

Brighton & Hove City Council

Agenda Item **25**

Place Overview & Scrutiny Committee

Subject: Local Government Reorganisation (LGR) - Progress Update and Engagement Overview

Date of meeting: 31 July 2025

Report of: Chair of Place Overview & Scrutiny

Contact Officer: Name: Rachel Kelly, Programme Director LGR
Email: rachel.kelly@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 relevant consultation documents were not available until 25th July.

1. Purpose of the Report

- 1.1 This report provides an update on Brighton & Hove City Council's approach to Local Government Reorganisation (LGR), aligned to the launch of the public engagement phase in July 2025. It is brought forward to ensure member oversight remains central to the process.
- 1.2 The Committee received an update on English Devolution and Local Government Reorganisation in June 2024, including the publication of the

Council's Interim Plan. That plan set out a commitment to transparency, public engagement and early member involvement.

1.3 This specially convened meeting reflects the importance of aligning Scrutiny input with the public engagement timeline and ensuring timely oversight ahead of the Council's statutory submission.

1.4 The report:

- Summarises progress since the Committee last considered LGR and Devolution matters
- Outlines the Council's engagement approach and rationale
- Sets out the options under consideration and how they align with national criteria
- Describes how partner engagement will inform the next phase
- Clarifies the statutory next steps following the Council's proposal
- Invites feedback and further lines of enquiry from Members

2. Recommendations

2.1 Place Overview & Scrutiny Committee to:

- note the progress update on Local Government Reorganisation;
- consider the engagement approach and materials (Appendix 1);
- identify any issues or lines of enquiry that need to be considered in the development of BHCC's final proposal to Government.

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. This is part of a wider national set of reforms detailed in the Devolution White Paper. 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 within the East Sussex ceremonial county boundary. In parallel, councils in West Sussex were invited to develop proposals for the West Sussex ceremonial county boundary. While these invitations were framed around the two ceremonial counties, the Minister for Local Government and Devolution made clear that views on the wider Sussex

footprint would be welcomed, particularly in light of future Mayoral Combined Authority boundaries

- 3.3 Brighton & Hove, as an existing unitary authority, has not been excluded from these discussions and is expected to test its future scale and sustainability through this process.
- 3.4 The Government has made clear that it is not prescribing a single model or geography for Local Government Reorganisation. Instead, proposals must meet their core criteria including:
- Serving a population of around 500,000 (or providing a strong rationale for deviation). Minister McMahon has expressed that unitaries of 300,000 may be considered.
 - Aligning with patterns of service use, travel, work and community identity
 - Demonstrating financial sustainability and long-term value for money
 - Protecting or enhancing public services through more integrated delivery
 - Showing evidence of local support
- 3.5 Further guidance from MHCLG (June 2025) confirms:
- There is no expectation of a single map or unified Sussex-wide proposal, but reference and consideration of the new Mayoral Authority for Sussex and Brighton would be welcomed.
 - All councils must demonstrate how proposed boundaries reflect functional geographies, service resilience, and fiscal stability
 - MHCLG will decide whether proposals meet the government's criteria, assess viability and which proposals they will take to statutory consultation
- 3.6 Government guidance encourages councils to work within existing local authority boundaries, using whole areas wherever possible. However, it also recognises that in some cases, the most coherent or viable proposal may involve combining parts of neighbouring authorities. Where this arises, proposals must be clearly justified and aligned to functional geographies and service integration.
- 3.7 In this context, councils may consult using whole wards as building blocks for potential new geographies. This ensures clarity and consistency while enabling proposals to reflect real-world patterns of service use and community life. Should any reorganisation proceed, the Local Government Boundary Commission for England (LGBCE) would lead a formal review of electoral arrangements, including warding and representation for any new authority.
- 3.8 All proposals must be submitted to MHCLG by 26 September 2025, with our Cabinet due to consider Brighton & Hove's proposal on 25 September 2025.

- 3.9 MHCLG will assess all proposals received and will only proceed to statutory consultation where a proposal is deemed to meet the Government's criteria and to be financially viable. This statutory consultation will be led by Government and separate from the local engagement phase.
- 3.10 Other local authorities across East and West Sussex will be submitting their own proposals, which may reflect differing boundaries. However, as these options emerge, the Council is continuing to undertake analysis to assess how its options align with neighbouring unitaries and the wider Sussex geography, though this is not part of the BHCC's public consultation. This will help us understand wider local support for any Sussex model that Brighton and Hove is minded to submit, as per the Governments core criteria.
- 3.11 The timeline for this work is set nationally. While the Council would prefer a longer period for consideration and analysis, the timescales have been set to align with the Government's intended timetable for announcing new Mayoral Combined Authorities in May 2026. The Council is doing all it can to ensure a robust and inclusive process within these constraints.

