

# Local Government Reorganisation in Surrey: Joint submission from Reigate & Banstead Borough Council and Crawley Borough Council

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# Local Government Reorganisation in Surrey: Joint submission from Reigate & Banstead Borough Council and Crawley Borough Council

## Introduction

### Our proposition

Our proposition is for:

- A single tier of local government that brings together the areas based on the existing authorities of Reigate & Banstead Borough Council in Surrey and Crawley Borough Council in West Sussex into the same unitary authority; and
- Removal of the hard administrative boundary that cuts across the heart of the Gatwick Diamond

Simply put, this is the solution that will maximise the future economic growth potential of our area.

It makes no sense to perpetuate the administrative boundary through the middle of the sub-region's most significant economy when the Government's primary agenda is to achieve greater growth. Removing this boundary as part of local government reorganisation will deliver the efficiencies that come with that process; but also unlock economic growth benefits (including the proceeds of growth to the national exchequer) that far exceed any financial savings realised through the process of unitarisation.

While the differing local government reorganisation and devolution timetables have not been designed to support the exploration of cross boundary arrangements, we believe that this is an exceptional circumstance that requires a willingness on the part of Government to introduce flexibility and accept a limited amount of additional complexity for maximum gain.

We acknowledge that this may not be the final boundary in order to take account wider proposals in both Surrey and Sussex. However, the process the Government has set out, using historic county boundaries as the basis for proposals, and the differing timeframes imposed on Surrey and Sussex, has rendered impossible our ability to suggest a definitive boundary set this out.

We therefore ask that the Government first considers our cross-boundary proposal, and if it sees merit in this allow for further discussions for its incorporation into the wider proposals.

### Outcomes

Our proposition will:

1. **Maximise the economic opportunity** of the Gatwick Diamond economic area
2. **Unlock the only sensible devolution geography** that genuinely delivers against White Paper objectives
3. Enable a **sensible geography for local planning to support the ongoing success of Gatwick Airport**, including a joined up approach to managing the impacts of the airport on the environment and local communities.

4. Allow for local and strategic **transport planning that supports the key regional transport corridors** (road and rail, north-south and east-west)
5. Unlock **sustainable housing solutions** while protecting sensitive landscapes
6. Ensure **continued delivery of high quality services** for our residents, and safe and legal services at Vesting Day
7. Allow for an **efficient and financially resilient** unitary authority
8. Unlock opportunities for **innovative models of service delivery, including prevention services**, working with public sector partners

### About this submission

**Reigate & Banstead Borough Council** and **Crawley Borough Council** are making this submission in response to the invitation for proposals for a single tier of local government issued by the Secretary of State for Housing, Communities and Local Government on 5<sup>th</sup> February 2025.

It has received formal agreement from each authority as follows:

- [Reigate & Banstead Borough Council, Executive Meeting, Wednesday 7<sup>th</sup> May 2025](#) following a meeting of the Full Council on 6<sup>th</sup> May 2025
- [Crawley Borough Council, Cabinet Meeting, Wednesday 7<sup>th</sup> May 2025](#), following a meeting of the Full Council

The submission is being made in alignment with the Government's timetable for Surrey local authorities to submit proposals (9<sup>th</sup> May 2025). The deadline for West Sussex local authorities to submit proposals is not until 26<sup>th</sup> September. On that basis:

- Reigate & Banstead Borough Council is making this submission alongside being a joint signatory to the Surrey Three Unitary Proposal; and
- Crawley Borough Council is making this submission without prejudice to any future Proposal submitted on the West Sussex timetable.

This approach is the only option that we feel is available to us given the processes and differing timescales that the Government have put in place for Local Government Reorganisation. It is disappointing that the process:

- Has provided no additional flexibility for our cross-boundary proposal to be submitted on timetable other than the Surrey timetable
- Underplays the realities of economic functioning areas where these are not coterminous with existing county boundaries; and
- Continues to promote scale as an antidote to systemic challenges within local government, ignoring the evidence of recent reorganisations.

**Alignment with the Government's criteria:** In preparing this submission we have had regard to the guidance from the Secretary of State set out in the Schedule to the original 5<sup>th</sup> February invitation letter, and to further guidance that has been issued both in writing and verbally since that date (including the feedback provided on the Surrey Interim Proposals and our joint letter of 21<sup>st</sup> March).

We understand from civil servants at the Ministry of Housing, Communities and Local Government that the 5 February 2025 invitation letter criteria will be used as the basis for decision-making, and we have used those criteria to inform this submission.

However, we would be worried if the response to our collective work over the past few months was merely a ‘tick box’ exercise against predetermined administrative criteria that (a) does not take account of the exceptional circumstances that the rest of this submission evidences, and (b) fails to acknowledge that there are proven models to managing risks to service delivery and wider reform emerging from a ‘non-standard’ approach to LGR which looks across existing administrative county boundaries.

### **Our ask of Government**

We appreciate that a cross boundary approach to unitarisation that we are suggesting introduces additional complexity in terms of the timeframes for delivery of LGR and Devolution in the area. However, this is not insurmountable, and we consider it justifiable given the huge economic benefits that will be unlocked.

The Government’s suggested boundaries for devolution are based on historic county boundaries that do not recognise the reality of modern-day economic geography. Through this suggestion we are calling on Government to adapt this approach where the benefits can be shown to outweigh administrative convenience, and where there is an acceptable approach to mitigating wider risks.

The economic functioning area that spans the boroughs of Crawley and Reigate & Banstead is worth over £13bn. Co-joined by one of the world’s busiest single runway airports, and at the heart of the Gatwick Diamond, this is the largest economy in the sub-region.

The use of historic county boundaries for the new Mayoral Strategic Authorities would see the strategic planning split between two separate elected Mayors. Given the complexities involved in balancing economic growth, environmental protection and community benefit, plus the challenges of wider strategic planning and transport, this is clearly sub-optimal at best and non-sensical at worst.

This sub-optimality extends also to service provision. A key example is the Surrey and Sussex Healthcare Trust. Based in Redhill, and there within the Surrey ICB, 50% of its users travel from within Sussex, with some of the greatest need emerging from Crawley. The Surrey-Sussex boundary is problematic in terms of meeting need and planning preventative approaches. LGR, if undertaken properly could accelerate rather than inhibit future service reform.

We recognise that this submission therefore presents a different answer to the question of future Devolution geographies to that in the Surrey Three Unitary submission, to which Reigate & Banstead is a joint signatory. We are committed to work constructively with Government to determine the best solution for a successful MSA in the area.

It should also be noted that the current boundary is a quirk of recent history. The Surrey-Sussex boundary once ran through Crawley. Within previous re-organisations, Crawley could easily have been incorporated within Surrey, and likewise parts of Reigate & Banstead (such as Horley) within Sussex. Administrative boundary lines are not permanent, but fluid and adjust over time according to wider needs. This should not be a barrier to reaching an optimal solution.

Our ask to Government is therefore that:

- This submission is taken into account alongside the other Surrey proposals for two or three unitary authorities in the county

- A cross boundary approach that incorporates Crawley is included within the Government's Surrey LGR consultation; and
- The Government takes a flexible approach to future devolution boundaries, accepting that these cannot be finalised until such time as resolution is reached on a cross-boundary approach to LGR in Surrey that also takes account of the Sussex position.

## Addressing the government's criteria

The rest of this submission elaborates on the rationale behind our proposition and how it will achieve our identified outcomes. The reference table below indicates in which sections each of the Government's criteria are addressed.

| Criteria   | Document reference  |
|--|---|
| <b>1. A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government.</b>  | Section 3   |
| 1.a Proposals should be for sensible economic areas, with an appropriate tax base which does not create an undue disadvantage for one part of the area   | Sensible economic areas – Section 1<br>Tax base – Section 6   |
| 1.b Proposals should be for a sensible geography which will help to increase housing supply and meet local needs   | Section 2   |
| 1.c Proposals should be supported by robust evidence and analysis and include an explanation of the outcomes it is expected to achieve, including evidence of estimated costs/benefits and local engagement  | Section 11<br>References to evidence base throughout document   |
| 1.d Proposals should describe clearly the single tier local government structures it is putting forward for the whole area, and explain how, if implemented, these are expected to achieve the outcomes described.   | Structures – Section 3 and Annex 1<br>Achievement of outcomes – throughout  |
| <b>2. Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.</b>  | Size – Section 3<br>Capacity – Section 5<br>Efficiencies and resilience – Section 6   |
| 2.a As a guiding principle, new councils should aim for a population of 500,000 or more  | Section 3   |
| 2.b There may be certain scenarios in which this 500,000 figure does not make sense for an area, including on devolution, and this rationale should be set out in a proposal   | Section 3   |
| 2.c Efficiencies should be identified to help improve councils' finances and make sure that council taxpayers are getting the best possible value for money  | Section 6   |
| 2.d Proposals should set out how an area will seek to manage transition costs, including planning for future service transformation opportunities from existing budgets, including from the flexible use of capital receipts that can support authorities in taking forward transformation and invest to save projects   | Service delivery approach – Section 5<br>Financial efficiencies – Section 6<br>Transition and implementation approach – Section 9 |
| 2.e For areas covering councils that are in Best Value intervention and/or in receipt of Exceptional Financial Support, proposals must additionally demonstrate how reorganisation may contribute to putting local government in the area as a whole on a firmer footing and what area-specific arrangements may be necessary to make new structures viable  | Section 6   |
| 2.f In general, as with previous restructures, there is no proposal for council debt to be addressed centrally or written off as part of reorganisation. For areas where there are exceptional circumstances where there has been failure linked to capital practices, proposals should reflect the extent to which the implications of this can be managed locally, including as part of efficiencies possible through reorganisation | Section 6   |

|   |   |
|---|---|
| <b>3. Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.</b>  | Section 5, Section 7  |
| 3.a Proposals should show how new structures will improve local government and service delivery, and should avoid unnecessary fragmentation of services   | Section 5   |
| 3.b Opportunities to deliver public service reform should be identified, including where they will lead to better value for money   | Section 7   |
| 3.c Consideration should be given to the impacts for crucial services such as social care, children's services, SEND and homelessness, and for wider public services including for public safety  | Section 5   |
| <b>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.</b>  | Working together – Section 10<br>Local views – throughout, plus Section 11; Annex 6 |
| 4.a It is for councils to decide how best to engage locally in a meaningful and constructive way and this engagement activity should be evidenced in your proposal  | Engagement to date – Section 11; Annex 6  |
| 4.b Proposals should consider issues of local identity and cultural and historic importance   | Section 2   |
| 4.c Proposals should include evidence of local engagement, an explanation of the views that have been put forward and how concerns will be addressed  | Engagement to date – Section 11; Annex 6<br>Addressing concerns – Section 8         |
| <b>5. New unitary structures must support devolution arrangements.</b>  | Section 4   |
| 5.a Proposals will need to consider and set out for areas where there is already a Combined Authority (CA) or a Combined County Authority (CCA) established or a decision has been taken by Government to work with the area to establish one, how that institution and its governance arrangements will need to change to continue to function effectively; and set out clearly (where applicable) whether this proposal is supported by the CA/CCA /Mayor | Not applicable  |
| 5.b Where no CA or CCA is already established or agreed then the proposal should set out how it will help unlock devolution   | Section 4   |
| 5.c Proposals should ensure there are sensible population size ratios between local authorities and any strategic authority, with timelines that work for both priorities   | Section 4   |
| <b>6. New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.</b>   | Section 8   |
| 6.a Proposals will need to explain plans to make sure that communities are engaged  | Section 8   |
| 6.b Where there are already arrangements in place it should be explained how these will enable strong community engagement  | Section 8   |



## Section 1: Economic growth

### DELIVERING AGAINST OUTCOMES

#### **Outcome 1 - Maximise the economic opportunity of the Gatwick Diamond economic area**

This section demonstrates that our cross boundary proposal better reflects the functional economic area and how bringing local authority boundaries into alignment with that can maximise the future economic growth potential of the area.

### **A well established and recognised geography and a sensible economic area**

We strongly believe that bringing our two authorities together into the same local (unitary) authority is the most sensible reflection of local economic geographies.

**History and geography:** Reigate & Banstead Borough Council (R&B) and Crawley Borough Council (Crawley) together sit at the heart of the successful Gatwick Diamond sub-region, a well-established economic area with Gatwick Airport at its heart.

Gatwick airport and the area surrounding it has a 70-year history playing a pivotal role in the UK's economy.

The economic strengths of the area have developed in parallel to the growth of Crawley as a New Town and as Gatwick Airport became established and has expanded into one of the world's busiest single runway airports and the second busiest airport in the UK. The concept of the Gatwick Diamond in its current guise emerged in the 1990s as a regional economic identity, and was a focal point for regional investment and growth by the regional economic and planning bodies in existence in the 2000s.

