

Local Government and NAC's (version 4 May 2026)

A - Proposal by the Rother Association of Local Councils

This proposal is for the Unitary Authority to consider when it comes into power, at which point it must adopt a method of local engagement. This document provides a template which the Unitary should consider adopting when deciding how to engage at a local level.

The proposal is supported in principle by the East Sussex Association of Local Councils.

This is a draft of a more detailed proposal that must be considered, adapted and approved by the Rother, Wealden, and Lewes District Associations and the East Sussex Association before it may be considered further by the District Councils, should they wish to do so.

If a final draft by all stakeholders can be agreed the aim is to have a proposal from all East Sussex Town and Parish Councils and their associations to be ready for consideration by the Unitary by May 2027.

B - Alternative Views

UK Govt white paper on LGR

The UK Govt white paper is primarily concerned with the removal of tiers of government and the replacement of that with a Unitary authority. It also states that Parish and Town Councils are not in the scope of LGR other than that they may take on additional services and that Parish & Town Councils must be recognised by and engaged by the unitary to enable more local representation. It does not define how this must happen, but it leans towards Neighbourhood Area Committees ("NACs").

The legislation and process to create a Mayoral team within the strategic authority is also ongoing but is not within the scope of this proposal. There are other ongoing proposals from the county associations in Sussex that address this.

NALC response from Aug 2025

Effective devolution and local government reorganisation must recognise the role of Parish and Town Councils as the community tier of local government. They can be a strong voice for local neighbourhoods and help address fears of remote government resulting from the establishment of new strategic and unitary authorities. By strengthening their role and expanding their coverage, the government can ensure devolution does not stop at the regional or subregional level and delivers tangible benefits for communities nationwide.

NALC response from March 2026

We are urging the government to place county associations at the centre of local government reorganisation, ensuring their expertise directly shapes the future of new unitary authorities.

In response to several government consultations on local government reorganisation, we have made a clear case that county associations must be recognised as key partners and included as full members of Joint Implementation Teams responsible for designing and delivering new governance structures.

Drawing on extensive engagement over the past year, county associations have built a detailed picture of the priorities, challenges and ambitions of parish and town councils. This insight is indispensable in creating reforms that genuinely reflect the needs of local communities.

We are also calling for parish and town councils to be embedded in the process from the outset, which includes ensuring new councils are considered early in the design of unitary authorities, not as an afterthought, but as a fundamental part of the local government landscape.

East Sussex Proposal for Neighbourhood Governance

Proposals defined in the business case (Assuming One East Sussex is approved) must broadly drive the principles that guide the implementation by the Unitary.

- Neighbourhood governance: The English Devolution and Community Empowerment Bill propose to introduce a requirement on all local authorities in England to establish effective neighbourhood governance, with details of this obligation to be set out in regulations that will be made after the Bill is made an Act of Parliament.
- For councils in East Sussex, the matter of how best to ensure genuine and meaningful local influence over decisions in a bigger unitary authority is a priority due to the strength of feeling expressed about this issue during engagement about reorganisation, not just because it could become a statutory obligation. Although more clarity on Government thinking in this area would be welcome following its intended review of good practice, any guidance must not be prescriptive, and no structures should be unilaterally imposed or abolished by central government. It should rest with the councils undergoing reorganisation to determine what would be most effective locally, recognising that neighbourhood governance structures need to be designed so they are valued by communities, not simply to function as a delivery mechanism for the new unitaries.
- Government signals about the potential role of town and parish councils in future neighbourhood governance have been ambiguous, but these should remain part of the suite of options available for consideration. This would be particularly important for areas like East Sussex which already have a number of local councils in operation.

The six councils in East Sussex have agreed the following principles to guide the assessment of future neighbourhood governance models:

1. **Building on foundations:** There are a number of existing structures to enable resident and community engagement in place across East Sussex. Those that have ²⁰ One East Sussex: Building the Future successful track records and local buy-in could potentially act as building blocks for a future model.