4. Analysis and Consideration of Alternative Options

- 4.1 The options currently under consultation were informed by early engagement undertaken between 24 February and 10 March 2025, using the Council's "Your Voice" platform. A total of 597 responses were received from residents, staff and stakeholders. This engagement did not test specific options but gathered views on the principles and potential implications of Local Government Reorganisation (LGR).
- 4.2 Feedback reflected a wide range of perspectives. While many respondents expressed concerns about losing Brighton & Hove's distinct identity, democratic accountability, or quality of services, others saw potential benefits in improved coordination, efficiency and economies of scale. There was conditional support for modest merge with eastward neighbourhoods, particularly to areas such as Saltdean, Peacehaven and Newhaven, which respondents identified as having natural links to the city. By contrast, proposals involving merging with areas to the north or west raised stronger concerns, particularly around identity, infrastructure and differences in community needs. The importance of transparent communication also emerged as a theme, informing how the current consultation has been framed.

- 4.3 Alongside this engagement, the Council undertook early technical appraisal of a range of potential configurations, including boundary changes to the north, west, and east. The eastern corridor was identified as the most viable focus for consultation. This reflects strong patterns of service usage, shared public infrastructure, education and health networks, and cross-boundary travel along the A259. Brighton & Hove already delivers or manages services in several of these areas, including parts of the Downland Estate. These factors support a coherent and functional geography for potential reorganisation, aligned with MHCLG guidance.
- 4.4 By contrast, options to the north and west presented less compelling evidence of service integration or community alignment. In the early engagement, many residents identified the South Downs as a natural northern boundary, and noted differences in rural character, demographics, and infrastructure. While some respondents recognised potential benefits in westward integration (e.g. with Shoreham), evidence of existing cross-boundary service reliance or commuting patterns was weaker. Given these findings, and the Government's criteria that proposals must be deliverable, coherent and grounded in real service geographies, the Council has focused on the eastern corridor, where both public sentiment and technical evidence are stronger.
- 4.5 The Council is now engaging on four options for reorganisation. These are all modest merging of Brighton & Hove unitary area with neighbouring areas. They reflect viable, locally grounded proposals for functional growth, while remaining within manageable geographic and population boundaries. Full descriptions of each option are provided in the Engagement Document (Appendix 1).
- 4.6 The four options focus on different configurations east:
- 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

and the greatest potential for achieving scale, service integration, and financial resilience.

- 4.7 These options were identified through early technical analysis of key factors including:
- Functional geography and travel-to-work areas
 - Use of public services and infrastructure
 - Existing community and economic ties
 - Population scale in relation to MHCLG's core criteria
 - Initial financial modelling, recognising limitations in available data
- 4.8 They are intended to provide a platform for discussion, not a finalised set of boundaries. The Council is not at this stage recommending any single option, nor excluding other potential configurations which may emerge through feedback or further analysis.
- 4.9 The aim of engaging on these options is twofold:
- To generate public feedback on which configurations feel most coherent and viable from a resident and community perspective
 - To signal clearly to MHCLG that the Council is engaging meaningfully with the Government's LGR criteria, including functional fit, local support, and financial resilience
- 4.10 Feedback from this consultation will inform further technical appraisal and comparative analysis over the summer, alongside engagement with partners and neighbouring councils.
- 4.11 It is important to acknowledge the limits of the current engagement. The Council is only engaging within its current boundaries, in line with statutory constraints and MHCLG guidance. Engagement with other councils, the NHS, and other anchor institutions is taking place through targeted bilateral conversations, deep-dive interviews, and shared analysis, not through the public consultation document.
- 4.12 A further strand of internal work is underway to assess how each option aligns with:
- Other potential unitary proposals being developed across East and West Sussex
 - Existing and future service commissioning footprints, particularly in health, care, and children's services
 - The broader viability of the Sussex sub-region under different LGR scenarios

- 4.13 This work is necessary because there is no requirement, or expectation, from MHCLG for a single, Sussex-wide solution. Multiple proposals are expected to be submitted from across the region, and MHCLG will assess each on its own merits, including how well they relate to one another. Brighton & Hove's options must therefore be robust in their own right, while also demonstrating how they contribute to a coherent wider picture.