Since that time, the area has been supported and promoted by sub-regional representative bodies, including the [Gatwick Diamond Initiative](#) and [Gatwick Diamond Business](#). The [Coast To Capital Local Enterprise Partnership](#) geography, established from 2011, was centred around Gatwick Airport and the Inner Gatwick Diamond, as recognised in the organisation's most recent strategic economic plan '[Gatwick 360](#)'.

The Gatwick Diamond geography also has and continues to inform strategic planning and transport considerations, its strengths and strategic location being acknowledged in local plan documents prepared by local authorities in the area [insert references] and in strategic planning and infrastructure planning documents prepared for the Surrey area and jointly by Gatwick Diamond local authorities<sup>1</sup>.

Reigate & Banstead and Crawley are located at the heart of the 'Inner' or 'Core' Gatwick Diamond, straddling the existing Surrey-Sussex county boundary. Gatwick Airport is located at the extreme northern boundary of Crawley, with its land ownership extending into Reigate & Banstead. The 'Outer' Gatwick Diamond area extends beyond our authorities, across authorities including Mole Valley, Horsham, Tandridge, Epsom & Ewell and Mid Sussex all of which contribute to the economic success of the sub-region.

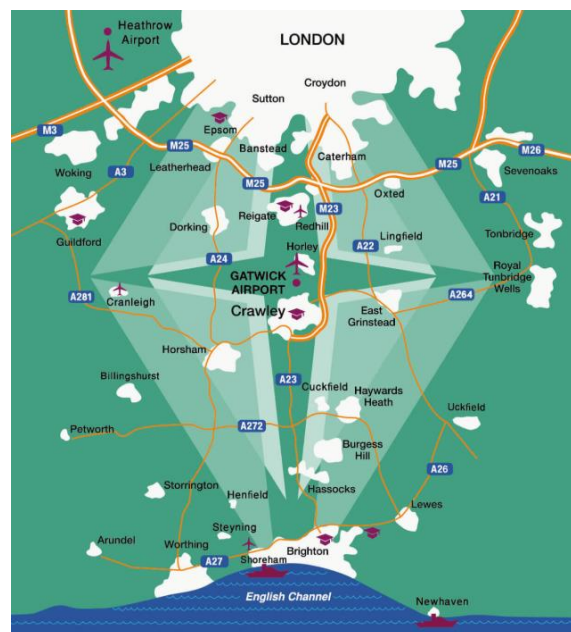
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<sup>1</sup> [Surrey Local Strategic Statement](#); [Gatwick Diamond Local Strategic Statement](#); [Gatwick Diamond Infrastructure Study](#); [Surrey 2050 Place Ambition](#)

Map 1 below shows the local authorities which the Gatwick Diamond crosses. Map 2 demonstrates the relationship of the area with key settlements and transport corridors. Map 3 is useful in providing information about comparator areas.



**Map 1: Local authorities within the Gatwick Diamond (Centre for Cities)**



**Map 2: Gatwick Diamond – key settlements and transport links (Gatwick Diamond Initiative)**



**Map 3: Gatwick Diamond and comparator areas** (Centre for Cities)

**Economic strengths:** In our joint letter to the Minister of 21 March 2025 (Annex 3) we outlined the key strengths the Reigate & Banstead and Crawley economy, including our GVA contribution and sectoral strengths and high growth clusters.

The Gatwick Diamond is a £24bn region, home to 45,000 businesses and 500 international businesses, and many large multinationals. Key sectors include medical engineering, science, aerospace, computer gaming, AI, automotive, defence and service industries. The area's economy performs well above the national average on various economic indicators: productivity levels, share of high-skilled jobs and traditionally a track record in attracting investment<sup>2</sup>.

The economy of the inner Gatwick Diamond (Reigate & Banstead and Crawley) is equivalent to that of Milton Keynes, and the GVA across the two authorities is bigger than both Brighton and Croydon, despite a significantly smaller population, contributing £13.05bn in GVA (over 50% of the area's total contribution).

More information about the economic strengths of the area is set out in the independent report at Annex 5, prepared by the Gatwick Diamond Initiative, and highlighting the role of the northern Gatwick Diamond area as a gateway for global connectivity and growth, and a pivotal economic zone for the UK. The sectoral strengths and international trade opportunities of the area surrounding Gatwick are also recognised in the Economic Strategies of Surrey and West Sussex County Councils<sup>3</sup>.

The Surrey Three Unitary Proposal also identifies the strong cross boundary economic links that exist between the Crawley/Gatwick area and Reigate & Banstead and East Surrey.

### **Contribution to the national exchequer and future economic growth potential**

Fundamentally, we know that the economic benefits of bringing our two authorities together will unlock huge economic opportunities – and indeed remove the risk of undermining the future economic strength and stability of the Gatwick Diamond. Removing this hard boundary between our authorities as part of LGR will not only deliver the efficiencies that come with that process; but also unlock economic growth benefits (including the proceeds of growth to the

<sup>2</sup> [Centre for Cities, The Economic Geography of the Gatwick Diamond](#)

<sup>3</sup> [Surrey's Draft Economic Growth Strategy 2025-2030; West Sussex Economic Strategy 2025-2030](#)

national exchequer) that far exceed any financial savings realised through the process of unitarisation.

Our two Councils have an estimated Business Rates ask for 2024/25 of over £200m. The latest figures (ONS 2022) on VAT take from our two boroughs is £748m, with a further £523m from other taxes captured by the ONS for the same period. The latest available income tax data (2022/23) at local authority district level shows a take of £1.338bn.

In total, this suggests a value to the exchequer of £2.8bn, yet this understates the total value of the contribution given that much of the tax take is not recorded at a local level, and because many people living in neighbouring areas commute into our towns to make their living. If Business Rates were an accurate barometer of total tax take, based on the location of economic production, it would suggest a total contribution of some £6.85bn.

The outlook for further growth and further tax revenues is strong. The Government has stated that it is minded to approve the expansion at Gatwick Airport. This would see the emergency runway to the north of the existing runway be upgraded, increasing capacity by a third. Land around Gatwick Airport is already coming forward to support future economic growth. Gatwick Green will see a further 2000 jobs, an additional £79m GVA per annum.

The high growth sector clusters in the area – which as noted above include MedTech and life sciences, aviation and defence manufacturing and training and financial services – have considerable growth potential but need coherent support for that to be optimised. A cross boundary approach to skills provision will help achieve this, building on work undertaken by Coast to Capital LEP to broker improved relationships across the area between skills providers and employers and explore opportunities for a higher education presence to unlock further economic growth potential

Further potential exists from the creation of the Gatwick Airport Economic Zone, which covers a wide area overlapping existing county boundaries and aims to achieve long term, sustained economic development across the region surrounding the area through joint public and private sector working.

Through mechanisms agreed within Crawley's recently adopted Local Plan, approval of the current Gatwick DCO will trigger a review of the whole safeguarded land with substantial potential for future land release for housing and commercial development (although options for housing development are likely to be limited due to proximity of the airport), and associated economic growth. Adjacent to the Airport, south of Horley, an additional large-scale opportunity for commercial development of sub-regional significance exists via an allocation in the Reigate & Banstead Local Plan. There is also significant potential for commercial development in Crawley town centre, as demonstrated by the successful introduction of Grade A office space.

### **The economic counterfactual**

Our area's potential is already constrained by the fact that it falls across two county administrative areas. This is a once in a lifetime opportunity to change that. Overlaying the existing divide with a Mayoral Strategic Authority boundary would compound the problem and arguably worsen the constraint.

The Economy Spotlight report by Coast to Capital on the Reigate & Banstead – Crawley Growth Area (Annex 4) considers this question. It finds that the reinforcing of the Surrey-Sussex boundary through this economic functioning area runs contrary to the sensible characteristics

the Government states strategic authorities should have. It also highlights the key strategic economic agendas that such an arrangement would negatively impact upon, including commuting networks, employment, strategic housing growth and economic growth. For example, undermining the creation of local growth and skills plans, employment support, and coherent infrastructure and land use planning. The opportunity to address housing challenges, create employment and skills opportunities, secure inward investment to benefit established and emerging businesses, and grow tax revenues will be undermined. As a result, our residents will lose out and our area's contribution to the Government's growth agenda will be inhibited.

The fact that the Gatwick Diamond is a thriving economic sub-region is in spite of, rather than because of, existing administrative boundaries. As the future economic potential of the area is increasing, the opportunity to align local and regional governance structures to support this should be grasped.

## Section 2: Housing, transport and place identity

### DELIVERING AGAINST OUTCOMES

**Outcome 3** - Enable a sensible geography for local planning to support the ongoing success of Gatwick Airport, including a joined up approach to managing the impacts of the airport on the environment and local communities

**Outcome 4** - Allow for local and strategic transport planning that supports the key regional transport corridors (road and rail, north-south and east-west)

**Outcome 5** - Unlock sustainable housing solutions while protecting sensitive landscapes

This section demonstrates how a cross boundary geography presents opportunities for a more joined up approach to local and spatial planning, enabling better management of environmental pressures. It will unlock housing delivery by providing a more sensible geography for the identification of housing sites; and help ensure proactive infrastructure planning and investment to ensure genuinely sustainable new development.

### A means of unlocking housing delivery

As well as the economic benefits, bringing our two authorities together will help to increase housing supply and meet local needs. It should be noted at the outset that both of our authorities have a strong track record of housing delivery, including the provision of affordable homes.

**Housing market areas:** The local housing market area is complex, particularly influenced by proximity to London but also the polycentric settlement structure of the Surrey/Sussex area. The overlap between the East Surrey Housing Market Area (HMA) and the Northern West Sussex HMA is a reflection of this; acknowledged both in Reigate & Banstead's latest [HMA Technical Paper \(2024\)](#) and Crawley's [Strategic Housing Market Assessment \(SHMA\) 2019](#).

The evidence shows a functional relationship between Crawley and parts of Surrey, with the strongest relationship (in house price and commuting terms) being with Horley and areas to the south of the M25 in Reigate & Banstead. The Crawley SHMA also recognises that the growth of the economic hub around Crawley/Gatwick could over time influence the housing market geography, and that the HMA geography could change over time, particularly if/when Gatwick Airport expands.

This cross boundary functional relationship is also identified in the Surrey Three Unitary Proposal.

**Housing need and supply:** Both our authorities have high levels of housing need. Under the standard method, Reigate & Banstead has a housing need of 1,306 and Crawley of 654.

Both authorities are also constrained in terms of housing land supply. Economic growth is no longer being met by sufficient housing and population growth to meet the needs of local employers. Crawley, with a population of 120,000 has a job base of 93,000, the second highest job density in the southeast. Consequently, the town (with an employment rate of 86%) has to import labour from across the region.

Crawley has all but exhausted the strategic housing sites within its boundaries. Increasingly, it relies on development in neighbouring areas to meet its housing need, exemplified by the

planned developments on Crawley's boundaries. Crawley has announced a housing emergency, driven by a lack of sufficient supply and the increasing unaffordability of owner occupation and the private rented sector. Despite a strong track record of social housing development, the borough has not been able to keep up, constrained as it is by its boundaries and the restrictions of Water Neutrality placed upon the area by Natural England.

In Reigate & Banstead, the majority of the borough is impacted by one or more environmental or policy constraints, including Green Belt, National Landscape, and flood risk areas. House prices and social housing need are similarly a major local concern.

Crawley's view is that the constraints on development to the south of the town (as described above) means that opportunities for future growth to the north must be explored (recognising that there are also extensive constraints here as described above).

Bringing the two authorities together into the same unitary authority will create the conditions for a more proactive and joined up approach to land-use planning that recognises these constraints. Sites on Crawley's boundaries (such as West of Ifield, a priority site for Homes England with the potential to deliver 10,000 homes) could form part of any new unitary. A joined up approach to local and strategic infrastructure planning make it more realistic that major strategic housing opportunities such as at Redhill Aerodrome and land to the east of Salfords could be fully unlocked.

Removing the hard administrative boundary that severs the complex East Surrey / North West Sussex Housing Market areas will enable a genuinely strategic approach to housing delivery across a wider area so that new housing can support economic growth, and benefit from properly planned and funded supporting infrastructure (including transport infrastructure), unlocking strategic development sites whilst also protecting sensitive areas from over-development. The market certainty that such an approach brings will create the conditions for prompt investment and strong delivery.

### **A sensible geography for transport and infrastructure planning**

Key national and regional transport corridors including the M23, and London-Brighton rail line run north-south through Reigate & Banstead and Crawley, connecting (in Reigate & Banstead) to east-west road and rail corridors (the M25 and North Downs rail line connecting Gatwick to Surrey and the Thames Valley).

These provide a key sense of connection between our authorities and others within Surrey. A survey of residents' connections with place by Reigate & Banstead Borough Council (see Annex 6) demonstrates strong connections with Crawley in the south and central parts of the borough whilst the north of the borough looks more to the north. There is a clear correlation with strategic transport corridors when defining sensible geography.

