation:

Cost group	Cost sub-group	Explanation
Transition	Shadow authorities	Cost associated with implementation and maintenance of shadow authorities will move in line with total number of proposed authorities. (Set up, Member basic allowances, additional cabinet, allowances and Head of Paid Service costs etc.)
Transition	Election to shadow authorities	
Transition	Programme delivery	<p>Five unitary model and cost of delivery driven by: Disaggregation of East Sussex County Council three ways across district and ward boundaries Disaggregation Lewes District Council three ways across ward boundaries Disaggregation of Wealden District Council two ways across ward boundaries Disaggregation of West Sussex County Council three ways across district boundaries, including change to coterminous Fire & Rescue Service hosted by West Sussex Reaggregation of upper and lower tier services across the MSA, increasing upper tier service providers from three entities to five, meaning two instances where there is no continuing authority for upper tier services (i.e. upper tier services transferred into a new entity)</p> <p>Four unitary model and cost of delivery driven by: Disaggregation of West Sussex County Council two ways across district boundaries Aggregation of lower tier services from 12 districts to three new unitaries Reaggregation of upper tier services, increasing upper tier service providers from three entities to four across the MSA, meaning one instance where there is no continuing authority for upper tier services (i.e. upper tier services transferred into a new entity)</p> <p>Three unitary model and cost of delivery driven by: Zero disaggregation of services, meaning no instances where there is no continuing authority for upper tier services Aggregation of lower tier services only, from 12 districts to two new unitaries</p>

Cost group	Cost sub-group	Explanation
Transition	Redundancy and pension strain	Estimates highly circumstantial based on appropriate, fair and transparent process but likely to be lower in a five unitary model. Consolidation of officers, and senior officers in particular, is likely to be more significant where fewer unitaries are proposed (alongside increased recurring staff savings)
Transition	ICT consolidation	Five unitary model increases the likelihood that contracts can be exited and consolidated more quickly during disaggregation but presents additional implementation requirements for infrastructure and systems, particularly in services where less regional sharing is likely
Transition	Branding, communications and engagement	Cost associated with communications, public engagement and curation of new brands will move in line with total number of proposed authorities
Transition	Creation of new councils	Set up of sovereign new entities will move in line with total number of proposed authorities
Transition	Closedown of existing/ shadow councils	Closedown of shadow entities will move in line with total number of proposed authorities
Transformation	Programme delivery	As per transition programme delivery section above
Transformation	Redundancy and pension strain	As per transition redundancy and pension strain section above
Transformation	ICT consolidation	As per transition ICT consolidation section above
All	Contingency	5% of total budget

Cost group	Cost sub-group	One-off costs 3 unitary model**		One-off costs 4 unitary model**		One-off costs 5 unitary model**	
		Lower range (£M)	Upper range (£M)	Lower range (£M)	Upper range (£M)	Lower range (£M)	Upper range (£M)
Transition	Shadow authorities	2.7	3.2	2.9	3.4	3.1	3.6
Transition	Election to shadow authorities	2.9	3.4	3.0	3.5	3.1	3.6
Transition	Programme delivery	13.7	16.1	18.6	21.	25.3	29.7
Transition	Redundancy and pension strain	8.5	10.0	6.4	7.5	4.8	5.7
Transition	ICT consolidation	26.4	31.0	28.2	33.1	30.1	35.4
Transition	Branding, communications and engagement	1.6	1.9	2.4	2.8	3.4	4.1
Transition	Creation of new councils	3.6	4.3	4.4	5.2	5.3	6.3
Transition	Closedown of existing/ shadow councils	1.6	1.9	1.6	1.9	1.6	1.9
Transformation	Programme delivery	15.4	18.1	16.0	18.8	16.5	19.4
Transformation	Redundancy and pension strain	11.7	13.8	9.2	10.8	7.2	8.5
Transformation	ICT consolidation	15.4	18.1	30.2	35.5	59.2	69.6
All	Contingency	5.2	6.1	6.1	7.2	8.0	9.4
Total one-off implementation costs		108.7	127.9	128.9	151.6	167.7	197.2

Upper range value assumed for each option.

Overall MTFP model

Assemble every element from the sections above to produce a view of every proposed authority, for both the proposed option and comparator options which:

- Starts with financial sustainability baseline covering each proposed authority for each financial year in each option
- Deducts apportioned transformation and reorganisation benefits/disbenefits for each proposed authority for each financial year in each proposed option
- Adds apportioned implementation costs phased for each proposed authority for each financial year in each proposed option
- Assesses the ability of each proposed authority to fund implementation by making an assumption that deficits and transformation costs are met in each financial year through usable reserves. This suggests any LGR option without further sources of funding or flexibility in funding is unlikely to be viable

The modelling does not take account of 'dynamic' factors including but not limited to:

- Mitigation of cost pressures through Officer and Member response
- Unknown political choices (e.g. council tax rates, service provision, capital borrowing, committed costs of existing plans)
- Cost pressures and overspends experienced since FY25/26 budgets have been set (which could be structural as well as in-year)
- Actual housing delivery, business growth or economic shifts in specific ward level areas
- Service data (activity and output level) to more accurately assess and disaggregate current demands, existing delivery models, forecasts and transition arrangements (in transition and transformation phases)



Analysis Report- BHCC community consultation on LGR options

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1. Executive Summary

Introduction

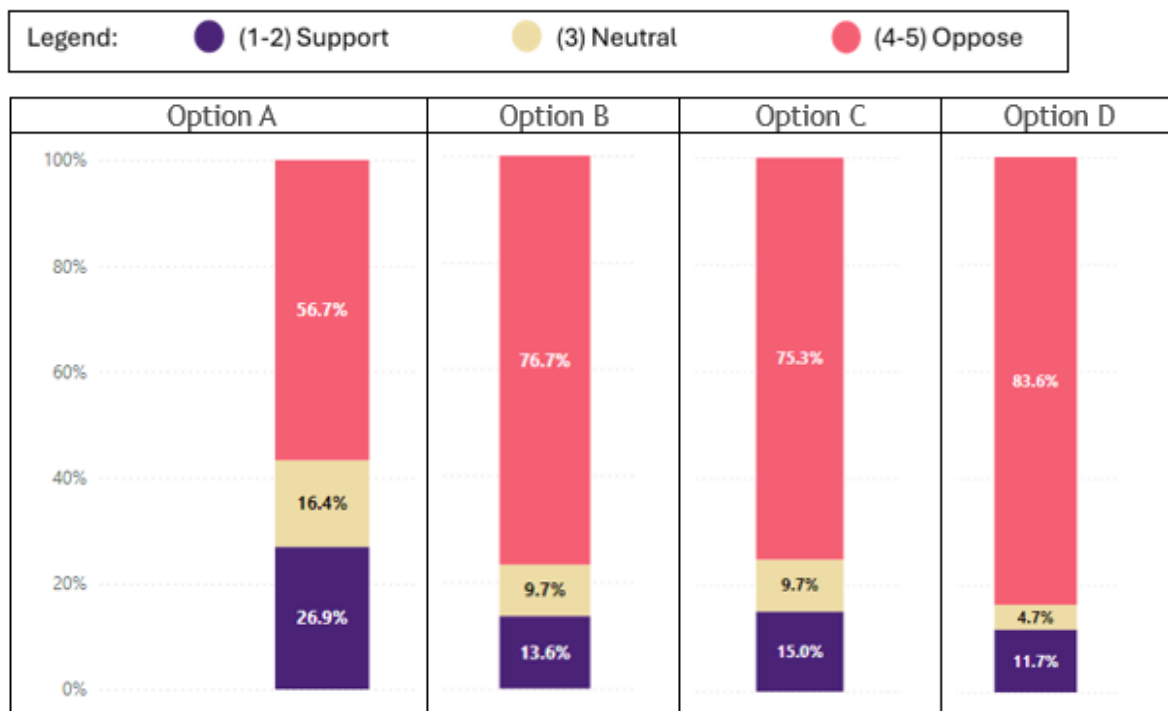
Brighton and Hove City Council (BHCC) published a community consultation, inviting responses to a public survey that closed on 25th August 2025. The principal subject of the survey were proposals developed by the council under the Local Government Reform process that requires proposals to be submitted to Ministry of Communities Homes & Local Government (MHCLG) on 26th September 2025.

The Options

The council set out four options for respondents to consider and comment on:

- Option A - BHCC merging with the wards of East Saltdean, Telscombe Cliffs and Peacehaven
- Option B - BHCC merging with the wards of East Saltdean, Telscombe Cliffs and Kingston
- Option C - BHCC merging with the wards of East Saltdean, Telscombe Cliffs, Peacehaven and Newhaven
- Option D - BHCC merging with the wards of East Saltdean, Peacehaven, Newhaven and Kingston

While none of the options had an overall positive level of support, at the highest level of analysis Option A was the most supported across all respondents.



Wider Themes from the Analysis

The community's feedback through this survey reveals a complex picture: a mixture of caution, scepticism, misunderstanding (of the process currently underway) but also hope. While some respondents see reorganisation as a chance to create a stronger, more capable council, many view it with concern and distrust. The overarching sentiment appears to be

that change must be justified clearly and designed carefully to avoid eroding local identity, worsening services, or concentrating power in Brighton & Hove City Council (BHCC) in relation to communities or areas that have differing characteristics.

At the heart of respondents' concerns seems to be two key issues: representation and trust. People are concerned about financial viability (i.e. debt inheritance and council tax harmonisation) and want to know that resources will be shared fairly, their voices will continue to matter, and that decision-making will not become more remote. Linked to this is a strong sense of identity and place, particularly from respondents in more rural areas with strong parish and village attachment, where historic ties to Lewes and East Sussex appear to be deeply felt. Any successful reorganisation involving or impacting these areas will need to recognise, respect and act on these identities and issues.

Service quality is another clear theme. There appears to be a perception that Brighton & Hove City Council (BHCC) is not always delivering on its current responsibilities, and this seems to undermine confidence in its ability to take on more. Respondents are particularly concerned about vulnerable groups (e.g. children with SEND, families and adults needing care), infrastructure capacity (e.g. waste, congestion on the A259 corridor), and the protection of green spaces. At the same time, some see the proposals as an opportunity for a larger council to attract investment and act decisively to deliver improvements, but only if a clear plan for service delivery and infrastructure investment is communicated.

Understanding of, and trust in, the process itself must be established and carefully supported. There was confusion about whether people could stay with existing councils, and calls for clearer information. Some participants feel the consultation has been rushed or biased, which risks alienating the very communities whose support will be needed. It is clear that many respondents were unaware that the severe constraints of both the timeline for the process imposed by central government, as well as the guidance from MHCLG on the nature and extent of the engagement, have materially impacted on the council's ability to undertake a more meaningful process.

Finally, the balance of respondents to the survey is a potentially important consideration when reviewing the outcomes, themes and insight shared in this report. There was a significantly higher number of responses from non-residents of BHCC, including a material proportion from outside the areas proposed for merging within the survey, who may not have current or accurate awareness of service performance. There also appears to have been an impactful anti-Brighton campaign in the surrounding areas and we may see the influence of this in some of the responses. While all responses to the survey have been given equal weight in this analysis, it is possible that some of the perspectives included in the analysis have been influenced by the statistical make-up of the responses.

