

**CABINET – 24 MARCH 2026****LOCAL GOVERNMENT REORGANISATION: RESPONSE TO  
CONSULTATION****SUPPLEMENTARY EXEMPT JOINT REPORT OF THE CHIEF  
EXECUTIVE AND THE DIRECTOR OF CORPORATE RESOURCES****PART A****Purpose of the Report**

1. The purpose of this report is to seek approval of the County Council's response to the Government consultation on local government reorganisation (LGR) in Leicester, Leicestershire and Rutland. The responses are attached as Appendices to the report.

**Recommendations**

2. The Cabinet is recommended to:
  - (a) Approve the consultation response for submission to the Government by the deadline of 26 March 2026, as set out in Appendices A-C;
  - (b) Approve the consultation response ratings for submission to the Government by the deadline of 26 March 2026, as set out in Appendices D;
  - (c) Authorise the Chief Executive, following consultation with the Leader and the Director of Corporate Resources, to make any necessary amendments to the consultation response before it is submitted to the Government provided that these do not change the underlying principles of the response as presented in this report.
  - (d) Note the comments from the Scrutiny Commission.

**Reasons for Recommendation**

3. The Government is undertaking consultation on the proposals for Local Government Reorganisation in Leicester, Leicestershire and Rutland for 7 weeks between 5 February and 26 March 2026. The County Council is a statutory consultee.

### **Timetable for Decisions (including Scrutiny)**

4. The Scrutiny Commission received a presentation which provided an outline of the consultation response at its meeting on 18 March. The Commission's comments are set out in paragraphs 12-22 of this report.

### **Policy Framework and Previous Decisions**

5. These have previously been set out in the main report.

### **Resource Implications**

6. There are no resource implications arising from the recommendation in this report.
7. Work completed to date on LGR has primarily been delivered using internal resources. Where external support has been required this has been paid for from the Government's Local Government Reorganisation Proposal Development Contributions grant, the main expenditure has been the financial modelling.
8. LGR will be a significant undertaking that will have a material impact on the Council's financial position in future years. The costs and benefits will be heavily dependent upon the option chosen by Government, with this decision expected before the summer recess of parliament. Regardless of which option is chosen a significant investment will be required before the new authority (s) come into existence, to support this £10 million was allocated as part of the MTFS approved in February 2026.
9. The council will need to continue the process of preparing for re-organisation, working alongside other local authorities in Leicestershire, Leicester and Rutland. This work has begun and will continue in the intervening weeks and subsequent to the government decision in the summer. The Council will need to ensure that it has resource to co-ordinate activity and input into this joint work.

### **Circulation under the Local Issues Alert Procedure**

10. This report has been circulated to all members of the Council.

### **Officers to Contact**

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## **PART B**

### **Background**

11. The Government is undertaking a consultation on the proposals for Local Government Reorganisation in Leicester, Leicestershire and Rutland for 7 weeks between 5 February and 26 March 2026. The County Council is a statutory consultee.

### **Scrutiny Commission**

12. The Scrutiny Commission received a presentation which provided an outline of the consultation response at its meeting on 18 March 2026. Arising from the discussion, the following key points were made:
13. Members stressed the importance of preserving the distinct civic and historic identities of the County and Rutland. The County Council's single unitary proposal commits to honouring this heritage; alternative north/south proposals risk diluting it.
14. Concerns were raised that current language implies a "County Council takeover," which could mislead the public. The Commission requested more neutral, professional wording, avoiding political or emotive phrasing, suggesting responses should be evidence-based and clearly explain the strengths of the single unitary model and risks of alternatives.
15. A benefit of the County's proposal related to how planning would operate. Emphasising that a north/south unitary option would centralise planning and reduce local democratic input, whilst the County Council's single unitary proposal intends to keep local engagement through area planning bodies. It was suggested that the concerns raised about reducing this under the north/south model also applied to the City Council's bid.
16. LGR would strengthen spatial planning and allow consistent policy-making across the county. A single unitary could also integrate housing, infrastructure, and service decision-making more effectively. Unifying housing land supply would support balanced decisions across housing, roads, schools, and community facilities.
17. There was concern that the City Council's proposal appears driven by land acquisition for housing and residents concerns in affected areas who fear diminished service quality if moved into the City were emphasised.
18. It was suggested that the City Council's proposal lacks detail on managing parished areas despite having no current experience of administering them.
19. Whilst it was accepted that boundary reviews are inevitable this would vary in complexity with a single unitary requiring minor adjustments, and no need for changes before 2027 elections. The commission suggested that the Council's

response should emphasise the boundary risks of alternative models; notably the north/south split or City expansion would be more complex, lengthy, and costly.

20. Public concerns about large authorities feeling remote was highlighted but it was acknowledged that this would apply to any LGR model. It was felt that clarification was needed on population figures and their implications, but the Commission noted that a single unitary population size falls within the Boundary Commission's guidance.
21. High costs of disaggregating services were noted.
22. There was strong support for a unified model due to opportunities to improve adult and children's services through integrated housing and related services.

### **Equality Implications**

23. Due to the complexity and scope of the proposal and possible wide scale impact of the changes proposed the Council will adopt a strategic approach to conducting Equality Impact Assessments during all programme phases and stages.

### **Human Rights Implications**

24. There are no human rights implications arising from this report.

### **Background Papers**

These have previously been set out in the main report.

### **Appendices**

A – Leicestershire County Council – Consultation Response

B – Consultation on the Proposal from Blaby District Council, Charnwood Borough Council, Harborough District Council, Hinckley and Bosworth Borough Council, Melton Borough Council, North West Leicestershire District Council, Oadby and Wigston Borough Council, and Rutland Council – Leicestershire County Council Consultation Response

C – Leicester City Council Proposal – Consultation Response

D – Consultation ratings

## **Leicestershire County Council Proposal – Consultation Response**

### **Executive summary**

Leicestershire County Council's proposal supports local government reorganisation through a single unitary authority for Leicestershire and Rutland (with Leicester City remaining unchanged), retaining existing boundaries to align with established public-service footprints (including police, fire and health) and the long standing Leicester/Leicestershire functional economic area. The proposal argues this approach is the simplest and lowest risk route to deliver reorganisation and will deliver improved public service and devolution quicker than any other proposal. This is because it uses a proven model, avoids boundary change and avoids disaggregation of services, delivering a "Day 1 Safe and Legal" transition that can be built on quickly to deliver longer term transformational benefits. The financial assumptions have been independently checked and aligned with Leicester City Council, projecting £114m savings over four years, a 1.58 year payback, and £21.5m transition costs funded from reserves (rather than asset sales or borrowing). The Council contends the Leicestershire–Rutland footprint provides the scale and resilience needed to withstand financial shocks and service pressures (including an ageing population and funding reductions), while avoiding the inefficiencies and workforce competition that could arise from creating multiple smaller unitaries. It also emphasises maintaining local responsiveness through strengthened Area Committees (with small budgets) and area-based planning and licensing, and reports engagement feedback showing no appetite for city boundary expansion and strong interest in protecting local identity and ceremonial counties (including Rutland).

### **Sensible geographies and economic areas**

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*Simple – no boundary changes required*

*Sensible – built on border that all residents and partners recognise*

*Strategic – best combination of authorities for Strategic Development Strategies and Devolution*

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This proposal maintains the geography of Leicester, Leicestershire, and Rutland to reflect established arrangements for public services. The new unitary authority will match the boundary for police, fire and health services.

Leicestershire and Leicester are an established functional economic area and the proposal builds on this by integrating Rutland into the Leicester and Leicestershire economic partnerships.

The county is already experiencing significant growth; by combining district and county functions, it will establish more robust and flexible planning structures capable of addressing substantial infrastructure challenges that currently hinder development.

Leicestershire County Council has considered the role of Spatial Development Strategies and Strategic Authorities that will cover the Leicester, Leicestershire and Rutland region and the important strategic functions around development, transport and growth that will accrue to the Strategic Authority. Other proposals have stressed the importance of having two or

three unitary authorities balanced by population, even when this will involve breaching the government guidelines. However, Strategic Authorities already operate successfully without balanced populations showing the most important factor is coherent unitary authorities that can deliver what residents need.

With no changes to boundaries, this approach offers the simplest method for reorganisation for the new authority, residents, and partner organizations.

### **Ability to deliver the outcomes described in the proposal**

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*Simple – quick and low risk approach*

*Sensible – delivers all the outcomes at low cost*

*Strategic – fastest preparation and delivery of transformation in the new authority*

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All of the financial calculations and assumptions have been independently checked and verified by the consultancy 31Ten and PwC and have been shared with and verified by Leicester City Council.

This proposal will save £114m over 4 years, paying back the necessary investment to deliver transition within 1.58 years. The proposed approach delivers substantial efficiency gains, achieving £40 million in savings by refining management structures, streamlining back office processes, and removing unnecessary duplication. At this scale, the authority is able to leverage enhanced purchasing power and strengthen its position within the market, optimising the benefits that arise from aggregating activities across the county.

Transition costs total £21.5m and are the lowest of all the proposals put forwards. It is proposed to fund transition through reserves, rather than through asset sales or borrowing, in contrast to other proposals.

The modelling for this option has a very good level of accuracy, due to its similarity to previous re-organisations. The focus will be on 'Day 1 Safe and Legal' transition, setting the scene for transformation, once the new authorities are established.

The nature of the proposal is such that there is a very high certainty of delivery. Leicestershire County Council's bid is low risk compared to the alternatives.

### **The right size to be efficient, improve capacity and withstand financial shocks**

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*Simple – a straightforward transition that maximises financial savings for future resilience*

*Sensible – avoids creating competition between three unitary authorities for staff and resource*

*Strategic – well-positioned to address the challenges arising from both a growing and ageing population*

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Leicestershire is a relatively small county with low funding per capita, making it highly sensitive to changes in scale; it currently ranks 19th lowest among remaining 21 counties by Core Spending Power. Consideration was given to ensuring manageability of change, and the new unitary authority would only be a modest increase compared to the existing County Council, serving a population that is approximately 5% larger. In practice, this increase is even less significant, as many services for Rutland are provided by Leicestershire.

Adopting the Leicestershire and Rutland footprint enhances efficiency by facilitating aggregation of activity, yielding rapid financial returns that support long-term financial stability.

Importantly, there is no requirement for unnecessary disaggregation, allowing resources and expertise to be deployed collectively. By managing service pressures as a unified county, notable advantages are realised, especially in areas experiencing higher growth rates in the North compared to the South—an issue that alternative proposals, such as the North-City-South model, fail to address effectively. Furthermore, the City fringe continues to be one of the most cost-effective regions to serve, owing to its lower levels of rurality, which simplifies service delivery and supports overall efficiency.

The proposed approach is well-positioned to address the challenges arising from both a growing and ageing population, ensuring increased demand for health, social care, and other essential services is met effectively. By enabling flexible deployment of services according to specific needs, the model maintains adaptability and resilience. Existing operations have already demonstrated the capability to deliver effectively at this scale, with no requirement for asset or capacity transfers. This not only streamlines processes but also helps to close gaps in savings activities. However, it is important to recognise that the current market presents difficulties for certain service areas. Establishing a competing council would likely exacerbate these issues, competing for specialist teams, staff, assets and resources. Any attempt to partition or redraw boundaries could result in costly imbalances in service capacity, ultimately undermining efficiency and stability.

Financial resilience is a central aspect of this proposal. Leicestershire County Council have carefully considered the implications of funding reform, basing the approach on existing organisational structures to address the anticipated £27 million loss of district transitional protections. This plan ensures that the City Council remains sustainable at its current scale, while also resolving issues linked to Rutland's small size and its relatively high Council Tax, which stands at 20% above the average. By avoiding the pitfalls associated with disparities in growth and demand between the North and South, this proposal is well-placed to deliver stability.

Leicestershire County Council have also taken into account the current financial climate in which the new unitary authority will operate. Significant savings will be required due to ongoing pressures on services, and these challenges will be intensified by the reduction in income protections that comes into effect from April 2029. By adopting the simplest and most efficient transformation strategy, Leicestershire County Council believe the new unitary authority will be best equipped to meet these financial challenges and secure long-term stability.

## **High quality, sustainable public services**

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*Simple – no need to unnecessarily disaggregate services between authorities*

*Sensible – making every penny of taxpayers' money count by getting best economies of scale*

*Strategic – rapid transition means the future focus can be on service improvements to reap the benefits of LGR*

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Leicestershire County Council believe this proposal will enhance consistent, flexible, and localised services for residents. By unifying district-delivered services, it will strengthen prevention, collaboration, and joint efforts across areas like waste, planning, housing, and social care. This will cement existing operations through community-based library points, family hubs, and area coordinators, alongside central functions such as the multi-agency child exploitation team for targeted needs and cost efficiency.

