

## **FOR CONSIDERATION: DRAFT BPC RESPONSE TO LGR CONSULTATION**

This briefing note summarises the Government consultation on Local Government Reorganisation in Sussex and sets out a recommended response position for BPC.

The consultation requires respondents to comment separately on four different reorganisation proposals, even where those proposals are not directly relevant to Brighton.

### **Context:**

The Government is consulting on proposals to replace the current two-tier system (county and district councils) with unitary authorities. In Sussex, four separate proposals have been submitted:

1. East Sussex proposal – creation of a single unitary authority for East Sussex (“One East Sussex”)
2. Brighton & Hove City Council proposal – including boundary change affecting parts of Lewes District
3. West Sussex County Council proposal
4. West Sussex district councils’ proposal (Adur, Arun, Chichester, Crawley, Horsham, Mid Sussex and Worthing)

### **Recommended overall position:**

- Supportive (with caveats) of the One East Sussex proposal
- Cautious and critical of the Brighton & Hove boundary change proposal
- Neutral / limited comment on both West Sussex proposals due to lack of relevance

This approach is proportionate to BPC’s size and role, avoids over-claiming expertise, clearly protects rural parish interests, is consistent with NALC-style good practice.

### **Key principles underpinning the responses:**

The recommended responses consistently emphasise the importance of rural voice and local democracy, the need for stability and continuity of services, recognition of the limited capacity of small parish councils, opposition to boundary change without strong justification, and the expectation that parish councils remain meaningful democratic partners

## **CONSULTATION 1 – ONE EAST SUSSEX**

### **Question 1**

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

#### **Recommended answer:**

Agree

#### **Suggested explanation (for Q9):**

Brightling Parish Council considers that the One East Sussex proposal reflects a sensible and coherent geography, aligned with existing service delivery footprints, travel patterns, and economic linkages. Retaining the current East Sussex boundary avoids unnecessary fragmentation and supports continuity for rural communities.

### **Question 2**

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

#### **Recommended answer:**

Agree

#### **Suggested explanation (for Q9):**

The proposed single unitary authority is of sufficient scale and capacity to deliver the strategic outcomes described, particularly in relation to integrated services, financial resilience, and partnership working. These outcomes are more likely to be achievable where reorganisation builds on existing systems and relationships rather than introducing boundary change.

### **Question 3**

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

#### **Recommended answer:**

Agree

#### **Suggested explanation (for Q9):**

From the perspective of a small rural parish council, a single East Sussex unitary authority represents an appropriate balance between scale and manageability. It is large enough to absorb financial pressures and volatility while remaining geographically coherent and administratively practical.

#### **Question 4**

To what extent do you agree or disagree that this proposal will put local government in the area as a whole on a firmer footing, particularly given that some councils are in receipt of Exceptional Financial Support?

**Recommended answer:**

Agree

**Suggested explanation (for Q9):**

Brightling Parish Council recognises that local government faces significant and ongoing financial challenges. The One East Sussex proposal provides a stronger collective footing by reducing duplication and enabling more strategic financial planning, even though reorganisation alone cannot resolve national funding issues.

#### **Question 5**

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

**Recommended answer:**

Agree

**Suggested explanation (for Q9):**

The Council agrees that a single unitary authority has the potential to deliver more joined-up and sustainable services. For rural areas, sustainability must include accessibility and responsiveness, and we would expect the new authority to explicitly recognise the higher costs and logistical challenges of rural service delivery.

#### **Question 6**

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

Brightling Parish Council acknowledges the engagement undertaken to date but notes that the scale and complexity of the process makes meaningful participation challenging for very small parish councils with limited administrative capacity. Further work will be needed to ensure rural parish perspectives are consistently reflected in future governance and service design. Brightling Parish Council notes the work being carried out by the LGR Working Group established by Rother Association of Local Councils (RALC). Since this work focuses on the specific requirements of rural areas, we would urge close attention is paid to the comments and recommendations submitted by this Group.

### Question 7

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

**Recommended answer:**

Agree

**Suggested explanation (for Q9):**

The Council agrees that a single East Sussex unitary authority would provide a clear and coherent partner within future devolution arrangements, helping to simplify governance and strengthen strategic engagement at Sussex and regional level.

### Question 8

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

While the proposal recognises the importance of community engagement, Brightling Parish Council considers that neighbourhood empowerment in rural areas will depend on how parish and town councils are formally embedded within the new authority's decision-making processes.