Coherent planning and investment around these transport corridors will be essential to support future economic growth and the efficient delivery of public services. Splitting local and strategic planning responsibility for these corridors will as a minimum - add complexity and risk and may undermine the ability to secure further investment (which in turn can unlock new strategic housing and commercial development sites).

The future success and growth of Gatwick Airport (whether under a single or two runway scenario) will continue to place significant pressure on the surrounding transport network, with around 80% of vehicles bound for the airport passing through Reigate & Banstead.



Developing a strategic approach to sustainable, active and public transport whilst placing the vital transport hub of Gatwick Airport on the very margin of the proposed authority, and thereby also dividing up what should be closely integrated sustainable surface access networks, would undermine the potential to deliver a step change in transport and travel across the area.

On the other hand, bringing our two authorities together would mean a more coherent and joined up approach to working with the Airport and planning to manage the local and environmental impact on the area and ensure the most sustainable passenger travel options.

Similarly removing the current administrative boundary between our authorities would bring benefits in terms of planning to manage and mitigate local environmental issues such as flood risk (associate with the River Mole catchment) and water supply and water quality, which without additional planning and investment will continue to constrain the development potential of our area.

### **Local identity and community coherence**

As Section 1 demonstrates, there is a long established economic identity around Gatwick and the Gatwick Diamond.

In addition to this, the interrelationships between our communities in Crawley and Reigate & Banstead are already strong, reflecting the local labour market, housing markets and transport networks, as well as the settlement structure and complementary roles of the towns within our two boroughs, with any residents from Reigate & Banstead accessing retail and leisure services in Crawley.

The Reigate & Banstead Residents' Survey (Annex 6) suggests that the towns that the borough's residents visit most frequently are within the borough (Reigate, Redhill and Banstead), with the top towns visited outside the borough as being Epsom, Dorking and Crawley. Residents in the southern part of Reigate & Banstead report Crawley as being most frequently visited (second to Horley). Overall, the R&B residents rated connections with Crawley as the second best of towns outside the borough (second to Croydon).

In Crawley, residents have stated a strong preference in terms of working location for remaining within the borough, with Horley (in Reigate & Banstead) as the next location of choice followed by Horsham. Access to services was largely defined as being within a 30-minute duration of travel. People were generally willing to travel further for leisure and shopping activities with Horley listed in the top three destinations outside of Crawley, after Horsham and Brighton.

This connectivity is also exemplified in the sub-regional travel to work area (see Annex 4) illustrates close functional relationship and north-south travel patterns between our two authorities.

The existing county boundary line that divides Surrey and Sussex around Gatwick/Crawley has changed over time. Parts of Crawley have previously been in Surrey, and in the past, there has been discussion about amalgamating parts of Reigate & Banstead within Sussex. The connections and relationships between our communities reflects that this area is not strongly defined by the historic ties that may exist in other parts of our areas. Indeed, reinforcing this illogical boundary through future LGR and devolution will only work to enshrine this constraint for the next generation and prevent the realisation of the potential of this significant economic area.



## Section 3: A single tier of local government, of an appropriate scale

### A single tier of local government

Our submission proposes bringing Crawley Borough Council together with Reigate & Banstead Borough Council into the same local (unitary) authority.

Bringing Crawley together with Reigate & Banstead into the same local (unitary) authority introduces scale to the current Surrey population. It increases it from 1.23m to 1.35m, making the average population of a three unitary solution closer to the Government's 500,000 target (at 450,000 average). As set out in the Surrey Three Unitaries Proposal, which Reigate & Banstead Borough Council is a joint signatory to, this enables, across the whole Surrey area, unitary authorities with a clear functional identity and economic geography compared to larger unitary authorities which align less well with local places and communities.

Our cross-boundary proposal does not therefore compromise establishing a single tier of local government across the Surrey area; and in Annex 1 we have provided examples of different practical solutions which we encourage the Government to consider. A cross-boundary solution as part of Surrey LGR brings not only huge economic benefit but also additional population numbers and alignment with functional relationships.

**Limitations:** Unfortunately, our submission has been constrained by the Government's stipulated process, which has been predicated on 'within county boundary' solutions, and timetable, which sets Surrey and Sussex on different pathways. In particular the accelerated timeline for Surrey has disadvantaged further detailed consideration of how best to incorporate the significant economic functioning area across our two boroughs.

### An appropriate scale

The 'target' scale of new unitary authorities proposed by Government has received considerable attention. One of the main arguments advocated for larger authorities is around provision of higher risk upper tier services – but here evidence<sup>4</sup> **does not** suggest that scale automatically translates to effectiveness; indeed, for personal, staff-intensive and preventative activity smaller scales are likely to be more appropriately provided at a more local place-based level

Looking across local government at Adult Social Care for instance, there is no correlation between the size of an authority and the outcomes that authority achieves, or the costs related to that service. This is because economies of scale are just one element of a range of factors that determine quality. In the case of Adult Social Care, best practice sets out that this includes:

- Quality of Leadership
- Robust accountability and assurance
- Workforce capacity and capability
- Equalisation of resource and demand
- Market resilience and responsiveness
- Community and prevention focus
- Localism and connection with place
- Integration and partnerships

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<sup>4</sup> [IMPOWER Index – IMPOWER](#)

These can all be nurtured by Councils of any size, but place is a key component which can be lost when operating at scale. There is tension between the local and delivery at scale, with local being needed for 'high-touch' integrated and preventative services and scale that benefits capital-intensive and specialist services plus commissioning and procurement. We believe there are proven models available that could allow for smaller areas to operate effectively around place, whilst allow scale to occur where this is needed (see Section 5).

It appears therefore that the rationale for 500,000 population can only be based upon a narrow view of local government finance rather than what delivers quality outcomes. It relies on estimates of economies of scale accrued by unitarisation, ignoring the evidence from recently formed unitaries that have not achieved anywhere near these saving figures claimed prior to unitarisation, and for many the underlying financial challenges and stresses remain unresolved and are once again coming to the fore.

While the assumption that scale always brings efficiency is therefore not evidenced, a more reasonable assumption is that pressures might be disproportionately concentrated in smaller areas and may be more dispersed and therefore better managed within larger areas. Yet this does not justify a standardised approach and runs the risk of larger areas diluting down historical strengths and local needs and identities.

Rightly therefore, the LGR process and criteria allows for exceptions where this can be justified, and we agree with the Government that it is only one of the criteria that should be used in judging proposals.

Our view is that growth should be considered a crucial justification given its pre-eminence within the Government's national agenda. Both Reigate & Banstead and Crawley have enviable track records of economic development and growth. We both encourage and actively deliver new housing. Separating our councils, and overly diluting this focus in larger areas without this track record or propensity for new growth not only undermines the future prospects locally, but also reduces the potential contribution to the national mission for growth.

As noted in our previous correspondence to the Minister, we are aware that the population of our two authorities combined – at 276,500 – is considerably less than the stated 500,000 target. It may be that our proposal needs to be seen as a starting point rather than an end point. But the economic benefits of bringing our two authorities together will unlock huge economic opportunities – and indeed remove the risk of undermining the future economic strength and stability of the Gatwick Diamond. **The proceeds of growth that our proposal will unlock will far outweigh any direct financial benefits from unitarisation<sup>5</sup>.**

There are also other reasons – local identity, geography and demography – that further underpin why – functionally – our proposal makes sense, which we elaborate on elsewhere in this submission.

What is also critical in making reorganisation a success is the process of decision-making on unitarisation; coherent transition planning work; and the implementation of service delivery

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<sup>5</sup> That “the returns to the public purse from growing economies, building housing [and] preventing future needs” from LGR – if delivered in the right way – can be “far more significant than the short-term savings that accrue from consolidating existing functions.” is recognised by [Inner Circle Consulting for the DCN](#). They conclude “as a minimum, we would argue that all unitary proposals must address ...the extent to which proposed arrangements ... are fit and optimised to exploit the growth potential of places”

models that genuinely reflect a local area's (and population's) strengths and challenges. We expand on these in Sections 5 and 9. We also believe that there are models available that will allow smaller unitaries to exist whilst minimising the risks of disaggregation. These are set out in Section 5. Notwithstanding the fact that we consider there are exceptional circumstances to justify a smaller than 500,000 population, there are also over 60 unitary authorities of a scale similar to or smaller than our combined population (ONS Mid-Year Estimates 2023); and the Government will be aware that the vast majority of these are able to function efficiently and effectively.

We can also confirm that we are open to the inclusion of our two authorities within a single larger unitary authority as part of a three unitary Surrey solution (which we recognise may also have practical benefits of avoiding any devolution of local government reorganisation 'islands'). Likewise, we would be open to exploring similar options within Sussex, although recognising the implications for population numbers/targets. We have included some potential scenarios in Annex 1.

In the Reigate & Banstead Residents' survey, residents expressed a preference for a 3 unitary arrangement (37%) over a 2 unitary arrangement (12%) with free text comments suggesting a high level of concern that larger councils will be more removed from their local communities, as well as some concern that local areas will lose their identity and sense of community through unitarisation.

Section 8 explores how the concerns raised about unitarisation leading to loss of community coherence can be addressed.

## Section 4: Unlocking devolution

### DELIVERING AGAINST OUTCOMES

**Outcome 2** – Unlock the only sensible devolution geography that genuinely delivers against White Paper objectives

This section demonstrates how removing the hard administrative boundary that divides our authorities brings greater alignment with not only the geographic requirements for devolution set out in the White Paper, but also unlock benefits across the breadth of the Government's devolution objectives, including economic growth and skills, spatial and transport planning, and public sector reform.

Our proposal for bringing together Reigate & Banstead and Crawley into the same local (unitary) authority is not solely about local government reorganisation. Indeed, it is driven by the devolution benefits of removing the increasingly illogical historic county boundary that cuts right across the heart of one of the most economic successful areas in the south east.

Our case, when it comes to the devolution benefits, is simple.

### The geographic basics

A Mayoral Strategic Authority that removes the hard administrative boundary that cuts across the heart of the Gatwick Diamond enables a MSA that addresses the geographic 'basics' set out in the White Paper. One that:

- Could have a scale more aligned with the indicative figure in the White Paper (noting the current Surrey county population of 1.2m)
- Is based on a sensible economic geography, that properly reflects and incorporates the strong, functional Gatwick Diamond economic area
- Reflects and does not cut across the established travel to work area around Gatwick
- Incorporates the coherent local labour market centred on Gatwick Airport, Manor Royal, and Crawley
- Does not lead to any devolution islands (assuming the boundaries are drawn correctly), can be contiguous with its constituent authorities, and allows for future improved alignment with other public sector boundaries

### Future potential and devolution objectives

The creation of a unitary council incorporating both of our authorities within a single MSA will achieve the Government's devolution objectives to a considerably greater extent than dividing the area between two MSAs.

**Economic development and regeneration:** Section 1 demonstrates the substantial economic benefits associated with bringing our authorities together and removing the existing administrative boundary that separates the Gatwick area, and its businesses, from a major part of its supply chain and labour market.

The driver behind devolution is economic growth; and our proposal will ensure that future growth potential can be secured rather than undermined. New Mayoral powers will enable targeted partnership working with Government to promote further innovation, secure inward investment, unlock commercial development opportunities and target future funding to fully

exploit the opportunities arising from the presence of the international airport. Ultimately, this will boost sub-regional productivity, jobs, and tax revenue.

**Transport and local infrastructure:** Section 2 introduces the key regional road and rail corridors that traverse our authorities and are essential to the current economic success of the area and unlocking its future potential. The benefits of creating a MSA that has responsibility for the transport links (and transport planning) from Gatwick Airport to London, the M25 and beyond are indisputable. Funding consolidation and increased autonomy for the strategic road network and investment decisions across the area will enable decisions that unlock strategic development sites. A simplified and stronger relationship with rail providers, as well as a new policy framework for bus service provision, will enable the improved network integration required for modal shift to sustainable transport methods.

**Housing and strategic planning:** Section 2 explains the housing need and opportunity across our area but also the constraints. Sensible strategic planning over a wide area, and long-term time horizons, is the only way that the area's considerable housing need can be addressed while also ensuring development takes place in a sustainable way that reflects environmental constraints and benefits rather than undermines our local communities. The combination of Spatial Development Strategy powers, development management powers and levy raising powers will enable the development opportunities that do exist to be properly phased, planned and built out supported by the required infrastructure. The market certainty that such an approach brings will create the conditions for prompt investment and strong delivery.

**Skills and employment support:** Despite the economic strength of our combined authorities, and the significant potential for growth, there is more to do to ensure that our residents fully benefit from the opportunities that this creates.

In Crawley, despite having the second highest job density in the south east and a high an employment rate of almost 84% (south east average of 79%), educational attainment at Key Stage 4 is 4% below the national average and 5.7% of young people are on out-of-work benefits. There is a concentration of these issues within the more disadvantaged neighbourhoods of Broadfield, Bewbush and West Green, that sit in the top 20% most deprived nationally. There is also a growing higher skilled population for whom language and other factors are a barrier to accessing employment. Similarly, in Reigate & Banstead, while we have a highly skilled resident population overall with almost half (47%) qualified to NVQ level 4+ compared to the 43% nationally, we also have pockets of skills deprivation, including in parts of Merstham and Preston. Due to the tight labour market, relatively high house prices and competition from outside the borough, employers in the area often struggle to recruit employees at a number of skills levels.