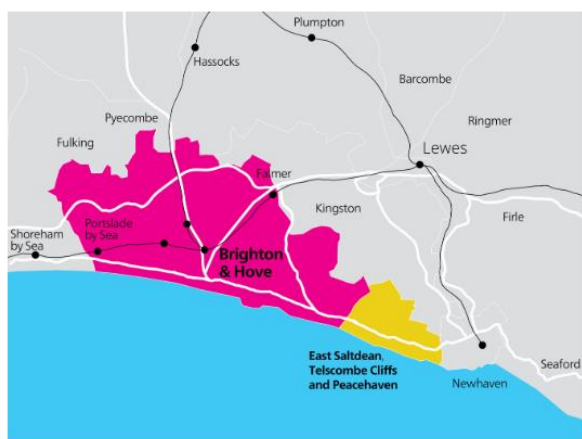
2. Background

Brighton and Hove City Council (BHCC) published a community consultation, inviting responses to a public survey that closed on 25th August 2025. BHCC consulted on four options (A, B, C and D shown below), all involving merging with wards to the east of the city currently under the administration of the two-tier council area (East Sussex County Council and Lewes District Council).

These options were based on the feedback and evidence they learned from community engagement that was conducted in April 2025 and supported by service, financial and demographic data gathered in the intervening period.

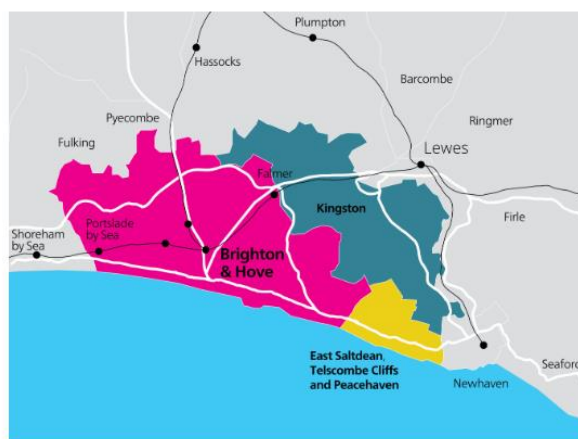
Option A: strengthening the eastern edge

This option includes East Saltdean, Telscombe Cliffs and Peacehaven, with an estimated population of 301,130.



Option B: extending to the eastern downs

This option includes East Saltdean, Telscombe Cliffs, Peacehaven and Kingston, with an estimated population of 303,117.



Option C: uniting the coastal corridor

This option includes East Saltdean, Telscombe Cliffs, Peacehaven and Newhaven, with an estimated population of 313,955.



Option D: coast and downs partnership

This option includes East Saltdean, Telscombe Cliffs, Peacehaven, Newhaven and Kingston, with an estimated population of 315,942.



This report sets out the principles, approach, plan and results of analysis carried out on the data received through this online consultation. It has been completed by Ignite Consulting Ltd, who are supporting BHCC with their submission to the government.

2.1 Summary of the survey

The survey consists of 23 optional questions. Respondents were led through the survey questions in the following order but were able to skip questions and return to them later if they wished.

Section	Question number	Response structure	Data type
About you	1. How are you primarily responding?	Select one	Quantitative
	2. What is your full postcode?	Free text	Quantitative
What matters to you	3. Which of the following Brighton & Hove services have you used in the last 12 months?	Select multiple	Quantitative
	4. Do you use similar services in other areas?	Select one	Quantitative
	5. If change does happen and your areas becomes part of a merged larger council, what would be most important to protect or preserve?	Free text	Qualitative
	6. What concerns, if any, do you have about how local councils will change through reorganisation?	Free text	Qualitative
Your views on the proposed option A	7. To what extent do you support or oppose option A: strengthening the eastern edge	Score from 1-5	Quantitative
	8. What are your main reasons for your answer?	Free text	Qualitative
Your views on the proposed option B	9. To what extent do you support or oppose option B: extending to the eastern downs	Score from 1-5	Quantitative
	10. What are your main reasons for your answer?	Free text	Qualitative
Your views on the proposed option C	11. To what extent do you support or oppose option C: uniting the costal corridor	Score from 1-5	Quantitative
	12. What are your main reasons for your answer?	Free text	Qualitative
Your views on the proposed option D	13. To what extent do you support or oppose option D: Coast and Downs Partnership	Score from 1-5	Quantitative
	14. What are your main reasons for your answer?	Free text	Qualitative
Further Comments	15. Do you have any final comments about how Brighton & Hove should be organised in future, or about any of the proposals you've seen?	Free text	Qualitative
Equalities monitoring questions	16. Do you want to answer the following equalities monitoring questions?	Yes / No	Quantitative
	17. What is your age?	Select one	Quantitative
	18. What best describes your gender?	Select one (free text option if you select 'other')	Quantitative

	19. Is the gender you identify with the same as your sex registered at birth?	Select one	Quantitative
	20. Which of the following best describes your sexual orientation?	Select one (free text option if you select 'other')	Quantitative
	21. How would you describe your ethnic origin?	Select one (free text option if you select 'other')	Quantitative
	22. Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?	Select one	Quantitative
	23. Please select your health condition, illness or disability from the list below	Select one (free text option if you select 'other')	Quantitative

3. Approach and methodology summary

This section summarises the methodology with the full methodology found in the Appendix (section 2 Full methodology).

3.1 Aims and objectives for the analysis:

- To determine the level of public support for Options A, B, C and D
- To understand the nuance of support for each option and what this tells us about the strengths and challenges of each option
- To identify if support varies by geographic area (wards using first part of postcode) or demographic group (e.g. age range)
- To gather information that will support the implementation of Local Government reorganisation (LGR) i.e. what services are people concerned about, how do they use services, what misconceptions will need to be addressed by communications
- To ensure that there is fair and wide representation in the responses (about you, equalities monitoring).

3.2 Data handling procedures:

Data handling procedures covered rules around anonymisation of data, data security, data cleansing and the tools that were used to support analysis with their justification. The full data handling procedures are set out in Appendix (section 2.1 Data handling procedures). All procedures were carried out in line with the UK GDPR principles of lawfulness, fairness, accuracy, purpose limitation, data minimisation, integrity and confidentiality, and accountability. Data was processed under a signed Data Processing Agreement (DPA), with secure storage and access limited to authorised project staff.

3.3 Analysis methodology:

The analysis will be guided by three core principles:

1. Transparency, meaning every decision from data cleaning to statistical analysis will be documented and fully justifiable
2. Objectivity, ensuring the methodology is designed to reveal what the data shows rather than support any pre-determined outcome
3. Reproducibility, so that an independent analyst could take the raw data and accompanying documentation and exactly replicate the final results.

3.3.1 Quantitative methodology

Data reconciliation and validation

Survey data was reconciled through a structured process. Response counts were manually verified in Excel and cross-checked in Power BI by both volume and unique ID. This ensured no missing or duplicated records. Two small discrepancies were identified in Q5 and Q6 (178 records in total, less than 1% of the dataset), but these did not affect the overall analysis.

Building the data model

A new Power BI file was created linking the golden dataset with external ONS geography

files. Qualitative datasets for Q5, Q6, and the option questions were appended to create a consolidated dataset. Unique respondent IDs linked qualitative and survey data, and postcodes were mapped to wards and Local Authority Districts.

Preparing variables for analysis

Several calculated fields and tables were developed to standardise and structure the data. These included grouping age into ONS categories, mapping resident vs non-resident status, categorising option scores (support, neutral, oppose), and restructuring service usage and health condition responses for analysis.

Geospatial mapping and visualisation

Icon Map Pro was used to present ward-level variations in support, neutrality, and opposition for each option. Maps applied the agreed colour scheme and ward boundaries to ensure clear and consistent visualisation.

Completeness and representation

All 2,307 responses were included in the analysis. Blank responses were not excluded but grouped as “Not Stated” to ensure full representation. Visuals therefore reflected the complete dataset.

These steps ensured that the quantitative analysis was transparent, reliable, and fully representative of the consultation data.

The full quantitative methodology is provided in Appendix (section 2.2 Methodology - Quantitative analysis).

3.3.2 Qualitative methodology

The qualitative analysis was designed to be as rigorous as possible within the project constraints of limited time and high volume: 7 qualitative questions × 2,307 responses (≈16,149 free text answers). To maximise validity and reliability at this scale, the work was structured at three levels. Rigour covered the processes followed to ensure validity and reliability, aligned with Braun and Clarke’s framework and applied consistently across teams. Analysis referred to the systematic coding and theming of every answer conducted line by line. Nuance and narratives meant identifying the richness beyond counts through the creation of “hypotheses for the narratives”.

Inductive vs deductive

The analysis combined deductive and inductive approaches. Draft codes were created using MHCLG criteria for Local Government reorganisation, a PESTLE framework, and an early cut of responses, but these were treated as provisional. New codes were introduced inductively where the data required, ensuring findings reflected what respondents actually said.

Code generation and refinement

AI was used once for an initial categorisation against the draft framework, with all outputs manually reviewed line by line. Analysts refined definitions through regular discussions and sample checks, updating the code lists to capture meaning accurately. Flexibility was maintained so that codes could differ between question sets if required. Due to time pressures, full double-coding of all responses was not possible, though consistency was safeguarded through team calibration.

Systematic line-by-line coding

Analysis was carried out by two teams: one focused on option-based responses and the other on stand-alone questions. Every response was read line by line, with multiple codes applied where necessary to retain richness. For option-based questions, codes were also labelled positive or negative in relation to the option.

Narrative construction and validation

Analysts recorded notes of emerging nuance during coding, which were developed into hypotheses for narratives. Draft narratives were tested in team discussions, with analysts challenging each other and using evidence such as frequency counts and quotes to decide which clusters of notes should become narratives. These drafts were then tested against the raw data and refined into final narratives. Narratives were drawn only from the data, with less common points not elevated, and Q15 was reviewed for new insights rather than fully coded. This process ensured that the narratives reported were firmly grounded in the data and transparently connected back to the original responses.

Cross-checks for validity and reliability

In addition, several safeguards were built in to strengthen validity and reliability:

- **Controlled use of AI:** AI assisted only with initial categorisation; all coding decisions were checked manually against agreed definitions.
- **Team separation and naming:** the options team and the stand-alone questions team ensured consistent application within each dataset.
- **Line by line manual coding:** every response was individually assessed; multiple codes captured richness.
- **Golden copy and working copies:** an untouched master dataset was preserved; all preparation occurred on duplicates.
- **Inclusive coding rule:** non-responses were not coded; otherwise, all answers were retained. No flagging or exclusion of 'outliers' or 'contradictory' responses.
- **Cross-team sample checks:** each team reviewed a subset of the other team's coding to test consistency.
- **Consistency with flexibility:** reliability was checked through discussions, sample reviews, and cross-team comparison; definitions sometimes differed between questions to avoid forcing responses into codes that did not fit.
- **Ongoing calibration:** frequent team discussions supported consistent interpretation and reduced subjectivity.
- **Iterative refinement:** codes and themes were updated as the data required; nothing was forced to fit the initial framework.
- **Narratives and counts compared:** narratives were checked against code frequencies across all seven questions to confirm alignment between qualitative insight and quantitative counts.
- **Traceability:** every narrative and summary links back through themes and codes to the original responses.

- **Respect for question intent:** during final consolidation, common ground was noted without erasing question-specific differences.

This combination of deductive structure, inductive openness, controlled AI use, systematic human checking, and explicit traceability was chosen to maximise validity and reliability while preserving the authenticity and richness of respondents' views.