Leicestershire and Rutland's services perform well despite budget pressures, with notable achievements in children's social care, highways, and adult social care. Splitting these services risks undermining good practice and performance. Leicestershire's and Leicester City's Adult Social Care services are rated as "requires improvement", the improvements both authorities are committed to risk being slowed if disruption occurs through disaggregation and reaggregation.

People services and infrastructure planning are most effective at scale, minimising leadership costs and maximising frontline resources. Aligning neighbourhoods with partners like health and police is crucial.

Combining county and district functions will reduce duplication and expand prevention work, continuing demand reduction efforts. A new single county unitary would minimise Council Tax harmonisation costs compared to city proposals, protecting frontline spending.

Critically, this proposal is the only one not to require any form of disaggregation of services, allowing a faster transition, with continual focus on service standards and effective delivery in the new authority. It means that residents of Leicestershire and Rutland can access services anywhere in Leicestershire and Rutland. The service to Rutland residents will noticeably improve as a significantly larger number of assets are available to members of the public and greater scale and expertise can be amalgamated with the public services already delivered in Rutland.

One unitary for Leicestershire and Rutland has been criticised for creating an authority so large that it cannot respond to the differing natures of parts of the region. Analysis shows that the larger of the two unitaries created in this proposal would still only be the 19<sup>th</sup> largest in the UK. Leicestershire County Council cannot see any compelling evidence in any of the proposals that shows there is this 'diseconomy of scale' from a larger organisation. The track record at County and District level in delivering from community locations, such as libraries, family hubs and with local area coordinators, shows that this will not be the case. Furthermore, the ambitious plans for Area Committees will enhance local engagement with decision-making and service delivery, ensuring that no community is left behind.

The City's service delivery approach would need to significantly change, as it currently cost 30% more per head than county services and serves a younger, more deprived and densely populated population. This would be a significant activity to align services potentially requiring either downsizing or delivering a reduced offer. For example, the county switches off street lights for efficiency, unlike the city.

This bid enables all services to continue seamlessly alongside LGR, avoiding disruption from service disaggregation or interim arrangements. There will be no need for 'shared services' or 'pay to use' models in this proposal. The County Council is committed to LGR's benefits and is already delivering at scale, including Rutland and Public Health.

Opportunities include integrating social care, wellbeing, and housing, optimising school planning, reducing duplication in community safety, achieving housing efficiencies, managing demand better, streamlining waste management, and simplifying planning boundaries to support housing growth where needed.

Aggregation of services will be challenging for all of the proposals put forward. But Leicestershire County Council are confident that by undertaking aggregation without the concomitant risks of disaggregation ensures that there is the greatest opportunity to deliver a transition of high-quality, sustainable public services, ready for further transformation in the new authority.

Leicestershire County Council have listened to the experience of other authorities embarking on the LGR process and those who have come through it and recognise the importance of ensuring that transition and transformation plans are not confused. This bid is the lowest risk for Day 1 Safe and Legal transition. Whilst it presents a vision for the possibilities afforded to future authorities from the aggregation of services in one unitary authority, it has been careful to ensure that it respects the right of new authorities to choose their own strategic direction for services. Leicestershire County Council believes that there is substantial risk from other proposals that are predicated on wholesale service redesign on largely untested and ill-defined prevention-based models or neighbourhood based approaches with wildly optimistic savings targets.

### **Being informed by local views and meeting local needs**

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*Simple – decision making taken close to residents*

*Sensible – listening to the clear opinion from residents around boundary expansion*

*Strategic – creating a structure that balances local needs and opinions with efficiency in service delivery to deliver value for the taxpayer*

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Leicestershire County Council collaborated with councils and partners to conduct a comprehensive financial analysis, establishing shared assumptions, data, and insight regarding the implications of public sector services.

Leicestershire County Council wanted to ensure that we engaged residents as much as possible to hear as many views as possible.

Initial engagement in February and March 2025 focused on understanding what people value from their council. Every household received information and a copy of the survey through their door and just under 1,500 responses were received.

Further engagement took place in October 2025 with around 1,000 residents, parish and town councils, businesses, voluntary and community groups, and council staff.

Just under 800 people responded to an online survey asking for feedback on proposals for change.

Additionally, engagement took place with residents, businesses, the VCSE and parish and town councils who provided valuable feedback on their priorities, including:

- Streamlined services
- Preservation of local identity
- Recognition of ceremonial counties
- The mechanics of Area Committees
- Transparency and long-term strategic planning

Leicestershire County Council acknowledged in our proposal that a specific concern raised was around the proposed authority being too large. We noted that the proposed unitary authority is not significantly larger than most other local authorities in budget, population, or area. Local changes are modest, with minimal budget increases and boundary adjustments, ensuring responsiveness to community needs. Most decisions—like social care and highway inspections—already occur locally; this reorganization is a structural update, not a change in service delivery.

The main way in which the proposal has addressed this concern is through bolstering our approach to Area Committees, setting them on a firmer and clearer footing, with a small budget for each. Alongside this, Area-based planning and local licensing ensure that this critical decision making is kept close to residents, addressing diverse community needs. There is also a clear commitment to devolve suitable services to town and parish councils where there is the willingness for this to happen.

Consistently, residents, partners, and Members of Parliament expressed that there was no appetite for expanding the city boundary. Over two thirds of respondents to the survey did not want any expansion to the City boundary. This was mirrored in all surveys undertaken by the other proposals.

### **Supporting devolution**

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*Simple – the most efficient way to deliver devolution*

*Sensible – working at an appropriate timescale to deliver the right results*

*Strategic – partnership working across the whole MSA area*

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All councils in Leicestershire and Rutland have publicly adopted a pro-devolution stance. This proposal supports this commitment by providing the most efficient approach to establishing a strategic authority, while minimising disruption during the transition process.

Additionally, it offers a robust foundation for the new Strategic Authority, as relevant functions remain intact and can be smoothly transferred. Partner organisations will experience continuity throughout this process.

For similar reasons, this solution is optimal for Spatial Development Strategies, ensuring that strategic planning resources remain undisturbed.

Leicestershire County Council recognise that delivering outstanding public services requires effective partnerships. This platform is designed to facilitate successful devolution and position partners for enduring success. However, in contrast to other proposals, this proposal does not seek an even faster timescale for devolution. Rather, we believe that this proposal will work with whatever timescale is most appropriate for central government.

### **Enabling stronger community engagement and gives the opportunity for neighbourhood empowerment**

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*Simple – area committee model can be easily delivered across the whole unitary authority*

*Sensible – Area Planning and Licensing committees that will deliver decisions that matter in local areas*

*Strategic – the right amount of political representation that balances effective governance and efficiency*

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Nationally, concerns have been raised regarding the scale of new unitaries. As previously discussed, this risk is highly manageable. Effective delivery at this level relies on establishing an appropriate operating model.

The proposed organisation intends to maintain a local focus while leveraging organisational scale when advantageous. For example, planning responsibilities will be allocated accordingly: area planning committees will oversee small-scale, street-level developments, whereas larger projects involving significant infrastructure will be managed centrally by professionals and Members experienced with complex proposals and major developers. Likewise, licensing will be managed through Area Licensing Committees.

Area Committees foster stronger communities by forming local groups that supervise local services and participate in area-specific decisions, ensuring the new unitary remains closely integrated with its localities and achieves enhanced sustainable growth. Leicestershire County Council are confident that this approach will ensure that all voices are heard, particular those of rural communities in Rutland.

The proposal has carefully considered an appropriate level of councillors to ensure a suitable balance of community representation and decision making, alongside a manageable workload. Mindful of the guidance from the LGBCE, for the new unitary council in

Leicestershire and Rutland, each councillor is proposed to represent about 6,500 voters—higher than the current single tier average of 5,000. This will ensure the council size fits guidance of 30 to 99 councillors.

Parish and Town Councils play a vital role in public service delivery across Leicestershire and Rutland. Where there is demonstrated demand, commitment has been made to establishing additional councils and offering all parishes a menu of services from which they may choose to assume responsibility. This strategy continues the commitment to genuine local devolution.

Leicestershire County Council recognise the importance of ceremonial counties and local tradition. This was a theme that came through strongly in engagement with communities. This is the only bid that fully recognises the historic county of Rutland by preserving its ceremonial institutions, such as the lieutenancy, rather than blurring them into a larger northern unitary.

Finally, under this proposal, Members of Parliament would interact with only one authority, further supporting robust local governance.

## **Consultation on the Proposal from Blaby District Council, Charnwood Borough Council, Harborough District Council, Hinckley and Bosworth Borough Council, Melton Borough Council, North West Leicestershire District Council, Oadby and Wigston Borough Council, and Rutland County Council – Leicestershire County Council Consultation Response**

### **Executive summary**

Leicestershire County Council supports rapid devolution and recognises the ambition to simplify governance. However, we do not support the District Councils/Rutland proposal to create three new unitaries (“North Leicestershire & Rutland”, “Leicester City”, “South Leicestershire”). We consider the proposal non compliant with MHCLG’s scale expectations for new unitaries, insufficiently evidenced on “economic geographies”, and carrying high transition and service risks with optimistic, overstated and, in several areas, unsubstantiated financial and delivery assumptions. We would ask MHCLG to test compliance with scale guidance and the evidential basis for “economic geographies”; require transparent, comparable financial modelling including permanent disaggregation costs, council tax harmonisation risk, and deliverability of savings; and seek robust assurance that “day one” for statutory services will be safe given the breadth of simultaneous disaggregation and governance complexity, particularly the proposed lead role for Rutland.

### **Sensible geographies and economic areas**

#### **Two unitary authorities vs three unitary authorities**

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*Leicestershire County Council query whether a three unitary authority model where no unitary meets the population threshold and offers no clear case for deviation, is compliant with the LGR guidelines*

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- The guidance from MHCLG clearly states that the size of a new unitary authority should be over 500,000 population. However, within this proposal, neither of the two new authorities proposed are close to meeting the threshold of 500,000.
- By contrast, the proposal for a new Leicestershire and Rutland unitary authority delivers an authority over the threshold.

#### **Methodology for establishing proposed boundaries**

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*Leicestershire County Council can find no evidence that the boundaries proposed form “distinctive economic geographies”*

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- Leicester and Leicestershire has historically been recognised as a Functional Economic Area (FEA) with strong co-operation across the local authorities in the area

on strategic land use planning and strategic economic development. There is little or no precedent for a north / south Leicestershire split.

- The bid argues that the three unitaries represent “distinctive economic geographies” of North Leicestershire and Rutland, Leicester City, and South Leicestershire. These are “areas defined by where people live and work”. The phrase ‘economic geography’ is used 20 times in the proposal, yet no methodology or evidence is provided that goes any way to proving that North Leicestershire and Rutland or South Leicestershire comprises an area “where people live and work”. Leicestershire County Council’s assumption is that the geography has been based upon simply trying to deliver balanced population sizes, rather than authorities that are right for Leicestershire.
- For example, whilst the bid characterises the North Leicestershire and Rutland unitary authority as an economic geography comprised of manufacturing and logistics, with salaries below the national median, this hides significant variances. Likewise, the southern authority demonstrates little coherency between the eastern and western halves.
- Most businesses are either based in larger towns or related to the logistics industry concentrated around major roads (such as the M1, M69 and A42) and East Midlands airport. In contrast, the East of the county is more rural with fewer major roads and fewer larger towns.
- The top five sectors in the proposed North and South unitary areas are almost the same, the only difference being that Education replaces Health in the North due to the presence of Loughborough University.
- Analysis of the combined AM/IP/PM peak period “commuter” class trips within the Pan Regional Transport Model (PRTM) produced the results below.
  - In terms of the "North, City, South" proposal and trips involving the "North, City, South" authorities:
    - Two-thirds (63.6%) of trips are within the same authority.
    - One-sixth (16.8%) of trips are between authorities.
    - One-fifth (19.7%) of trips are to/from places outside of the "North, City, South" area.
  - Analysis of commuting flows between districts shows very little movement between NWL and Melton and Rutland and vice versa, suggesting little travel coherence in having those areas grouped as a unitary authority.
  - Hinckley and Blaby display slightly more interaction with each other given closeness of boundaries, but limited flows between them and Oadby & Wigston and Harborough.
- Some of the responses to this proposal through public engagement suggested that more obvious authorities would be an east/west split, with Rutland/Melton/Harborough/Oadby and Wigston and then North West Leicestershire/Charnwood/Hinckley and Bosworth and Blaby. These would arguably deliver a better rural/semi-rural split, with authorities better matched to existing transport links. However, the population split, using the proposal’s population numbers would then be West: 562,000; City: 373,000; East: 256,000 which is clearly unbalanced.
- It should be noted that the former NHS Clinical Commissioning Groups (CCGs) were organised on an east/west basis across Leicester, Leicestershire and Rutland. This reflected the more rural east Leicestershire complexion and the different characteristics of the west. The local NHS groupings have since been restructured.