Our area already has a strong track record of non-standard employment support and LGR when aligned with Devolution could create new opportunities again. Our area benefits from a range of further education provision with natural catchments that cross the county administrative boundary. However, there is little higher education presence in the area, which has been identified as limiting the future economic growth potential of the Gatwick Diamond area.

A MSA representing our combined area will be able to build on the positive progress made by the Coast to Capital LEP Employment and Skills Board to introduce a coherent Local Skills Improvement Plan for this high growth potential area; to build stronger relationships between education and skills providers, ensure delivery matches need; and to build on the creation of

the Institute of Technology at Crawley College to explore opportunities for a higher education presence in the area and to strengthen research and innovation opportunities

**Environment and climate change:** While our economy is strong, investment and a consistent policy framework is needed to ensure that it can continue to grow while also positively contributing to national carbon reduction and clean energy targets. A MSA representing our combined economic area will ensure that Mayoral powers in relation to climate change and decarbonisation can be targeted to greatest effect. The White Paper recognises the opportunity that can be unlocked from future energy system planning across functional economic areas. Therefore, to draw an administrative boundary through a functional economic area such as the Gatwick Diamond will represent a missed opportunity – not only in relation to sub-regional energy planning but also a joined up approach to funding distribution and supporting skills provision to support the continued growth of low carbon sectors.

**Health, wellbeing and public service reform:** Our submission explores opportunities for improved health and wellbeing services and public sector reform in Sections 5 and 7.

Health service provision across our area (and Surrey more widely) is complex and does not fully align to existing county boundaries. Particularly when it comes to acute care, the current administrative boundary results in unnecessary complexity and inequitable service provision across the area. The opportunity to remove this boundary and re-align health structures with a more realistic functional cross boundary geography will deliver real benefits for overall population health and resident outcomes. While working relationships between local government and the health sector are strong at a local level in both Reigate & Banstead and Crawley, a Mayor for the area with a clear remit and responsibility within Integrated Care Partnership(s) will create the conditions to enable us to deliver on the health, wellbeing and prevention opportunities outlined elsewhere in this submission.

**Public safety:** Although police force and fire and rescue geographies currently align to county boundaries, the White Paper recognises that in some instances MSAs will not align with current boundaries. It accepts that in these cases it will be appropriate to take steps to ensure alignment in the longer term; including as necessary support from Government to introduce legislation to enable combining areas to achieve coterminous boundaries. As noted in Section 7; there are already good working relationships across the county boundary and shared back office and specialist functions; which provide a solid framework for boundary realignment at the appropriate time.

### **Size ratios between local authorities and any strategic authority**

We believe our proposal for bringing together Reigate & Banstead and Crawley Borough Council into the same unitary authority will not only create a sensible administrative hierarchy for the sub-region that maximises economic growth potential, but also that it allows for sensible population size ratios between local authorities and a future strategic authority.

Of course, as this proposal is being submitted in advance of local government reorganisation proposals for Sussex, we only know part of the picture at this stage so cannot be specific about size ratios.

However, we anticipate that these would be well within the range of existing combined authorities which sees individual constituent local authorities making up anything from less than 7% of the CAs total population to around 75% of the CAs total population.

## **Timelines for devolution**

We are disappointed that there has been no movement on the Government's original LGR and Devolution timelines to recognise the opportunity that exists for a growth-maximising cross-boundary solution.

We therefore ask that the Government takes a flexible approach to future devolution boundaries, accepting that these cannot be finalised until such time as resolution is reached on a cross boundary approach to LGR in Surrey. This flexibility should allow for the boundaries of the Sussex and Brighton MCA as consulted on to continue to be refined, to either expand or contract as Surrey devolution arrangements are developed following local government reorganisation across the county.

This flexibility will ensure that the best devolution solution is secured (capturing the economic growth and other benefits of removing the hard boundary through the heart of the Gatwick Diamond) while also enabling early devolution in Sussex (Mayoral elections in May 2026) with devolution in Surrey following the year after (Mayoral elections in May 2027).

## Section 5: Sustainable public services

### DELIVERING AGAINST OUTCOMES

**Outcome 6** – Ensure continued delivery of high quality services for our residents; and safe and legal services at Vesting Day

**Outcome 8** - Unlock opportunities for innovative models of service delivery, including prevention services, working with public sector partners

This section explains how a well planned and phased approach to transition and implementation can unlock early benefits for service provision and residents, while also safely managing the risks associated with disaggregation of more complex services. This precautionary approach will put new unitary authorities in a strong position – once established - to then deliver transformation and innovative models of service delivery and prevention.

*Our proposed approach to implementation (Outcome 6) is explored more in section 9*  
*Opportunities for public sector innovation (Outcome 8) are explored more in section 7*

Unitarisation brings with it a once in a generation opportunity to deliver service improvement to benefit residents and secure authorities ongoing financial resilience

In this section we explore models of sustainable public service delivery. In Section 6 we focus on financial efficiencies and resilience.

### Service delivery opportunities:

New structures provide the opportunity to build on our locally high quality services to enhance and further improve delivery, through:

- Efficiencies from removal of duplication through consolidation of back office functions and economies of scale
- Building on existing established models of delivery and building resilience into stretched services
- Improved models of service delivery reflecting natural (cohesive) geographic and demographic communities and commonalities
- Delivering services as close to residents as possible enabling a more responsive service
- More holistic approaches to both place and people services by bringing together upper and lower tier authority functions; and
- An enhanced prevention role through bringing services together across a coherent area and enhanced collaboration with health and other public sector partners
- Retaining the advantages of economies of scale, and avoid risks of disaggregation where appropriate, through the use of a shared services approach

### Aggregation of lower tier services

Once the geographies of unitarisation are known, work to align and ‘aggregate’ lower tier services could begin – we don’t believe that this will need to wait for the shadow unitary period or vesting day.

This approach means that financial savings will be realised early and can be built into the Year 1 budgets for the new unitary authorities, putting them on a sound financial footing.



Early opportunities will include the consolidation of lower tier contracts, systems and assets and coordination or sharing of regulatory service provision such as planning, building control and environmental health and licensing.

During the shadow period we would also anticipate arrangements to be put in place for the alignment of, and transition to, a joint approach for services such as housing and homelessness, and waste collection. Again, these will unlock efficiency savings early on in the lifetime of the new unitary authorities or allow for greater resilience of stretched services.

These early efficiency savings will help offset the acknowledged costs of transition, including short term duplication of senior staff and councillor costs within the shadow period, programme management costs and early redundancy costs.

### **Safe transition of high risk services, and the conditions for future reform**

Our priority is the safe and legal delivery of all services at Vesting Day. We also recognise the complexity that comes, not only from disaggregating upper tier services such as social care, children's services and SEND; but also from introducing a cross-boundary element to that disaggregation. This does not however, mean that it cannot be achieved. It has been achieved elsewhere in the country with proper planning and support.

The challenge comes from the way in which Government has structured LGR, both the insistence of utilising counties as the base geography and the timeframes for submissions, not least for Surrey authorities and this submission.

**Adult social care, children's services, SEND and public health:** The government has rightly highlighted the risks associated with disaggregation of high risk upper tier services. Any reform from local government reorganisation must ensure the continuity of critical services such as adult social care, children's services, SEND and public health at Vesting Day while also creating the conditions for future reform.

The final decision of how these services will be transitioned and delivered will be for the new unitary authority, but given the risks involved in disaggregation and the need to avoid unnecessary fragmentation, especially given two upper tier authorities affected by this proposal, we would propose using a shared services approach on an interim basis to allow for the proper planning required to ensure that new arrangements can be put in place safely.

In the longer term, decisions can be made about service delivery models that maximise the service delivery benefits of place-based delivery whilst also securing financial benefits from 'at scale' commissioning and procurement. This does not rule out any future disaggregation, where there is a strong case that this might lead to better outcomes.

This was the approach taken in Cumbria during its move to unitarisation. The disaggregation of Children's Services was placed at the heart of the improvement journey. This recognised the opportunity to reset leadership and culture, to create a more collaborative approach, and one that by working more local and integrated approach could improve outcomes. It was also thought that focusing on smaller populations would bring greater strategic capacity to focus on early intervention and prevention<sup>6</sup>.

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<sup>6</sup> [https://www.copeland.gov.uk/sites/default/files/attachments/lgr\\_final.pdf](https://www.copeland.gov.uk/sites/default/files/attachments/lgr_final.pdf)

We also note that this approach is proposed in the Surrey Three Unitary proposal. Views within West Sussex are not yet known due to the different timeframes for submissions.

Different models for sharing services exist, but options that would be suitable for interim arrangements are outlined below.

**Shared or joint service arrangements:** The joint commissioning and delivery of upper tier services through formal partnership arrangements.

A joint or shared service model would be legally owned by all unitary partners and overseen by a joint committee providing oversight and accountability. Staffing and infrastructure would be pooled or seconded to a host authority and a s75 agreement with NHS bodies to enable coordination and integration. Delivery teams would work across the participating area. This model is likely to be preferred as it provides formalised arrangements, local flexibility and decision making, and will enable the new unitary authorities to benefit from early economies of scale.

**Outsourcing:** This introduces contractual arrangements with an external body – such as a company or trust, for example a local authority trading company or community interest company. Unitary partners would jointly commission the service(s) with staff and assets seconded or transferred. While this model also allows for early economies of scale, it may not be preferred due to the more complex governance arrangements and the dilution of local control and responsibility.

Addressing the fact that these services are currently provided across two county authorities will require close working with both counties. This will take account of the fact that Surrey County Council will not exist beyond April 2027, whereas West Sussex County Council will continue to provide services across its area for at least a further year beyond this. The models identified above would allow for this cross-boundary complexity to be explored and resolved during the planning and shadow phases. Neither County Council has been involved in the development of this proposal.

In doing so we will look to learn from experiences elsewhere in the country where cross upper-tier authority unitarisation has been implemented, such as Bournemouth, Christchurch and Poole.

### Longer term service transformation and prevention

When it comes to service delivery, the real direct financial benefits of unitarisation come from longer term opportunities for transformation, service re-design, and a shift towards a focus on prevention working with public sector partners. This will deliver not only best value for council taxpayers but for the public purse more generally.

**Prevention:** Unitarisation offers a once in a generation opportunity to join up services across both tiers of local government and local health services, and to design them on a preventative footing.

Again, these decisions will be for the new unitary authorities, not our authorities, but the following examples demonstrate what can be achieved.

In Crawley, joint working is already underway with the local ICB to design Integrated Community Teams. The NHS has realised that the preventative agenda must be at a local level in order to

create the necessary joining up across different services and community and voluntary services. Doing so allows for a better approach to higher cost residents either with complex needs or underlying vulnerabilities, producing better outcomes and reduced costs.

Reigate & Banstead is a key partner in East Surrey Place which also brings together health and public sector partners. Using an asset-based community development approach, the council has established 'Partnership Groups' in 5 of their most vulnerable communities. Membership is made up of local organisations and active citizens who develop a local action plan which helps identify and direct work around local issues and places, giving people living and working in those communities the ability to influence outcomes.

These Partnership Groups enabled highly effective collaboration between the council and local groups and residents in delivering the area's Covid welfare response during the pandemic, and since then have paved the way for genuinely system wide frontline collaboration between communities, the voluntary and community sector, local government, the NHS, local policing teams, housing providers and more.

The potential of such approaches is substantial. A non-Council example is the [Jean Bishop Centre](#) in Hull. By looking at the needs of the patient in their entirety (rather through service silos) and offering a more joined up approach to other local services, the centre was able to achieve a 50% reduction in emergency admissions across nearly 3,000 severely frail patients. It also saw A&E admissions for people over 80 by 13.6% and for residents in care homes by 18% and reduction in medicine costs of £100 per person per year.

While the timetable for LGR in Surrey has not allowed for any quantification of the scale of potential savings by designing high cost services on a preventative footing, the potential savings from these type of localised preventative approaches across public services are huge with the potential for applications across social services, SEND, housing and employment. But they require a shift away from an exclusive focus on siloed outcomes and scale.

Redesigning high costs services on a preventative footing requires services to be able to work with residents at a local level and in a holistic way that joins up local services. This way of working extends beyond local government and has the potential to benefit health and employment outcomes in particular.

Prevention by working across services is not a new idea. Often these ways of working are piloted, using external funding, and are proven to be successful. However, they rarely make the transition to mainstream services because of the scale of change required and the costs of running two types of service delivery in parallel. The opportunity that LGR provides is the once in a generation chance to start with a blank sheet of paper and to build services in a way that better meets the needs of residents while being mindful of the public purse.