The full qualitative methodology is provided in Appendix, section 2.3 (Methodology - Qualitative Analysis).

3.3.3 Integration of Qualitative coding with the survey dataset

Once qualitative coding was complete, the coded responses were systematically re-integrated with the survey data to enable triangulation and deeper insight. This process ensured that themes and codes could be analysed not only in isolation but also in relation to response scores and respondent demographics. In total, over 16,000 coded lines were linked back to 2,307 response records.

A key technical challenge was to “flatten” the coded responses into a single row per respondent, allowing direct alignment with the survey data. This was achieved through the unique ID field, which was present in both the golden dataset and the coded qualitative dataset supplied to analysts. Flattening ensured that multiple codes per respondent could be aggregated and represented consistently, without losing the richness of the survey data.

The full integration of the quantitative and qualitative data methodology is provided in Appendix, section 2.4 (Methodology - Integration of qualitative coding with the survey dataset).

3.4 Assumptions and Limitations

There were a number of assumptions that were made throughout the analysis and limitations due to both the structure of the survey itself and the process of analysis. These are summarised below and the full discussion of limitations, including how they were managed, is provided in Appendix, section 2.5 (Assumptions and limitations).

Structure of the survey

1. Duplicate submissions

The survey only captures the primary relationship of the responder with the council and the city. Duplicate submissions may be submitted from individuals skewing the results.

2. Optional questions

All questions are optional resulting in an incomplete data set, threshold for accepting incomplete responses was therefore low and all responses were considered.

3. Human error in answering questions

For example, misreading scale, changing your relationship lens as you complete the survey (e.g. from a resident to a council member of staff)

Analysis

4. Time constraints, team-based division of labour

The volume of responses and tight timetable limited the extent of double-coding across all questions. Work was divided between two teams, which supported consistency within each stream but meant no single analyst reviewed the entire dataset. Question 15 (“Further comments”) was read line by line to capture new insights but not fully coded, so quantitative comparisons are limited.

5. Bias / human margin for error or inconsistency

As with all qualitative analysis, interpretation involves subjectivity. Steps such as line-by-line coding, sample reviews, team discussions, and final consolidation reduced individual bias, but they cannot eliminate it entirely. Minor differences in interpretation may also occur if repeated by another team.

6. Deductive method

The coding began with a deductive framework based on MHCLG criteria for Local Government reorganisation, PESTLE, and early responses. While this provided structure, it may have shaped initial thinking before inductive refinement was applied.

7. Use of AI tooling

An AI tool was used once for an initial organising pass to manage scale. All responses were subsequently reviewed manually, but the involvement of AI still introduces some risk of misclassification compared with wholly manual coding.

8. Loss of detailed nuance through narrative construction and summarising

Narratives were designed to reflect the most common and important issues, meaning points raised by only a small number of respondents were not elevated. This ensured findings represented broader patterns but reduced visibility of minority perspectives.

Safeguards such as line-by-line coding, cross-team discussion, iterative refinement, and explicit traceability reduced risks and increased reliability. However, these measures did

not eliminate the limitations, which should still be considered when interpreting the findings.

Data handling procedures

Potential limitations in data handling

1. Duplicate submissions retained

- By design, duplicates were not identified or removed, since respondents may have multiple roles.
- Limitation: this may slightly inflate counts if some individuals submitted multiple times without disclosing separate perspectives.

2. Incomplete responses included

- All partial responses were retained.
- Limitation: some analyses may be based on smaller denominators, which could affect comparability across questions.

3. Nonsensical or protest data retained

- Inclusive coding meant no subjective exclusions.
- Limitation: while this avoided bias, it may reduce precision where irrelevant entries were included in counts.

4. Discrepancies in reconciliation (Q5 and Q6)

- Around 178 records were not fully reconciled.
- Limitation: this could marginally affect demographic linkage or coding completeness, though not overall patterns.

5. Manual processes

- Some checks (Excel filtering, manual coding) involved human handling.
- Limitation: introduces a small margin for human error, despite audit trail and validation.

4. Findings

4.1 Demographic data

The survey was published online as part of a month-long public engagement exercise aimed at the local community within Brighton & Hove (B&H). A total of 2283 online responses and 24 physical responses were received.

Question 1 asked respondents what their relationship with the council was and how they were responding to the survey. The spread of responses is shown below, with the highest proportion of responses from non-residents of Brighton & Hove.

<i>Question 1 - Relationship with the council</i>	Number of responses	% of total responses
Resident of BHCC	717	31%
Non-resident of BHCC	1344	58%
Council employee, public sector stakeholder, local business, local charity or voluntary organisation	132	6%
No answer / other selected	114	5%
Total	2307	100%

Question 2 asked respondents to provide their postcode and this data was used to more accurately map all responses into three categories:

1. Residents - wards within Brighton & Hove
2. Non-residents - wards outside of Brighton & Hove
3. Unknown - where no postcode was provided or partially provided and we were unable to map the location to a ward.

This mapping has been used to triangulate and segment responses to other questions throughout this analysis, wherever the data is split by residents and non-residents.

A series of equalities questions (Q15 - Q23) were asked as part of the survey to capture the demographics around age, gender, sexuality, ethnicity and disability of respondents. This data is provided in the Appendix section 1.1.2 (About you and demographic data).

4.2 Service usage and what matters to respondents

Questions 3 and 4 asked respondents about the services that they use both in Brighton & Hove and in other areas. A summary of responses is provided below as well as pie charts later in this section.

<i>Question 3 - Which of the following Brighton & Hove services have you used in the last 12 months?</i>	% of respondents who use each service, by demographic		
	All	B&H Residents	Non-residents
Bus or transport network	33%	28%	39%
Children's or youth services	2%	3%	2%
Council housing or homelessness advice	2%	2%	1%
Libraries or cultural venues	16%	21%	11%
Mental health support in schools	1%	1%	1%
Parks and seafront	25%	27%	21%
Public health like health checks or vaccinations	13%	17%	9%
None of the above	7%	0%	15%

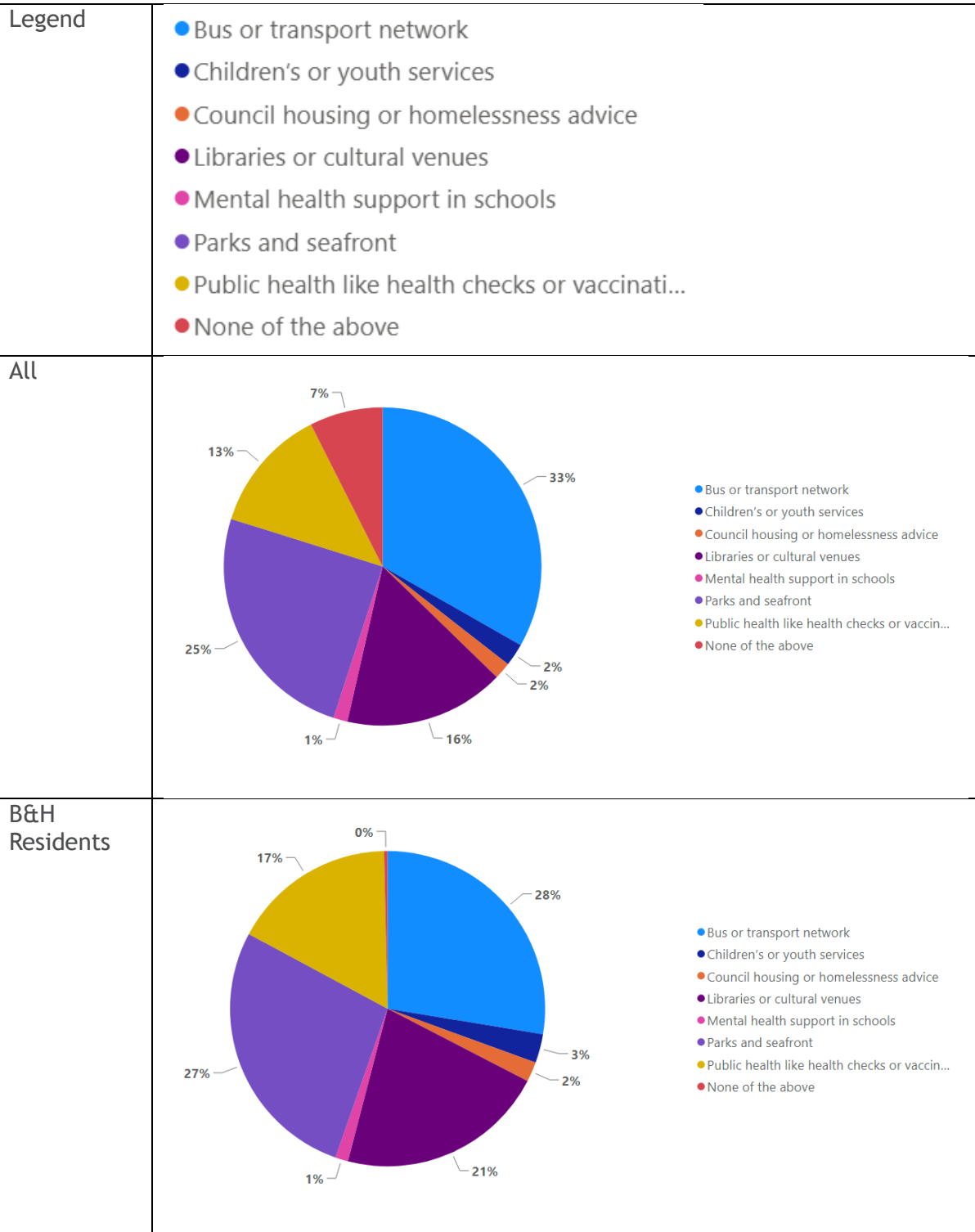
Respondents highlighted frequent use of Brighton & Hove's transport network and outdoor spaces, particularly the parks and seafront. Local residents reported drawing on a wider range of services, including parks, the seafront, libraries, cultural venues, and public health provision, while non-residents tended to focus mainly on transport and outdoor amenities. A larger proportion of non-residents stated they did not use any of the services listed.

<i>Question 4 - Do you use similar services in other areas?</i>	Response, by demographic		
	All	B&H Residents	Non-residents
Yes	49%	17%	69%
No	27%	65%	9%
Not stated	21%	16%	19%
Don't know / not sure	3%	3%	2%

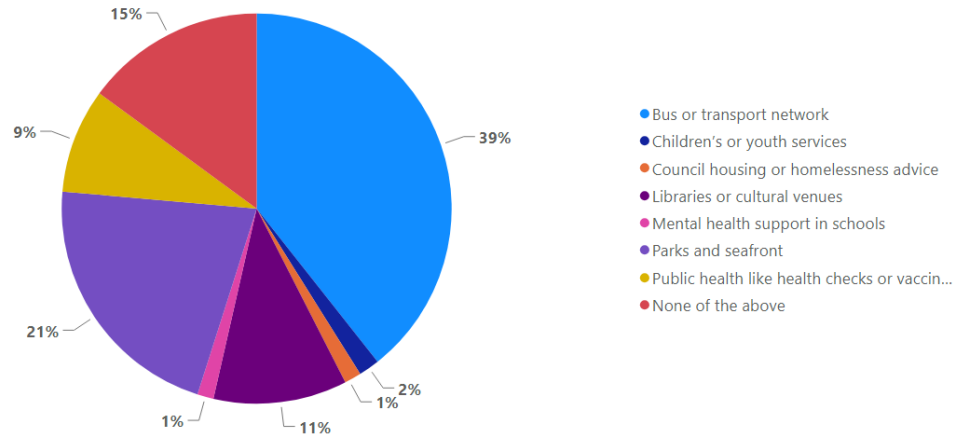
When asked about using similar services in other areas, Brighton & Hove residents generally indicated that they rely mainly on local provision, with few looking elsewhere. In contrast, non-residents were much more likely to make use of equivalent services in their own or other locations.