- That this split is not even considered within the proposal suggests that the primary driver has been balancing populations, rather than areas that naturally hold together as coherent units.

### **Expansion of city unitary**

- Leicestershire County Council agree with the proposal in its rejection of any expansion to the boundary of Leicester City Council.

### **Ability to deliver the outcomes described in the proposal**

#### **Optimistic economic growth projections**

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*Leicestershire County Council believe that the economic modelling outputs (e.g. headline growth and Treasury benefit figures) are only indicative and are not dependent upon re-organisation.*

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- This proposal argues that 83% Gross Value Added Growth can be achieved by 2050 vs 40% baseline growth. These figures come from a report by the Economic Intelligence Unit which suggests that if all of the key pipeline development projects in the county were delivered then this level of GVA Growth could be achieved.
- There are two significant flaws in this work. Firstly, it assumes that all of the pipeline projects can be delivered. Given that some, such as the Hinckley Rail Freight Terminal, have been refused planning, this cannot be assumed.
- Secondly, it believes that only a three unitary model can deliver all of the projects in the pipeline and the economic growth objectives of their areas. This is the only reason given for why a three unitary model achieves 83% GVA growth. There is nothing in the report undertaken by the Economic Intelligence Unit Report that indicates that smaller unitaries are naturally more predisposed to higher economic growth. Neither is there anything in the report that suggests that a two unitary authority arrangement would automatically fail to deliver these key pipeline projects. Indeed, it is likely that a two unitary approach, with more focussed economic development teams, well-resourced and led, could be far more effective at attracting the right calibre of staff to deliver the entire pipeline of developments.

#### **Methodology to create purported savings**

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*Leicestershire County Council do not believe that the supposed £44m of savings are a true reflection of the proposal.*

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- £44m savings are overstated, true level likely half this due to:
  - Workforce savings assumptions are unrealistic (£9m).
  - Income equalisation savings are not related to LGR (£10m).
  - Reliance upon asset sales greater than other proposals (£3m)
  - Disaggregation (£5m) and borrowing costs not included

- When consistent assumptions are used per the independent financial analysis of proposals done by the consultants 31Ten. This suggested a net saving of £17m in a three unitary authority model. This is also in line with historic experience.
- Disappointingly, this proposal did not share financial modelling. Leicester City Council and Leicestershire County Council's bids share the same financial modelling which makes comparison more straightforward. Leicestershire County Council also gained external validation of their financial appraisal from PwC. The three unitary proposal assumes workforce efficiencies higher than the County's two unitary model.
- Given that all the proposals acknowledge that a three unitary model will have higher ongoing management and administration costs, compared to a two unitary model, this suggests that in order to achieve a higher level of workforce efficiencies, the three unitary proposal could have to cut service levels to achieve this saving.
- Leicestershire County Council do not believe that income equalisation should be included as they are not a saving that can only be delivered as a result of LGR. All of the current lower tier authorities could harmonise fees and charges today and this is open to all proposed options.
- This proposal assumes savings as a result of asset rationalisation totalling £5.5m. In the two unitary authority model, asset rationalisation only leads to savings of £2.5m. The three unitary model proposes selling £75m of assets, calling into question how services will be delivered in rural communities without appropriate infrastructure.
- The estimated £4.95 million total permanent disaggregation cost appears difficult to reconcile with the scale of services that would need to be split across two new authorities, including adult social care, children's services, SEND, highways, public health, libraries, trading standards and waste disposal.

### Ability to close the deficit gap

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*Leicestershire County Council believe there is little credibility of moving from an estimated ~£95m budget gap at vesting to surplus within 2 – 4 years, especially given the statement that this is achieved without service reductions and without using reserves.*

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- The proposal's long-term viability depends on two conditions being met simultaneously: successful delivery of the prevention model at the scale modelled, and successful disaggregation and stabilisation of all county-level services without significant quality deterioration or cost overrun. Each is individually challenging; achieving both concurrently, during a compressed transition, without County Council cooperation, with 200+ new prevention staff to recruit, and with an inherited collective budget gap of £95 million, represents a high-risk delivery scenario. If prevention savings underperform by even 30%, the new authorities face a structural deficit with no fallback strategy identified.

### Transition costs

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*Disaggregation costs will be significant, particularly for adult social care, children's services / SEND, highways and waste disposal, where risks and duplication pressures are typically highest*

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- This proposal is the most expensive of all on the table, with transition costs of £30m and an asset review costing £1m. The main driver is redundancy (£12m vs £6.8m), reflecting the complexity of creating two new organisations rather than one. By contrast, the two unitary model will cost around £21.5m to deliver.
- Leicestershire County Council note that the plan is that services transfer "as is" with common policies and ICT retained for at least year one; divergence only after robust assurance. This is pragmatic and mirrors the Cumbria precedent. However, the risk of duplication during the interim period (parallel leadership structures, dual ICT licensing, overlapping commissioning) is acknowledged implicitly but not costed.
- On top of these costs, this proposal has a further £100m of costs. This will be borrowed, costing over £10m in interest and repayments, per annum (assuming 20-years). Surprisingly, £80m of this borrowing will not be used on transition costs, but rather will be spent on improving property and social housing. This suggests the plans are distracted by transformation and future operating model. The final £20m is allotted to new IT systems. Whilst it is good to see an acknowledgement that robust IT is important, it was surprising to see such a heavy reliance applied to replacing only IT systems at such a high cost. The claim of "no disaggregation costs" for ICT defers cost rather than eliminating it. Social care case management systems, SEND databases, education data and public health records all require splitting across a new boundary that does not currently exist within these systems.

## **The right size to be efficient, improve capacity and withstand financial shocks**

### **Methodological questions over population sizes**

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*Leicestershire County Council does not find that the proposal makes a compelling argument for deviation from guidelines on population size.*

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- The assumption has been made that the population size of the northern unitary is 416,000; the City 404,000; and the southern unitary 403,000. These numbers are reiterated on p.114 as being the "current landscape". However, Office for National Statistics mid year population estimates for 2022 are: Northern Unitary 387,000; City 372,000; Southern Unitary 378,000. This is well below the figures quoted in this proposal.
- Leicestershire's proposal uses Office for National Statistics mid year population estimates for 2022. These were the most recent estimates available at a small geographical level, which was essential to allow the impact of boundary changes to be modelled.
- Even with this 12% population increase, the government guidance mandates a minimum population size of 500,000 unless there are significant reasons why not. This proposal misses this threshold by over 225,000 population in 2035. Despite the submission arguing that it aligns with "guidance on sustainable scale" this is clearly not the case.
- No compelling argument has been made as to why the Leicestershire circumstances are so unique as to warrant this deviation from guidance. The proposal hinges entirely around the idea of parity between unitary authorities under one mayoral strategic authority being the most desirable outcome.

### **Efficiency and capacity losses in small authorities**

- The proposal accepts that management costs will be lower in the alternative two unitary authority model. Leicestershire County Council's independent analysis suggests that the difference in potential saving in workforce costs between a two and three unitary authority model is £7.3m. This is largely due to the increased costs in a three unitary authority model of senior management, separate finance, HR, audit, legal, democratic services.
- Alongside this, the proposal notes that three unitaries is likely to lead to recruitment challenges for key roles. There is no solution presented for this, other than a vague commitment to "build resilient, well-resourced teams, underpinned by the right cultures and infrastructure to meet both system-wide and local needs". This significantly underplays the risk in this area. Three unitary authorities competing for senior managers, finance professionals, lawyers, social workers, planners, and skilled engineers will undoubtedly lead to wage inflation and high churn between authorities. This will impact on financial efficiency and productivity.
- Smaller unitaries also miss out on an opportunity to have the critical mass to develop specialist teams in certain areas. For example, specialist auditors, cyber security experts, environmental health noise specialists or fostering recruitment leads. This is likely to lead to poorer service levels, or over heavy reliance upon agency staff or consultants.
- Finally, this proposal will reduce capacity in key areas. Specialist teams, such as those for exploited children or youth justice, would need to be duplicated, resulting in higher costs and potential dilution of expertise.

### **High quality, sustainable public services**

- Leicestershire County Council believe that this proposal will be unable to deliver high quality, sustainable public services. This is for three principal reasons: the risks from disaggregation; uncertainties over future service architecture and the process of aggregation; and the blurring of transition and transformation with a premature focus on future strategic service delivery.

### **Risks of unnecessary disaggregation**

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*Leicestershire County Council believes that the risks around disaggregation where it is not necessary to do so, are not adequately understood and managed in this proposal*

*Leicestershire County Council urges clear assurance that "day one" will be safe for critical statutory services and core enabling services (e.g. payroll, safeguarding, care packages, placements, key ICT), given the scale of simultaneous disaggregation / aggregation implied by the model.*

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- Overall, the proposal understates the scale of disaggregation required. It notes that disaggregation is required in ASC and Children's Services but is silent on Highways, Environment, Trading Standards, Public Health, libraries and culture, with these being relegated to something of a footnote at the end of the proposal.

- Risks for services from disaggregation:
  - Increased Leadership and Operational Costs: Moving to two unitary authorities would necessitate the appointment of additional chief officers and directors, leading to immediate duplication of costs across all leadership layers.
  - Deterioration in Adult Social Care: Splitting services that “Require Improvement” into two new organisations during a compressed 24-month transition carries high risk of further deterioration. No evidence is provided that splitting will maintain or improve quality, the proposal frames this as a “unique opportunity to redesign care and support,” which is aspiration rather than evidence. No caseload mapping, no provider engagement plan.
  - Loss of Consistency and Efficiency in Children’s Services: The current model ensures consistent, centrally led but locally delivered upper tier services. Splitting an “Outstanding” service risks diluting leadership capacity, disrupting practice culture, and losing organisational cohesion. Workforce shortages acknowledged but not quantified; no Ofsted-focused risk assessment. Mitigations listed as “shared protocols, digital” are insufficient for a high-risk statutory service. SEND is a nationally pressured service with complex cross-boundary commissioning and tribunal obligations. Splitting EHCP management and specialist placement commissioning creates risks for continuity for individual children. Mitigation listed as “DfE agreements.” No detailed SEND transition plan or EHCP transfer protocol provided.
  - Inefficiency in Specialist Services: Specialist teams, such as those for exploited children or youth justice, out-of-hours teams, control rooms, network management, and business support functions, would need to be duplicated, resulting in higher costs and potential dilution of expertise. For some posts, with already a shortage of good candidates, salaries would likely be the same but with potential for salary spiralling and greater agency costs in a competitive and dynamic recruitment market between the two new unitary authorities. Some specialist assets cannot be disaggregated such as the central management system for street lighting and some specialist highways equipment.
  - Imbalance in Demand and Funding: Demand for services is not uniform across Leicestershire. Disaggregation could result in the north facing significantly higher demand without corresponding funding, exacerbating financial and delivery challenges and creating an undesirable postcode lottery effect. Could also lead to a ‘cliff-edge’ effect where access to services varies wildly in a small area as provision moves from one unitary to another.
  - Reduced Service Accessibility: Residents would have less choice for how they access physical services, such as libraries and recycling and household waste sites, which would lead to frustration with the changes. May trigger a review of whether the service(s) remains ‘comprehensive & efficient’.
  - Complexity in Service Division and Asset Allocation: Some assets and services, such as care homes and specialist highways equipment, are not evenly distributed or easily visible. Splitting them could lead to gaps in provision, inefficiencies and disputes over responsibility and funding. Particular concerns include:
    - Lack of Short Breaks respite provision in Southern unitary – Carlton Drive. The remaining in-house respites will be situated in the North. This could impact the people living in the south who attend the services in the North.

- Learning Disabilities Community Life Choices split between the North and South, with 20 in the North and 13 in the South. Accordingly, competition for placements will increase. This would increase out of county placements or incur larger adult social care funded transport.
- Some resources are based on a whole county approach like children's residential homes, foster homes, supported accommodation. It is based on variable demand across the county and the child's needs and cannot be restricted to population determinants like reserving residential homes in the north for children who previously lived in the north. Reducing the accessibility of these services (foster placements, residential homes) will increase dependency on more costly private placement providers.
- Bardon WTS lies across the boundary of NWLDC and HBBC so potentially jointly owned by the 2 new unitaries.
- 9 HWRC in northern unitary and 6 in southern unitary. Less choice for residents as cannot access all sites across Leicestershire.
- Administrative and Governance Complexity: Managing relationships, contracts and governance across multiple authorities introduces additional bureaucracy and potential for conflict, especially when joint commissioning or shared services are required
- Partnership working: VCSE organisations who currently work with the county council may not have the capacity to work with two authorities. If they do, they may find it difficult if the North and South run differently. This could impact on productivity of these groups.
- While the complexity and difficulty of merging IT systems is well known these issues are significantly worse when it comes to disaggregation of line of business systems. For example Adults and children's system are notoriously difficult to extract work cases from to then import into another system. The reasons for this are systems are often deeply interconnected, with complex workflows, shared data, and overlapping processes that support both service delivery and compliance requirements. Splitting them apart is not simply a technical task—it requires a careful analysis of how information flows between different teams, what data is shared, and how those interdependencies support case management and safeguarding across age groups. To achieve the required outcomes it may require significant redesign to preserve both the integrity of records and the quality of care. The sensitivity of the data involved and the need to comply with strict regulatory requirements add further layers of complexity, making the process both time-consuming and resource intensive.