2. **Sustainability:** For any new model to work in practice and not just on paper, which is what residents rightly expect, significant investment of member and council staff time will be required. Ensuring that appropriate resourcing can be maintained over time will be critical.

3. **Fit for the future:** The new unitary will have a wider set of functions than any of the existing councils currently have so consideration needs to be given to how neighbourhood arrangements can meaningfully shape delivery and decisions about matters of community interest including regulatory functions e.g. planning.

4. **Fair and appropriate to the needs of local populations:** Any future model should be designed around the needs of the communities it serves, ensuring fair and equitable access to services and outcomes for residents in every part of East Sussex. This means considering whether proposals are suitable and practical for the populations they are intended to serve, and for infrastructure in rural settlements, where factors such as limited public transport, travel distances and variable digital connectivity can affect residents' ability to access services and participate in local decision-making. This approach is consistent with the principle of "rural proofing" now embedded in national policy: the English Devolution and Community Empowerment Act 2026 includes rural, alongside coastal communities, as distinct areas of competence, enabling the appointment of a rural affairs commissioner and creating a duty to have regard to the needs of rural communities. Testing neighbourhood arrangements against these considerations from the outset will help ensure that no community is disadvantaged by virtue of its geography.

East Sussex has a mixture of sparsely populated rural areas, market towns and continuous urban development along the coastal strip, each of which comes with its own challenges and opportunities. As a result, it may be that there would be value in allowing some variation in the structures that are set up, but there would at the same time need to be transparency and consistency in how these bodies are able to interact with the new unitary and the level of influence they are offered.

5. **Collaborative leadership:** Many public service outcomes are not delivered by local government alone and rely on partnerships with other public sector organisations, some of which (health and police in particular) are considering their own service footprints at neighbourhood or community level. While strict alignment of geographies may not be possible or desirable, it would be helpful to ensure there

is some degree of coherence across East Sussex, which could be particularly critical to unlocking the potential of public service reform to improve outcomes and drive out costs. It is anticipated that the preferred models to maintain public accessibility and democratic accountability as well as find the appropriate balance between the two will be set out in the final proposal for LGR in East Sussex. These are intended to reflect fair representation ratios, investment in digital and in-person engagement tools, and options for embedding local accountability into the governance framework of the new authority. Together, these measures are designed to ensure that the new unitary council not only maintains but enhances its role as a trusted, responsive, and locally rooted institution one that reflects the diversity of East Sussex's communities and empowers them to shape their future.

C - Experience to date

Neighbourhood Area Committees – Success of implementation to date

NAC's have been set up within the UK by authorities transferring to a Unitary with varying degrees of success. Cornwall, Somerset, and Northumberland have set up NAC's or similar. Surrey is in the process of doing so. These have attempted to create a forum for local groups, service providers, Parish & Town Councils and Unitary Councillors intended to enhance local engagement and plug a gap between Parish & Town Councils (the lowest level of Government) and the Unitary and engage with more local voices.

Problems have been found in the administration of the NAC's, possibly because with a ratio of about 50,000 residents to each NAC, the number of NAC's becomes at the same time too cumbersome to manage by the unitary and not flexible enough to engage across a range of subjects.

The pilot NAC's for Surrey use the 50,000:1 ratio and are expected to have 21 attendees each. A meeting held by North Cornwall (North Cornwall Community Area Partnership), 19 Dec 2025 about Housing and Planning had 50 persons from Gov & other organisations invited to attend and 2 members of the public. That is a logistical challenge regardless of deciding on or managing outcomes.

Further issues in our view include a lack of Governance with many NAC members not being elected, and no auditable governance procedures. (given that the NAC's are not part of the Govt structure). It is also not clear how decisions taken at NAC level will result in change, or how they may be funded or administered. There does need to be scrutiny of whatever committee or similar are formed.

What is not clear is what the outcomes of the NAC's is meant to be or how any findings from meetings will result in action unless there are informed, authorised decision makers

included in the process (even if these can only influence the authority). This therefore risks setting up a new tier of meetings without clear authority, outcomes, governance, or funding.