Overall, the findings suggest that residents and non-residents interact with Brighton & Hove services in very different ways. Local residents depend on a broad range of services within the city and are less inclined to seek alternatives elsewhere. Non-residents, on the other hand, mainly use transport and outdoor amenities when visiting, while continuing to access most other services in their own areas. This highlights Brighton & Hove's role as both a provider of essential services for its residents and a gateway destination for visitors, with transport and public spaces acting as the primary points of connection.

Question 3 - Which of the following Brighton & Hove services have you used in the last 12 months?



Non-B&H residents

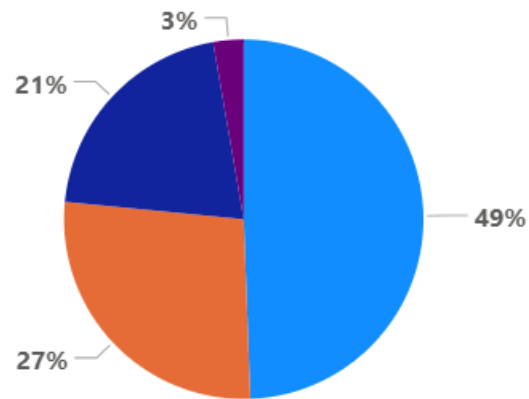


Question 4 - Do you use similar services in other areas?

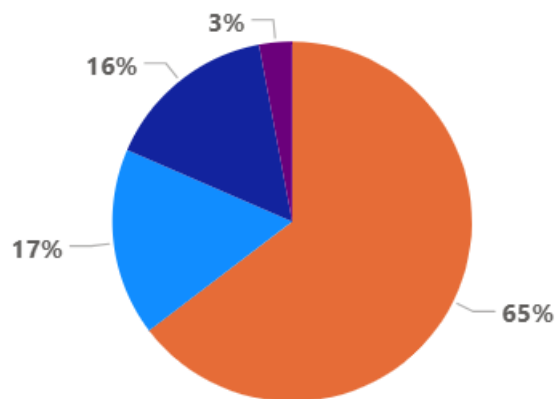
Legend

● Yes ● No ● Not Stated ● Don't know / not sure

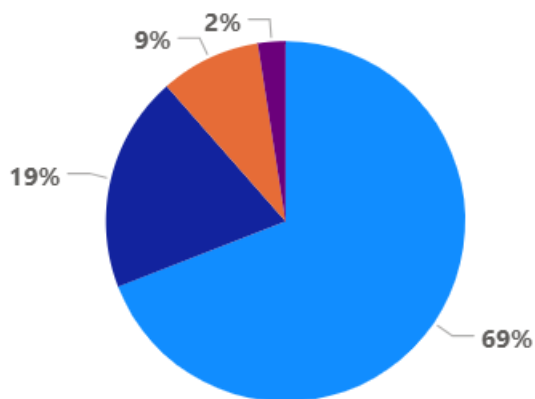
All



B&H Residents



Non-B&H residents



Questions 5 and 6 asked respondents broader, open questions about what mattered most to them - the things they want to preserve and protect and the things they are concerned about through reorganisation. Respondents answered with free text which was coded to count how many times key topics were mentioned. This is shown in the tables below. Section 4.4 provides the narrative that sits alongside this thematic analysis, drawing out nuances of the comments.

Question 5 - If change does happen and your areas becomes part of a merged larger council, what would be most important to protect or preserve?

Table below shows count of number of times each code was mentioned across all responses.

All	Code	Civic pride	Economic	Expansion proposals	Political	Service	Total
	Service performance					626	626
	Local identity/community/culture	610					610
	Trust in BHCC/competence				298		298
	Opposition to expansion			263			263
	Parks/green space/coastline					258	258
	Transport/traffic					246	246
	Representation				192		192
	Health and care					149	149
	Housing delivery targets		143				143
	Education					119	119
	Waste					111	111
	Access/distance to services					108	108
	Financial efficiency/value for money		81				81
	Tax/council tax		50				50
	Employment/economic growth		49				49
	Infrastructure		43				43
	Least disruption/status quo			39			39
	Support for expansion			27			27
	Social needs of demographic	7					7
	Not enough benefits/info			6			6
	Funding/resources required		5				5
	Ability to meet community needs					4	4
	Offers alternative			3			3
	Deprivation	2					2
	Total	619	371	338	490	1621	3439

B&H Residents	Code	Civic pride	Economic	Expansion proposals	Political	Service	Total
	Service performance					213	213
	Local identity/community/culture	190					190
	Trust in BHCC/competence				78		78
	Transport/traffic					76	76
	Representation				62		62
	Health and care					59	59
	Parks/green space/coastline					54	54
	Opposition to expansion			51			51
	Access/distance to services					36	36
	Financial efficiency/value for money		36				36
	Housing delivery targets		36				36
	Education					31	31
	Waste					21	21
	Employment/economic growth		17				17
	Support for expansion			17			17
	Infrastructure		13				13
	Least disruption/status quo			13			13
	Tax/council tax		8				8
	Social needs of demographic	4					4
	Offers alternative			3			3
	Ability to meet community needs					1	1
	Not enough benefits/info			1			1
	Total	194	110	85	140	491	1020
Non-B&H Residents	Code	Civic pride	Economic	Expansion proposals	Political	Service	Total
	Local identity/community/culture	345					345
	Service performance					317	317
	Trust in BHCC/competence				188		188
	Opposition to expansion			172			172
	Parks/green space/coastline					168	168
	Transport/traffic					131	131
	Representation				112		112
	Housing delivery targets		82				82
	Waste					78	78
	Education					73	73
	Health and care					71	71
	Access/distance to services					59	59
	Financial efficiency/value for money		36				36
	Tax/council tax		34				34
	Employment/economic growth		26				26
	Infrastructure		26				26
	Least disruption/status quo			19			19
	Support for expansion			8			8
	Funding/resources required		5				5
	Not enough benefits/info			3			3
	Ability to meet community needs					2	2
	Deprivation	1					1
	Social needs of demographic	1					1
	Total	347	209	202	300	899	1957

Question 6 - What concerns, if any, do you have about how local councils will change through reorganisation?

Table below shows count of number of times each code was mentioned across all responses.

All	Code	Civic pride	Economic	Expansion proposals	Geography & Environment	Political	Service	Total
	Representation and accountability to communities					521		521
	Service performance and workforce issues						366	366
	Trust and competence in Brighton's leadership					338		338
	Identity, culture, and politics	248						248
	Ability to meet community needs						204	204
	Financial costs, efficiency, and value for money		183					183
	Funding, resources, and cuts		127					127
	Pressure on existing services						92	92
	Housing and buildings development		83				1	84
	Area too big				81			81
	Support/no concerns for reorganisation			68				68
	Council tax and charges		66					66
	Waste						63	63
	Transport/traffic						61	61
	Employment/economic growth		56					56
	Environmental impact				51			51
	Lack of benefits and information			43				43
	Social needs and vulnerable groups	39						39
	Boundaries				36			36
	Opposition to expansion			33				33
	Access/distance to services						30	30
	Infrastructure		29					29
	Offers alternative			29				29
	Area too small				22			22
	Least disruption/ Status quo			18				18
	Deprivation	17						17
	Education						16	16
	Housing						16	16
	Health and care						15	15
	Total	304	545	208	191	863	869	2980
B&H Resident s	Code	Civic pride	Economic	Expansion proposals	Geography & Environment	Political	Service	Total
	Representation and accountability to communities					129		129
	Service performance and workforce issues						115	115
	Trust and competence in Brighton's leadership					63		63
	Funding, resources, and cuts		59					59
	Identity, culture, and politics	54						54
	Pressure on existing services						50	50
	Support/no concerns for reorganisation			50				50
	Financial costs, efficiency, and value for money		47					47
	Employment/economic growth		26					26
	Ability to meet community needs						25	25
	Area too big				25			25
	Lack of benefits and information			17				17
	Social needs and vulnerable groups	16						16
	Council tax and charges		14					14
	Access/distance to services						11	11
	Housing and buildings development		10				1	11
	Offers alternative			10				10
	Waste						10	10
	Boundaries				9			9
	Area too small				7			7
	Environmental impact				7			7
	Deprivation	6						6
	Opposition to expansion			6				6
	Health and care						5	5
	Infrastructure		4					4
	Least disruption/ Status quo			4				4
	Transport/traffic						4	4
	As/all above			2			1	3
	Education						2	2
	Total	76	160	90	49	192	227	794

Non-B&H Resident S	Code	Civic pride	Economic	Expansion proposals	Geography & Environment	Political	Service	Total
	Representation and accountability to communities					323		323
	Trust and competence in Brighton's leadership					218		218
	Service performance and workforce issues						205	205
	Identity, culture, and politics	170						170
	Ability to meet community needs						157	157
	Financial costs, efficiency, and value for money		106					106
	Housing and buildings development		62					62
	Transport/traffic					47		47
	Waste					46		46
	Area too big				42			42
	Council tax and charges		41					41
	Funding, resources, and cuts		41					41
	Environmental impact				38			38
	Boundaries				23			23
	Opposition to expansion			23				23
	Pressure on existing services					22		22
	Employment/economic growth		21					21
	Infrastructure		21					21
	Lack of benefits and information			20				20
	Social needs and vulnerable groups	20						20
	Access/distance to services						16	16
	Offers alternative			15				15
	Education						13	13
	Support/no concerns for reorganisation			13				13
	Area too small				12			12
	Housing						12	12
	Least disruption/ Status quo			11				11
	As/all above			7				7
	Deprivation	6						6
	Total	196	293	93	115	545	524	1766

4.3 Options

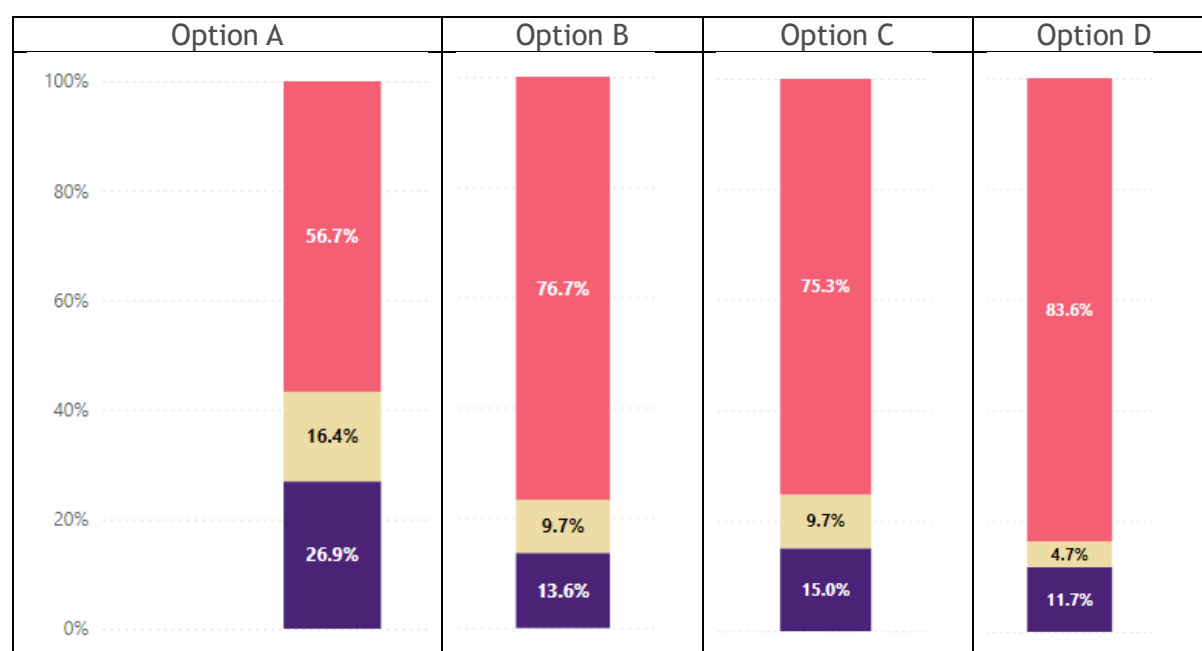
Questions 7-14 asked respondents for their opinions on four options for expansion (options A, B, C and D shown in section 2 of this report).