### **The role of Rutland as a lead authority**

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*Disaggregation and aggregation are complex undertakings and there is a significant dependency upon scaling up Rutland*

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- The proposal seems to be contradictory in its attitude towards aggregation and disaggregation. On the one hand it claims to be creating two new unitaries from the current Leicestershire and Rutland boundaries, yet on the other hand it talks of expanding the remit of Rutland County Council, to avoid having to set up new

structures of ASC and Children’s Services from scratch and diminishing the remit of Leicestershire County Council to be the ASC authority for the southern unitary. This model of expanding one unitary authority and shrinking another top tier authority is entirely without precedent in any other LGR in the country and poses a high risk of confusion, contradiction and failure. Indeed, Leicestershire County Council already delivers a number of specialist services for Rutland, including adult mental health social care, Deprivation of Liberty Safeguards (DoLS), Approved Mental Health Professional (AMHP) service.

- For Rutland to become the lead authority for these two key services areas, the authority would need to scale up its operations ten-fold and this is likely to lead to significant risk to the resulting public services. The figures below give an idea of the differing scale between Rutland and Leicestershire:
  - During 2024/25 Leicestershire children’s services experienced the following case volumes (Rutland figures shown in brackets).
    - Referrals to Social Services: 6,752 (385)
    - Child in Need Plans at year end: 636 (38)
    - Child protection plans at year end: 511 (28)
    - Looked after children at year end: 694 (32)
    - Children with SEN – total of cases (January): 7,196 (376)
  - During 2024/25 Leicestershire Adult Social Care experience the following activity levels (Rutland figures shown in brackets).
    - New contacts received: 29,300 (1,285)
    - Episodes of reablement for new clients: 3,890 (95)
    - No. clients accessing long-term support: 10,908 (490)
    - Reviews of clients receiving services for >12 months: 3,850 (160)
    - Number of people receiving ASC assessments, who have not received local authority long-term support in the previous 12 months: 5,315 (670)
    - Number of safeguarding concerns: 2,910 (485)
    - Number of safeguarding enquiries: 1,050 (80)

### **Unclear TOM for aggregated and disaggregated services**

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*Leicestershire County Council do not agree with the mechanisms set out for disaggregation and aggregation and their coherency of approach, particularly around the role of shared services*

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- As well as concerns over disaggregation, the proposal is also weak on the potential future model for aggregated services. Whilst Leicestershire County Council would agree with the proposal’s focus on day 1 “transfer ‘as is’ to the new authorities, ensuring continuity and minimising disruption”, the proposal then becomes confused by its focus on future service models, which are irrelevant to day 1 transfer and aggregation. Throughout it talks of ‘neighbourhood delivery models’, with no details of what this might look like in practice. Contradictorily, it also suggests that some services (audit, special schools, fostering recruitment, youth justice) might be run over a larger area or that other services are not shared but bought from one leading authority, e.g. libraries, highways, waste services and disposal sites. This adds yet more complexity, risk and uncertainty to the model.

- In services that are to be amalgamated, such as HRAs, the proposal provides detail on how these services could delivery greater service levels through economies of scale. This is inarguable, although the logical conclusion must be that one authority for Leicestershire and Rutland and one for Leicester City would even greater financial benefits, levels of social rent homes and tenant satisfaction.

### **Blurring of lines between transition and transformation**

- As noted above, the proposal is confused about the process of transition and transformation of future services. Leicestershire County Council maintain that this proposal makes inappropriate assumptions about the strategic focus for delivery of services within future authorities, which should rightly be the responsibility of the new democratically elected representatives.

### **Focus on 'prevention'**

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*Leicestershire County Council support the notion of ensuring good prevention in place however, questions if the prevention focus of the three unitary model is appropriate at this stage in the LGR process, and how it will distract from day 1 'safe and legal' preparations.*

*Leicestershire County Council believe that the prevention case should be treated as contingent on whether savings are genuinely realised and then actually reinvested (e.g. the stated plan to create 200+ new posts), rather than being absorbed by wider financial pressures.*

*Leicestershire County Council disputes the assertion that a single unitary would be "too large" to deliver neighbourhood-level prevention effectively, and distinguish between what is structurally unachievable versus what could be addressed through governance design (area structures, delegated budgets, locality teams).*

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- Prevention is the centrepiece of the long-term financial case. The proposal explicitly acknowledges that "savings directly from LGR will not be sufficient to change the financial landscape for Local Authorities" and that "a fundamental change in how we support our residents" is required. The £44 million LGR structural savings are framed as funding upfront prevention investment, generating £71 million/year in demand reduction by 2037/38, producing a net saving of £50 million/year. Prevention is therefore not supplementary, it is the mechanism on which the entire long-term financial case depends.
- The proposal ignores the scale of preventative services already delivered by LCC, planned to lead to significant future services. This includes a significant and wide range of work across our public health services and communities teams through to support provided to children and families, adults and older adults to prevent escalation into high cost services.
- The delivery mechanisms proposed (multi-agency family help teams, social prescribing, active wellbeing programmes, befriending, mental health outreach) are

operational approaches that do not inherently require new unitary authorities. Indeed many of these mechanisms already exist across Leicestershire. The proposal itself acknowledges these build on "existing partnerships and networks." Districts and the County could jointly invest through Section 75 agreements or pooled budgets. The LGA Prevention Spending Model is a national model, not one contingent on reorganisation.

- The evidence base cited relies primarily on national prevention modelling (including NICE return-on-investment benchmarks and the LGA Prevention Spending Model), which provide indicative estimates rather than evidence of realised local authority savings. The proposal does not demonstrate a clear causal link between structural reorganisation and the achievement of these prevention outcomes, nor provide case studies from previous reorganisations where comparable demand reductions have been achieved.
- The proposal provides no local case studies showing comparable returns, nor evidence that the specific mix of interventions proposed would replicate this outcome.
- Many prevention benefits also accrue across the wider public sector (particularly the NHS), rather than directly to council budgets. As such, the projected savings appear dependent on policy choices and sustained investment rather than organisational restructuring.
- The proposal expects £71m per annum savings through prevention. This seems an exceedingly ambitious sum. If prevention savings do not materialise at the scale or pace modelled, the new authorities will have a structural financial gap that LGR savings alone cannot close
- The proposal also assumes that a prevention approach is adopted by all three unitaries. It seems premature to assume that there would be a willingness within the northern and southern unitaries to adopt a prevention approach, when this should rightly be subject to future democratic test. Indeed, the proposal acknowledges this when it says "It can only represent our vision of the opportunity available; local decisions in the new councils will determine the actual direction they take in terms of corporate priorities".
- The proposal assumes that the City unitary, untouched in other ways by LGR, will change wholesale their current delivery model to match what this proposal requires. This is an unacceptable strategic imposition on an existing unitary authority.
- This early declaration of a prevention focus in the three authority model is also a significant blurring of the lines between transition and transformation in LGR. Experience from other authorities currently going through the process of LGR, particularly where disaggregation is involved, is that the laser focus in the early stages must be on transition to the new authorities and Day 1 Safe and Legal functions. By setting out a future strategic direction and pledging to invest in 200 prevention-focussed staff, this proposal will risk distracting its staff onto future service models, rather than the safe and legal delivery of services.
- Clearly, the prevention case is the most strategically important and analytically ambitious element of the proposal, but it carries the highest delivery uncertainty.

### **Being informed by local views and meeting local needs**

#### **Questions over relative rurality of Leicestershire**

- This proposal argues that three unitaries better supports local communities. The argument is that because Leicestershire is a heavily rural county with significant distances between settlements, one local authority for the whole of the county would

not be able to reach all communities. Whilst it is inarguable that there are many rural parts of the county, to characterise Leicestershire communities as more isolated than those in North Yorkshire, where there is only one unitary authority, would be incorrect.

### **Reliability of the survey data**

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*Leicestershire County Council does not consider that the engagement evidence demonstrates that feedback was representative and materially shaped the proposal, rather than being referenced selectively to support a preferred model.*

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- The survey conducted online was very skewed. 42% of responses came from a very small geographic area linked to potential city expansion. The questionnaire was quite leading in its focus, as was the telephone survey. Each question had a preamble setting out the district proposal and then asking for comment. On the telephone, only 51% supported the district model, despite heavily leading questions.
- There is little in the detailed Engagement Report to justify the opening headline 'Widespread support expressed for the main proposals'. This appears simply misleading. Within the longer report it says: "Responses were mixed regarding the proposal to establish three unitary councils to run local government across Leicester, Leicestershire and Rutland."
- The report contains the line "It was explained that the councils considered the option of a single unitary for Leicestershire (with a second unitary authority covering Leicester City) but ruled this out for various reasons." Before asking whether three unitary councils was a good idea. This suggests respondents were told that the county proposal was not actually an option (p39 engagement report). The other options were thus not presented as a choice.
- The report later says that 73% of councillors or members of local authority staff agreed with the North City South proposal. There were at least 600 in this category (may be more as 1000 people didn't say if they were a council employee or not). This is likely to be around 15% of respondents factoring in a small number of 'didn't say's'.

### **Supporting devolution**

#### **Risks to the devolution timescale from disaggregation**

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*Leicestershire County Council is concerned that complex and unnecessary disaggregation will delay the timescale of devolution.*

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- Leicestershire County Council agrees with the aspiration for a rapid pace of devolution.
- This proposal claims to be the only proposal that seeks to bring forward devolution at the earliest opportunity. Leicestershire County Council do not see how this proposal promotes the acceleration of devolution. Rather, the amount of time that it will take to

disaggregate and aggregate services suggests that devolution will likely have to be delayed until the three unitaries are stable. By contrast, a single council for Leicestershire requires far less disaggregation and aggregation and could allow devolution to happen in a timescale that works for all parties and central government.

## The role of the MSA

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*Leicestershire County Council does not believe there is convincing evidence that balanced populations in lower tier authorities are necessary for an effective MSA to function*

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- The three unitary model place great significance on the importance of parity of three councils under one MSA. It argues that this model will prevent one council from dominating the MSA. They argue it will lead to “overlapping accountabilities, duplication of effort and potential disagreements over responsibilities”. Given that the roles of an MSA will be clearly set out by central government, there are unlikely to be disagreements over who performs which function, whatever the size of administrations beneath the MSA. North Yorkshire and York function under one MSA without these issues being present, with North Yorkshire having taken on the boundaries of the former district councils.
- LCC argue that the MSA will be operating at a strategic level and so works irrespective of the size of the bodies beneath it. It has its own democratic mandate and area of remit, it is not just there to duplicate the wishes of bodies beneath it. At times there might be a perception that one part of the mayoral area is receiving more attention from the MSA, but this is the case with any tier of government and is not unique to the make up of the MSA in Leicestershire, Leicester and Rutland.

## **Enabling stronger community engagement and gives the opportunity for neighbourhood empowerment**

- The proposal calls for a Leader and Cabinet model of governance for both unitaries, which is in line with Leicestershire County Council’s proposals.

## Neighbourhood Partnerships

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*Leicestershire County Council does not believe that the proposed Neighbourhood Partnerships contain sufficient detail to provide assurance that they will allow stronger community engagement and neighbourhood empowerment.*

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- The proposal will establish Neighbourhood Partnerships, mapped to PCN footprints and neighbourhood policing areas. Each of these will have a population of 40-50,000. Whilst these are broadly similar to Leicestershire County Council’s Area Committee model, Leicestershire County Council has significant concerns about this model: what the partnerships are actually designed to achieve; the lack of funding; lack of

key decision making taking place at a neighbourhood level; the absence of comment on unparished areas; and lack of respect for traditional ceremonial roles and historic counties.