Cornwall have established Local Community Networks which, while still developing, are working well. The key findings are that a greater number of groups with lower levels of direct power work better than a small number of groups with higher levels of more power. A structure that enables all relevant stakeholders to contribute and is democratically valid even without direct power to decide can better influence the decision by the unitary. There is no one-size-fits-all solution. This requires any proposed structure to be sufficiently flexible.

One issue that appears common in all areas with new NAC's is the substantial cost of setting up, managing the meetings and then processing the data back into the unitary via link staff.

D – District and County Association of Local Councils

Importance of retaining an active and effective District Association and County Association Network of Local Councils

NALC have stated that county associations expertise “should directly shape the future of new unitary authorities” and should be “recognised as key partners and included as full members of Joint Implementation Teams responsible for designing and delivering new governance structures” The county associations in East (and West) Sussex are formed of and draw their expertise from the district association which in turn directly represent the 1.2 million residents in Sussex via parish and town councils. This is an existing democratic structure underpinned by robust and auditable governance at parish level, with direct links to residents and other stakeholders.

It is also our view that by inserting an additional layer of Government (in the form of NAC's) whose aims are aligned with the current district and county associations of engaging with NGO's, local groups and other authority service providers, will significantly reduce the ability of district and county associations to remain relevant because the link to the Unitary will be via the NAC not the current association structure.

Rother District

If we take Rother District as an example, using the 50,000:1 ratio there would be 2 NAC's. Given that Bexhill is 50% of the population of Rother that would presumably be one NAC for Bexhill and one for everyone else. For East Sussex that would require 7+ NAC's (excluding the current Boroughs), each meeting 6 to 10 times per year. That is a significant admin load on the unitary, who would be responsible for setting these up, managing meetings, and coordinating and summarising outputs across the regions and with the other unitary regions in Sussex.

Cornwall have 18 LAN's these vary in size from very small groups to very large depending on the subject matter and geographical needs. The NAC model using a 50:1 ratio would not be a solution here and will not work in East Sussex.

An alternative to stand alone NAC's

The desired outcomes must first be defined to understand what the NAC's aim are and to understand how best to deliver these.

The table in Appendix A summarises and compares the assumed outcomes required of NAC's and the current outcomes intended for parish, district and county associations. There is a clear overlap. One of the weaknesses of the DA's and CA's is that these are third party organisations outside of the umbrella of the County and District Councils. NAC's would be within that umbrella because they would be managed by the Unitary.

E – Proposal to create a combined NAC and District Association structure.

It is our view that the most effective structure to deliver the outcome needed is to merge District Associations and NAC's. This would provide;

1. A democratic, accountable and multifunctional framework. It would include Unitary Councillors & Parish Councillors, at ratios that were appropriate to the subject matter.
2. A flexible structure that could engage at the Parish level, or in Groups of Parishes, at district level or across more than one district. Sub committees could be formed as needed with as wide or narrow scope as needed.
3. Engagement with all stakeholders, be consistent in its approach across Sussex, and have auditable governance.
4. A cost-effective structure. Rather than adding a new layer of government it is better to **build on an existing structure** with much of the expertise needed for informed decision making. Costs could be shared and with the use of IT systems to collect data (rather than just minutes) and the use of AI to link the outcome from all groups this could be absorbed in to the unitary scrutiny and decision-making process without adding many link staff and costs.

The outcomes expected of NAC's are aligned with the aims of the existing local government county and district associations structures, but as noted earlier delivering those aims for NAC's has proven difficult and expensive, while some of the aims of district associations can also be difficult to deliver because there is no requirement for District Councils or other service providers to engage with the Associations. Combining the NAC and district associations would both imbed the process within the umbrella of the unitary, strengthen

the reach of DA's and be a more cost effective and flexible approach to engagement at a local level.

The decision on how to proceed is for the new unitary council to consider but the principles defined in the One East Sussex bid must be adhered to.