Questions 7, 9, 11 and 13 asked respondents to score the extent to which the support or oppose each option using a scale of: 1 (Strongly support) - 5 (Strongly oppose). For the purposes of presenting this data, we have assumed that a score of 1 or 2 demonstrates support, a score of 3 is neutral, and a score of 4 or 5 demonstrates opposition.

A colour legend has been applied to all charts which show this data:

Legend:	● (1-2) Support	● (3) Neutral	● (4-5) Oppose
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Below is the summary of the scores given to each option by the full set of respondents. Whilst the majority of respondents are in opposition to all options, you can see that option A had the most support and option D has the least support overall.



By using the data collected around post codes of respondents, we have also broken down the spread of support vs opposition by Brighton & Hove residents and non-resident groups and shown on maps, the average score of respondents within different wards.

There are limitations to the data presented in maps or split by grouping of resident / non-resident. Whilst 90% of respondents provided a postcode, 6% of responses were invalid or incomplete so the data that is presented by ward (maps) and resident / non-resident categories only represents 83.5% of total responses. There were also a minority number of respondents from wards outside the map area shown in this report which will not be seen on the maps. It is also important to remember that the maps show spread of responses and the average score by ward, and does not account for density of responses i.e. if there is a single respondent from a ward, their score will determine the average score for that

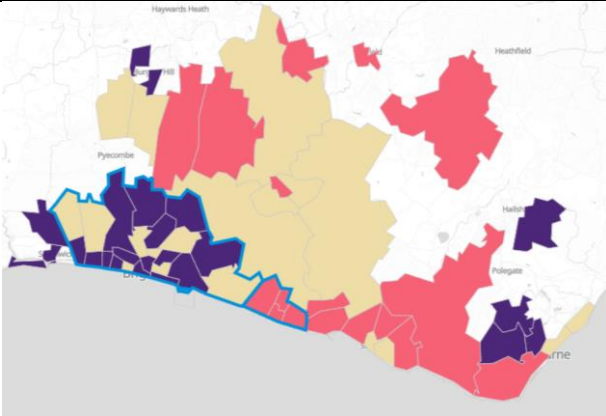
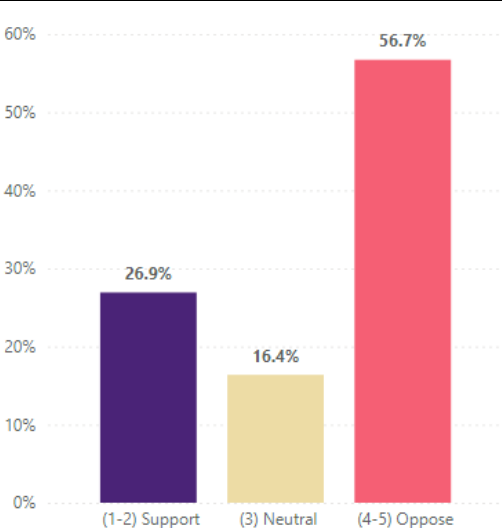
entire ward. See the table below for an overview of the number of responses captured from each Local Authority (as the list of wards would be an exhaustive list).


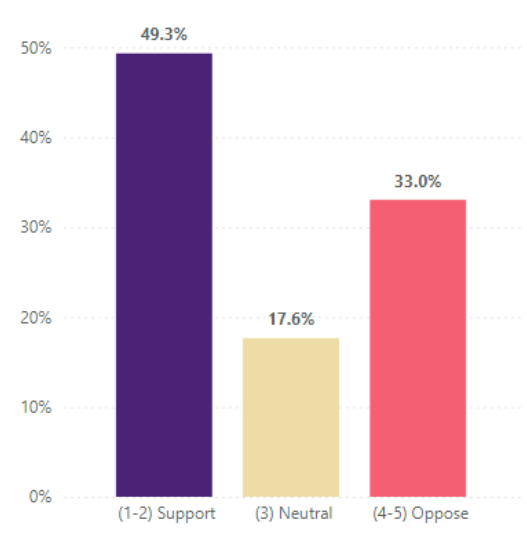
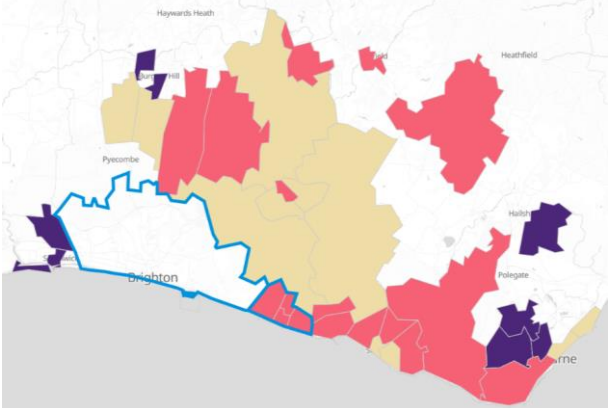
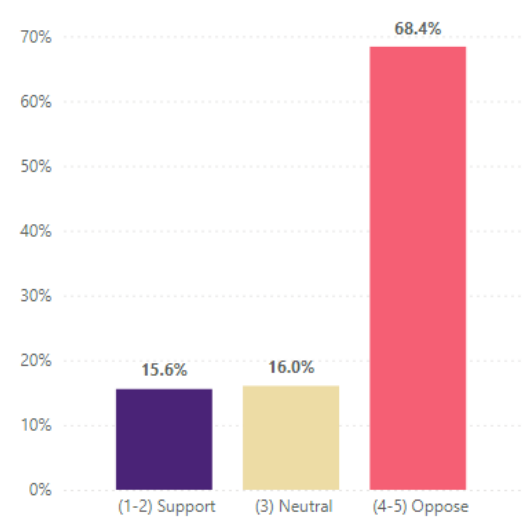
Local Authority	# Responses	% of Total
Lewes	1219	53%
Brighton and Hove	676	29%
Not Stated	230	10%
Postcode invalid/incomplete	149	6%
Mid Sussex	7	0%
Eastbourne	6	0%
Wealden	6	0%
Adur	5	0%
Worthing	4	0%
Chichester	2	0%
Hastings	1	0%
Rother	1	0%
Wandsworth	1	0%
Total	2307	100%

In addition to the quantitative data, questions 8, 10, 12 and 14 asked respondents to provide a reason for their score. The free text answers to these questions were coded in order to count how many times key topics were mentioned and look for common themes. Key data around the most common topics mentioned (by resident/non-resident demographic and by supporters/opposers to the options) is presented here alongside the scoring data. Exclusions from the lists are: topics that are mentioned fewer than 10 times or the topic code 'no clear reasoning'. Further narrative around the common themes and nuances is given in section 4.4.

Question 7 and 8 - To what extent do you support or oppose option A: strengthening the eastern edge. Provide your reasons.

Legend: (1-2) Support (3) Neutral (4-5) Oppose

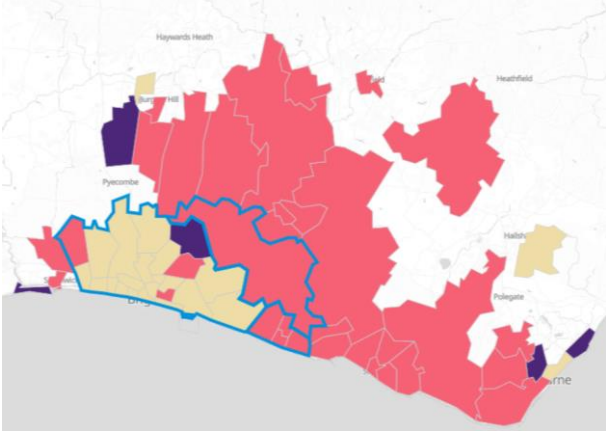
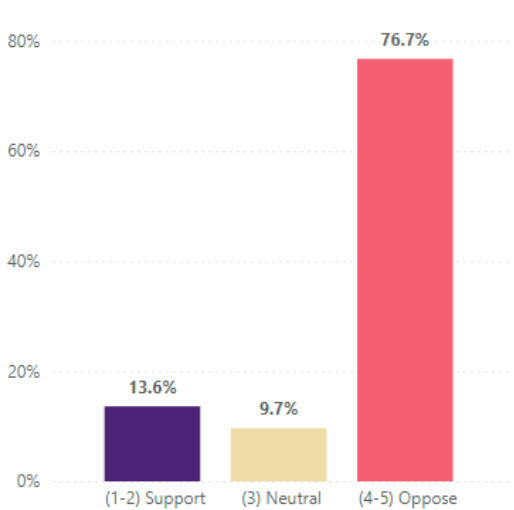
OPTION A	Map showing average score by ward	Average option scores	Key topics from comments (# comments)								
All respondents		 <table><thead><tr><th>Option</th><th>Percentage</th></tr></thead><tbody><tr><td>(1-2) Support</td><td>26.9%</td></tr><tr><td>(3) Neutral</td><td>16.4%</td></tr><tr><td>(4-5) Oppose</td><td>56.7%</td></tr></tbody></table>	Option	Percentage	(1-2) Support	26.9%	(3) Neutral	16.4%	(4-5) Oppose	56.7%	<p>Top 5 overall:</p> <ul style="list-style-type: none">Local identity and brand (343)General opposition (145)Area too big (134)Trust in BHCC, competence (120)Area too small (102)
Option	Percentage										
(1-2) Support	26.9%										
(3) Neutral	16.4%										
(4-5) Oppose	56.7%										