- Neighbourhood Partnerships will comprise Ward members, council teams, Parish Councils, local partners, VCSE, residents. However, the proposal does not actually say what they will do, beyond flood resilience. There is a significant risk that these bodies are simply an expensive ‘talking shop’ for services which tramples on the role of elected members and parish councils. Whilst there is a commitment to Neighbourhood Aligned Service Delivery, with area-based teams that deliver key services, this is no clear detail of what this is or how it relates to the neighbourhood partnerships and the level of influence that they hold over service delivery.
- LCC’s proposal for Area Committees is considerably stronger because it includes a budget assigned to each area to give local people and partners the opportunity to participate in and influence local decision making and service priorities through community grants. To this end, committees could choose to hold themed meetings focused on specific issues and establish task-and-finish groups to address topics in greater depth. Area Committees would play a vital role in the Council’s future governance model, acting as locally focused bodies with autonomy to influence decisions and drive community-led change. To ensure value for money remains a priority, they would not be responsible for direct service delivery, but would hold an important oversight function, ensuring services are delivered effectively and reflect the needs of their local areas. For example, this includes supporting initiatives around community safety, health and wellbeing, using preventative approaches, which are increasingly recognised in NHS neighbourhood health service models as effective in improving outcomes and reducing demand on public services.
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### **Support for planning and licensing**

- Disappointingly, this proposal also misses the opportunity to deliver visible decision making that truly affects residents’ lives in a decentralised way. In LCC’s two unitary model there is a clear commitment to Area Planning and Licensing Committees, ensuring that residents can see and influence decision making that has a real impact on their local areas. By contrast, the three unitary model takes these critical decision far further away from the communities they impact.

### **Parish Councils**

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*Leicestershire County Council is concerned that there is no confirmation of the status and governance of unparished areas in the city and county.*

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- Leicestershire has a number of areas that are unparished. There has been concern expressed in some communities of how unparished areas are to be governed and managed in a unitary authority. The three unitary proposal is entirely silent on this and particularly how Neighbourhood Partnerships might work in unparished areas.

### **Diminution of ceremonial functions**

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*Leicestershire County Council notes the impacts of diluting the ceremonial functions of the Lieutenancy and High Sheriff on the identity of the historic counties of Leicestershire and Rutland*

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- Finally, this model proposes changing the historic ceremonial boundaries of the lieutenancies of Rutland and Leicestershire, expanding the remit of the Rutland lieutenancy to cover north Leicestershire and diminishing the role of the Leicestershire lieutenancy to just the city and southern parts of the county. This splits up the role of key ceremonial figures and traditional counties and would require primary legislation or amendment of the 1997 Lieutenancies Act. These ceremonial roles can be left intact within the LCC model, preserving local identities.

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## **Leicester City Council Proposal – Consultation Response**

### **Executive summary**

Leicestershire County Council supports the principle of a two-unitary model as the most effective structure for Leicester, Leicestershire and Rutland and also supports rapid devolution under a Mayoral Strategic Authority. However, we do not support implementing Leicester City Council's proposed boundary expansion (Option 1) as part of Local Government Reorganisation (LGR), because the proposal does not evidence that the benefits outweigh the material financial, service delivery and implementation risks it creates. Nor does the proposal account for the significant negative impact upon the remaining county area. We would ask MHCLG to proceed with LGR and devolution without boundary expansion at this stage, prioritising deliverability, stability and early benefits to residents. If any boundary issues do require attention, these should be considered as limited, evidence led boundary adjustments after reorganisation, following the proper statutory processes and once the Spatial Development Strategy and new governance arrangements are established. We would also require robust assurance on transition costs, service continuity and distributional impacts (including council tax harmonisation) before considering any boundary change.

### **Note on Leicester City Council Option 1 and Option 2**

Leicestershire County Council notes that the City Council has produced a base proposal (Option 2), the existing city plus three southern districts (Oadby & Wigston, Harborough and Blaby), formed of whole district building blocks, with a formal request that the Secretary of State uses modification powers to implement the preferred boundary expansion (Option 1). As the City Council are not supportive of Option 2, Leicestershire County Council are only responding to this consultation on Option 1.

## **Sensible geographies and economic areas**

### **Two unitary authorities vs three unitary authorities**

- Leicestershire County Council agrees with the City Council that a two unitary solution is the optimum for Leicestershire, Leicester and Rutland. Leicestershire County Council also agree that a two unitary solution should include Rutland within its boundaries as this makes most geographic and economic sense.
- This proposal does deliver two new unitary authorities with populations over 500,000. However, Leicestershire County Council does not believe that the benefits of achieving two populations over the threshold outweighs the short and long term risks of this approach, which are set out in more detail below. Of particular concern is that the proposal does not explain how service levels will be set for the new unitary, which combines areas of very different demographic and funding characteristics.
- By contrast, the strength of a two unitary model without boundary expansion is that it can be completed quickly and with limited risk, allowing devolution to happen rapidly and the county areas to enjoy the transformational benefits from unitarization that the City currently enjoys.
- Boundary expansion should only be considered once a proper benefit and risk assessment can be performed and central government is satisfied that the outcomes from LGR and devolution have been achieved.

## Methodology for establishing proposed boundaries

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*No clear link has been demonstrated between the justification for boundary expansion offered in the proposal and the actual boundary lines proposed, given that the proposed boundary is substantially larger.*

*The evidence offered cannot be described as compelling evidence for boundary expansion that does not use existing districts or parishes and the precedents that might set for LGR and boundary expansion elsewhere.*

*The proposal is contrary to Boundary Commission guidance*

*Leicestershire County Council believe that the case for boundary expansion is considerably weaker than that of other cities presented to MHCLG*

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- Leicestershire County Council have considered each of piece of evidence for expanding the boundary below and why they are not a compelling reason for the boundary expansion proposed:
  - The 'Principal Urban Area', Office for National Statistics modelling and boundaries from the covid-19 lockdowns are presented as three possible models. However, the proposed city boundary does not use any of these models as a base.
  - Data from the census shows residents' commuting patterns, with the argument that the large number of people working in the city but living in the county demonstrates that city boundaries should be increased. However, Leicestershire County Council's analysis of the combined AM/IP/PM peak period "commuter" class trips within the Pan Regional Transport Model (PRTM) shows the reality is far more complex.
  - With regards to sectoral movements of commuter trips, it is true (and expected) that there are many movements between Leicester City and its suburban/surrounding areas. However, as shown by the table below, two-thirds of commuter trips within the area the City is proposing to govern are **not** to/from places within the City's *current* boundary. As such, the logic that they should govern these areas due to the high propensity of city-commuters is flawed, as overall twice as many non-City-commuters live within these areas.

	Leicester City	Elsewhere
Blaby	28%	72%
O & W	46%	54%
Harborough	57%	43%
Charnwood	39%	61%

	TOTAL	35%	65%
○	Whilst it is inarguable that people commute from outside of an urban centre to work, extending the logic used in this proposal would see a large swathe of north Leicestershire move into a Nottingham unitary authority and the south east of England governed from greater London.		
○	Bus and public transport networks are used as a surrogate for the potential future boundary. Again, this simply reflects where commuters might live and is designed to optimise commercial advantage for operators, not optimal local government boundaries.		
○	Particularly unconvincing is the utilisation of customer data from Curve and leisure centres. Curve rightly attracts visitors from across the county, as it is the only large producing theatre. Accordingly, this data cannot be used to prove the logic of an expanded city boundary.		
○	The proposal draws upon the examples of Sheffield and Bradford to show that the current unitary authority is three times more densely populated. Leicestershire County Council notes that one quarter of land in the Bradford UA is in the Nidderdale AONB and so not developable and one third of Sheffield UA is in the Peak District National Park. The context of the creation of the Sheffield UA from South Yorkshire was that the four county boroughs within South Yorkshire were each added to urban district councils and rural district councils. This reflected the four principal population centres in South Yorkshire. This is a fundamentally different population spread, density and structure to Leicestershire where there was only one county borough and so no need to equitably split the pre-1974 county between multiple larger settlements.		
○	Even if one of these potential models for city expansion were particularly compelling, there is then no logical argument presented as to the proposed boundaries in option 1. These are substantially larger than all of the examples presented above. At no point in the proposal is any overarching logic presented for the proposed boundary. Leicestershire County Council do not believe that the proposed boundary is drawn tightly enough to the built-up urban area and functional catchments the submission relies on.		
●	The proposal argues that it creates a coherent split of unitary authorities, with the City unitary being more urban in focus and the county unitary being more rural. However, this ignores the large urban centres within the county, such as Loughborough, Coalville, Melton and Hinckley. Indeed, analysis shows that in the expanded city unitary, 57% of the population will live within an urban setting.		
●	The extent of the revised boundaries proposed means that 26% of the land of the supposedly 'urban' city unitary will actually fall within the ONS classification of 'Smaller rural' land, as this only includes 1% of the city population, it shows that this 26% of land is very sparsely populated indeed.		
●	As this proposal relies heavily upon the argument of two coherent urban and rural unitaries, that the evidence does not bear this out suggests that the whole rationale of boundary expansion is built on flimsy evidence.		
●	Leicestershire County Council is not ignoring the pragmatic realities of some areas of the city where boundaries are complex and lead to poorer public services. It is aware of examples where contiguous streets fall within the city and county, leading to confusion over arrangements for delivery of services.		
●	Boundary change can only be properly assessed once reorganisation is complete to allow a proper evidence base to be developed and need for boundary change fully		

understood. However, Leicestershire County Council strongly maintain that LGR is not the time for boundary expansion.

- This proposal splits district councils and parish areas across two separate unitary authorities. Parishes are intended to sit wholly within the area of a single principal council, and splitting them across two new unitaries creates immediate governance and electoral anomalies which would have to be resolved through further boundary change work. The Local Government Boundary Commission for England (LGBCE)'s technical guidance is clear that in parished areas, parishes should be used as the building blocks for new electoral divisions to avoid boundaries that are less intelligible to residents and more difficult and costly to administer. The LGBCE cannot create or abolish a parish council and cannot change the boundary of an existing parish. A Community Governance Review (CGR) would need to be carried out in order to achieve this. However, the LGBCE's LGR guidance highlights that, when it comes to a full electoral review of a newly established authority, it asks authorities not to run a concurrent CGR because this can create confusion and complicate arrangements. For these reasons, an option which splits parishes is considered to be poor practice, introducing avoidable administrative burden at the point of reorganisation and first elections, and should be avoided where a viable alternative exists.

### **Comparison to other cities requesting boundary expansion**

- It is noted that Oxford, Gloucester and Lincoln are proposing boundary expansion along the lines of that requested by Leicester City.
- Oxfordshire commissioned independent modelling producing scenario-specific GVA, employment and agglomeration projections. Gloucestershire produced unit-level economic impact calculations with Government-approved sources. Lincoln provided a specific GVA-mismatch analysis showing entrepreneurship growth not translating into economic output due to boundary constraints, plus a quantified innovation cluster (LSIP: £17m GVA pa, 850 jobs, £100m cluster). Leicester's financial case relies on percentage-based aggregate savings with no independent validation.
- Growth mechanism: Oxford identified a precise mechanism, 2.6% Green Belt release yielding 40,000 homes and 29,000 jobs. Lincoln anchored its boundary to the pre-existing Lincoln Strategy Area, a joint Local Plan geography already in use across three councils, giving it a planning-policy foundation that pre-dates and is independent of the LGR process. Gloucester tied expansion to parishes forming the functional urban area with a proven regeneration track record. Meanwhile, Leicester identifies 30,000 homes and 67ha of employment land but does not present an equivalent planning-policy mechanism demonstrating these can only be delivered through boundary expansion rather than through strategic planning across the MSA.
- Global/national significance: Oxford tied expansion to the UK's international competitiveness (£78bn Oxford-Cambridge Corridor prize). Lincoln tied expansion to a nationally significant defence and innovation cluster, including Britain's first Air & Defence College and LSIP. Gloucester tied expansion to a £4bn economy with a demonstrable regeneration track record. Leicester's arguments, while valid locally, do not articulate a comparable national or international economic imperative.
- Neither Gloucestershire, Oxfordshire nor Lincoln rely on suburban tax-base absorption as a primary financial argument. Oxfordshire's financial case is built on growth revenue, new homes and commercial space generating genuinely additional council tax and business rates. Lincoln's financial case is built on service transformation, a prevention-led operating model generating efficiencies, with the city

starting from a notional £8.5m surplus. These approaches are materially stronger because they do not trigger Fair Funding offsets.

- Lincoln's boundary is anchored to the Lincoln Strategy Area, a geography that three councils already use for joint plan-making. This means the boundary is not an invention of the LGR process but a pre-existing, agreed planning geography. Oxfordshire's boundary is explicitly tied to the Green Belt, and Gloucestershire's to surrounding parishes forming the functional urban area.

