

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

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

- 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

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

- 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

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.

- 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

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

- £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

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.

- 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

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

- 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

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

- 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

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.

- 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

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

- 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

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

- 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'

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).

- 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

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.

- 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

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

- 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

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

- 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

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.

- 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

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

- 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

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

- 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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