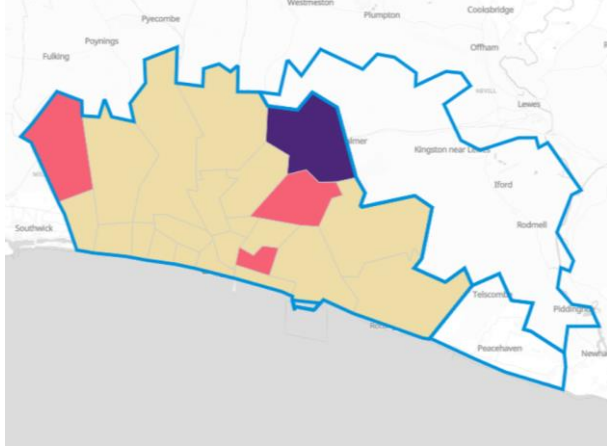
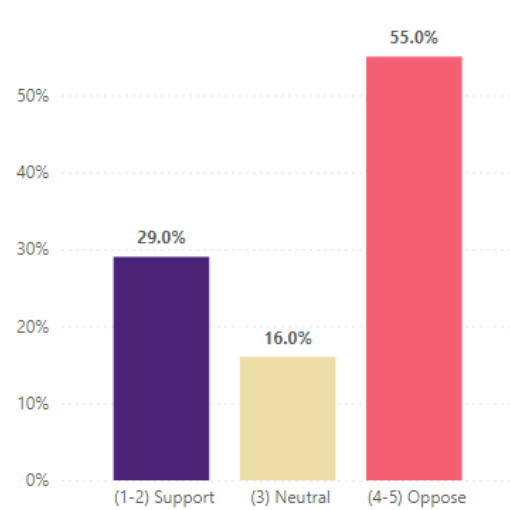
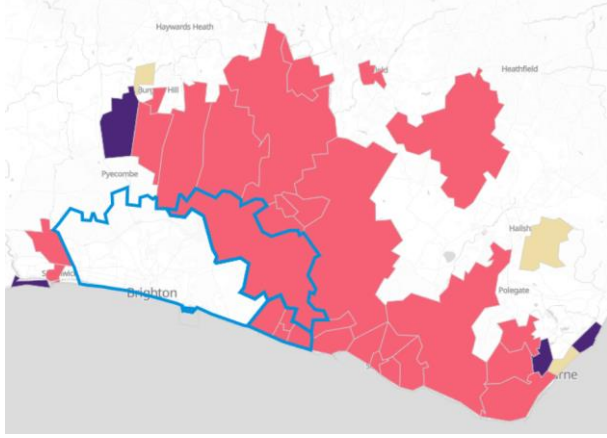
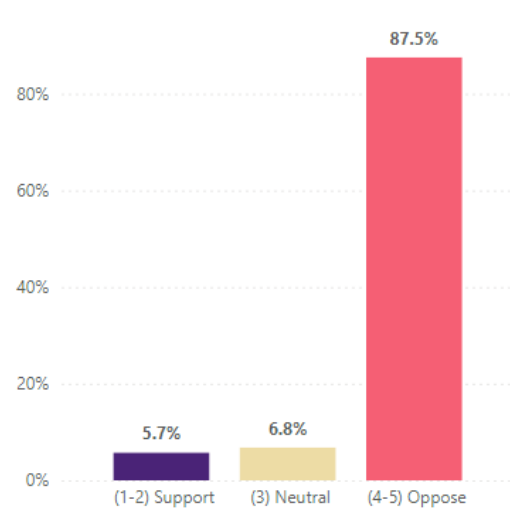
B&H residents		 <table><tr><th>Response</th><th>Percentage</th></tr><tr><td>(1-2) Support</td><td>49.3%</td></tr><tr><td>(3) Neutral</td><td>17.6%</td></tr><tr><td>(4-5) Oppose</td><td>33.0%</td></tr></table>	Response	Percentage	(1-2) Support	49.3%	(3) Neutral	17.6%	(4-5) Oppose	33.0%	<p>Top 5 for supporters:</p> <ul style="list-style-type: none">Local identity and brand (51)General support (41)Area too small (33)Least disruption, status quo (33)Boundaries (16) <p>Top 5 for opposers:</p> <ul style="list-style-type: none">Local identity and brand (29)Area too small (23)Trust in BHCC, competence (23)Area too big (22)General opposition (20)
Response	Percentage										
(1-2) Support	49.3%										
(3) Neutral	17.6%										
(4-5) Oppose	33.0%										
Non-B&H residents		 <table><tr><th>Response</th><th>Percentage</th></tr><tr><td>(1-2) Support</td><td>15.6%</td></tr><tr><td>(3) Neutral</td><td>16.0%</td></tr><tr><td>(4-5) Oppose</td><td>68.4%</td></tr></table>	Response	Percentage	(1-2) Support	15.6%	(3) Neutral	16.0%	(4-5) Oppose	68.4%	<p>Top 5 for supporters:</p> <ul style="list-style-type: none">Local identity and brand (31)General support (26) <p>Top 5 for opposers:</p> <ul style="list-style-type: none">Local identity and brand (161)General opposition (89)Area too big (76)Trust in BHCC, competence (75)Service performance (40)
Response	Percentage										
(1-2) Support	15.6%										
(3) Neutral	16.0%										
(4-5) Oppose	68.4%										
Conclusion	<ul style="list-style-type: none">Option A had the most support of the four options										

	<ul style="list-style-type: none"> • Brighton & Hove residents made up the majority of this with more in favour than opposing (this is the only option for which this is the case). However, Residents of the proposed expansion areas were opposed to the proposal • Local identity was the key topic as for the entire qualitative data set but there were a high number of comments about the positive links between Brighton and the expansion area (East Saltdean, Telscombe Cliffs and Peacehaven) and reuniting Saltdean • Supporters had mixed views about the new area being the right size (causing the least disruption and retaining natural links) or not being ambitious enough to warrant the upheaval • The majority of opposition came from non-residents of Brighton & Hove and the average scores of those respondents from within the expansion areas were in opposition. Key concerns were around BHCC's ability to maintain and deliver a high level of service to the new areas, or new areas becoming subsumed in a larger area and losing their identity or being deprioritised.
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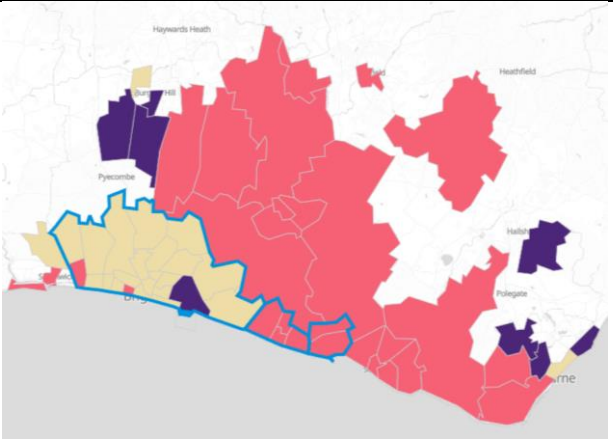
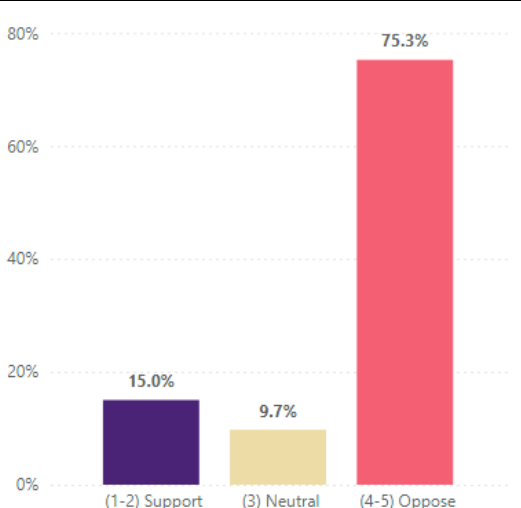
Question 9 and 10 - To what extent do you support or oppose option B: extending to the eastern downs. Provide your reasons.

Legend: (1-2) Support (3) Neutral (4-5) Oppose

OPTION B	Map showing average score by ward	Average option scores	Key topics from comments (# comments)								
All respondents		 <table><thead><tr><th>Option</th><th>Percentage</th></tr></thead><tbody><tr><td>(1-2) Support</td><td>13.6%</td></tr><tr><td>(3) Neutral</td><td>9.7%</td></tr><tr><td>(4-5) Oppose</td><td>76.7%</td></tr></tbody></table>	Option	Percentage	(1-2) Support	13.6%	(3) Neutral	9.7%	(4-5) Oppose	76.7%	<p>Top 5 overall:</p> <ul style="list-style-type: none">Local identity and brand (458)Area too big (281)General opposition (183)Trust in BHCC, competence (120)Service performance (97)
Option	Percentage										
(1-2) Support	13.6%										
(3) Neutral	9.7%										
(4-5) Oppose	76.7%										

B&H residents		 <table><tr><th>Response</th><th>Percentage</th></tr><tr><td>(1-2) Support</td><td>29.0%</td></tr><tr><td>(3) Neutral</td><td>16.0%</td></tr><tr><td>(4-5) Oppose</td><td>55.0%</td></tr></table>	Response	Percentage	(1-2) Support	29.0%	(3) Neutral	16.0%	(4-5) Oppose	55.0%	<p>Top 5 for supporters:</p> <ul style="list-style-type: none">Local identity and brand (19)General support (18)Area too small (14)Area too big (11)Boundaries (11) <p>Top 5 for opposers:</p> <ul style="list-style-type: none">Local identity and brand (75)Area too big (73)General opposition (31)Trust in BHCC, competence (23)Service performance (19)
Response	Percentage										
(1-2) Support	29.0%										
(3) Neutral	16.0%										
(4-5) Oppose	55.0%										
Non-B&H residents		 <table><tr><th>Response</th><th>Percentage</th></tr><tr><td>(1-2) Support</td><td>5.7%</td></tr><tr><td>(3) Neutral</td><td>6.8%</td></tr><tr><td>(4-5) Oppose</td><td>87.5%</td></tr></table>	Response	Percentage	(1-2) Support	5.7%	(3) Neutral	6.8%	(4-5) Oppose	87.5%	<p>Top 5 for supporters:</p> <ul style="list-style-type: none">No topics mentioned 10+ times <p>Top 5 for opposers:</p> <ul style="list-style-type: none">Local identity and brand (285)Area too big (140)General opposition (115)Trust in BHCC, competence (82)Service performance (57)
Response	Percentage										
(1-2) Support	5.7%										
(3) Neutral	6.8%										
(4-5) Oppose	87.5%										
Conclusion	<ul style="list-style-type: none">Option B was opposed in the majority with a small portion of supporters who were mainly Brighton & Hove residents. Note that scores for Option B were very closely aligned to scores for Option CResidents of the proposed expansion areas were opposed to the proposal										