### **Developable land in the city area**

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*Leicestershire County Council believe that the city council's argument over the need for access to developable land is negated by the provisions within Spatial Development Strategies which allocate land and housing targets across the wider LLR area.*

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- Leicestershire County Council acknowledge that the city council has a lack of developable land over the next decade. Whilst it is correct to state that getting agreements from district councils over absorbing the housing and development requirements of Leicester City has had challenges, the principle has never been brought into question.
- This cooperative approach would be cemented through the Spatial Development Strategy process, which Leicestershire County Council welcomes. This will allow joined up planning for the whole of Leicestershire, Leicester and Rutland and ensure that we continue to deliver the housing and development targets that the region needs, but without forcing inappropriate development in inappropriate locations and building on greenspace, simply to meet targets.
- The SDS will look ahead at least 20 years and set the coordinating framework for all local plans within the SDS footprint, identifying the appropriate scale of growth and development. It could also identify the need for regeneration, protection or improvement of the built or natural environment.
- Leicestershire County Council believe that the SDS process within a Strategic Planning Board, in advance of devolution, addresses all of the City Council's concerns around developable land.
- A key barrier to development is the requirement for significant infrastructure funding that makes schemes unviable. The proposal does not address this and will make the challenge more difficult by financially weakening the county council, which is responsible for major infrastructure schemes, and risking a delay to devolution.
- Finally, it is worth noting that boundary expansion does not create any more developable land, it merely moves the administrative responsibilities for that development from one authority to another. It also leads to disruption to planning teams, slowing down potential development in the region.

### **Ability to deliver the outcomes described in the proposal**

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*Leicestershire County Council believe that further scrutiny of transition cost assumptions and funding realism, including redundancy / programme costs, IT ranges / contingency, and shadow authority costs is required.*

*Leicestershire County Council would wish to further stress-test the financial model's load-bearing assumptions, including savings phasing, allocation methods and any explicit "dis-economies of scale" effects.*

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- Transition costs are higher under this proposal. Whereas a single unitary for Leicestershire and Rutland, with no expanded city boundary is forecast to cost £21.5m to deliver in transition costs, the City Council proposal is forecast to cost £28.1m, with significantly higher programme management costs, reflective of the complexity of the change required.
- The financial modelling for these costings was jointly commissioned by the City and County Councils and so is considered robust and reliable.
- However, it should be noted that even with the additional contingency costs applied to the City Council's budgeted transition costs, risks remain due to the complexities involved in complex service disaggregation, multiple IT migrations, and extensive legal negotiations. By retaining existing boundaries and structures, the preferred option streamlines the change process and avoids unnecessary expenditure. It also means that all the benefits of reorganisation are invested in frontline services.
- Due to limited time and complexity there has not been an assessment of the cost to resolve mismatches between populations and assets following boundary change. Resolution will require assets to be relocated (expensive) or shared (undermines case for boundary change).
- Leicestershire County Council also note that the City Council intend to fund transition through capital asset sales, whereas the County Council proposal would use reserves and so preserve assets for more appropriate rationalisation in the future.
- During transition, existing services continue on existing terms from Day 1, with harmonisation phased over subsequent years. The messaging is "nothing changes on Day 1", "bins will be collected, care provided and local offices open for business." This is a sensible approach reducing disruption risk, but it means both legacy authorities' systems, contracts and practices must run in parallel for an unspecified period, creating unquantified duplication costs. Extensive legal agreements will be required to make this happen, eroding the time available to implement improvements that will benefit residents.
- Dual-running of ICT systems is one of the mitigations across all service areas. Specific system divergences are identified: Liquidlogic vs. Mosaic (children's services), City One vs. County SEND2 (SEND), Causeway vs. county asset management (highways). No migration plan, timeline, or cost estimate is provided for any system. ICT migration is consistently identified as one of the highest-risk areas, yet remains at scoping stage.

## **The right size to be efficient, improve capacity and withstand financial shocks**

### **Overall financial assumptions**

- The proposal makes the argument that LGR will improve the overall health of local government in Leicestershire and Rutland in a two unitary model. The financial modelling has been jointly commissioned by Leicester City Council and Leicestershire County Council and so we accept the assumptions made around savings. However, the overall health of the county area will be reduced in favour of the City, a situation that will be extremely challenging when the transitional arrangements from funding reform cease.

### Impact on deprivation-related costs

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*Leicestershire County Council suggest that there are unintended financial consequences of these proposals by moving areas from the county into the city and that this will impact on the sustainability of the county unitary.*

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- These proposals will allow the city unitary to rebalance its deprivation somewhat. The boundary expansion means that the city unitary acquires some less deprived areas. Currently 85% of LSOAs fall within the bottom half most deprived LSOAs in the country. Under option 1 falls to 57%.
- At no point in the proposal does the City Council explain how changing the balance in deprivation between the two unitaries, by bringing less deprived areas into the City Unitary might improve service levels for residents, or affect the financial performance of the city council. It is simply presented *ipso facto* as a benefit. Given all of the other disbenefits of boundary expansion, Leicestershire County Council do not believe that simply adjusting deprivation balance is a strong enough reason to expand the city.
- Furthermore, whilst improving the need and deprivation balance in the city might be to Leicester City Council's benefit, it will have a substantial and harmful impact on the financial resilience of the county council. Leicestershire is a relatively small county with low funding per head – so is very sensitive to loss of scale – currently the lowest CSP per head of the two-tier counties for 2025/26 and is projected to remain the lowest over the next 3 years. The City fringe is one of the cheapest areas to service due to lower than average rurality and this area would be lost to city expansion, driving up average costs per head across the rest of the unitary authority.
- The cost per resident in the city is 30% higher than the county. The single unitary for Leicestershire and Rutland option ensures maximum scale and efficiency whilst also bringing down the cost of services in Rutland, which are currently very high comparatively at £1,685 per head.
- A single county unitary incorporating Rutland gives a total cost per head of £906 across the expanded region. In the city expansion option, the County area loses scale and efficiency, bringing its cost per head up to £968. This neatly demonstrates the effects of economies of scale for the county that would be lost through an expanded city boundary.

### The financial sustainability of the City

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*Leicestershire County Council has seen no evidence to the overall impact of moving the council tax base from the county to the city through boundary expansion and whether this does anything other than simply*

*moving funding from one authority to another, rather than fundamentally revising the finances of local government.*

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- The proposal acknowledges that "future projection is difficult due to the Fair Funding Review," but does not follow the logic of its own financial case to its conclusion. With funding allocations finalised after the proposals were submitted the position is now much more clear. The city's 2026/27 revenue budget explicitly states that it gains from full council tax base equalisation because its tax base is relatively low, and that it benefits from deprivation-targeted funding including the £11.7m Recovery Grant. The City is now budgeting to produce a financial surplus.
- Boundary expansion would absorb suburban properties predominantly in higher council tax bands, raising the city's tax base, but under Fair Funding, a higher tax base triggers is accounted for in equalisation, lower RSG top-up, and potential loss of deprivation-weighted grants. The proposal counts the suburban tax yield as a gain without modelling the offsetting loss in formula funding, creating a significant risk that the claimed £28m improvement is substantially overstated. Nor is it addressed whether suburban and rural communities would see their needs accurately reflected within a city-dominated funding profile, how business rates, assets, liabilities and reserves would be allocated between authorities, or, as parish council stakeholders noted, whether the benefits accrue to the city rather than to parishes and their communities.
- Funding reform takes away the financial sustainability justification. Firstly, by materially increasing the relative funding of the City which is going up by 36% compared to 16% for the County area when transitional protections fall out. But also by having 100% equalisation of Council Tax in the methodology the on-going benefits of growing the base are removed.
- The recent funding settlement has put the city on a much stronger footing. In 2026/27 the city is projecting an end of year surplus after making only £5m of savings. The county council gap is £15m assuming £23m of savings are delivered.
- Leicestershire County Council do not believe that this proposal clearly demonstrates that boundary change improves public service sustainability, and instead simply shifts pressures and responsibilities between councils at significant cost and service disruption.
- The City Council has not provided any evidence that its financial position is worse than the County Council's. Both authorities have significant general fund deficits, and the County Council has a far more significant SEND pressures (including transport). A cursory review of comparative service offers shows that the City is able to offer more discretionary services at a higher level, for example:
  - No street light dimming or overnight switch off
  - Extended Household Waste Site opening hours
  - An extensive Youth Service
- The City is already better funded than the County Council, with the City having a Core Spending Power of £1,150 per person compared to £960 for the County based on figures for 2025/26.

### **The financial sustainability of the County**

- Overall, the effects of boundary change will be to materially worsen an already difficult financial position for the County Council. At the end of the MTFs the County Council's gap between income and expenditure is £85m after £48m of savings.
- Several risks have not been quantified in this proposal, for example disruption to service assets will be material. Some of Leicestershire County Council's key bases are close to the City and tens of millions would be required to re-locate if joint arrangements cannot be established. As mentioned, joint arrangements are rarely long-term solutions.
- Due to the number of residents moving between authorities, there will need to be a rebalancing of funding. For some funds, such as the Better Care Fund, it is forecast that £37.8m of County Council BCF Funding will be lost. In the County, BCF is paid at £141 per head, whereas at £207 per head in the City. If the County BCF continued to be paid at the current rate, with a lower caseload, it could cause a significant future budget gap due to the lack of economies of scale at this lower payment rate.
- The City's preferred expansion option tips the balance of savings in the City's favour, with the City benefiting from almost 60% of the savings generated. This leaves the residual County area with a budget gap of around 6% of net spend in 2028/29.

### **Council tax harmonisation**

- The proposal acknowledges a 21% range between the highest and lowest Band D bills across LLR. It states harmonisation must occur but does not indicate whether expansion-area residents would face increases or decreases. This is a significant gap as the change in population is so significant.
- This also makes it harder for equalisation of the high Rutland Council Tax to be resolved.

### **High quality, sustainable public services**

#### **Impact on individual service areas**

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*Leicestershire County Council do not believe that the fragmentation examples are material and systemic (children / SEND; housing / homelessness; highways / transport / flood), and this suggests that boundary change is not the right lever.*

*Leicestershire County Council does not believe that the proposal clearly demonstrates that boundary change improves public service sustainability, rather than shifting pressures and responsibilities between councils.*

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- The proposal makes the case that boundary expansion is critical to improve services in several key areas. Leicestershire County Council maintain that the imperative for boundary change is neither clear nor urgent. Indeed, it has not been proposed before the government letter on LGR. Leicestershire County Council have tested each of these assumptions to see whether the issues highlighted are actually material and whether the supposed 'failings' are systemic and things that boundary expansion would solve.
- Adult Social Care – the case is made that boundary expansion “brings the wider urban/suburban area into a single commissioning approach, reducing duplication,

giving providers a consistent route into brokerage and safeguarding, and scaling Leicester's established practice in areas such as reablement, where performance indicators show strong outcomes across a large population." The case study focusses on outcomes from the urgent community response service.

- Whilst there are arguments for greater economies of scale through commissioning over a wider area, the proposed city boundaries include large swathes of rural Leicestershire, undermining the urban/suburban focus suggested here.
- The expanded city boundary could create some economies of scale for the city unitary, but will create similar diseconomies of scale across almost all commissioned services within the remaining county unitary.
- Currently the county homecare contract is paid in zones – urban, rural, fringe and isolated. The urban packages are the most popular as there are more people living in those areas and there is less travel time required for providers so they are more profitable. Having less of these would impact on costs for Leicestershire County Council as more packages would be in the higher cost zones, less packages for providers and those available are more expensive to provide which would mean potential less providers who work with Leicestershire County Council due to not having the availability of the work and an impact on Leicestershire County Council's ability to find care for those people who we commission packages for and the current responsiveness we have.
- The proposal argues a single expanded city would enable one commissioning approach, one brokerage hub and consistent tariffs. However, joint commissioning across council boundaries is already established practice nationally under Section 75 of the NHS Act 2006 and through pooled budget arrangements. The proposal itself notes "well over 100 partnership arrangements across different geographies" already exist across LLR. Consistent commissioning could be pursued through a formal joint commissioning agreement without structural change.
- Both Leicestershire County Council and Leicester City Council's Adult Social Care services are currently rated as 'Requires Improvement'. Complex disaggregation of services would be highly unwise at a time when service improvement is needed and could further put the quality of service delivery at risk.
- The case study presents a model of service delivery that is different to that in the county. However, the model could be adopted by the county council, should they so wish, it is not a natural outcome of boundary expansion.
- This suggests that the criticisms of current delivery of Adult Social Care are not systemic and related to the current city boundary. It also suggests that overall outcomes could be worse in the county, as a result of boundary expansion.
- SEND and education – the case is made that boundary expansion "aligns mainstream, special and alternative provision across the wider urban area, reducing duplication in home-to-school transport, applying stronger statutory performance more consistently, and giving families clearer and faster routes to support." The case study makes the argument that in city schools there are greater levels of embedded SEND support which county children may be able to access after the boundary expansion as they might be within the catchment area of city schools.