5. Community Engagement and Consultation

- 5.1 Our public consultation launched on 25 July 2025 and runs until 25 August. The engagement approach aims to ensure a range of voices are heard.
- 5.2 Our consultation invites residents, partners, community groups and stakeholders to:
- Understand what LGR means in the local context
 - Consider four boundary options developed in response to national criteria
 - Share views on what matters most to them, from local identity to service continuity
- 5.3 Given the limited timeline, the Council is delivering a proportionate engagement programme. In-person events have been planned in Saltdean and along the city's eastern border. Paper surveys are available through libraries, and digital materials have been made as accessible and inclusive as possible.
- 5.4 The consultation is clear that no decision has been made. Rather than asking the public to choose a final option, the Council is seeking to shape its formal proposal based on resident and stakeholder input.

6. Financial Implications

- 6.1 A key national test for LGR proposals is the financial *sustainability* of the resulting unitary authorities. Each proposed footprint must demonstrate viability in the long term, including the ability to meet statutory responsibilities and deliver value for money.
- 6.2 The Council is undertaking detailed analysis of each option's population scale, revenue base, and cost implications, including dependencies on financial data from neighbouring authorities. This work is ongoing and will inform the final submission to Government. At this stage, engagement and modelling are helping to identify the potential implications of reorganisation.

- 6.3 A second key test is financial *deliverability*: the ability of local authorities to absorb the costs of transition and structural change. The Government has not committed to providing transitional funding, meaning any implementation costs must be borne locally. this creates a potential risk for BHCC and we will continue to engage with government on funding.
- 6.4 The financial context for reorganisation is shaped by the wider local government funding environment, including:
- The forthcoming Fair Funding Review, which will redefine allocation formulas and baselines
 - Rising demand and cost pressures across statutory services, particularly adult social care
- 6.5 Financial modelling is taking place and will be reflected in the final Cabinet paper and submission to MHCLG.

Finance Officer: John Hooton

Date: 240725

7. Legal Implications

- 7.1 Following the submission of LGR proposals in September, the Ministry of Housing, Communities and Local Government (MHCLG) will carry out a statutory consultation before Government determine which proposal, if any, is to be implemented. A statutory process will then be followed to implement the new Unitary Authorities and establish the new single tier of government in the area. The legal process will specify the transition arrangements during the period until new unitary councils go live.
- 7.2 Legal advice will be required throughout the programme.

Legal Officer: Elizabeth Culbert

Date: 240725

8. Equalities Implications

- 8.1 An Equalities Impact Assessment will be developed as part of the Council's formal proposal. The engagement process has been designed to ensure a range of voices are heard, including those at risk of exclusion from digital channels.

9. Sustainability Implications

- 9.1 The engagement process includes reference to environmental and infrastructure considerations. While reorganisation is not being driven by net

zero or place-shaping objectives, the potential for greater integration of local transport, planning and climate action across geographies is being explored.

10. Health and Wellbeing Implications

- 10.1 The implications of LGR for health, adult social care, public health and integrated commissioning being explored. Structured interviews with NHS partners, including the ICB, provider trusts, and commissioners, will be undertaken in August. These will inform:
- The resilience of place-based working
 - Continuity of commissioning and safeguarding responsibilities
 - Workforce, governance and integration impacts
- 10.2 The Council recognises that changes to commissioning footprints and integration arrangements are of particular interest to health scrutiny members and commits to sharing emerging findings as part of future engagement. Health scrutiny members are invited to help shape the lines of enquiry.

11. Conclusion

- 11.1 The Local Government Reorganisation programme remains at an early but critical stage. This update reflects the Council's commitment to open engagement, robust governance and timely delivery in line with national deadlines.
- 11.2 The programme faces a compressed timeline, with the Council required to submit its proposal to Government by 26 September 2025, ahead of Cabinet consideration on 25 September 2025. This timeline has been set nationally to align with the Government's plans for new Mayoral Combined Authorities in May 2026. While the Council acknowledges that the timetable is uncomfortable, it is doing all it can to deliver a high-quality and inclusive process within the constraints.
- 11.3 MHCLG will assess all proposals received, including those from other Sussex authorities, against national criteria. There is no expectation of a single Sussex-wide view. MHCLG will determine whether proposals are viable and whether they proceed to statutory consultation, likely to begin from October 2025.
- 11.4 The Council recognises the scale and complexity of this decision and welcomes continued scrutiny as part of ensuring that any proposal reflects local needs, statutory responsibilities, and long-term resilience.

Supporting Documentation

- **Appendix 1** – LGR Engagement Document, July 2025