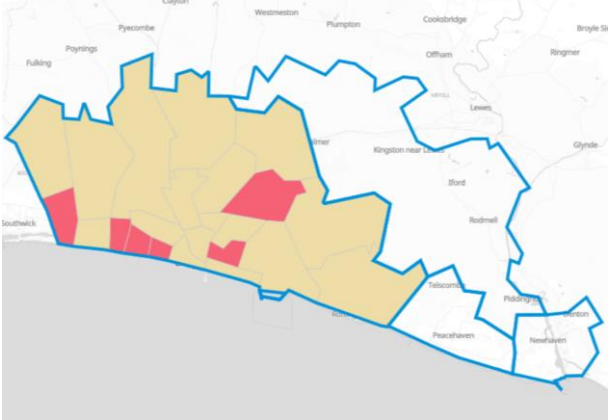
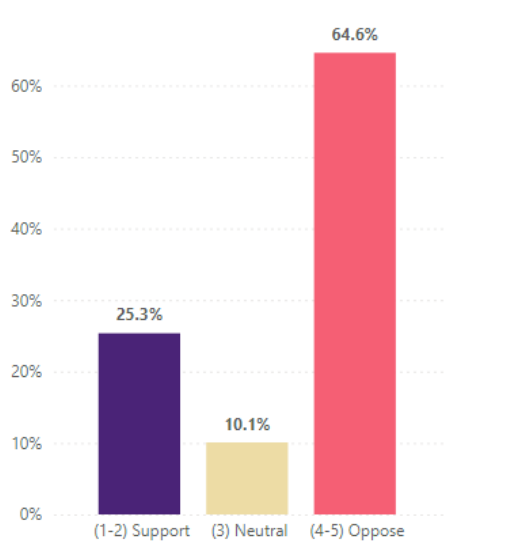
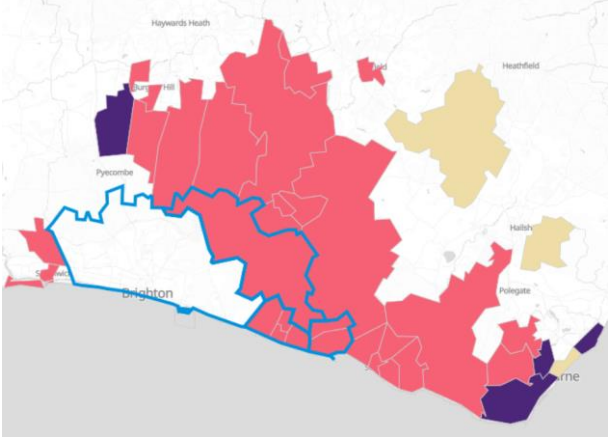
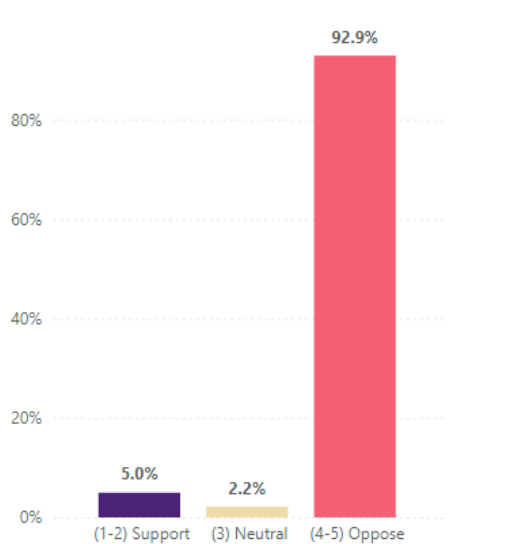
	<ul style="list-style-type: none"> • Opposers argued that the area is too big and there is a lack of shared identity between the city, coastal and rural areas included • There was a concern that service performance would be impacted with BHCC not able to meet the needs of these new and different communities due to a lack of ability, experience and resources • Opposers shared concerns about the natural areas within the expansion areas being used for housing and development and demonstrated distrust in BHCC's motives for the expansion • Supporters noted that a large area was necessary in order to deliver impactful change
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Question 11 and 12 - To what extent do you support or oppose option C: uniting the coastal corridor. Provide your reasons.											
Legend: <div><div></div> (1-2) Support</div> <div><div></div> (3) Neutral</div> <div><div></div> (4-5) Oppose</div>											
OPTION C	Map showing average score by ward	Average option scores	Key topics from comments (# comments)								
All respondents		 <table><thead><tr><th>Option</th><th>Percentage</th></tr></thead><tbody><tr><td>(1-2) Support</td><td>15.0%</td></tr><tr><td>(3) Neutral</td><td>9.7%</td></tr><tr><td>(4-5) Oppose</td><td>75.3%</td></tr></tbody></table>	Option	Percentage	(1-2) Support	15.0%	(3) Neutral	9.7%	(4-5) Oppose	75.3%	Top 5 overall: <ul style="list-style-type: none">Local identity and brand (457)Area too big (250)General opposition (189)Trust in BHCC, competence (125)Service performance (101)
Option	Percentage										
(1-2) Support	15.0%										
(3) Neutral	9.7%										
(4-5) Oppose	75.3%										

B&H residents		<table><thead><tr><th>Response</th><th>Percentage</th></tr></thead><tbody><tr><td>(1-2) Support</td><td>29.9%</td></tr><tr><td>(3) Neutral</td><td>15.2%</td></tr><tr><td>(4-5) Oppose</td><td>54.9%</td></tr></tbody></table>	Response	Percentage	(1-2) Support	29.9%	(3) Neutral	15.2%	(4-5) Oppose	54.9%	<p>Top 5 for supporters:</p> <ul style="list-style-type: none">Local identity and brand (27)Transport / traffic (18)General support (17)Boundaries (10)Connecting services (10) <p>Top 5 for opposers:</p> <ul style="list-style-type: none">Local identity and brand (84)Area too big (56)General opposition (35)Trust in BHCC, competence (18)Service performance (18)
Response	Percentage										
(1-2) Support	29.9%										
(3) Neutral	15.2%										
(4-5) Oppose	54.9%										
Non-B&H residents		<table><thead><tr><th>Response</th><th>Percentage</th></tr></thead><tbody><tr><td>(1-2) Support</td><td>7.7%</td></tr><tr><td>(3) Neutral</td><td>7.3%</td></tr><tr><td>(4-5) Oppose</td><td>85.1%</td></tr></tbody></table>	Response	Percentage	(1-2) Support	7.7%	(3) Neutral	7.3%	(4-5) Oppose	85.1%	<p>Top 5 for supporters:</p> <ul style="list-style-type: none">Local identity and brand (16) <p>Top 5 for opposers:</p> <ul style="list-style-type: none">Local identity and brand (265)Area too big (137)General opposition (110)Trust in BHCC, competence (89)Service performance (51)
Response	Percentage										
(1-2) Support	7.7%										
(3) Neutral	7.3%										
(4-5) Oppose	85.1%										
Conclusion	<ul style="list-style-type: none">Option C was opposed in the majority with a small portion of supporters who were mainly Brighton & Hove residents. Note that scores for Option C were very closely aligned to scores for Option BResidents of the proposed expansion areas were opposed to the proposal										

	<ul style="list-style-type: none"> • Opposers argued that the area is too big to maintain service levels across the whole footprint as the council would be serving too many people with distinct social needs • Responders also challenged whether the size of the area would stretch services thin and showed concern that service performance would dip from current levels for the existing residents • Supporters noted the common identity and needs of coastal areas in the proposed expansion area and the opportunities for connecting services along the coast
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Question 13 and 14 - To what extent do you support or oppose option D: coast and downs partnership, Provide your reasons.											
Legend: <div><div></div> (1-2) Support</div> <div><div></div> (3) Neutral</div> <div><div></div> (4-5) Oppose</div>											
OPTION D	Map showing average score by ward	Average option scores	Key topics from comments (# comments)								
All respondents		<table><thead><tr><th>Option Score</th><th>Percentage</th></tr></thead><tbody><tr><td>(1-2) Support</td><td>11.7%</td></tr><tr><td>(3) Neutral</td><td>4.7%</td></tr><tr><td>(4-5) Oppose</td><td>83.6%</td></tr></tbody></table>	Option Score	Percentage	(1-2) Support	11.7%	(3) Neutral	4.7%	(4-5) Oppose	83.6%	Top 5 overall: <ul style="list-style-type: none">Local identity and brand (420)Area too big (390)General opposition (218)Trust in BHCC, competence (125)Service performance (108)
Option Score	Percentage										
(1-2) Support	11.7%										
(3) Neutral	4.7%										
(4-5) Oppose	83.6%										

B&H residents		 <table><thead><tr><th>Response</th><th>Percentage</th></tr></thead><tbody><tr><td>(1-2) Support</td><td>25.3%</td></tr><tr><td>(3) Neutral</td><td>10.1%</td></tr><tr><td>(4-5) Oppose</td><td>64.6%</td></tr></tbody></table>	Response	Percentage	(1-2) Support	25.3%	(3) Neutral	10.1%	(4-5) Oppose	64.6%	<p>Top 5 for supporters:</p> <ul style="list-style-type: none">• General support (32)• Local identity and brand (15)• Financial efficiency, value for money (12)• Area right size (11)• Transport / traffic (11) <p>Top 5 for opposers:</p> <ul style="list-style-type: none">• Area too big (120)• Local identity and brand (69)• General opposition (49)• Service performance (26)• Trust in BHCC, competence (20)
Response	Percentage										
(1-2) Support	25.3%										
(3) Neutral	10.1%										
(4-5) Oppose	64.6%										
Non-B&H residents		 <table><thead><tr><th>Response</th><th>Percentage</th></tr></thead><tbody><tr><td>(1-2) Support</td><td>5.0%</td></tr><tr><td>(3) Neutral</td><td>2.2%</td></tr><tr><td>(4-5) Oppose</td><td>92.9%</td></tr></tbody></table>	Response	Percentage	(1-2) Support	5.0%	(3) Neutral	2.2%	(4-5) Oppose	92.9%	<p>Top 5 for supporters:</p> <ul style="list-style-type: none">• <i>No topics mentioned 10+ times</i> <p>Top 5 for opposers:</p> <ul style="list-style-type: none">• Local identity and brand (268)• Area too big (188)• General opposition (124)• Trust in BHCC, competence (85)• Service performance (55)
Response	Percentage										
(1-2) Support	5.0%										
(3) Neutral	2.2%										
(4-5) Oppose	92.9%										
Conclusion	<ul style="list-style-type: none">• Option D had the least support overall, across both resident and non-resident groups										

	<ul style="list-style-type: none"> • Residents of the proposed expansion areas were opposed to the proposal • The key reasons cited were that the expansion area is too big and lacks cohesive identity across the city and rural communities within it • There were concerns about the ability of a single council to meet the differing needs of these communities and landscapes from experience, ability and funding points of view • Opposers shared concerns about the natural areas within the expansion areas being used for housing and development and demonstrated distrust in BHCC's motives for the expansion • The small number of supporters were mainly Brighton & Hove residents (though note that the map shows the average scores only and so shows that the Brighton & Hove area is neutral overall) who commented on opportunities to connect and deliver improved services over a larger footprint, taking full advantage of the potential for financial efficiencies through reorganisation.
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4.4 Thematic analysis

Thematic analysis of the comments in the qualitative, open text, questions was carried out using the codes given to each response as a starting point. The full methodology for how this was carried out is explained in section 3.3.2 and the Appendix (section 2.3 Methodology - Qualitative analysis).

Resulting narratives were developed with detailed nuance and justification included. These are included fully in the Appendix (section 1.2 Narrative from qualitative analysis), and the summaries are provided in tables below to demonstrate the spread and sources of this information. These have been grouped into a set of themes and sub-themes (see table below) to make them more digestible but there are overlaps between the themes and narratives from each of the questions which reflects the amount of repetition that came through from respondents when completing the survey.

Key themes	Sub themes
Key theme 1: General feedback	<ul style="list-style-type: none"> • Alternative views • Representation and voice
Key theme 2: Sense of place	<ul style="list-style-type: none"> • Boundaries • Social, cultural and political identity
Key theme 3: Service	<ul style="list-style-type: none"> • Access to services • Delivery of services
Key theme 4: Trust and confidence in BHCC	<ul style="list-style-type: none"> • Housing and development • Reputation and competence • Finance

4.4.1 Key theme 1: General feedback

Sub-theme - Alternative Views

Some respondents suggested alternatives beyond the current proposals, such as dissolving Brighton back into East Sussex, creating a pan-Sussex or coastal mayoral authority, or even splitting Brighton and Hove. Others opposed expansion altogether, citing fears over identity loss, increased taxes, and further pressure on infrastructure. There was also debate over the direction of growth, with many arguing that expansion westwards toward Adur, Shoreham, or Worthing made more sense than eastwards. Opinions were divided on scale: some felt the proposals were too limited to justify disruption, while others argued that a Sussex-wide approach would be more ambitious and effective.