### Question 9

**Free text box – explanation for Questions 1–8**

*Suggested consolidated text, or could be a combination of the comments above:*

Brightling Parish Council is a very small rural parish council and has responded to this consultation on the basis of proportionality, local experience, and capacity. The Council is broadly supportive of the One East Sussex proposal, which offers geographic coherence, financial resilience, and continuity of service delivery. However, our responses reflect the importance of explicit safeguards to ensure that rural voices are not diluted within a large unitary authority. Strong engagement with parish councils, recognition of rural service pressures, and clear democratic links between the unitary authority and parish councils will be essential to the success of any reorganisation. Brightling Parish Council is aware of work being carried out by the LGR Working Group established by Rother Association of Local Councils (RALC). Since this work focuses on the specific requirements of rural areas, we would urge close attention is paid to the comments and recommendations submitted by this Group.

## **CONSULTATION 2**

### **Proposal from Brighton & Hove City Council**

This proposal is less directly relevant to Brightling Parish Council and includes a request for boundary change affecting parts of Lewes District. The responses below reflect that position.

#### **Question 1**

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

##### **Recommended answer:**

Disagree

##### **Suggested explanation (for Q9):**

Brightling Parish Council does not consider that the proposed geography reflects a sensible or coherent economic or community area from a rural East Sussex perspective. The proposed boundary changes are focused on urban coastal connections and do not reflect the character, service needs, or economic relationships of rural parishes within Lewes District.

#### **Question 2**

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

##### **Recommended answer:**

Neither agree nor disagree

##### **Suggested explanation (for Q9):**

While the Council recognises that the proposal sets out ambitions for service delivery, Brightling Parish Council has insufficient evidence to assess whether these outcomes would be delivered for rural communities outside the existing Brighton & Hove area. The proposal is primarily urban-focused and does not clearly articulate benefits for small rural parishes.

### Question 3

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

Brightling Parish Council is not persuaded that the proposed council size, achieved through boundary change, offers clear advantages over existing arrangements for rural areas. The marginal increase in population does not appear sufficient to offset the financial, operational, and governance risks associated with disaggregating existing services.

### Question 4

To what extent do you agree or disagree that this proposal will put local government in the area as a whole on a firmer footing, particularly given that some councils are in receipt of Exceptional Financial Support?

**Recommended answer:**

Disagree

**Suggested explanation (for Q9):**

The Council does not consider that boundary change proposals provide a clear or proportionate response to the wider financial challenges facing local government. From a rural parish perspective, stability, continuity, and minimising transition risk are more likely to place local government on a firmer footing than structural change affecting only limited areas.

### Question 5

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

Brightling Parish Council cannot determine whether the proposal would deliver sustainable public services for rural communities. The proposal does not provide sufficient detail on how rural service access, cost pressures, and local responsiveness would be addressed following boundary change.

### **Question 6**

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

**Recommended answer:**

Disagree

**Suggested explanation (for Q9):**

From the perspective of a small rural parish council, the proposal does not appear to be informed by the views or needs of rural communities within Lewes District. Brightling Parish Council is not aware of meaningful engagement that reflects rural parish priorities or concerns regarding boundary change.

### **Question 7**

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

While the Council recognises the importance of devolution arrangements, it is unclear how boundary changes affecting a limited area would materially strengthen strategic governance or support devolution outcomes from a rural East Sussex perspective.

### **Question 8**

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

**Recommended answer:**

Disagree

**Suggested explanation (for Q9):**

Brightling Parish Council does not consider that the proposal clearly demonstrates how neighbourhood empowerment would be strengthened for rural parishes. There is insufficient clarity on the future role of parish councils or how local decision-making would be protected within an expanded urban authority.

### Question 9

Free text box – explanation for Questions 1–8

*Suggested consolidated text, or could be a combination of the comments above:*

Brightling Parish Council is a very small rural parish council within East Sussex. While we recognise the ambitions set out in the Brighton & Hove City Council proposal, we do not consider that it adequately reflects the geography, service needs, or democratic priorities of rural communities within Lewes District. The proposal is primarily urban-focused and does not provide sufficient evidence that boundary change would deliver tangible benefits for rural parishes, while introducing additional complexity and risk.

### Question 10

To what extent do you agree or disagree that the proposal sets out a strong public services and financial sustainability justification for boundary change?