The six principles defined in the One East Sussex bid : and fit with this proposal by RALC

1. **Building on foundations:** Use and adapt the existing structure rather than introduce a new layer. The proposal would create a stronger link between local needs , the unitary council and parish & town councils using an enhanced exiting structure.
2. **Sustainability:** This proposal does not require substantial new admin structures. It could be improved by increasing and redefining the admin support needed at District and County level for both personnel and IT capability.
3. **Fit for the future:** The proposed structure is more flexible than the NAC's that have been set up in other regions. NAC only solutions would be costly and limit engagement to large groups, which could risk missing local needs. East and West Sussex are close to 100% Parished which would enable working groups as a subset of a District Association/NAC to form to fit the size and frequency needed to achieve the outcome required. Control of working group set up and aims would need Unitary and District Association/NAC to agree defined procedure and have data sharing (e.g sharepoint) capability to manage ambitions and delivery. This would enable local and a birds eye view of engagement across the County.
4. **Fair and appropriate :** The proposed structure would allow the larger towns to manage themselves if they chose to, and also combine where needed with others where there is a common issue. Rural Parishes, with other stakeholders can group together if they needed to for projects either in clusters for local delivery or at district level as appropriate. Boroughs while currently outside of the scope of District and County Association could if they decide to become Town Councils work within the same structure, standalone if they choose to but also combine for common issues.
5. **Collaborative leadership:** The proposal would link Parish & Town Councils and stakeholders through the districts within the County/Unitary umbrella with all the elected and accountable member and officers collaborating to enable the Unitary to ultimately take properly informed decisions in a transparent and collaborative process.

The advantages of this approach are:

- Does not replicate but uses an existing structure with local knowledge and good governance to reach the goals indicated for NAC's in the Government white paper.
- Gives a voice to residents either through the P&T council or directly into the Association/NAC.
- Enhances the role of P&T Councils and its links via the Associations to the Unitary decision makers. (Should also help P&TC recruitment by recognition of their relevance by residents)
- Reflects the rural pattern and profile of East Sussex, ensuring the voice of rural communities is heard and policy and service delivery is rural proofed.
- Increases transparency and audit trail of actions from identifying local priorities to actions by the unitary. (using consistent and appropriate governance and process).
- Reduces the admin burden on the Unitary who are far removed from local levels to properly understand or apply this in a local context.
- Enables a tiered and County wide approach to address local and common agendas using a defined and consistent structure.
- A raising of engagement and of standards of competence and effectiveness at all levels.
- Avoids single issue groups dominating agendas in NAC's.
- This a scalable approach across Counties.

What is needed to implement this.

- District & County Associations need to have a defined level of competence and auditable governance. (Similar to P&T Councils)
- A change to the constitutions and terms of reference for District & County Associations to enable them to combine the aims and manage the additional work intended of NAC's.
- Embed with voting rights, Unitary members and officers as needed into the new structure.
- Use IT for the collection and distribution of information. One system across the County. E.G Sharepoint set up to manage activity across all levels rather than just minutes plus IA for analysis.
- Some funding from the Primary to professionalise the administrations and competence of associations/NAC's and share the admin burden.
- Clear application of scrutiny to the admins and outcomes of the Associations/NAC.
- A commitment to the rural proofing of policy and practice via reference to such in the terms of reference agreed.

Appendix A. Key roles and Outcome NAC's and District Associations.