Summary of points from qualitative data	Source question
Alternative structures: Calls for Brighton dissolution, pan-Sussex, or coastal mayoral unitary.	Q15
Opposition to expansion: Concerns include the strain on local infrastructure, loss of historical and cultural ties, environmental impact, and financial implications	Q5
Alternative options: Respondents question eastward expansion, suggesting westward partnerships instead.	Q6
Alternative options: Suggestions for alternative expansion direction (westward), or coastal corridor approach. Preference to remain with current authorities.	Q7,9,11,13

Ambition: Concerns that expansion too small (not worth the upheaval, might just absorb areas without generating benefits) or not bold enough to drive regional change.	Q7,9,11,13
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Sub-theme - Representation and Community Voice

A consistent concern was the lack of clear information about what reorganisation would achieve, leading many to see it as a takeover rather than a partnership. There was confusion around the process with many raising a preference to remain with existing councils. While some respondents saw potential for improved democracy, more feared that their voice would be diluted and their needs overlooked under a larger council dominated by Brighton. Representation, accountability, and fairness were recurring themes, with questions about whether resources would be shared equitably. Respondents wanted evidence that they would see tangible benefits and guarantees that local decision-making would not be lost.

Summary of points from qualitative data	Source question
Lack of benefits and information: Unclear benefits, poor communication, fears reorganisation resembles a takeover.	Q6
Voice and influence: Many respondents express concerns that merging councils will dilute their local identity and representation. They fear that their voices will be drowned out by the priorities of a larger, urban-focused council, making it difficult for local people to influence decisions that directly affect their lives.	Q5
Representation and accountability: Smaller communities fear losing voice, transparency, genuine engagement and fair representation.	Q6
Benefits: Perceived lack of benefits and risks for communities in expansion areas (housing development, investment focused on Brighton & Hove). Opportunities mentioned (transport, regeneration). More information requested.	Q7,9,11,13
Community voice and representation: Perceptions that communities in expansion areas have not properly been consulted and may be absorbed against their wishes, their voice weakened within a larger city-led council.	Q7,9,11,13

4.4.2 Key theme 2: Sense of place

Sub-theme - Boundaries

Many respondents questioned the logic behind the proposed boundaries, describing them as arbitrary or politically motivated. There were calls for “natural” boundaries that respect geography, transport links, and community ties. An alternative westward expansion or the coastal corridor was seen by some as logical, but others felt rural and inland areas did not belong in a Brighton-led authority.

Summary of points from qualitative data	Source question
Boundary logic: Calls for more natural boundaries, concerns around splitting communities and fracturing local identity and service use. Mixed views on coastal corridor alignment.	Q7,9,11,13

Sub-theme - Social, Cultural and Political Identity

Identity was a strong theme, with strong parish and village attachment from rural communities, and particular concerns about losing historic and cultural ties to Lewes and East Sussex. Many feared being “subsumed” by a larger urban authority with concerns that this would dilute their community spirit, heritage, and political identity. Some Brighton residents also expressed anxiety that their city’s distinct culture could be weakened by merging with neighbouring areas.

Summary of points from qualitative data	Source question
Identity loss: Kingston/Ouse Valley resist transfer, citing historic Lewes ties.	Q15
Community: Concern that a larger council will prioritise urban areas over rural areas leading to loss of community spirit	Q5
Cultural: Residents are proud of their cultural heritage and diversity in Brighton & Hove	Q5
Local identity: Strong feeling around losing individual area’s unique identity and the differences that exist	Q5
Identity, culture, and politics: Merger threatens cultural traditions and political balance across areas.	Q6
Identity: Challenges around community identity (urban vs smaller villages) and historical fit (historic county lines, cultural ties) for expansion areas with Brighton & Hove, suggesting these fit better with Lewes or East Sussex councils. Limited support for where extension feels logical and natural (A).	Q7,9,11,13

4.4.3 Key theme 3: Services

Sub-theme - Access to Services

Transport and congestion (e.g. the A259 corridor) were major worries, with fears that a larger council would exacerbate existing issues without major infrastructure improvements. Concerns were also raised about waste, education access, especially for rural families, and the potential loss of valued parks and green spaces.

Summary of points from qualitative data	Source question
Transport dependency: Coastal change requires A259 solutions or worsened congestion.	Q15
Education. Access to education and distance from schools is a concern if the council footprint is stretched.	Q5
Parks/greenspace. Residents value their green space for recreation and environmental reasons.	Q5
Traffic/transport. Residents rely on existing services for daily commuting and access to services	Q5
Access to services and education: Residents fear longer travel distances, especially impacting vulnerable groups.	Q6

Sub-theme - Delivery of Services

Respondents expressed doubts about Brighton & Hove City Council’s ability to maintain or improve services under a larger and more complex authority. There were fears that vulnerable populations would be most affected (i.e. impact on children with SEND and families and adults needing care), that rural needs would be ignored, and that existing

infrastructure could not cope with further demand. Respondents raised the importance that services continue to be delivered competently and locally. A minority saw an opportunity for a larger council to deliver regeneration and major projects.

Summary of points from qualitative data	Source question
Lewes split risk: Breaking district disrupts schools, SEND, and care pathways.	Q15
Vulnerable at risk: Reorganisation feared to harm families, disabled people, and services.	Q15
Health and care. Concern that the merger will negatively impact the quality and availability of healthcare provision	Q5
Waste. Differing views on quality of service and concern about decline in service provision that exists	Q5
Customer service and communication: Reorganisation risks faceless council, worsening accessibility and resident engagement.	Q6
Rural needs and local knowledge: Brighton unlikely to understand or deliver rural community needs.	Q6
Service performance and workforce pressures: Concerns over job losses, overstretched staff, declining local services.	Q6
Infrastructure: Concern over investment in infrastructure needed. Debate over whether key infrastructure (e.g. Newhaven Port) would strengthen or harm development. Some opportunity to deliver regional infrastructure projects.	Q7,9,11,13
Too big: Challenges of a single council managing large expansion (diverse mix of communities and geographies), pressure on infrastructure, stretching services thin and reducing access to 'local' services.	Q7,9,11,13
Transport and parking: Concerns raised around pressure on existing road networks, traffic and parking. Perception of poor public transport links to Brighton vs Lewes.	Q7,9,11,13

4.4.4 Key theme 4: Trust and confidence in BHCC

Sub-theme - Housing and Development

Development pressures were a significant worry. Respondents feared that merging would open their areas to more housing development, reduce green space, and import social challenges from the city.

Summary of points from qualitative data	Source question
Economic fallout: Fears of Brighton expansion undermining Peacehaven, Newhaven, and tourism.	Q15
Housing development. Concerns about excessive development, preservation of green spaces, maintaining local identity and services, ensuring affordable housing, and addressing the strain on infrastructure and services	Q5
Social needs: Many comments express concerns about being negatively impacted by issues around homelessness and antisocial behaviour.	Q6

Housing, development, and environment: Concerns about rural overdevelopment, green space loss, antisocial behaviour.	Q6
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Sub-theme - Reputation and Competence

Trust in BHCC was low, with many respondents' citing a perception of poor financial management and service delivery as reasons to oppose expansion. It is worth noting that a disproportionate number of respondents were from outside the B&H area and so may not have an accurate level of awareness of BHCC's current service provision. The consultation process was also criticised as rushed and biased, reinforcing suspicion that decisions were already made. Some saw the eastward focus as politically driven.

Summary of points from qualitative data	Source question
Flawed consultation: Process criticised as biased, inaccessible, rushed, and manipulative.	Q15
Trust & confidence: General sense of distrust towards BHCC. Criticism of BHCC's service management (bins, housing, public transport, social care) and fears that expansion is driven by financial or political motives (perception of 'land grabbing').	Q7,9,11,13
Political motives: Eastward focus viewed as Labour's ideological land grab.	Q15
Vanity project: Boundary changes seen as costly distractions from local priorities.	Q15
Trust in BHCC. Concern exists around the Council's poor financial management and decision-making	Q5
Trust and competence of Brighton leadership: Brighton seen as mismanaged, untrustworthy, incapable of fair leadership.	Q6
Service performance: Concerns about BHCC ability to service rural, coastal and village needs (communities and environmental) citing perceived weak service performance, comparison with existing councils and potential for unequal resources for new areas.	Q7,9,11,13

Sub-theme - Financial Concerns

Financial worries were common, with anxiety around inheriting Brighton's debt, council tax harmonisation, and the possibility of unfair resource distribution. Many respondents wanted to see robust financial modelling before supporting any change.

Summary of points from qualitative data	Source question
Economic fallout: Fears of Brighton expansion undermining Peacehaven, Newhaven, and tourism.	Q15
Housing development. Concerns about excessive development, preservation of green spaces, maintaining local identity and services, ensuring affordable housing, and addressing the strain on infrastructure and services	Q5
Housing, development, and environment: Concerns about rural overdevelopment, green space loss, antisocial behaviour.	Q6

5. Recommendations

A key objective for this community consultation was to gather information that will support the implementation of Local Government reorganisation (LGR) plans and as such the following recommendations have been made as a conclusion of the analysis carried out.

The recommendations and next steps set out in this report should be considered within the specific context of Brighton & Hove City Council. They sit alongside the council's existing objectives, policies, projects, and resources and it is likely that many of the issues raised through the consultation are already be recognised by the council, with steps taken or planned to address them.

The ability to act on recommendations, and to use the findings to support the implementation of LGR, will depend on the council's wider context, priorities, and capacity. The evidence provides insight into which services residents are most concerned about, how people use them, and what misconceptions may need to be addressed through communications, but it is for the council to determine how best to respond within its circumstances.

Recommendations for next steps

1. **Communicate the Local Government Reform process, objectives and timetable** - Explain the framework and directions from central government and the constraints within which the council is operating.
2. **Communicate a clear case for change** - Explain how reorganisation can positively impact communities, residents and businesses and how benefits will be shared fairly across communities.
3. **Clarify boundaries and direction of growth** - Provide transparent reasoning for chosen areas, address perceptions of political bias, and explain why alternatives were ruled out.
4. **Protect local identity and representation** - Consider governance mechanisms such as area committees or parish involvement to safeguard local voices and maintain accountability.
5. **Commit to service continuity and improvement** - Share concrete plans for maintaining and enhancing key services, with specific guarantees for rural areas and vulnerable groups.
6. **Address transport and infrastructure concerns** - Link reorganisation to investment in transport, education, and community infrastructure, with clear timelines and funding commitments.

7. **Rebuild trust through better engagement** - Design a more inclusive, participatory process with two-way dialogue, accessible information, and visible responsiveness to feedback.
8. **Provide financial transparency** - Publish financial modelling, show how debt will be managed, and commit to fair resource allocation and council tax stability.
9. **Safeguard green spaces and manage development** - Set out how housing growth will be balanced with infrastructure and how local character and open spaces will be protected.
10. **Demonstrate early wins** - Deliver visible improvements in key services before or alongside reorganisation to build credibility and confidence.