- This argument is incorrect as access to schools is governed by straight line distance from home, rather than a child being within the boundary of a local authority.
- There is a realistic scenario where educational outcomes for children with SEND are worse under these proposals as special schools relied upon by county residents move into the city, making sufficiency worse.
- Children’s Services – the proposal argues that boundary expansion “creates a more coherent unitary council footprint for safeguarding, early help and placements, improving sufficiency by growing fostering and residential capacity closer to home and commissioning once with providers”. The case study argues that children in foster care with EHCPs would be better served with boundary expansion as currently they might move to a new fostering placement outside of the current city boundary.
  - Whilst the case study clearly highlights a complex situation for looked-after children, it does not seem to be a systemic failing that boundary expansion will naturally resolve. The challenges of being handed over from one authority to another could be resolved far more easily through better liaison between caseworkers, shared access to data or a joint SEND strategy, rather than boundary expansion.
  - The proposal highlights improvements in commissioning for the City unitary, but the same caveats around additional costs for the county unitary apply, as with Adult Social Care above. There are also significant risks to the City’s Children’s Services department, already rated ‘Requires Improvement’, of taking on a major disaggregation that could further put service levels at risk.
  - Whilst boundary expansion might reduce some of these instances of fragmentation of service provision, it does not remove it entirely. It is a certainty that “edge effects” will continue to be experienced even with an expanded boundary. Arguably these will be worsened as a rural county unitary diverges in practice from the urban/suburban city.
- Housing and homelessness – the proposal argues that boundary expansion will align “pathways, tenancy standards and homelessness strategies across the expanded city, tackling concentrated pressures with one strategy and extending Leicester’s inhouse landlord model to improve safety and sustainment of tenancies.” The case study is around access to housing stock for homeless families in Leicester City.
  - The case study shows a clear example where access to services for county residents that might move into the expanded city would decline, as it argues that county housing stock could be used to house high priority residents from Leicester City.
  - In Leicester City 21.5% of housing is in the social rented sector and 78.5% is privately owned. In Leicestershire the respective figures are 10.8% and 89.1%. In Rutland the respective figures are 10.2% and 86.5%, with a further 3.3% of housing owned by other public sector. There is thus a relatively smaller stock of social rented housing in the county area.
    - Total households on the housing waiting list per 1,000 households:
      - Leicester 42.5
      - Leicestershire 21.2
      - Rutland 31.7
    - Detail:
      - Charnwood 14.6
      - Harborough 16.2
      - North West Leicestershire 17.1

- Blaby 19.8
  - Hinckley and Bosworth 23.6
  - Melton 25.5
  - Oadby and Wigston 57.2
- This shows that the housing waiting list need is greatest in Leicester City. It is important to note though that the waiting list is even more acute in Oadby and Wigston, one of the areas that will be fully absorbed by the proposed expansion. This suggests that simply expanding the boundary of the city will not automatically improve access to social housing for City residents. It is likely to be controversial if one of the outcomes of LGR is that county residents find it hard to access social housing.
  - The City Council believes that by having a housing strategy “across the two new authorities for urban and rural areas” it would join up areas with high need and those with high stock. This is an issue which is, in part, solved by SDS and not something that boundary expansion will deliver. Using the SDS to ensure appropriate levels of house building across the whole of Leicester, Leicestershire and Rutland, is a much better approach to dealing with lack of access to social housing, rather than simply redistributing the existing pool of social housing in favour of city residents. Indeed, homelessness prevention and rough sleeping strategies are already coordinated across LLR through existing multi-agency partnerships. Allocations policies could be harmonised through a shared choice-based lettings system (such as HomeChoice, referenced in the proposal) without requiring boundary change.
  - The proposal notes that HRA debt apportionment poses “significant technical challenges.
- Highways and transport – the City Council claim that “the city could plan and manage transport improvements and maintenance across the travel-to-work area more coherently, applying consistent policies, coordinating works and scaling delivery capacity for schemes.” The case study presented concerns major arterial routes in the city where cycle lanes stop at the county boundary, along with bus routes and highway maintenance regimes.
    - Enhanced Partnerships under the Bus Services Act 2017 can already operate across local authority boundaries. The proposal itself notes the MSA would provide strategic transport planning across LLR, a function existing regardless of city boundary expansion. The bus coordination benefit is attributable to devolution and the MSA rather than to city boundary expansion specifically.
    - Whilst it is true that on major arterial routes into the city, the approach to the highway will vary at the authority boundary, this is an issue that can be resolved through coordinated planning and strategic direction from the MSA. It is not a systemic problem solved solely by boundary expansion.
    - There is also a high likelihood that highway maintenance will decline in an expanded city unitary authority. Currently the city has no responsibility for rural roads, with greater focus needed on winter service, surface dressing, drainage and flood response and vegetation maintenance. As presented above, the expanded city is taking on significant rural assets, rather than being solely urban.
  - Neighbourhood and environmental services – the proposal makes the case that boundary expansion “removes anomalies across district boundaries, standardises licensing and enforcement, and improves efficiency and equity in waste, cleansing, public safety and other visible services.” It provides an example of one street in

Harborough District where the boundary is mid-way through the road and consequently the residents have differing refuse collection arrangements.

- Whilst Leicestershire County Council acknowledge this example and recognise a number of similar examples around the county, Leicestershire County Council does not accept that this is a material problem that boundary expansion should be solving. Boundary change could be considered once reorganisation is complete to allow a proper evidence base to be developed and need for boundary change fully understood. However, Leicestershire County Council strongly maintains that LGR is not the time for boundary expansion.
- In all of the service examples a common issue is that the required service changes have not been considered, with no plausible solution put forward. Simple adoption of existing City council policies and approaches will not be possible, due to the county's 30% lower funding per resident, nor would they be appropriate due to the deprivations, age and rurality characteristics of the areas being adopted.

### **The risk of 'edge effects'**

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*Leicestershire County Council do not believe that boundary expansion reduces fragmentation rather than moving it, noting the submission's own recognition of continuing "edge effects".*

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- This proposal makes the case that key services are fragmented at the boundary of the current city and county. However, as noted above, Leicestershire County Council are not convinced that boundary expansion reduces fragmentation rather than moving it, noting the submission's own recognition of continuing "edge effects". By removing some of the semi-urban areas from the county unitary, boundary expansion could have the undesired effect of heightening the fragmentation that it moves, but putting the boundary at a point where there is a cliff edge change in provision from urban/semi-urban to rural services that are not delivered in a similar manner.
- Fragmentation is not currently a significant issue.

### **The risks from disaggregation and expansion of boundaries**

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*Leicestershire County Council are particularly concerned of the risks of disaggregation of services, particularly when not based on a district council footprint, and are not assured that the benefits outweigh the harms.*

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- Leicestershire County Council have serious concerns over the practical implementation of the proposed boundary and how this might impact services.
- Risks for services from disaggregation:
  - Fragmented boundaries: disaggregating key services such as: street lighting, waste depots and waste sites at a street by street level poses serious risks to the ongoing delivery of these services.
  - Imbalance in Demand and Funding: the movement of population and need between the county and the expanded city unitary will lead to significant changes in the overall profile of need within the new authorities. For example,

32% of people who draw on Adult Social Care services within the County would require their social care needs to be met within the City as they reside in the proposed expansion – the scale of the transfer of this care required could cause significant transition risks and long term funding challenges.

- Loss of economies of scale: Increased unit provision cost to the Council to lack of economy of scale in many services. Also, increased rurality means that remaining services, including waste collection or homecare, in county unitary are more expensive to deliver. Significant changes to funding allocations would be required.
- Deterioration in Adult Social Care: The expanded city would absorb responsibility for adult social care for a suburban, and in places, semi-rural, population currently served by the county. The proposal argues the city can scale its existing commissioning and practice models (reablement, direct payments, urgent community response) across the wider footprint, with a single brokerage hub simplifying hospital discharge. However, this assumes that models designed for a compact, urban geography with relatively concentrated demand and short travel times will translate effectively to a more dispersed suburban and rural setting, where provider markets are thinner, domiciliary care rounds are longer, and workforce recruitment is already more challenging. No workforce capacity assessment is presented to test this assumption. The county has an older age profile (20.6% aged 50-64 vs. 15.9% in the city), meaning demand patterns in the expansion area may differ materially, not only in volume but in type, with a likely higher prevalence of isolated older people, limited public transport access to day services, and greater reliance on domiciliary rather than residential care. The proposal does not address how the city's delivery model would adapt to these fundamentally different operating conditions.
- Deterioration in Children's Services: This is the highest-risk service area. The Ofsted performance gap is significant: the city is rated "Requires Improvement" while the county is rated "Outstanding." The proposal acknowledges that "Ofsted position diverges... so public confidence will need careful management during transition", a communications measure, not a service quality safeguard. Additional risks include different ICT systems (Liquidlogic vs. Mosaic) requiring dual-running and migration; differing safeguarding thresholds; workforce morale and retention during change; and unclear roles during transition. The proposal does not set out a performance improvement plan, a timeline for achieving Good or Outstanding, or any undertaking to protect service standards during transfer.
- Lack of some services within the City unitary: some services such as Public Rights of Way, Parish Council Support, or Strategic Road Network Infrastructure Management are either not currently held by the City Council, or not held to the degree or complexity that would be required in an expanded city unitary. This would require the creation of new specialist teams.
- Reduced Service Accessibility: Families are transferred from an Ofsted rated 'Outstanding' service in the County to a 'Requires Improvement' in the City. Schools and early year providers located in the boundary expansion area would transfer to the City and included in their sufficiency planning. This would cause immediate issues in early years and school place sufficiency for Leicestershire (potential oversufficiency in the city) due to the number of schools and early years providers in the boundary expansion area. Significant loss of HWRC capacity for Leicestershire

residents (Whetstone is the largest HWRC in Leicestershire, handling 16% of all HWRC tonnage). Potential need for construction of additional large HWRC to provide additional capacity.

- Complexity in Service Division and Asset Allocation: Some assets and services, such as care homes and specialist highways equipment, are not evenly distributed or easily visible. Splitting them could lead to gaps in provision, inefficiencies and disputes over responsibility and funding.

Particular concerns include:

- Boundary changes would result in the loss of care homes and beds across Oadby & Wigston (19 homes, 584 beds), parts of Charnwood (including Syston, Thurmaston, Queninborough, Anstey, Birstall, Wanlip—portion of 45 homes, 1434 beds), Harborough (portion of 15 homes, 727 beds), and Blaby (portion of 18 homes, 444 beds). Community Life Choices (CLC) services for people with learning disabilities would also be significantly reduced: Oadby & Wigston would lose 2 services, Charnwood a portion of 13 (12 for LD), and Blaby a portion of 4 (2 for LD). The largest impact would be on Community Life Choices services for people with learning disabilities—necessitating either out-of-county commissioning or new in-county service development if demand exceeds provision.
- Carlton Drive Short Breaks respite would be part of the City, reducing the offer for County residents who need respite (unless we commission in an out of area provision. From April to August 2025, Carlton Drive provided 796 respite, full night stays. This is on average 159 full night stays per month or approx. 40 per week. This is a large resource to lose if it becomes part of the City's resources. Carlton Drive also provides urgent respite for times of unplanned events and is a facility to accommodate people at very short notice which could impact on care pathway teams
- Waterlees supported living accommodation, currently providing 9 flats and 15 supported living places, staffed by Leicestershire County Council staff
- Reduction in Leicestershire specialist provisions. One area special school, one SEMH school and 5 Enhanced Resource Provision (431 places) that cater for children within the scope of this option but also a significant amount outside of the scope for this option. This would leave an increased deficit of specialist provisions available, especially for children and young people residing in Harborough, which utilise many of these provisions.
- Whetstone waste transfer station is a business-critical asset to the County Council which would transfer to Leicester City Council. This would require extensive waste flow remodelling and service reconfiguration. Could potentially require the construction of additional WTS at significant capital cost to enable delivery of County Unitary waste service. There is a risk to service resilience in finding appropriate alternative waste sites in planning terms.
- Loss of Whetstone trade waste service and associated income.
- Blaby District Council waste depot (district depot with the best facilities) transfers to Leicester City Council risks leaving the wider Leicestershire unitary with insufficient depot capacity. Again, this

would require service reconfiguration and could impact on the efficiency and resilience of waste collection services for residents.

- Risks from IT system disaggregation: While the complexity and difficulty of merging IT systems is well known these issues are significantly worse when it comes to disaggregation of line of business systems. For example Adults and children's system are notoriously difficult to extract work cases from to then import into another system. The reasons for this are systems are often deeply interconnected, with complex workflows, shared data, and overlapping processes that support both service delivery and compliance requirements. Splitting them apart is not simply a technical task—it requires a careful analysis of how information flows between different teams, what data is shared, and how those interdependencies support case management and safeguarding across age groups. To achieve the required outcomes it may require significant redesign to preserve both the integrity of records and the quality of care. The sensitivity of the data involved and the need to comply with strict regulatory requirements add further layers of complexity, making the process both time-consuming and resource intensive.