**Recommended answer:**

Strongly disagree

### Question 11

Free text box – explanation for Question 10

Suggested text:

Brightling Parish Council does not consider that the proposal provides a strong public service or financial sustainability justification for boundary change. The limited population gains proposed do not outweigh the risks of service disaggregation, governance disruption, and loss of local accountability. For rural communities, stability and continuity within existing East Sussex boundaries offer a more robust foundation for sustainable service delivery.



## **CONSULTATION 3**

### **Proposal from West Sussex County Council**

#### **Question 1**

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

Brightling Parish Council is not located within West Sussex. While the proposal appears to consider geographic and economic factors relevant to that area, the Council does not have sufficient local knowledge or evidence to reach a view.

#### **Question 2**

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

As a parish council in East Sussex, Brightling Parish Council does not have the evidence or local insight required to assess whether the proposed outcomes would be delivered within West Sussex.

#### **Question 3**

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

The Council recognises that scale and resilience are key considerations in reorganisation. However, Brightling Parish Council is not sufficiently close to the West Sussex context to form a justified view on the proposed council sizes.

#### **Question 4**

To what extent do you agree or disagree that this proposal will put local government in the area as a whole on a firmer footing, particularly given that some councils are in receipt of Exceptional Financial Support?

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

Brightling Parish Council acknowledges the financial challenges facing local government nationally, but does not have sufficient information to assess how the West Sussex proposal would affect financial stability within that area.

#### **Question 5**

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

As an East Sussex parish council, Brightling Parish Council is unable to assess the likely impact of the proposal on public service quality or sustainability within West Sussex.

#### **Question 6**

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

The Council understands that engagement has taken place within West Sussex but is not in a position to evaluate whether local views have been adequately reflected.

### Question 7

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

Brightling Parish Council recognises the importance of devolution arrangements but does not have sufficient insight into the West Sussex context to assess the implications of this proposal.

### Question 8

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

The Council is unable to assess how neighbourhood empowerment would operate within the proposed West Sussex arrangements.

### Question 9

Free text box – explanation for Questions 1–8

*Suggested consolidated text, or could be a combination of the comments above:*

Brightling Parish Council is a small rural parish council within East Sussex and is not located within the West Sussex area. The Council therefore does not have sufficient local knowledge or evidence to provide detailed comment on the West Sussex County Council proposal. Our responses reflect this limited relevance and are confined to high-level procedural observations only.

## **CONSULTATION 4**

**Proposal from Adur District Council, Arun District Council, Chichester District Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council and Worthing Borough Council**

### **Question 1**

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

Brightling Parish Council is not located within West Sussex. While the proposal appears to consider geographic and economic factors relevant to that area, the Council does not have sufficient local knowledge to assess whether the proposed geographies are appropriate.

### **Question 2**

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

As a small rural parish council in East Sussex, Brightling Parish Council does not have the evidence required to assess whether the proposed outcomes would be delivered within West Sussex.

### Question 3

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

The Council recognises the importance of scale and resilience in local government structures, particularly in the context of financial pressures. However, Brightling Parish Council is not sufficiently close to the West Sussex context to form a justified view on the proposed council sizes.

### Question 4

To what extent do you agree or disagree that this proposal will put local government in the area as a whole on a firmer footing, particularly given that some councils are in receipt of Exceptional Financial Support?

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

Brightling Parish Council acknowledges the financial challenges facing local government nationally, including the use of Exceptional Financial Support by some West Sussex councils. However, the Council does not have sufficient information to assess whether this proposal would place local government in West Sussex on a firmer long-term footing.

### Question 5

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

As Brightling Parish Council is not located within West Sussex, it is not in a position to assess the likely impact of the proposal on public service quality or sustainability in that area.

### **Question 6**

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

The Council understands that engagement has taken place within West Sussex but does not have the evidence required to evaluate whether local views have been adequately reflected in the proposal.

### **Question 7**

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

Brightling Parish Council recognises the importance of devolution arrangements but does not have sufficient insight into the implications of this proposal for West Sussex.

### **Question 8**

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

**Recommended answer:**

Neither agree nor disagree

**Suggested explanation (for Q9):**

The Council is unable to assess how community engagement and neighbourhood empowerment would operate under the proposed West Sussex arrangements.

## Question 9

Free text box – explanation for Questions 1–8

*Suggested consolidated text, or could be a combination of the comments above:*

Brightling Parish Council is a very small rural parish council within East Sussex and is not located within West Sussex. The Council does not have sufficient local knowledge or evidence to provide detailed comment on the proposal from the West Sussex district and borough councils. Our responses are therefore limited to high-level observations and reflect the proposal's limited relevance to our parish.

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