This opportunity is also well timed. The cost of Local Government services is dwarfed by those relating to health and benefits. The creation of Integrated Community Teams within the health sector is central to the NHS's preventative agenda to provide better support for those with long term conditions and underlying vulnerabilities. As noted above, our area has been at the forefront of designing how we might better work collectively to support those with complex needs across both tiers of local Government, health partners and the local community and voluntary sector. LGR, if done correctly, can be the catalyst for this change.

This agenda plays into the Government's new ten-year plan for health, directly contributing to two of the three 'key shifts', namely 'acute to community' and 'treatment to prevention'. The [joint publication](#) from the LGA, ADASS, Social Care Institute for Excellence, Mencap, Skills for Care, Think Local Act Personal, The Care Provider Alliance and Social Care Future, sets out the opportunity to deliver. There are also opportunities relating to Early Intervention, Care Leavers and more joined up approaches to reducing SEND costs when working collaboratively at the local level.

**Other service amalgamation benefits:** The bringing together of upper and lower tier services also offers other service amalgamation benefits and opportunities for more efficient ways of working to deliver improved outcomes.

This includes benefits from a single authority:

- having responsibility for local planning, highways planning, education planning and minerals and waste planning, creating the conditions for genuinely spatial local plans
- having responsibility for both waste collection and waste disposal, resulting in service efficiencies and a more responsible approach
- bringing together regulatory services such as environmental health, licensing and trading standards improving coordination and facilitating a holistic approach to awareness raising, risk mitigation and enforcement

### **Avoiding cross boundary fragmentation**

As set out elsewhere in our response - we consider a cross boundary solution to be necessary to unlock sensible local government structures and devolution structures that will endure and realise the government's White Paper objectives.

In this sense, we would argue that in our proposal by its very nature avoids **further unnecessary fragmentation** across what is a functional economic, travel to work, labour market and wider housing market area.

Meanwhile cross boundary integration of service provision (whether through the aggregation of lower tier services or the disaggregation of upper tier services) can be achieved by:

- Recognising and planning for the different timeframes for LGR and devolution across the area
- Establishing early and constructive working relationship and programme management and governance arrangements (see section 9)
- Minimising disaggregation risks for high risk services at Vesting Day by the use of interim models that avoid immediate disaggregation of complex upper tier services such as adult social care, children's services and SEND.
- Place based survey delivery models; and
- Learning from other areas.

## Section 6: Financial efficiencies and resilience

### DELIVERING AGAINST OUTCOMES

#### **Outcome 7** – Allow for an efficient and financially resilient unitary authority

This section explores how financial efficiencies can be achieved and the overall financial resilience of bringing our authorities together; recognising that work to develop proposals for LGR are still in the early stages in West Sussex. Initial efficiencies from alignment and consolidation of lower tier services will benefit the initial financial resilience of a new unitary, with savings from transformation activity being of a greater scale but taking more time to achieve safely and without compromising service delivery.

Local government reorganisation will deliver efficiencies against a ‘do nothing’ scenario. However, in the light of the forthcoming Fair Funding Review, the benefit of these savings to council finances and to local service delivery may be limited. New unitary authorities will be increasingly reliant on council tax income for their future financial sustainability and to manage the impact of rising demand across local government services.

From experience elsewhere in the country it is also clear that the direct financial benefits of local government reorganisation can take some time to be realised, if indeed they are realised at all. We are concerned of the scale of the supposed efficiency savings being suggested in some quarters and how divorced these seem to be from the realities emerging for those who have unitarised in recent years. These hypothetical models are simply not based on recent evidence.

This is not to say that reorganisation does not present the opportunity for direct efficiencies. But it makes it even more important that the process of unitarisation is properly planned and managed, with appropriate support from government, to ensure taxpayers get the best possible value for their money.

The differing timescales that our authorities are working to for LGR, and lack of flexibility in the Government’s process to allow for cross boundary proposals, has limited our ability to undertake in-depth cost/benefits analysis.

Work in West Sussex has not been sufficiently advanced given the 26 September deadline, however the general scale and type of costs and benefits associated with Surrey LGR are explored in more detail in the Surrey Three Unitary proposal, which Reigate & Banstead is a joint signatory to.

As noted in the introductory section to this submission, fundamentally the proceeds of economic growth to the national exchequer that a cross boundary unitary authority will unlock will far exceed any direct financial savings realised through the process of unitarisation.

### Short term financial efficiencies

We have identified opportunities across our authorities for:

- Reduced councillor numbers, associated allowances and electoral costs
- Reduction in senior management numbers and associated salaries (although recognising costs associated with redundancy)
- Reduced back office costs through removal of duplication, including systems and staff (although recognising costs associated with redundancy)

- Co-location and some reduction in operational assets
- Efficiencies from procurement, securing economies of scale and increased buying power

We believe that while there will be costs associated with the implementation process, it will be possible to realise some financial efficiencies from consolidation of systems and procurement activity prior to Vesting Day, putting new unitary authorities on the strongest possible footing for longer term transformation and innovation activity. This is further described in Section 5 above in relation to the aggregation of lower tier services, and section 9 in relation to the types of anticipated costs.

### **Longer term transformation and service re-design**

The real benefits of unitarisation come from longer term opportunities for transformation, service re-design, and a shift towards a focus on prevention working with public sector partners. This will deliver not only best value for council taxpayers but for the public purse more generally.

Given the very short time frame to put this proposal together we have not had the opportunity to develop detailed analysis in this area.

It will be fundamental to shape and re-design services, given that as a new unitary we will have the responsibility of some of the disaggregated County responsibility such as Adult Social Care, Special Educational Needs and Road / Highways.

The focus will be upon those outcome areas that are high cost, high demand and/or deliver poorer outcomes for our residents. Not taking the opportunity to introduce reform in these areas would be a wasted opportunity given the impact on local government finance. These include:

- **Children**

Reigate & Banstead has the highest total population and third highest proportion (22.6%) of 0-18 population in Surrey; Crawley has the highest proportion (23.9%) in West Sussex. In both instances, proportions are higher than the South East and England averages (ONS 2023 Mid Year Estimates) Both authorities have high numbers of children in families claiming Jobseekers Allowance. Public Health outcomes for the authorities highlight (Public Health England) pre-school development levels, pupil attendance, emergency hospital admissions and re-admissions, out of work benefits and homelessness as the areas of focus. These are outcomes that require local integration and preventative approaches rather than scale.

- **Adults**

Reigate & Banstead has the second highest population aged 65+ in Surrey, although ranks 7<sup>th</sup> of the 11 authorities proportionally. Crawley's 65+ population is the lowest, proportionally, in West Sussex (ONS 2023 Mid Year Estimates). This brings a better overall population balance across the proposed area. Health outcomes in our area for this age cohort are generally positive but with some risk factors around general health, falls and hip fractures, highlighting a key prevention opportunity that would benefit from localised joint working.

- **SEND**

The current challenges with SEND provision are well recognised, including both rising demand (evidenced by increases in the number of Education, Health and Care Plan

requests in the area) and the increasing complexity of needs. At the same time, the existing funding environment is extremely challenging; and the sector faces considerable supply, workforce and skills challenges. In 2024 the Isos Partnership set out the five enablers of improvements in local SEND systems. The first of these relate to the co-production both with young people and their parents/carer, and with key strategic partners, to drive a system with users at its heart. The nature of SEND services and the need for efficiencies of scale make this a prime candidate for a shared service approach on a longer-term basis. Any localisation would therefore be limited to the coproduction elements with young people, parents and carers.

- **Homelessness**

In recent years, both authorities have seen a substantial increase in homelessness and temporary accommodation costs. In Crawley, these - which if measured as a percentage of net revenue budgets – are one of the highest in the country. Unitarisation presents a significant opportunity when it comes to homelessness in four respects. The first is to bring together statutory housing duties with those owed to children and vulnerable adults to create improved and accelerated pathways. The second is to provide improved support to enable people to move into alternative accommodation. The third is to target the two main driving factors of mental health and alcohol and substance misuse. The fourth is to take a wider strategic look at the provision of accommodation.

As noted above, when it comes to the most costly but higher risk services, the emphasis will first be on the safe transition of services using a shared services model or similar. This manages the risks of disaggregation. The review and evaluation of interim service delivery measures once unitary authorities are fully established will allow for the medium-term realisation of efficiencies from commissioning and procurement activities.

At this stage we envisage the longer-term view will see a mixed economy approach. For those functions that benefit from economies of scale, we would look to test the viability of a shared services approach or similar being formalised on a more permanent basis. However, where prevention, improved outcomes and greater efficiency require a more localised approach, it is right and proper to bring these into the new unitary structure in a way that does not create undue risk at Vesting Day, before any disaggregation and subsequent transformation.

## **Debt**

Neither Reigate & Banstead or Crawley are subject to or facing Best Value intervention and/or in receipt of Exceptional Financial Support. Annex 7 explains our collective debt situation.

A high-level overview indicates that collective debt between the two authorities has a value of £229.3m. The majority of this figure (£224.3m) is attributable to the Housing Revenue Account debt held by Crawley Borough Council. This debt is affordable and serviced within the 30-year HRA business plan and has no impact on the General Fund. A short-term debt balance of £5m is held by Reigate and Banstead. Reigate and Banstead does not have a Housing Revenue Account. Existing external debt is not therefore a significant issue in bringing our authorities together.

The underlying need to borrow is determined by the capital financing requirement, details of this is displayed in Annex 7.



It is our joint view that it is not appropriate for the Government to expect Reigate & Banstead - as a Surrey local authority – to contribute to the resolution of the debt problems of other local authorities in Surrey that are geographically distant from it, solely by virtue of historic administrative boundaries. Likewise, from a Crawley perspective, it would be unreasonable to ask its residents to bear a portion the costs of debt incurred by an authority with whom there is no operational or strategic relationship.

Setting this objection in principle to the Government's 'ask' aside; bringing our authorities together will not compromise the financial sustainability of a new unitary authority and indeed provides opportunities to enhance it compared to the 'do nothing' scenario.

It will create additional opportunities to manage existing and future debt, which may include revenue spend efficiencies (as discussed in Criteria 2c); the disposal of a limited number of operational assets via estate rationalisation; and opportunities for additional revenue generation via the development activity across our combined landholdings.

## **Tax base**

This proposal is not able to speak for other parts of Surrey or Sussex. The Surrey position is captured in the Surrey Three Unitaries submission. The Sussex position will not be set out until September as a result of the Government choosing different timeframes. Instead, this proposal sets out the position for Reigate & Banstead and Crawley.

Funding per head is higher in Reigate & Banstead at £1,265 (slightly higher than the Surrey average) than in Crawley at £1,122 (lower than the West Sussex average). Below the headline figure the variations are much greater. Crawley receives less in Council Tax (£643 per head to £912 in Reigate & Banstead) due to the structure of its housing, but more in both Business Rates (£281 to £184) and Government Grants (£198 to £168).

One key risk to the current finance position is business rate reset. Unless suitably dampened this could see Crawley's finance position worsen by more than £2.8m and is a key threat within the Medium Term Financial Plan (MTFP). The Crawley MTFP forecasts a gap of £4.670m to £5.088m over the coming years, approximately 25% of the net revenue budget. Along with uncertainty around government grants, the other main drivers for this are establishment cost and the challenging economic climate.

Reigate & Banstead [Medium Term Financial Strategy](#) also forecasts a budget gap starting at £1.876m for 2026/27 and cumulatively rising to £5.283m in 2029/30. This is 24% higher than the current budget requirement. As with Crawley, the main financial challenges for Reigate & Banstead are staff establishment costs, economic factors and uncertainty around central government funding review outcomes.

Importantly in the context of LGR, the impact will be felt prior to unitarisation. This underlines the importance of the fair-funding review and not relying on the process of unitarisation to address underlying financial strain. The combined usable General Fund reserve position as at 31 March 2025 is £42.350m (excluding HRA). A table in Annex 7 shows the total reserve position as at 31 March 2024, which was when that last statement of accounts was produced for both authorities.

Due to time constraints aggregation costs are based on data produced using the Pixel Financial Management County Council disaggregation model. These are shown in Annex 7 and give an indicative overview of the combined financial position.



The combined Council Tax Base for 2025/26 equates to 101549.47 (See also Annex 7 which provides 2024/25 information). A Band D council tax property in Reigate Banstead will pay £264.87 and Crawley £239.04 which is slightly lower than Reigate and Banstead. The new authority will need to harmonise its council tax across its geographical area.

It is recommended that council tax harmonisation starts from year one of the new authority. It is to note that decisions around council tax setting are for the new authority to determine.

## Section 7: Public sector service alignment and reform

### DELIVERING AGAINST OUTCOMES

**Outcome 8** - Unlock opportunities for innovative models of service delivery, including prevention services, working with public sector partners

This section explains how the real opportunities for public sector alignment and reform exist once local government reorganisation across both the Surrey and Sussex areas has been implemented and once MSA boundaries have been established; with a particular opportunity to improve acute healthcare provision. It also elaborates on how alignment of other public service and public safety boundaries with new local government boundaries can be secured in the medium to longer term.