### Impact of the urban/rural unitary authority divide

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*Leicestershire County Council are not satisfied that service levels will actually improve as a result of boundary expansion, or whether this proposal simply redistributes demand*

*Leicestershire County Council believes that the movement of rural areas into the City will adversely impact service levels as an urban authority struggles to cope with the service requirements of rural infrastructure*

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- Above all, Leicestershire County Council are not convinced that the City Council has made a consistent case for boundary change either in terms of the coherency of the urban/semi-urban vs rural split, or in terms of financial improvement through expanded council tax base.
- The city's proposal makes the case that boundary expansion is important as it would bring the semi-urban and rural areas into the city unitary, thus increasing the council tax base, with higher valued properties, and also decreasing the overall levels of deprivation. Leicestershire County Council do not believe that the City makes the case that service levels will improve in this scenario and their bid requires clearer, quantified proof that this would be the case. The current proposal seems to envisage a redistribution of demand, rather than lower overall costs for the whole of LLR, or improved service performance across LLR.
- Indeed, there is a strong argument that by acquiring large amounts of rural Leicestershire, service performance in the expanded unitary will actually decline as the authority struggles to manage the competing challenges of, for example, highway maintenance on rural roads, for an authority used to focussing on the urban highway. Leicestershire County Council believe that the when 26% of the land in the city

unitary is actually rural, the authority will acquire poses a particular risk to service delivery in the following areas:

- Asset geography and route design – rural assets are dispersed and routes are longer. Dead mileage is higher and round design must change to maintain productivity.
- Winter service – rural resilience depends on barn locations, long runs and experienced drivers who can cover exposed routes in severe weather. Rotas and priority networks differ from urban operations.
- Carriageway preservation – rural networks rely on seasonal programmes such as surface dressing. The same specialist cohort is shared with winter operations so fragmentation raises unit costs and risks programme viability.
- Drainage and flood response – rural drainage involves ditches, grips and ordinary watercourses requiring different plant, methods and response plans than urban kerb and gully regimes.
- Vegetation and environmental maintenance – verges, hedges and grips require cyclic maintenance across dispersed routes often outside urban cycles.
- Public Rights of Way – a largely rural PRow network needs dedicated inspection, enforcement and works across parishes and farmland.
- Management and maintenance of County Farms estate.
- Inspection, enforcement and emergency response – rural footprints need different standby coverage, incident access plans and inspection schedules to maintain response times and safety.

### **Being informed by local views and meeting local needs**

#### **Data sharing**

- We would agree that “there has been good collaboration during the process with data being made available and shared across all councils, underpinned by a data sharing agreement. The city and county councils have also conducted joint financial modelling of the options. This was offered to the district/Rutland group but was not taken up.”
- Leicestershire County Council have continued to work with the city council to ensure shared financial data that can be used for consistent modelling.

#### **The reliability of the survey data**

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*Leicestershire County Council considers there is a risk from proceeding with a boundary expansion that is clearly rejected by a substantial majority of public respondents to all questionnaires.*

*Leicestershire County Council is mindful of feedback from local MPs on their views concerning expansion of the city boundary.*

*Leicestershire County Council’s experience shows that reported public confusion over which council to contact is predominantly resolved through unitarisation. The minimal benefits for boundary change should not*

*influence a decision versus demonstrated and crucially evidenced service / cost outcomes*

*Leicestershire County Council maintains that the engagement evidence does not demonstrate that feedback was representative and materially shaped the City's proposal, rather than being referenced selectively to support a preferred model.*

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- The survey carried out by this proposal has several issues which call into question how reliable its conclusions might be:
  - The response rate was the lowest of any proposal at only 810 participants. There was no randomised survey. It was heavily promoted to city staff, yet the responses of staff cannot be disaggregated from the overall.
  - Questions were phrased in such a way that respondents were unlikely to disagree e.g. whether they consider themselves to live in either an urban area or suburb, whether councils should reflect how people live, work and travel across an area, whether councils should represent areas that share common issues. The majority of questions were not about the City's LGR proposal.
  - The narrative about the survey results stated at the start that there were opinions for, against and neutral regarding the City's proposal, however, the report only supplied a selection of supportive quotes. It was stated at the start that town/parish councils were against the proposals but no negative quotes were provided, only ones noting some agreement.
  - The question about knowing which council to use showed just 15% were unsure, however, the commentary extrapolated the views of these 121 people to imply that 30,000 residents shared this view. There was no indication whether these 121 people lived in the proposed city expansion area or elsewhere, yet it was implied to be representative of them.
  - Concerns over boundary expansion was most common issue raised in the comments by a long way (42% of comments while the next most common issue attracted 10% of comments)
  - 488 people made comments and 341 of these people expressed a concern about boundary expansion. This is 70% of comments but the report chose to use 42% of all responses. The typical comments were overwhelmingly negative about city expansion.
  - Linked to this high level of opposition to boundary expansion, all of the local MPs that responded to the city council also refuted the idea of boundary expansion.
  - This proposal claims that Leicestershire County Council councillors opposed city expansion by a tiny margin (23 to 22) in July 2025. This is an incorrect reading of this vote, which related to specific amendments. In November 2025, the council voted unanimously to oppose city expansion.
- There is a clear and substantial risk to the delivery of LGR if the wholesale boundary expansion promoted in this plan were to take place. It runs the risk of alienating local communities and local authorities and preventing them from engaging fully in the process of LGR, bringing the timescales and outcomes into doubt.

### **Supporting devolution**

- Leicestershire County Council agree with the proposal for two unitary authorities underneath one MSA as the best solution for rapid devolution.
- However, Leicestershire County Council disagree with the premise that balanced population sizes are key to ensuring devolution is effective. This proposal claims that boundary expansion to create a urban-focussed and rural-focussed unitary would make for a more effective MSA. As Leicestershire County Council have already stated, the current proposals do not achieve this urban/rural split, but even if that split were attainable, the mix of functions at MSA level are such that clearly defined lower level authorities are not necessary. The recently announced SDSs for regional areas mean that development planning will be conducted over the Strategic Planning Board.
- Leicestershire County Council do not believe that a convincing case has been made that the complexities of boundary expansion, redrawing of parish boundaries, aggregation and disaggregation of services, does not pose a substantial risk to achieving devolution on the timescales indicated by MHCLG. There would not be the capacity within any organisation for significant devolution.
- Unless a Strategic Authority is created and takes on all potential powers at the same time as boundary expansion there will be a significant amount of disaggregation of function that will ultimately be transferred. This is disruptive and not a good use of public money.

#### **Enabling stronger community engagement and gives the opportunity for neighbourhood empowerment**

- The proposal calls for a Leader and Cabinet model of governance for both unitaries, which is in line with our proposals.

#### **Neighbourhood area committees**

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*Leicestershire County Council does not believe that the proposed Neighbourhood Area Committees contain sufficient detail to provide assurance that they will allow stronger community engagement and neighbourhood empowerment.*

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- The proposal advocates for Neighbourhood Area Committees, although limited detail is provided for these at this stage. A governance review is to be undertaken in the transition phase to establish more detail of the precise make up these committees. Leicestershire County Council believe this is important, in order to avoid them becoming a 'talking shop' with little influence.
- LCC's proposal for Area Committees is considerably stronger because it includes a budget assigned to each area to give local people and partners the opportunity to participate in and influence local decision making and service priorities through community grants. To this end, committees could choose to hold themed meetings focused on specific issues and establish task-and-finish groups to address topics in greater depth. Area Committees would play a vital role in the Council's future governance model, acting as locally focused bodies with autonomy to influence decisions and drive community-led change. To ensure value for money remains a priority, they would not be responsible for direct service delivery, but would hold an important oversight function, ensuring services are delivered effectively and reflect

the needs of their local areas. For example, this includes supporting initiatives around community safety, health and wellbeing, using preventative approaches, which are increasingly recognised in NHS neighbourhood health service models as effective in improving outcomes and reducing demand on public services.

- Disappointingly, this proposal also misses the opportunity to deliver visible decision making that truly affects residents' lives in a decentralised way. In LCC's two unitary model there is a clear commitment to Area Planning and Licensing Committees, ensuring that residents can see and influence decision making that has a real impact on their local areas.

## Parish Councils

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*Leicestershire County Council is uncertain of the status and governance of unparished areas in the city and county.*

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- Whilst the proposal says that parish councils will remain, there is no discussion of the place of unparished areas in the future model and governance of these areas is left unclear.
- Boundary expansion will involve significant changes to parish boundaries in six areas, which would be complex and require a community governance review. This should not run concurrently with LGR and the splitting of parishes will create immediate governance and electoral anomalies.

## Levels of councillors and representation

- The mix of councillors proposed seems reasonable, with slightly lower ratios for the rural county areas, but in keeping with other similar local authorities.
- Political marginalisation risk is not explicitly addressed. Expansion-area residents would move from district councils (where they often comprise the majority electorate) to a much larger city unitary where they would constitute a minority. Neighbourhood area committees are offered as the mechanism for community voice but are described in principle only, no delegated powers, budgets or terms of reference are specified. This is a significant gap given that the most vocal opposition comes from the areas that would be absorbed.

### City Response

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

Dropdown answers -- Please Select -- Strongly agree Somewhat  
agree Neither agree nor disagree Somewhat disagree **Strongly**  
**disagree** Don't know

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?

dropdown answers -- Please Select -- Strongly agree Somewhat  
agree Neither agree nor disagree **Somewhat disagree** Strongly  
disagree Don't know

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?

dropdown answers -- Please Select -- Strongly agree Somewhat  
agree Neither agree nor disagree Somewhat disagree **Strongly**  
**disagree** Don't know

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

Dropdown answers -- Please Select -- Strongly agree Somewhat  
agree Neither agree nor disagree **Somewhat disagree** Strongly  
disagree Don't know

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

Dropdown answers -- Please Select -- Strongly agree Somewhat  
agree Neither agree nor disagree Somewhat disagree **Strongly**  
**disagree** Don't know

6. To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements?

Dropdown answers -- Please Select -- Strongly agree Somewhat  
agree Neither agree nor disagree Somewhat disagree **Strongly**  
**disagree** Don't know

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

Dropdown answers -- Please Select -- Strongly agree Somewhat  
agree Neither agree nor disagree **Somewhat disagree** Strongly  
disagree Don't know

8. If you would like to, please use the free text box to explain the answers you have provided to questions 1-7 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on the proposal.

**Leicestershire County Council has submitted a separate written response to this proposal.**

9. This is a proposal that is accompanied by a request that the Secretary of State considers boundary change or that affects wider public services. To what extent do you agree or disagree that the proposal sets out a strong public services and financial sustainability justification for boundary change?

Dropdown answers -- Please Select -- Strongly agree Somewhat  
agree Neither agree nor disagree Somewhat disagree **Strongly**  
**disagree** Don't know

10. If you would like to, please use this free text box to explain your answer to question 9.

- **Leicestershire County Council strongly maintains that LGR should not be a vehicle for boundary expansion. The outcomes of LGR are entirely different from those being sought through boundary change.**
- **The key benefits of LGR are to remove the inefficiencies of two-tier working. Boundary change seeks to create a larger geographical area and increased income.**
- **The justification for boundary change is very different and should only considered once reorganisation has been achieved. The proposal does not provide:**
  - **A proper evidence base to demonstrate need**
  - **Demonstration that the required changes to service delivery are understood and implementable. This would be significant for the proposed changes in geography and population.**
  - **Evidence that required changes to service assets and any shared use agreements have been considered.**
  - **A clear financial argument, given that funding reform has removed the City's pressing financial need**
  - **A clear need to identify development land within city boundary since the introduction of Spatial Development Strategies**
  - **A demonstration of service fragmentation at boundaries as a significant pressing issue and it is not clear why this would be different at the revised boundaries**
  - **Consideration of the implications for the remaining county, which are significant and detrimental**

**North City South**

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

Dropdown answers -- Please Select -- Strongly agree Somewhat  
agree Neither agree nor disagree Somewhat disagree **Strongly**  
**disagree** Don't know

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?

dropdown answers -- Please Select -- Strongly agree Somewhat  
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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?

dropdown answers -- Please Select -- Strongly agree Somewhat  
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4. To what extent do you agree or disagree that the proposed councils will deliver high quality, sustainable public services?

Dropdown answers -- Please Select -- Strongly agree Somewhat  
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5. To what extent do you agree or disagree that the proposal has been informed by local views and will meet local needs?

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6. To what extent do you agree or disagree that establishing the councils in this proposal will support devolution arrangements?

Dropdown answers -- Please Select -- Strongly agree Somewhat  
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**disagree** Don't know

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

Dropdown answers -- Please Select -- Strongly agree Somewhat  
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 disagree Don't know

8. If you would like to, please use the free text box to explain the answers you have provided to questions 1-7 referring to the question numbers as part of your answer. You may also use the box to provide any other comments you have on the proposal.

**Leicestershire County Council has submitted a separate written response to this proposal.**

### **Leicestershire County Council**

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**Leicestershire County Council has submitted a separate written response to this proposal.**