Stakeholder	Role	Outcome	Engagement level
Unitary Cllrs & Officers	Decision makers and primary service provider across the County.	Able to understand and deliver local needs, directly or with partnerships. To receive feedback on service delivery. To work across / with other Gov service providers.	<ul style="list-style-type: none"> • P&TC for specific projects. • District/NAC for combined projects with relevant or all stakeholders, communications, and delivery monitoring. • County level for more strategic projects, executive direction & scrutiny
Town and Parish Councils	Decision makers and primary service provider at Parish level. Representative of residents views and needs from services delivered by the Unitary and other Gov providers.	Able to understand and deliver local needs, Directly or with partnerships. To receive feedback on local service delivery and delivery by the unitary. Effective comms with the unitary To effectively engage with the public and other stakeholders.	<ul style="list-style-type: none"> • Residents, Local groups, and NGO's • Other P&TC for specific projects. • District/NAC for combined projects, communications. (this could be beyond regional boundaries where common interest in clear
P&TC District Assoc and NAC's	<ul style="list-style-type: none"> • Forum for establishing combined efforts/projects within the region. • Forum to review and define issues and ideas common to P&TC in the region. • Working with the District/unitary Council on communications, info sharing. • Working with the Gov service 	<p>Able to understand and deliver local needs of P&T Councils in the region.</p> <p>To coordinate if needed actions for groups of stakeholders</p> <p>To receive feedback on local service delivery and delivery by the unitary.</p> <p>To effectively engage with the District/Unitary on service and Gov matters.</p>	<ul style="list-style-type: none"> • Gov Service providers, Local groups, and NGO's. • Unitary for services, legal, Gov matters and regional projects. • P&TC for specific projects. • P&T Councils for training and Governance • County Associations for County wide opportunities, issues, governance, training, legal updates, communications,

	<p>providers and other stakeholders.</p> <ul style="list-style-type: none"> • Provision of admin, services to P&TC. • Monitor Governance and Capability. 	To effectively engage with the public and other stakeholders.	
P&TC County Assoc	<ul style="list-style-type: none"> • Forum for combined efforts/projects within the region and with the district/unitary Council on opportunity and issues across district boundaries. • Provision of Training for P&T's. • Provision of admin, legal and recruitment services to • Represent County at National levels. • Receive & distribute advice from National Assoc and from UK Gov. 	<ul style="list-style-type: none"> • Able to identify and understand opportunities, issues, and project within the districts. • Good governance at district and P&TC. • To receive feedback on local service delivery and delivery by the unitary. • To effectively engage with the District/Unitary on service and Gov matters. • To effectively engage with stakeholders. 	<ul style="list-style-type: none"> • Unitary for services, legal, Gov matters and cross regional projects. • P&T Councils for training and Governance and services provided. • National Associations for UK wide opportunities, issues, governance, training, legal updates. Communications. • Mayor and Unitary for Strategic.
Emergency Police & Fire	Provide police services, Road Safety, Community Policing, advice general and responses to planning.	To advise on Police matters at levels appropriate. To receive feedback and information from levels as appropriate.	P&TC's local policing. District Assc / NAC for common advice / issues and feed back. At County level for more strategic or County wide issues.
Health Providers	Provision of local health services and health emergency	Advise on and understand local needs. Feed back and action to NHS at relevant levels	P&TC's possible at local levels. District Assc / NAC for common advice / issues

			planning and monitoring and feed back.
Housing providers	Build large scale housing. Provide local housing/affordable.	Stakeholder at a strategic level. Identify opportunity and need at local level and build housing needed working in partnership with stakeholders.	Unitary & Mayoral levels. P&T's and public for specific applications. P&TC's for local needs. District / NAC's to support development
NGO's & Charities	Identify and provide specific needs.	Stakeholder at a strategic level and at district/NAC to identify opportunity and need at local level	Very dependent on the NGO/Charity Aims but at Unitary & Mayoral levels or District / NAC's to support needs or possible at P&TC's
Energy / Facility Providers	Provide Power, Gas, Water	Input at strategic level, district/NAC for major projects and advice on planning.	Very dependent on the NGO/Charity Aims but at Unitary & Mayoral levels or District / NAC's to support needs or possible at P&TC's
Telecoms Providers	Provide access to telephone and data services	Input at strategic level, district/NAC for Advise on service provision and feedback on quality of provision.	Unitary & Mayoral levels for major project oversight. District/NAC for common interests. P&T's and public for specific provision levels..
Members of the Public	To have a voice and receive the services they need.	There is a place where they can engage,	P&T Councils for local needs and representation to the unitary. District/NAC's if they wish to engage where interest and common beyond local.
Rural communities			