*Opportunities for service delivery innovation are explored more in section 5*

The real opportunities for public sector service alignment and reform exist once local government reorganisation across both the Surrey and Sussex areas has been implemented and once MSA boundaries have been established. Until that time, for some areas, interim measures for some public services will be required.

In practical, administrative terms, the White Paper recognises that unitarisation and devolution will require some public sector service realignment – therefore the cross boundary solution we are proposing is clearly within scope and acceptable in principle to Government. At the same time – especially in relation to health – creating more appropriate administrative geographies that reflect current demand clearly unlocks the potential for sectoral reform benefitting not only residents but also the public purse.

### Health

Section 5 provides some examples of the opportunity for transformative prevention activity.

Bringing the two authorities together provides a real opportunity for stronger whole system working, across health geographies that are already well advanced in working together and with local authorities on place based initiatives such as [East Surrey Place](#); and community level integrated community or neighbourhood teams in [West Sussex](#) and [East Surrey](#).

Combining our areas also presents the opportunity for Better Care Funding to be allocated at a geography that reflects local needs and assets and optimises benefits for local people.

Acute services in our area are provided by East Surrey Hospital, the catchment of which extends across our two authorities and beyond. Around 40% of hospital activity takes place in East Surrey, with around 30% in Crawley, and the hospital trust (Surrey and Sussex Healthcare Trust) also provides services at Crawley Hospital. This exemplifies how public sector service provision in this sector extends across existing county boundaries and highlights the functional geographies which future arrangements should seek to support.

The hospital trust is part of the Surrey Heartlands ICS, but the fact that the hospital is accessed by populations from two different Integrated Care Systems (ICS) is recognised as complicating care provision. This is particularly the case given the differing population-level health needs across the area - Crawley having a younger population, higher levels of deprivation and greater ethnic diversity compared to East Surrey, meaning its populations service needs are different.

The hospital's status as a minor rather than lead partner in Sussex healthcare structures results in challenges in understanding and planning for those different population needs, with the current situation risking exacerbating inequality in outcomes.

Combining our authorities provides the opportunity to properly address this anomaly. It will address the current disadvantage that exists in terms of planning for and administering acute health services across the county boundary, managing patient pressures, and coordinating commissioning activity. Ultimately it will ensure better health outcomes for the whole population and the taxpayer.

Community level health partnerships can provide a solid building block for aligning strategic and acute health provision boundaries with local government and devolution boundaries in the longer term. This will also ensure that the health needs of local populations can be addressed by capitalising on local knowledge and connections and building effective and efficient joint working with local authority services such as social care, housing, community safety, public health, and support for those with multiple disadvantages.

## **Fire and rescue**

Fire & Rescue (F&R) services currently operate on existing county boundaries, with Reigate & Banstead served by Surrey F&R and Crawley by West Sussex F&R. There is some collaboration between the areas, with Surrey, East Sussex and West Sussex F&R services sharing an emergency control room and collaborating on services such as prevention, education and community outreach.

However, under our proposal some realignment of service provision may be needed as an interim measure and in the longer term.

Under the Government's LGR timetable Surrey County Council will cease to exist in April 2027; with no MSA in place for the county until May 2028. As such, regardless of any cross boundary unitary geography, an Independent Fire Authority is likely to be required as an interim measure. We note that the White Paper recognises the potential for 'incidental' boundary alterations. Subject to the relevant agreements with West Sussex and the Home Office then, this could incorporate Crawley during the interim period to facilitate alignment with a cross boundary unitary authority. In the medium term the White Paper envisages a single Mayor taking on responsibility for one or more F&R Authority functions – and once final MSA geographies in the area are resolved we would anticipate that transfer occurring as envisaged by Government.

This approach we believe is practical, realises strategic ambitions, will help minimise disruption and avoid duplicated governance.

## **Police and Police and Crime Commissioner (PCC)**

**Police and Crime Commissioner:** The offices of the Police and Crime Commissioners currently exist on a county-basis, with separate PCCs for Surrey and for West Sussex. MSAs will take on responsibility for the PCC once established.

**Police services:** Surrey Police operates over the current county area as does West Sussex Police. However, the services share a wide range of back office and specialist functions already, and cooperate, operationally, on a day-to-day basis. As part of the process of developing this proposal, this has been confirmed through conversations with Surrey Police. For example, shared back office services include procurement, fleet management, risk management and

staff support. Shared operational services include major crime, forensics, firearms, roads policing, public order, serious and organised crime, surveillance and cybercrime.

The differing timeframes associated with local government reorganisation and devolution in Surrey and Sussex will enable a phased re-alignment of Police governance and operational geographies during 2027-28 with consolidation once final MSA geographies in the area are resolved. We believe the level of existing shared operations between the forces minimises the risks associated with this process.

### **Emergency planning / resilience and community safety**

**Emergency planning and resilience:** Emergency planning and resilience responsibilities are coordinated through Local Resilience Forums (LRFs), which align to police force areas. Crawley currently belongs to the Sussex Resilience Forum, while the rest of Surrey falls under the Surrey LRF. We would expect any re-alignment of LRF boundaries to mirror the process for realignment of Policing boundaries. In the event of an incident relating to Gatwick Airport, having the immediate area within a single LRF area would be beneficial.

**Community safety:** Community Safety Partnership arrangements would similarly be able to be re-aligned.

## Section 8: Democratic accountability and community empowerment

One of the greatest concerns of lower tier authorities across our area is that moving to unitary structures carries with it a risk of reduced community engagement and neighbourhood empowerment. This is also recognised in the Surrey Three Unitary Proposal.

It is a concern that is backed up by the findings of the recent Reigate & Banstead Residents' Survey which indicated that a high proportion of residents do not support the transfer of the vast majority of lower tier council services to a larger authority (Annex 6).

At the heart of our proposal is therefore a commitment to ensure that this risk is not only mitigated but that we take the opportunity to in fact strengthen local engagement and empowerment structures and opportunities.

### Existing engagement structures

As 'lower tier' borough councils we understand the necessity of close relationships between local government and the communities it serves. Both authorities have strong existing working relationships with our communities; for example:

#### In Reigate & Banstead:

- The borough is partially parished, with Salfords & Sidlow Parish Council and Horley Town Council covering the southern parts of the borough and well established residents' associations in the north
- We fund [5 Community Development Workers](#), who are embedded in those communities in our borough that have higher levels of deprivation and/or more vulnerable residents – Horley, Redhill, Merstham, Preston, and Woodhatch and Whitebushes
- We have a [strategic grant relationship](#) with 11 Voluntary and Community Sector organisations. These core relationships enable collaborative working and shared delivery to improve resident wellbeing.
- More broadly, our relationships with the Voluntary and Community Sector extend to over 200 local organisations with network events and collaboration focused on key themes including - older people; young people; cost of living; and community safety
- We have strong relationships with local businesses, including through our support for local business organisations, our Sustainable Business Network, the learning and networking events that we run and our business e-newsletter and social media presence.

#### In Crawley:

- As a compact new town, Crawley has not needed parishing previously, but unitarisation within a larger geographical footprint raises the case for a Town Council and further investigation of this has not been ruled out.
- Designed with the New Town ethos, the town is made up of 14 distinct neighbourhoods, each with its own set of community assets and facilities
- Proactive approach to the disadvantaged neighbourhoods of Broadfield, Bewbush and West Green through the creation of Neighbourhood Action Groups, linking action to wider agendas such as employment and health

- The council supports 16 organisations through its strategic grants programme, totalling more than £375k, and in addition provides a small grants programme
- Over 350 community and voluntary groups, 40 places of worship and 50 languages spoken, with approximately one-fifth of the population born outside of the UK
- Dedicated Community Development Team supporting a wide variety of activity to strengthen communities and delivering corporate priorities
- Significant and strong business and economic partnerships including the Town Deal Board, the Professional Services Network, the Manor Royal Business Improvement District, and strong links into Gatwick Diamond

### **Future models of community empowerment**

As outlined above, there are well established community engagement and empowerment structures already in place.

In planning for, and implementing, unitarisation proposals we would utilise these strong community relationships to ensure that our residents are supported to understand and influence the shape and priorities of the new authority.

The final shape of community engagement and empowerment arrangements will of course be a decision for the new unitary authority; however through the planning and shadow phases of transition we would explore the following models. Engagement with our communities as we do this will be essential. Based on our local knowledge and understanding of our communities, we would explore:

- Formal Community Governance Reviews leading to the establishment of new Parish / Town Councils
- Establishment of other informal but viable forms of community representation, such as area or community forums supported by the new unitary authority; or residents' or community associations.
- The inclusion of Area Committees within the new unitary governance structures with delegated responsibility for decision-making in some areas (for example planning, licencing etc)

In **addition** to this, we believe that unitarisation including our two authorities creates a real opportunity for:

- The development of new models of community participation; building on best practice locally and across the sector, from community development activity to build local community capacity to more participative decision making processes; and
- The continued evolution of neighbourhood engagement forums which bring together communities with a wide range of public sector service providers to provide the genuinely joined up delivery of hyperlocal services and asset-based community development.
- Localised arrangements in areas of need to tackle disadvantage and to take forward agendas around service integration and prevention across the breadth of public services

In Reigate & Banstead we have engaged with our Town and Parish Councils, both of which have added their support to our proposal for a cross boundary unitary authority that brings the Reigate & Banstead and Crawley areas together.

## Addressing the concerns raised through resident feedback to date

The Reigate & Banstead Resident Survey asked for views on positive and negative aspects of moving services to larger (unitary) councils. A number of positives were identified, which are summarised in Annex 6.

One of the Government criteria is specifically about how any concerns identified will be addressed, so this section focus on that question.

Concerns identified in the survey – and how those can be addressed – are summarised below:

| Concerns identified  | How the concern can be addressed   |
|--|--|
| Removed from the community (1334 comments)                           | By having unitarities of a smaller scale that reflect functional ‘on the ground’ community geographies (as proposed in Section 3)<br>By implementing (in consultation with local people) a range of formal and informal structures to increase democratic accountability and community empowerment (as proposed in Section 8)  |
| Poorer services (515 comments)                                       | By implementing a robust transition and implementation programme to both properly plan for future service provision and ensure maintenance of BAU services (as proposed in Section 9)<br>Through resident consultation, engagement and service evaluation (as proposed in Section 9)<br>By maximise opportunities for innovation and a holistic approach to preventative and other services (as proposed in Section 5)<br>By close joint working between authorities (as proposed in Section 10) |
| LGR will not save money and could be more inefficient (348 comments) | By having a carefully phased and managed transition process (As proposed in Section 5)<br>Through the exploration of early opportunities for alignment and consolidation to secure financial efficiencies, and longer term transformation programmes post vesting day to unlock further savings (As proposed in Sections 5 and 6)  |
| Areas will be too big to manage (204 comments)                       | By having unitarities of a smaller scale that reflect functional ‘on the ground’ community geographies (as proposed in Section 3)<br>By implementing (in consultation with local people) a range of formal and informal structures to increase democratic accountability and community empowerment (as proposed in Section 8)  |
| Communication with a larger council (125 comments)                   | By having communications and engagement as a key workstream throughout the planning, shadow and post vesting day phases of implementation (as proposed in Section 9)   |
| Accountability (96 comments)   | By implementing (in consultation with local people) a range of formal and informal structures to increase democratic accountability and community empowerment (as proposed in Section 8)<br>By retaining appropriate numbers of elected councillors (as proposed in Section 8)   |
| Loss of local identity (93 comments)                                 | By having unitarities of a smaller scale that reflect functional ‘on the ground’ community geographies (as proposed in Section 3)<br>By implementing (in consultation with local people) a range of formal and informal structures to increase democratic accountability and community empowerment (as proposed in Section 8)  |

|                            |   |
|----------------------------|---|
| Bureaucracy (79 comments)  | By having governance as a key workstream throughout the planning, shadow and post vesting day phases of implementation (as proposed in Section 9)<br>By implementing (in consultation with local people) a range of formal and informal structures to increase democratic accountability and community empowerment (as proposed in Section 8) |
| Councillors (53 comments)  | By retaining appropriate numbers of elected councillors (as proposed in Section 8)  |
| Staff losses (48 comments) | By having HR as a key workstream throughout the planning, shadow and post vesting day phases of implementation (as proposed in Section 9)   |

## Elected member representation

We believe that opportunities exist for a reduction in the number of elected members across our area while still retaining robust local democratic accountability.

In Reigate & Banstead, a model that uses county divisional boundaries but retains three councillors per division would result in 30 councillors rather than the current 55 councillors. In Crawley, using the same model would result in 27 councillors rather than the current 45 councillors.

