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26th October 2018

Dear Anthony,

Nottinghamshire County Council - Public engagement on the structure of local government

Thank you for the opportunity to comment on your engagement exercise on the future of local government in Nottinghamshire.

Nottingham has not sought the reopening of the question around boundaries, despite the outcome in 1998 leaving the City Council under-bounded, but you will be aware of Nottingham City Council's view that any local government reorganisation proposals should be discussed collaboratively between our two councils and our district council colleagues. Together we can openly discuss local government reorganisation in the best interest of residents, businesses and all our stakeholder for the whole N2 area.

Local government reorganisation that includes the district council areas of Gedling, Broxtowe, Rushcliffe and Ashfield will have a significant impact on the city of Nottingham. Unlike other Core Cities, Nottingham is disadvantaged by being one of the most underbounded cities in the country. Proposals to create a new unitary council would further compound this disadvantage - cementing an under-bounded city within a larger county unitary.

Thriving cities maximising their economic potential and reinvesting the growth they create can have compound benefits for the city and for the surrounding area. While at the Cabinet Office, the current Secretary of State for BEIS, Greg Clark, said:



'The city is one of the rising forces of the 21st century. I want all our cities to be thriving places, living up to their full economic potential, matching growth with greener ways of living and doing business. When our cities do well, our countries do well.'

Nottingham's position as an under-bounded city is reflected in many key socio-economic indicators. Taken together, these make a compelling case for local government reorganisation that should include Nottingham and some of the surrounding district areas. For instance, less than half (48.7%) of those who work in the city also live in the city. This is a significantly lower figure than for other comparable cities. In Derby, the equivalent 'self-containment' figure is 66.4%. Amongst other Core Cities, Sheffield's self-containment is 75.7% and that for Leeds is 70.5%. As a destination of choice for leisure, entertainment and shopping, many people from outside the city make use of city services and use city infrastructure but they do not contribute to the funding of these. Conversely, neither are they in a position to hold Nottingham's decision makers to account for choices that can significantly affect their daily lives.

Any case for change should be cognisant of the real functioning economic and social geography around us. Standard measures include travel-to-work (TTWA), housing market, and travel-to-learn areas.

TTWAs provide information about commuting flows and the spatial structure of the labour market, all of which will influence household price and location. TTWAs also provide information about the areas within which people move without changing other aspects of their lives. Nottingham's TTWA covers Gedling, Broxtowe, Rushcliffe and Hucknall. The Broad Rental Market Area (BRMA) is the geographical area used by the Valuation Office Agency (VOA) to determine the Local Housing Allowance rate. Again the Nottingham BRMA covers a similar area as the TTWA – a much wider geography than the existing city council's boundaries. Whilst housing market areas are defined predominantly in terms of the areas "where most of those changing house without changing employment choose to stay", it is also relevant to consider them in the context of "...the geographical area in which a substantial majority of the employed population both live and work".

Our position is that it is of fundamental importance to consider the extent to which the resident population work in the area and the workplace population live in the area in any new round of local government reorganisation. Given the transport, infrastructure and economic responsibilities of single tier councils, a clear and objective case can be made for TTWAs and housing market areas guiding new unitary council boundaries.

Boundaries that more closely reflect these socio economic patterns are the norm for the vast majority of the rest of the Country - and indeed the world. It is the boundary between Nottingham and Nottinghamshire that is inconsistent, arbitrary and an unsustainable result of the outcome in 1998.

Driving or walking north along Deer Park Drive, visitors will find themselves leaving the city and entering the county, subsequently leaving the county and entering the city, then once again leaving the city and entering the county. This boundary confusion occurs over the

course of as little as 100 meters on a largely straight road. As the road bends to the south east it terminates once more back in the city.

Across the north and north east of Nottingham there are a significant number of direct neighbours who find themselves on different sides of the border – indeed there are cases where neighbours share party walls, but do not share the same Council. But it is this non-credible geography that would be set in stone by the county moving towards a unitary structure on its existing boundaries.

Any future local government reorganisation needs to be sustainable and future-proof. The current County Council proposal to consider change on just the County Council boundary only would stifle Nottingham and Nottinghamshire's growth and reduce accountability for city services. Such a large unitary would dilute its focus on its diverse service delivery responsibilities across former coalfields and growing market towns if it had additional Metropolitan duties in an arbitrary ring around Nottingham.

With the County committed to its policy of moving towards reorganisation, we at the City Council would want to consider local government reorganisation for the N2 area alongside you and district colleagues. We would suggest the Economic Prosperity Committee (EPC) is an appropriate forum to collectively discuss a way forward that would be of greatest benefit to our citizens.

Yours sincerely

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Chief Executive

Nottingham City Council

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