There is also potential to consider the future frequency of elections as both Reigate & Banstead and Crawley are elected by thirds. All options would need to be considered by members but by way of example, were a decision to be made to move to 'all out' 4-yearly elections, this could deliver average annual cost savings of approximately £725,000 per year<sup>7</sup>. This example is stated but does not predetermine any final decision that may be made by elected members on this frequency of elections.

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<sup>7</sup> Assuming a total reduction in councillor numbers of 43 at a saving of £10k per councillor per year and assuming the cost per elector of a local election to be £3.09.



## Section 9: Transition and Implementation process

### DELIVERING AGAINST OUTCOMES

**Outcome 6** – Ensure continued delivery of high quality services for our residents; and safe and legal services at Vesting Day

This section outlines the proposed approach to transition and implementation, and how robust early planning, relationship building and engagement, and strong programme management and governance can ensure the safe and legal delivery of services at Vesting Day and continued service improvement beyond this date.

*Our proposed approach to service delivery is explored more in section 5*

We acknowledge that a cross boundary solution introduces a degree of additional complexity that may not have been envisaged by Government in developing its timelines for devolution and local government reorganisation. However, we believe that addressing this complexity can be relatively straightforward, enabling local government reorganisation in Surrey to proceed in line with identified timeframes (with a go live date of 1 April 2027), Sussex devolution in line with DPP timeframes (May 2027) and Surrey devolution to proceed swiftly the year after (May 2027).

The programme for transition to, and then implementation of, new unitary structures would follow that proposed within the Surrey Three Unitary Proposal.

#### Programme management and phasing:

- A pre-planning phase where preparatory work, relationship and capacity building and data collation takes place
- The planning phase, once geographies are known, where work commences to develop service level transition plans, undertake relevant delivery model options appraisals for upper tier and high risk service areas, commence the alignment and consolidation of lower tier services and systems, and to prepare for the shadow unitary authorities coming into being
- The shadow phase, which sees the establishment of shadow governance structures, appointment of senior staff and the development of detailed target operating models and transition plans for all service areas
- Post vesting day, with the closedown of the precursor councils, the conclusion of service transition and completion of implementation plans, and then the gearing up of transformation and service redesign, including to maximising the opportunities around prevention

More information is provided at Annex 2 including in relation to workstreams and timeframes, and we would refer Government to the Surrey Three Unitary Proposal which elaborates further and is similar to the one that we would follow.

Central to securing service delivery outcomes will be effective and consistent communications and engagement activity, with residents, businesses, staff, and stakeholders throughout the implementation programme, including awareness raising, consultation on service priorities and seeking and responding to feedback.

Maintaining business as usual activity will also be essential. The resource ‘ask’ of local government reorganisation is huge; but our authorities are committed to continuing to support

and invest in our staff and operational activities to maintain a high level of service provision over the transition period.

There will be costs associated with transition and implementation, as demonstrated where LGR has already taken place and within the Surrey Three Unitary Proposal.

- Initial shadow unitary election costs
- Redundancy costs
- Programme management costs
- IT/Systems alignment / consolidation costs
- Shadow authority costs (period of duplication of member and senior staffing costs)
- Costs associated with the creation of the new councils
- Costs associated with the closedown of the existing councils
- Communications, engagement and branding costs.

In order to progress LGR at pace, and consistent with the Surrey and West Sussex Interim Plans submitted, we are seeking Government funding to cover the costs of preparing for Vesting Day. This will enable the efficiencies generated through early alignment and consolidation to be used to underpin the financial resilience of the new authority from 'day 1'; and ensure that the new authority is well placed to then take a proactive approach to transformation and service-reform and realise the real financial benefits of unitarisation sooner.

## Section 10: Deliverability

Reigate & Banstead and Crawley have shared interests and a positive working relationship; and have worked together to prepare this submission, which has been formally endorsed by both Councils.

Reigate & Banstead Borough Council has also worked collaboratively with authorities across Surrey to prepare the Surrey Three Unitary submission to which it is a joint signatory. Likewise, Crawley continues to work collaboratively with West Sussex authorities towards the submission date of 26 September.

Both the Surrey and West Sussex Interim Plans submitted to Government on 21 March recognised the potential for ongoing exploration of cross boundary geographies.

- The Surrey Interim Submission recognised “we also remain open to conversations with our neighbours about devolution on a wider footprint.”
- The West Sussex Interim Submission recognised that prior to the final options for West Sussex, it will need to be resolved “how Crawley best fits both the unitarisation and devolution agendas given the economic links to the north and in particular Reigate and Banstead. This £13.2bn economic functioning area at the heart of the Gatwick Diamond would be divided into two separate MCAs if based on traditional county boundaries. Given Surrey is on a unique trajectory, with its LGR proposals due by May 2025 (shadow elections in 2026), it seems likely this matter will be resolved relatively quickly.”

Reigate & Banstead has strong day to day working relationships with the other Surrey districts and boroughs (particularly those in East Surrey), and Surrey County Council, across a range of service delivery areas; and similarly Crawley does with other West Sussex districts and boroughs and West Sussex County Council.

### **Working together in the future to secure safe, legal, effective and efficient unitarisation:**

Despite the differing views on unitary geographies that exist between some of the authorities across our area, we are committed to working constructively together to successfully implement whatever unitary solution the Government decides; our priority being to ensure that residents receive not only a safe and legal service at Vesting Day, but also continue to benefit from the many non-statutory and preventative services that local government across the area currently provides.

We will do this by taking a collaborative, phased approach to transition planning and implementation. More detail about this is included in Section 9 and Annex 2 and includes:

- A focus on relationship building, data collation and sharing, and establishing joint programme management, governance and decision making arrangements in the pre-planning and planning phases in the run up to shadow unitary elections. It will be essential that this includes all constituent lower tier authorities and both Surrey and West Sussex County Councils; and then
- Utilising shared programme and delivery team structures to develop detailed service level delivery plans, options appraisals where appropriate and (with the shadow authorities) target operating models for the new unitary authorities

## Section 11: Our evidence base

We have drawn on a range of evidence to inform our submission, which we reference throughout this submission.

**Economic evidence:** Our proposition is based around the economic benefit that can be secured by bringing our authorities together, and removing the administrative boundary that currently cuts through the heart of the Gatwick Diamond.

Our submission is supported by an economic assessment provided by Coast to Capital (Annex 4), which provides robust evidence of the economic case for bringing our authorities together. This is supplemented by an independent report provided to the authorities by the Gatwick Diamond Initiative (Annex 5), and other information drawn from trusted third party sources, which we reference throughout this submission.

**Evidence of local resident engagement:** Reigate & Banstead has undertaken a dedicated Resident Survey, exploring local government reorganisation and issues of local identity, connection and democracy. The results of this are summarised at Annex 6. The Residents' Survey was designed to provide a representative sample of local views, and we therefore have confidence in its outputs. Crawley has also undertaken some initial resident engagement, the interim results of which are referenced in Section 2.

**Evidence of stakeholder engagement:** Both Reigate & Banstead and Crawley Borough Councils have engaged with a range of local stakeholders to discuss and explore the challenges and opportunities around a cross-boundary geography. This is in addition to the stakeholder engagement undertaken across the wider Surrey area.

Our submission is supported by letters from a number of key partners (Annex 8).

**Evidence of estimated costs and benefits:** The differing timescales that our authorities are working on for LGR, and lack of flexibility in the Government's process to allow for cross boundary proposals, has limited our ability to undertake in-depth cost/benefits analysis as work in West Sussex has not been sufficiently advanced.

We have provided some comparator and combined information in Annex 7. The nature and type of the costs and benefits from bringing our two authorities together will align with those identified in the Surrey Three Unitaries proposal.

We are firmly of the view that the proceeds of the growth that bringing our two authorities together will generate far outweigh the direct financial benefits that unitarisation will deliver. We also note that elsewhere where unitarisation has proceeded these direct benefits take considerable time to realise, if they are realised at all.

That is why, elsewhere in our submission we explore the wider growth benefits *and* the non-financial benefits of our proposed approach.

## Annex 1: Geographic options for bringing together Reigate & Banstead and Crawley into the same unitary authority

The table below sets out different options for bringing together Reigate & Banstead and Crawley into the same unitary; this is inevitably partial given the different timeframes that West Sussex is working to.

Fundamentally, our case rests on the fact that our identified outcomes – and particularly the economic outcomes - can be achieved solely by bringing together our two authorities, but we recognise that there are other considerations that the Government will wish to take into account in reaching its final view

### Comparison with LGR 500,000 ‘target’

| Existing authorities   | Total population# | Observations  |
|--|-------------------|---|
| Reigate & Banstead, Crawley  | 276,530           | Would leave Tandridge as an ‘island’ (unless joined with Kent authorities).                                   |
| Reigate & Banstead, Crawley, Tandridge                             | 365,939           | Would require an alternative unitary geography to be developed from that in the Surrey Three Unitary proposal |
| Reigate & Banstead, Crawley, Tandridge, Mole Valley                | 454,205           | Would leave Epsom & Ewell as an ‘island’ (unless joined with London authorities)                              |
| Reigate & Banstead, Crawley, Tandridge, Mole Valley, Epsom & Ewell | 536,194           | Is consistent with the Surrey Three Unitary proposal with the addition of Crawley                             |
| Reigate & Banstead, Crawley, Tandridge, Mole Valley, Epsom & Ewell | 447,928           | Would require an alternative unitary geography to be developed from that in the Surrey Three Unitary proposal |
| Reigate & Banstead, Crawley, Horsham, Mid Sussex                   | 583,909           | Note that work in relation to West Sussex LGR options is still ongoing due to differing submission timescales |
| Reigate & Banstead, Crawley, Tandridge, Horsham, Mid Sussex        | 673,318           |   |

#Source: ONS Mid-Year Population Estimates June 2023

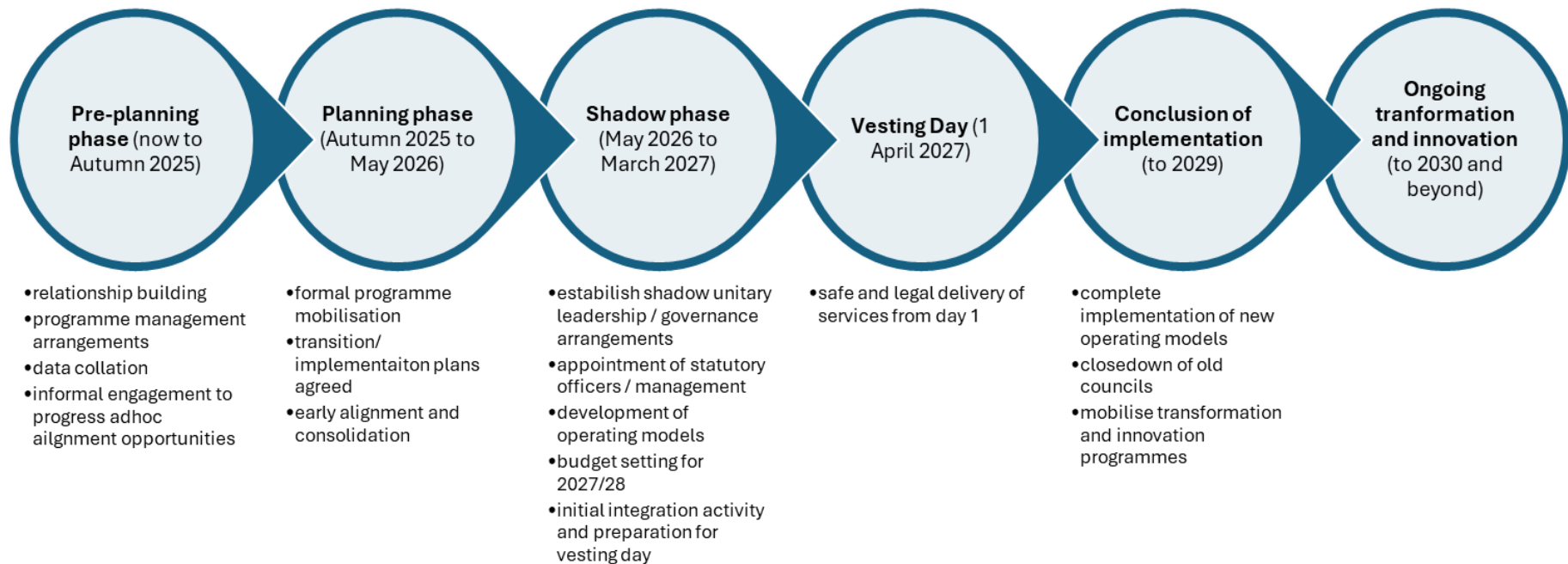
**Map showing Reigate & Banstead, Crawley and the relationship with other neighbouring Surrey authorities**



## Annex 2: Transition and implementation

### Transition and implementation phases and key activity

The programme for transition to, and then implementation of, a new unitary structure that brings our authorities together to achieve unitarisation aligned with the Government's timetable for Surrey would follow that proposed within the Surrey Three Unitaries Proposal, and the same principles and considerations apply.



We recognise a cross boundary proposal introduces a degree of additional complexity, which means that effective joint working and collaboration during the Pre-planning and planning phases will be essential. We therefore propose the establishment of joint programme management, governance and decision making arrangements during these phases bringing together the constituent lower tier authorities and Surrey and West Sussex County Councils.

The transition and implementation programme is envisaged to have the following workstreams, coordinated by a joint PMO and shared governance structures overseeing the development of transition/implementation plans for all service areas.

- Communications & engagement
- Legal, governance, & electoral
- Finance and debt
- Human resources & Organisational Development (including Culture Change)
- Data, IT and systems
- Assets
- Contracts, procurement & commercial
- Service delivery and customer contact
- Community governance & neighbourhood empowerment
- Devolution and the move towards creation of a Mayoral Strategic Authority

The image below shows indicative timeframes for key areas of planning, transition and implementation activity.

|   | May-25 | Jun-25 | Jul-25 | Aug-25 | Sep-25 | Oct-25 | Nov-25 | Dec-25 | Jan-26 | Feb-26 | Mar-26 | Apr-26 | May-26 | Jun-26 | Jul-26 | Aug-26 | Sep-26 | Oct-26 | Nov-26 | Dec-26 | Jan-27 | Feb-27 | Mar-27 | Apr-27 | May-27 | Jun-27 | Jul-27 | Aug-27 | Sep-27 | Oct-27 | Nov-27 | Dec-27 | Jan-28 | Feb-28 | Mar-28 | Apr-28 | May-28 | Jun-28 | Jul-28 | Aug-28 | Sep-28 | Oct-28 | Nov-28 | Dec-28 | Onwards |  |  |
|---|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|---------|--|--|
| Pre-planning phase  |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |         |  |  |
| Planning phase  |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |         |  |  |
| Shadow phase  |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |         |  |  |
| Vesting day   |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |         |  |  |
| Implementation  |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |         |  |  |
| Ongoing tranformation and innovation (to 2030 and beyond) |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |        |         |  |  |

| Implementation programme                        | Planning            | Mobilisation                    | Closedown                                    |
|---|---------------------|---------------------------------|--|
| Unitary governance and decision making          | Planning            | Elections                       | Shadow arrangements                          |
| Staffing  | Planning            | Senior staff appointment        | Other staff appointments                     |
| Target operating models                         | Options assessments | Model development and agreement | Implementation                               |
| Finance transition and planning                 | Planning            | Consolidation / Transition      | '27/28 Budget                                |
| Community governance and empowerment            | Options assessment  | Agree approach                  | Implement                                    |
| Lower tier services alignment and consolidation | Planning            | Ad-hoc alignment                | Continued alignment/efficiencies realisation |
| Upper tier services services delivery           | Planning            | Options assessment              | Agree  |
| Operational asset rationalisation               | Options assessment  | Agree approach                  | Implement/ efficiencies realisation          |
| Transformation programme                        |                     |                                 |  |



### **Annex 3: Letter to the Minister, 21 March 2025**

See separate attachment

### **Annex 4: Coast to Capital Economy Spotlight – Reigate & Banstead / Crawley Growth Area**

See separate attachment

### **Annex 5: Gatwick Diamond Initiative: The Northern Gatwick Diamond - A UK Gateway for Global Connectivity and Growth**

See separate attachment

### **Annex 6: Reigate & Banstead Resident Survey findings**

See separate attachment

## Annex 7: Financial information

### Collective Debt

| Borrowing type<br>£                       | GF               | HRA                | Non-specific       |
|---|------------------|--------------------|--------------------|
| Long term borrowing                       | -                | 224,325,000        | -                  |
| ST borrowing with other Local Authorities | 5,000,000        | 0                  | 0                  |
| ST borrowing with other organisations     | 0                | 0                  | 0                  |
| <b>Total short-term borrowing</b>         | <b>5,000,000</b> | <b>-</b>           | <b>-</b>           |
| <b>Total external borrowing</b>           | <b>5,000,000</b> | <b>224,325,000</b> | <b>229,325,000</b> |

| Cost of Finance<br>£      | 2025/26          | 2026/27          | 2027/28          |
|---------------------------|------------------|------------------|------------------|
| Budgeted interest payable | 300,000          | 300,000          | 300,000          |
| Total budgeted MRP        | 1,352,102        | 1,381,108        | 1,403,940        |
| <b>Total finance cost</b> | <b>1,652,102</b> | <b>1,681,108</b> | <b>1,703,940</b> |

| Capital Financing Requirement (£) | 2025/26            | 2026/27            | 2027/28            |
|-----------------------------------|--------------------|--------------------|--------------------|
| GF                                | 107,783,000        | 113,439,000        | 119,868,000        |
| HRA                               | 226,519,000        | 231,519,000        | 234,519,000        |
| <b>Total CFR</b>                  | <b>334,302,000</b> | <b>344,958,000</b> | <b>354,387,000</b> |

### Total Reserve Position at 31 March 2024

|                       | Crawley         | Reigate and Banstead | Total             |
|-----------------------|-----------------|----------------------|-------------------|
| Usable Reserves       | £68,844         | £74,601              | <b>£143,445</b>   |
| Unusable Reserves     | £909,236        | £137,375             | <b>£1,046,611</b> |
| <b>Total Reserves</b> | <b>£978,080</b> | <b>£211,976</b>      | <b>£1,190,056</b> |

#### Breakdown of Usable Reserves:

|                                  |                |                |                 |
|----------------------------------|----------------|----------------|-----------------|
| General Fund Balances            | £3,810         | £3,500         | <b>£7,310</b>   |
| Earmarked General Fund Reserves  | £11,170        | £29,450        | <b>£40,620</b>  |
| Housing Revenue Account Reserves | £26,776        |                | <b>£26,776</b>  |
| Capital Receipts Reserve         | £17,741        | £9,179         | <b>£26,920</b>  |
| Capital Grants Unapplied Account | £9,347         | £32,472        | <b>£41,819</b>  |
| <b>Total Usable Reserves</b>     | <b>£68,844</b> | <b>£74,601</b> | <b>£143,445</b> |

## Funding Analysis

|   | Crawley            | Reigate and Banstead | TOTAL              |
|---|--------------------|----------------------|--------------------|
| <b>Baselines, Top-ups/ tariffs, and Settlement Funding Assessment (SFA)</b> |                    |                      |                    |
| District BFL  | 4,058,144          | 2,620,988            | 6,679,132          |
| County BFL  | 19,405,245         | 18,168,383           | 37,573,627         |
| <b>Total Baseline Funding Level (BFL)</b>                                   | <b>23,463,389</b>  | <b>20,789,371</b>    | <b>44,252,759</b>  |
| District RSG  | 280,918            | 188,216              | 469,134            |
| County RSG  | 665,512            | 547,659              | 1,213,171          |
| <b>Total Revenue Support Grant (RSG)</b>                                    | <b>946,430</b>     | <b>735,875</b>       | <b>1,682,305</b>   |
| District SFA  | 4,339,062          | 2,809,205            | 7,148,266          |
| County SFA  | 20,070,757         | 18,716,042           | 38,786,798         |
| <b>Settlement Funding Assessment</b>  | <b>24,409,819</b>  | <b>21,525,246</b>    | <b>45,935,065</b>  |
| District BRB  | 54,503,184         | 24,763,314           | 79,266,497         |
| County tier split (fire 1% not included)                                    | 9%                 | 9%                   |                    |
| County BRB  | 12,263,216         | 5,571,746            | 17,834,962         |
| <b>Business Rate Baseline</b>   | <b>66,766,400</b>  | <b>30,335,059</b>    | <b>97,101,459</b>  |
| <b>Top-up (+) or tariff (-)</b>   | <b>-43,303,011</b> | <b>-9,545,689</b>    | <b>-52,848,700</b> |
| <b>Business Rate Retention System</b>                                       |                    |                      |                    |
| <i>Tier split</i>   |                    |                      |                    |
| <i>Levy rate</i>  |                    |                      | <b>50.0%</b>       |
| Non-Domestic Rating Income + Section 31 grants                              | 71,684,628         | 31,689,667           | 103,374,295        |
| Top-up/ (Tariff)  | -43,303,011        | -9,545,689           | -52,848,700        |
| Retained rates (including TT)   | 28,381,617         | 22,143,978           | 50,525,595         |
| <b>Retained rates above BFL</b>   | <b>4,918,228</b>   | <b>1,354,607</b>     | <b>6,272,836</b>   |
|   | 21.0%              | 6.5%                 | 14.2%              |
| Levy  | -2,459,114         | -426,261             | -2,885,375         |
| S.31 - cap compensation for adj Non-Domestic Rating Income                  | 12,830,139         | 6,238,644            | 19,068,783         |
| S.31 - Multiplier Cap (Adj to Tariff or Top-up)                             | -7,750,388         | -1,879,229           | -9,629,617         |
| Compensation for under-indexing the multiplier                              | 5,079,752          | 4,359,414            | <b>9,439,166</b>   |
| Renewables  |                    |                      |                    |
| Designated areas  |                    |                      |                    |
| Shale Gas   |                    |                      |                    |
| Cost of Collection  |                    |                      |                    |
| <b>TOTAL BUSINESS RATE INCOME</b>   | <b>31,002,254</b>  | <b>26,077,131</b>    | <b>57,079,385</b>  |

| <b>Council Tax (2024/25)</b>                                 |                    |                    |                    |
|--|--------------------|--------------------|--------------------|
| Council taxbase (for council tax setting purposes) (£)       | 36,637             | 64,252             | 100,889            |
| Band D (district) (£)  | 232                | 257                |                    |
| Band D (county) (£)  | 1,715              | 1,759              |                    |
| Deduct fire element of county Band D                         | -100               | -100               |                    |
| TOTAL Band D (incl ASC precept, excl local precepts)         | 1,847              | 1,916              |                    |
| Band D (district) (£) 2025-26                                | 239                | 265                |                    |
| Band D (county) (£) 2025-26                                  | 1,696              | 1,741              |                    |
| TOTAL Band D (incl ASC precept, excl local precepts) 2025-26 | 1,935              | 2,006              |                    |
| Council Tax  | 70,877,053         | 128,905,137        | 199,782,191        |
| Second home premium  |                    |                    |                    |
| <b>TOTAL COUNCIL TAX</b>                                     | <b>70,877,053</b>  | <b>128,905,137</b> | <b>199,782,191</b> |
| <b>Grant Funding</b>   |                    |                    |                    |
| Revenue Support Grant  | 946,430            | 735,875            | 1,682,305          |
| New Homes Bonus  | 24,850             | 540,966            | 565,816            |
| Public Health Grant  | 5,299,811          | 5,449,674          | 10,749,485         |
| Minimum Funding Guarantee/ Funding Floor                     | 381,173            | 1,161,573          | 1,542,746          |
| Employers' National Insurance Contributions Grant            | 1,492,930          | 1,104,600          | 2,597,530          |
| Social care grants (separate sheet)                          | 13,028,424         | 14,114,739         | 27,143,164         |
| Children's Social Care Prevention Grant                      | 381,861            | 309,767            | 691,628            |
| Domestic Abuse Safe Accommodation Grant                      | 249,553            | 346,744            | 596,297            |
| <b>TOTAL GRANT FUNDING</b>                                   | <b>21,805,032</b>  | <b>23,763,940</b>  | <b>45,568,972</b>  |
| <b>TOTAL RESOURCES</b>                                       | <b>123,684,339</b> | <b>178,746,209</b> | <b>302,430,548</b> |
| <b>Total population</b>                                      | <b>110,190</b>     | <b>141,348</b>     | <b>251,538</b>     |
| <b>TOTAL BUSINESS RATE INCOME (per head)</b>                 | <b>281.35</b>      | <b>184.49</b>      | <b>226.92</b>      |
| <b>TOTAL BUSINESS RATE INCOME (share %)</b>                  | <b>100%</b>        | <b>100%</b>        | <b>100%</b>        |
| <b>TOTAL COUNCIL TAX (per head)</b>                          | <b>643.23</b>      | <b>911.97</b>      | <b>794.24</b>      |
| <b>TOTAL COUNCIL TAX (share %)</b>                           | <b>100%</b>        | <b>100%</b>        | <b>100%</b>        |
| <b>TOTAL GRANT FUNDING (per head)</b>                        | <b>197.89</b>      | <b>168.12</b>      | <b>181.16</b>      |
| <b>TOTAL GRANT FUNDING (share %)</b>                         | <b>100%</b>        | <b>100%</b>        | <b>100%</b>        |
| <b>TOTAL RESOURCES (per head)</b>                            | <b>1,122.46</b>    | <b>1,264.58</b>    | <b>1,202.33</b>    |
| <b>TOTAL RESOURCES (share %)</b>                             | <b>100%</b>        | <b>100%</b>        | <b>100%</b>        |

## **Annex 8: Letters of support [to be added prior to submission]**